

# Food Standards Scotland submission of 24 October 2022

## PE1978/A: Allow raw milk to be sold in Scotland

Food Standards Scotland (FSS) recognises pasteurisation as the key critical control point in the prevention of milk borne disease. Raw drinking milk has historically been recognised as a high risk to public health due to its association with a number of food poisoning outbreaks in Scotland, mainly Salmonella, Campylobacter and E. coli O157 infection, and 12 potentially associated deaths in Scotland. To mitigate this risk mandatory pasteurisation of raw cows' drinking milk was introduced in Scotland in 1983, and extended to drinking milk from all farmed animals in 2006. Since these controls were put in place illnesses linked to the consumption of raw milk in Scotland have virtually disappeared.

The E.coli Task Force Report from 2001, which was commissioned after 21 people died in a major food poisoning outbreak in Wishaw in 1996, highlighted the raw milk ban in Scotland as a positive step in protecting consumers from the risks of E.coli O157. It was also noted that mandatory pasteurisation also protects the wider community, as milk borne pathogens such as E.coli O157 are known to be transmitted through person to person contact.

The most recent scientific reviews were published in 2015, by experts from the [European Food Safety Authority's \(EFSA\) Panel on Biological Hazards](#), and [in 2018 by the UK Scientific Advisory Committee on the Microbiological Safety of Food \(ACMSF\)](#).

The 2015 EFSA opinion on public health risks associated with raw milk in the EU noted that raw milk could be a source of harmful bacteria – including Campylobacter, Salmonella and Shiga toxin-producing Escherichia coli (STEC) - including E. coli O157 - and Listeria monocytogenes. It also identified a clear link between drinking raw milk and human illness, with the potential for severe health consequences in some patients.

The report by ACMSF concluded that there had been an increase in the microbiological risk associated with consumption of raw drinking milk in the UK between 2015 and 2018. This was considered to be reflective of greater levels of exposure due to increases in the number of registered producers and volume of production and consumption in England, Wales and Northern Ireland, alongside an increase in the number of outbreaks of human illness associated with raw drinking milk.

With respect to perceived health benefits, [a review undertaken by the Food Standards Agency in 2018](#) found little available evidence to indicate that pasteurising milk substantially alters its nutritional composition and concluded that there was insufficient evidence to show the effect of pasteurisation on the functional properties of nutrients in milk.

Given the historical evidence and weight of expert scientific opinion in favour of mandatory pasteurisation to protect public health, there are currently no plans to lift the ban on direct sales of raw drinking milk in Scotland. <http://www.foodstandards.gov.scot/business-and-industry/industry-specific-advice/dairy>