

These comments are regarding the proposed HB 2616, which would authorize the sale of unpasteurized cow milk beyond what is currently permitted.

Not all raw milk contains pathogenic (disease-causing) bacteria; in fact, most doesn't. However, if a person consumes raw milk that does contain pathogenic bacteria, it has the potential to cause much worse than a stomachache. There are multiple known pathogens associated with dairy foodborne diseases, those underlined are the most common: *Bacillus cereus*, *Campylobacter jejuni*, *Coxiella burnetii*, *Cryptosporidium parvum*, Shiga toxin-producing *Escherichia coli* (such as O157:H7), *Listeria monocytogenes*, *Salmonella* spp., *Staphylococcus aureus*, *Vibrio parahaemolyticus*, *Toxoplasma gondii*, *Yersinia enterocolitica*, and *Yersinia pseudotuberculosis* (de Klerk & Robinson 2022).

Pasteurization greatly reduces the viable bacterial content of milk (and other food products). That reduction in microbes translates into reduction of risk.

An analysis of unpasteurized milk and illness outbreaks in the United States was recently published (The authors found that in jurisdictions where retail sale of raw milk was allowed, there was 3.2 times greater number of outbreak-associated illness compared to those where sale was restricted to on-farm only. The proposed changes (to ORS 621.012, 621.117, 621.122, 621.991 and 621.995; and repealing ORS 621.116) detailed in this bill would allow for retail sale of unpasteurized milk in Oregon, and not just at farmers markets.

Lastly, the proposed changes in wording in Section 4, from "shall not" to "may not" would make the statute more ambiguous, making interpretation unnecessarily more difficult for relevant state agencies (ODA in particular) and the general public.

Respectfully submitted,
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(My OSU title is provided for identification purposes only and I am providing this statement in my personal, not official OSU capacity.)

References

de Klerk JN, Robinson PA. 2022. Drivers and hazards of consumption of unpasteurised bovine milk and milk products in high-income countries. *PeerJ* 10:e13426 <https://doi.org/10.7717/peerj.13426>

Koski, L. et al. 2022. Foodborne illness outbreaks linked to unpasteurised milk and relationship to changes in state laws – United States, 1998–2018. *Epidemiology & Infection*, 150, E183.
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