



Nurses for Children and Young People of Aotearoa

The sale of raw milk to consumers: a response to the Ministry of Primary Industries

Nurses for Children and Young People of Aotearoa (NCYPA), a professional section of the New Zealand Nurses Organisation, welcome the opportunity to comment on the above proposal. This submission is informed by feedback from members of the NCYPA national section, from NZNO members, from consultation with colleagues with specialist knowledge in dietetics and nephrology, and from individual members of the Paediatric Society of New Zealand.

We believe it is important to comment on raw milk sales and consumption because there are potential risks to children. As a professional organisation, NCYPA members are in a position to influence health consumers and other professionals on child health protection and illness prevention.

1. NCYPA believes that children and infants are in a special risk group in relation to the consumption of raw milk because:
 - milk is the recommended drink for young children;
 - children have relatively immature immune systems; and
 - drinking raw milk is a choice made by parents and caregivers and not the child.

2. The position of NCYPA in regard to raw milk is informed by current best evidence outlined in Ministry of Health Guidelines for infants and toddlers (2012, p. 59) that

“Milk and milk products should be pasteurised because there is considerable risk of contracting an infectious disease such as campylobacteriosis or tuberculosis from unpasteurised milk and milk products.”

3. NCYPA notes that the Ministry of Primary Industries(2014) has outlined the growing trend for raw milk consumption in New Zealand which is associated with an increase incidence in foodborne illnesses. Other literature notes the link between raw milk availability and the incidence of foodborne illness in the United States (Schneider, Mohle-Boetani, Vugia, & Menon, 2008). Anecdotal evidence from our members suggests that in some regions where

farm gates sales have increased with the use of dispensing machines, there has also been an increase in raw milk related illness.

4. NCYPA supports the policy objectives on the sale of raw milk stated in the consultation document, and recommends adding a specific objective to:

Ensure that consumers receive information about the risks to pregnant women, infants and children who as a group are particularly vulnerable to contaminated raw milk

5. NCYPA agrees that the individual freedom to purchase and consume raw milk needs to be carefully considered against potential serious health risks to children (Honish, Predy, Hislop, Chui, & et al., 2005; Schneider et al., 2008). It has been suggested by some members who gave feedback for this submission that rural consumers might have a higher level of immunity to pathogens in raw milk than urban consumers. It is likely that parents or caregivers choose raw milk for themselves and their children for a variety of reasons which might include health, ethical and social benefits. While it is important that parents and caregivers have freedom to care for their children according to their own beliefs and values, it is also very important that the rights and wellbeing of the child are taken into consideration. One submitter wrote:

“My sister aged 1 died from tuberculous meningitis contacted from drinking unpasteurised milk. You can guess my stand on this Luddite proposition. “

6. The onus for providing adult raw milk consumers with accurate and clear product information rests with both the manufacturer and the regulatory authority. It is important that parents are made aware of the increased incidence of outbreaks of illness which have been associated with increased popularity of drinking of raw milk (Ministry for Primary Industries, 2014). Parents must also understand that children and infants are more susceptible than healthy adults to foodborne illnesses because they have immature immune systems. Young children succumb rapidly to the effects of dehydration which accompanies gastro-intestinal symptoms caused by food borne pathogens. This information should be included on food labelling. As one health professional stated:

“The only sane option is to require all milk/cheese products normally to be pasteurised. Exceptions must be clearly labelled with a warning of not being treated and the special risks during pregnancy, early childhood, the elderly etc especially from listeriosis and others. A look at the existing rules for unpasteurised Swiss cheeses can be a useful model as they specify conditions of production which minimise bacterial risk. But heat treatment must be the norm and exceptions strictly controlled and monitored.”

In summary, NCYPA does not support any option which *promotes or increases the sale* of raw milk to consumers because of the potential and serious health risks particularly to pregnant women and her foetus, to children and infants.

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References

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