

# Citizen Participation and Public Petitions Committee

11th Meeting, 2023 (Session 6), Wednesday  
28 June 2023

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

**Lodged on** 31 October 2022

**Petitioner** Cristina Rosique-Esplugas

**Petition summary** Calling on the Scottish Parliament to urge the Scottish Government to allow raw drinking milk to be sold in Scotland, bringing it in line with England, Wales and Northern Ireland, and allow farmers the opportunity to sell unpasteurised drinking milk.

**Webpage** <https://petitions.parliament.scot/petitions/PE1978>

### Introduction

1. The Committee last considered this petition at its meeting on [18 January 2023](#). At that meeting, the Committee agreed to write to the Food Standards Agency, Food Standards Scotland, the National Farmers Union Scotland, and Dairy UK.
2. The petition summary is included in **Annexe A** and the Official Report of the Committee's last consideration of this petition is at **Annexe B**.
3. The Committee has received new responses from Dairy UK, Food Standards Scotland, the National Farmers Union (NFU) Scotland, the Food Standards Agency, and the Petitioner which are set out in **Annexe C**.
4. Written submissions received prior to the Committee's last consideration can be found on the [petition's webpage](#).
5. Further background information about this petition can be found in the [SPICe briefing](#) for this petition.
6. The Scottish Government's initial position on this petition can be found on the [petition's webpage](#).
7. Every petition collects signatures while it remains under consideration. At the time of writing, 301 signatures have been received on this petition.

## Action

The Committee is invited to consider what action it wishes to take.

### **Clerk to the Committee**

## Annexe A

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

#### Petitioner

Cristina Rosique-Esplugas

#### Date lodged

31 October 2022

#### Petition summary

Calling on the Scottish Parliament to urge the Scottish Government to allow raw drinking milk to be sold in Scotland, bringing it in line with England, Wales and Northern Ireland, and allow farmers the opportunity to sell unpasteurised drinking milk.

#### Previous action

I have emailed Mairi Gougeon MSP and the Scottish Government.

#### Background information

Scotland should follow what most countries have been doing in recent years and stop considering raw milk a public health hazard. There are measures that can be put in place to control for food safety, as is done with many other everyday food products.

The sale of raw drinking milk is legal in England, Wales, Northern Ireland, and most European countries. It has higher nutritional value and it can be better tolerated than pasteurised milk. In my view, there is no reason why the Scottish Government should forbid customers who want to acquire this product from their trusted source from being able to do so.

## Annexe B

### Extract from Official Report of last consideration of PE1978 on 18 January 2023

**The Convener:** Our final new petition, PE1978, which was lodged by Cristina Rosique-Esplugas—I apologise if that was not the correct pronunciation—calls on the Scottish Parliament to urge the Scottish Government to allow raw drinking milk to be sold in Scotland, which would bring it in line with England, Wales and Northern Ireland, and allow farmers the opportunity to sell unpasteurised drinking milk.

Cristina Rosique-Esplugas highlights in her submission that the sale of raw drinking milk is permitted in the rest of the UK, as well as in most European countries. She believes that it is time for raw milk to stop being considered a public health hazard, and notes that measures can be put in place to control food safety, as is the case with many other food products.

Responding on behalf of the Scottish Government, Food Standards Scotland states that raw drinking milk has historically been recognised as high risk to public health due to its association with a number of food poisoning outbreaks in Scotland. It notes that mandatory pasteurisation of cows' drinking milk was introduced in 1983 and was extended to drinking milk from all farmed animals in 2006. It suggests that, since then, illnesses linked to the consumption of raw milk in Scotland have virtually disappeared.

Food Standards Scotland also highlights the report of the UK Advisory Committee on the Microbiological Safety of Food in 2018, which concluded that there had been an increase in the microbiological risk associated with the consumption of raw drinking milk in the UK. As a result, there are no plans to lift the ban on direct sales of raw drinking milk in Scotland.

Do members have any comments or suggestions as to how we might proceed? There seems to be very clear guidance from the Scottish Government in this instance.

**David Torrance:** On the basis of the guidance from Food Standards Scotland, historic evidence and the weight of opinion from the scientific community, can we close the petition under rule 15.7 of the standing orders? I do not think that Food Standards Scotland or the Scottish Government will shift on this issue.

**The Convener:** How do colleagues feel about that? Obviously, we could explore the matter further with Food Standards Scotland, but the direction in relation to Scotland seems to be pretty clear, so I am not sure that that would lead to a productive route forward.

**Paul Sweeney:** I can understand the point about whether we will be able to get anywhere with the petition. However, I am curious as to why there is a difference between the jurisdictions and why it is not seen as such an issue in other parts of the UK as it is here. Also, does the farming industry have a view on whether a change in policy would improve its commercial opportunities?

**The Convener:** Clearly, the 1983 ban would have been introduced pre-devolution. The ban in 2006 was post-devolution, so I do not know whether we were following any national advice at the time. The issue is whether, by extending our investigation into all that, we become better informed of the circumstances but no further forward with regard to taking the petition anywhere, because the direction from the Scottish Government and Food Standards Scotland is clear. I just wonder what the mood of colleagues is. Mr Torrance has proposed that we close the petition on that basis, but how are other colleagues minded?

**Alexander Stewart:** I am content to close the petition, because we know what the answer will be and extending our investigation would only prolong the situation. Where we are with the matter is clear cut.

**The Convener:** Are we minded to close the petition but nonetheless think that it is worth while to ask the question, so that we have the answer to hand? What do you think, Mr Ewing? I think that Mr Sweeney is erring on the side of exploring things a bit further before we close the petition.

**Fergus Ewing:** I suppose that our primary function is to give voice to petitioners. I agree with Mr Torrance that there is zero chance that Food Standards Scotland will move on that, for the very good reason that, as I understand it, raw milk can carry salmonella, E coli, listeria and campylobacter—I think that I have pronounced that correctly—and can cause food poisoning. We have seen very serious illnesses and death with other foodstuffs as a result of food poisoning. Therefore, it is a very serious matter, indeed, and I agree that it is most unlikely that that view will change, irrespective of what further information we get.

On the other hand, we have a duty to the petitioner. The petition is new—it has just been lodged—so, as Mr Sweeney said, it would be interesting to know why the sale of raw drinking milk has been made legal in England and what the experience has been there. I do not know that we are in a position to conduct a detailed inquiry, but, in the interest of fairness to the petitioner, that question should be asked, because it is not clear to me why it has been legalised in England, given that the health experts in Scotland say that the risks are so serious that the ban must remain in place.

As a relative newbie to the committee, perhaps I am being a bit softer than Mr Torrance, but we owe some kind of duty to the petitioner. We could write to Food Standards Scotland, and perhaps to the Food Standards Agency in England as well, to ask why, in England, the sale of raw drinking milk is legal. It would be interesting and illuminating to know why they have legalised that in England and whether, having done so, they have had any cases of food poisoning, for example.

**The Convener:** It is clearly reassuring to those of us on the committee that the Scottish National Party is such a broad church in terms of the views and personalities that it incorporates. The committee is largely agreed on what we think the final outcome might be, but I take the point that we have reached a conclusion without actually understanding why there is a variation. In the first instance, it might be useful for us to have some further understanding of why that variation occurs. Are you content with our pursuing it on that basis, Mr Torrance?

**David Torrance:** I am quite happy to withdraw my recommendations and to write to—

**The Convener:** It is not so much that you are withdrawing your recommendations as it is that we are deferring them subject to that further advice being received.

**David Torrance:** Yes—until we get that information back.

**The Convener:** That makes perfect sense.

**Paul Sweeney:** Is there a successor to the Milk Marketing Board? Does that exist any more, or was that function disbanded long ago? I remember that there was a national authority that dealt with milk production.

**The Convener:** You are looking at me as if I ought to be an authority on these matters. Although Mr Ewing and I might be at the older end of the lifespans that are represented on the committee, I must say that I am not an expert on that subject. No doubt others might be able to tell us more.

**Paul Sweeney:** Dairy UK is the national trade association, so it might be worth asking it the question, too. I was just looking online to see whether I could find out more while we were talking.

**The Convener:** I suppose that we might also usefully ask the industry for information. I am not quite sure whether the petition is arising out of an industry concern or whether it sits outside of an industry concern—for all I know, the concern might not exist in the industry in Scotland at all.

**Fergus Ewing:** We could ask NFU Scotland as well, but I suspect that its members will be concerned about the reputation of dairy farmers, because it is a highly specialised area—

**The Convener:** That is my thought, too. We could write to the NFUS.

**Fergus Ewing:** The dairy farmers do a brilliant job. Anyone who watched “This Farming Life” on television yesterday evening will have seen dairy farmers in the south of Scotland who provide a great service for the country, and I assume that they would be concerned about the reputational risk arising from any food poisoning incident involving milk.

**The Convener:** Do members agree to take the action as discussed?

**Members** *indicated agreement.*

## Annexe C

### Dairy UK submission of 23 February 2023

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

Dairy UK is a trade body representing producer co-operatives, processors, manufacturers and distributors of dairy products within the UK. We welcome the opportunity to provide comments to the petition PE1978 which calls on the Scottish Parliament to urge the Scottish Government to allow raw drinking milk (RDM) to be sold in Scotland.

Dairy UK agrees with Food Standards Scotland (FSS)'s view that raw drinking milk has in the past posed a significant risk to the public, as evidenced by several food poisoning outbreaks in Scotland. As also stated by FSS, compulsory pasteurisation has addressed this problem and we feel it is important to continue to prioritise food safety and public health.

The potential public health impact of pathogens being present in raw drinking milk is high, especially in specific vulnerable groups. Effective enforcement of the controls of RDM provides a level of public health protection but cannot remove completely the risk associated with the unpasteurised product.

Importantly, allowing sales of RDM appears to increase the risk of illness and outbreaks associated with RDM consumption – in 2018 the Advisory Committee on the Microbiological Safety of Foods [concluded](#) that “*the microbiological risk associated with consumption of raw drinking milk in the UK has increased since the issue was last considered in July 2015*”. They also added that: “*The increased risk reflects greater levels of exposure due to increases in the number of registered producers and volume of production and consumption alongside an increase in the number of outbreaks of human illness associated with RDM [...]*”.

Consumer safety is the first priority but, beyond that, potential issues arising from consumption of unpasteurised milk could have a tremendous negative impact on reputation of the whole dairy sector.

The dairy industry is proud of its high standards of food safety and works hard to ensure that consumption of milk is safe, healthy and nutritious. Pasteurisation is a very important tool for achieving this and the safest option for public health.



To conclude, Dairy UK does not support the request lodged through PE1978. We believe that compulsory pasteurisation has helped to protect consumers in Scotland and should continue to be in place.

## Food Standards Scotland submission of 23 February 2023

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

Food Standards Scotland (FSS) has been asked for further comment in relation to the petition submitted to the Citizen Participation and Public Petitions Committee.

When Scottish Ministers considered the issue of raw drinking milk (RDM) in 2006 and decided to retain the prohibition in relation to cows milk and also extend it to other species this followed on from a public consultation within Scotland on the proposals, which indicated there was widespread support amongst industry, enforcers and public health bodies for maintaining the ban and extending it.

As far as FSS is aware this remains the case and no representation has been made to FSS in the intervening period to suggest otherwise other than an occasional enquiry from a member of the public about removal of the ban. These are rare and do not suggest a change in opinion nor a desire within the dairy industry to remove or even review the ban.

A slightly false impression can be gained that RDM is readily available in all other countries apart from Scotland. In fact, several EU countries impose a ban or restrictions on the sale of RDM and this fact is recognised in the drafting of Regulation 853/2004, now retained, allowing Member States to individually decide on the position. Several states within the United States of America impose bans or restrictions and other countries such as Australia do likewise.

Whilst RDM remains available in the other UK nations, this does not mean that RDM is not recognised in those nations as a risky product. Indeed the Food Standards Agency's (FSA's) public advice is that raw or unpasteurised milk and cream may contain harmful bacteria that can cause food poisoning ([Raw drinking milk | Food Standards Agency](#)). It is noted that an enquiry has been submitted by the Committee to the FSA

and it would not accordingly be appropriate for FSS to try to explain the rationale behind the regulatory position in the other UK nations.

However, a discussion of the position is contained in the FSA Board Minutes from and in a paper submitted to the FSA Board in June 2018 ([Minutes of the FSA Board meeting 20 June 2018 \(nationalarchives.gov.uk\)](#); [FSA 18-06-07 Raw Drinking Milk \(nationalarchives.gov.uk\)](#)). In a paper submitted to the FSA Board meeting in March 2018 ([FSA 18-03-07 Raw Drinking Milk Programme \(nationalarchives.gov.uk\)](#)), it is noted that, “*Over the last 18 months, there has been a noticeable increase in the number of producers who sell Raw Drinking Milk (RDM) and a rise in the number of outbreaks of human illness attributable to the consumption of the product.*” This is not a picture replicated in Scotland due to the ban being in place. The FSA continues to attempt to regulate the RDM market with a view to reducing incidents of people falling ill.

Public Health Scotland (PHS) have advised FSS that clinical surveillance data in Scotland has identified 9 cases of STEC since 2014, which mention the consumption of RDM as a possible risk factor for their illness, consumed from farms both in the rest of the UK and abroad. FSS is also aware from public health authorities in other parts of the UK that consumption of RDM has been and continues to be associated with cases and clusters of infections including STEC and Campylobacter.

Having regard to the historical data and scientific evidence previously referred to in the initial response, including the absence of evidence for any clear health benefit to weigh against the risks and the additional information above, FSS can again confirm that there is no plan to lift the ban on the sale of RDM in Scotland.

## National Farmers Union (NFU) Scotland submission of 24 February 2023

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

Following your request, received on 27 January, I write to provide the views of NFU Scotland on Petition PE1978: Allow raw milk to be sold in Scotland.

NFU Scotland believes that the risks of selling raw milk significantly outweigh the benefits, therefore raw milk should not be sold in Scotland. If a change is to be further considered by this committee, NFU Scotland would welcome the opportunity to be involved in the discussions going forward.

Our position is based on the fact that there is evidence that there is a risk of raw drinking milk to public health. To mitigate the risk of raw milk's link to diseases such as Salmonella, Campylobacter and E.Coli O157 infection, mandatory pasteurisation of drinking cow's milk was introduced in Scotland in 1983, and was extended to drinking milk from all farmed animals in 2006.

The Scottish policy of mandatory pasteurisation is aligned with the Advisory Committee on the Microbiological Safety of Food advice, who recommend pasteurisation as the key critical control point in the prevention of milk borne disease. The recommendations of the E.coli task Force Report from 2001 highlighted that the raw milk ban in Scotland is a positive step in protecting consumers from the risks of E.coli O157.

Our view is aligned with Dairy UK's position, who are also against the sale of raw milk. They state that British dairy farmers are proud of their high standards of food safety, and in order to maintain this, pasteurisation of drinking milk is essential.

Food Standards Scotland also set out on their website that there are no plans to lift the ban on direct sales given the historical evidence and weight of expert scientific opinion in favour of mandatory pasteurisation.

We would be happy to provide further information should this be of assistance.

# Food Standards Agency submission of 3 May 2023

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

It has always been legal to sell raw milk intended for direct human consumption in England, Wales and Northern Ireland, although there are restrictions in place that apply to the sale of raw cows' milk intended for this use. These restrictions are found in [Schedule 6](#) of the Food Safety and Hygiene (England) Regulations 2013 (as amended) and equivalent Regulations in Wales<sup>1</sup> and Northern<sup>2</sup> Ireland.

Schedule 6 sets out that raw cows' milk intended for direct human consumption can only be sold directly to the consumer by:-

- registered milk production farms at the farm gate or farmhouse catering operation
- farmers at registered farmers' markets
- distributors using a vehicle as a shop such as a milk round
- direct online sales
- vending machines at the farm

Specific hygiene criteria for raw milk intended for direct human consumption are also laid out in Schedule 6, along with powers for the FSA to undertake sampling, analysis and examination of raw cow's milk at farm premises used for the sale of such milk for direct human consumption and the costs that can be recovered. It also includes a [requirement](#) that consumers are informed that "This milk has not been heat-treated and may therefore contain organisms harmful to health".

Following an increase in the number of producers selling Raw Drinking Milk (RDM) and a rise in the number of outbreaks of human illness attributable to the consumption of the product, in 2017 the FSA Board asked for an increase in focus on the issues and controls surrounding RDM.

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<sup>1</sup> [The Food Hygiene \(Wales\) Regulations 2006](#)

<sup>2</sup> [The Food Hygiene Regulations \(Northern Ireland\) 2006](#)

In 2018 the FSA conducted a policy review of the official controls for RDM and produced three Board papers looking at the current controls and made recommendations for enhanced controls. The papers can be found here - [March 2018](#), [June 2018](#) and [December 2018](#).

The FSA Board papers looked at a number of different issues, including an updated risk assessment, economic analysis, consumer research, the registration process for new entrants, and the enforcement of verified and validated food safety management systems (including testing for pathogens).

The June 2018 Board paper concluded that “the risk from RDM is not so unacceptable as to justify removing the right of adult consumers to choose to drink it, provided certain controls are met”. The proposed recommendations included the requirement for existing and new Food Business Operators to have a validated and verified food safety management system based on Hazard Analysis and Critical Control Point ([HACCP](#)) principles. Additionally, there was a requirement for existing and new FBOs to validate and verify their controls by having a pathogen sampling programme (or demonstrably equivalent) in place.

As part of the review the FSA also developed an [industry guidance document](#) that was published in March 2020 and reinforced its [advice](#) that RDM may contain harmful bacteria that can cause food poisoning and therefore individuals more vulnerable to food poisoning, such as people over 65, pregnant women, infants, small children and people with compromised immune systems should not consume RDM.

In the years following the Board papers the number of producers stabilised, and then reduced to approximately 140 producers currently. A trade association – the [Raw Milk Producers Association](#) - is now operating and we have regular productive meetings with them as they continue to drive improvements within the RDM industry.

## Incidents/Outbreaks

Annex 1 of the March 2018 paper includes data on ‘**Outbreaks involving human illness associated with RDM (and certain raw milk products) in the UK from 01/01/2014 to 20/12/2017.**’

Since 2018 there have been a small number of outbreaks, details of which are below:

<b>Date</b>	<b>Pathogen</b>	<b>Number of confirmed cases</b>	<b>Number of suspected cases</b>	<b>Hospitalisations</b>
22/2/18	Campylobacter	0	1	0
8/10/18	E.coli 0157	1	0	0
10/06/19	Campylobacter	3	2	0
27/04/21	Campylobacter	36	7	7
12/10/22	Salmonella Typhimurium	5 (1 historic case (April 2021))	0	0

## Petitioner submission of 22 June 2023

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

*This submission was written by Stuart Whitby, and has been edited and submitted for publication by the petitioner, Cristina Rosique-Esplugas.*

Dear members of the Citizen Participation and Public Petitions Committee,

Thank you for investigating this petition further and for the chance to provide further information in defence of our proposition.

In viewing your previous discussion, you proposed 4 external agencies to help your decision. One of these was Food Standards Scotland, who quoted an ACMSF (Advisory Committee on the Microbiological Safety of

Food) report that there was an increased risk from RDM (Raw Drinking Milk) in England. This omitted the following paragraph, which stated that this increased risk was statistically insignificant and reflected the 5-fold increase in production and consumption of RDM in England. FSS have previously stated that “Raw milk is a high-risk food”. This contradicts the statement in the ACMSF’s report which confirms that “Raw milk remains medium risk with medium uncertainty”. FSS are the agency who relentlessly pursued and nearly destroyed Errington Cheese after an e-coli related death which was later traced to poor handling practices of raw meat, and attempted to destroy the artisan cheese industry in Scotland via regulation which was impossible to meet. FSS appears to be unjustifiably biased against unpasteurised milk products.

Next was the Food Standards Agency. On 14th March 2018, their officers demonstrated a lack of awareness of research into the benefits of drinking raw milk in a meeting discussing risks. They do not appear to have given any consideration to a response from a Senior Researcher at the University of Utrecht’s Department of Immunopharmacology, who is a specialist in the field of raw milk, milk quality, organic grassland and animal husbandry. This indicates that the FSA may not have a full understanding of available knowledge in this area.

The FSA state that there is little credible scientific evidence to support the claim that raw milk has health benefits. The reality is that there is little funding to investigate these benefits as there is no industry funding for that research. However, there are multiple articles where components of raw milk are tested and confirmed to be of benefit.

Dairy UK was approached for comment. Dairy UK represent milk processors. Legalising the sale of milk, which is merely filtered, not processed, is against their interests as an agency.

Neither the FSA nor FSS have any responsibility for public health, merely the safety of food. It is easy to destroy everything in milk by pasteurisation. However, this negates any health benefits as well as pathogen risk.

Alkaline phosphatase is one of the components of raw milk. Low levels of intestinal alkaline phosphatase have been linked to asthma, allergies, poor intestinal barrier function (leading to poorer outcomes vs E-coli O157), leaky gut, obesity, colitis, irritable bowel disease, insulin

resistance associated with type 2 diabetes, frailty related to aging, and liver fibrosis as caused by alcoholism. Testing in these studies<sup>3</sup> is generally performed by consumption of orally supplemented alkaline phosphatase. However, alkaline phosphatase is abundant in raw milk, and delivered to the intestine thanks to the protection of the fat globules. The test for successful pasteurisation is to confirm the destruction of alkaline phosphatase. Alkaline phosphatase is just one of a long list of beneficial enzymes in milk that are destroyed by pasteurisation.

Raw drinking milk is simply "milk in its natural form", as recommended by Public Health Scotland in its promotion of breastfeeding as providing the best nutrition for infants. Pasteurised milk is the processed version of this, and has only become common in the past 100 years since the upscaling of the dairy industry resulted in lower cleanliness standards in city dairies in the early-to-mid 20<sup>th</sup> century. Milk testing agencies have confirmed that levels of pathogens in milk have been consistently falling since the 1980s – the time when the ban was put in place in Scotland.

At the very least, Scottish consumers who wish to purchase raw milk should have the option to do so. At present, there are people in Scotland who (perfectly legally) buy raw milk from England which is sent by post (at least 70 litres per week confirmed). The main reason that pathogens grow in raw milk is due to a lack of proper temperature control. As such, the length of time in the distribution network leads to a far higher chance

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<sup>3</sup> Studies on the consumption of alkaline phosphatase:

Santos, G. M., Ismael, S., Morais, J., Araújo, J. R., Faria, A., Calhau, C., & Marques, C. (2022). Intestinal alkaline phosphatase: A review of this enzyme role in the intestinal barrier function. *Microorganisms*, 10(4), 746. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9026380/>

Wu, H., Wang, Y., Li, H., Meng, L., Zheng, N., & Wang, J. (2022). Protective effect of alkaline phosphatase supplementation on infant health. *Foods*, 11(9), 1212. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9101100/>

Gao, C., Koko, M. Y. F., Ding, M., Hong, W., Li, J., Dong, N., & Hui, M. (2022). Intestinal alkaline phosphatase (IAP, IAP Enhancer) attenuates intestinal inflammation and alleviates insulin resistance. *Frontiers in Immunology*, 13. <https://www.frontiersin.org/articles/10.3389/fimmu.2022.927272/full>

Kühn, F., Adiliaghdam, F., Cavallaro, P. M., Hamarneh, S. R., Tsurumi, A., Hoda, R. S., ... & Hodin, R. A. (2020). Intestinal alkaline phosphatase targets the gut barrier to prevent aging. *JCI insight*, 5(6). <https://insight.jci.org/articles/view/134049>

Liu, Y., Cavallaro, P. M., Kim, B. M., Liu, T., Wang, H., Kühn, F., ... & Hodin, R. A. (2021). A role for intestinal alkaline phosphatase in preventing liver fibrosis. *Theranostics*, 11(1), 14. <https://www.thno.org/v11p0014.htm>



of Scottish consumers becoming ill than would be the case if this was legally available for sale in Scotland.

Please note the following from the previously mentioned Senior Researcher's [response to the FSA](#):

*“In 2014 three quantitative microbial risk assessments (QMRA) and other scientific papers on the topic of raw milk were subject to review. The reviewer demonstrated how inappropriate evidence has long been mistakenly used to affirm that raw milk is a high-risk food. The scientific papers cited demonstrated a low risk of illness from raw milk consumption for each of the pathogens Campylobacter, Shiga-toxin producing E. coli, Listeria monocytogenes and Staphylococcus aureus. The low risk profile applied to healthy adults as well as members of susceptible groups: pregnant women, children and the elderly.*

*The QMRAs contradicted the long-held view that raw milk is a high-risk food and their accuracy was confirmed using foodborne illness outbreak data.”*

Furthermore, the FSA provided a foodborne illness outbreak report which shows that raw milk is significantly lower risk than shellfish, chicken, deli meats, pre-packed sandwiches, and bagged salad.

The ACMSF's report on the relative risk ranking of foods for vulnerable groups showed the risk of unpasteurised milk lower than pasteurised.

A survey of 50 Scottish dairies for the BBC confirmed that 49 out of 50 farmers drank raw milk. It is legal to sell raw milk for animal consumption in Scotland, and it is unknown how many people “buy for animal consumption” and drink it themselves with no oversight.... and no reported problems in 40 years.

While failures in raw milk production quality can produce local outbreaks of illness, the source can be quickly identified (following the English model of local distribution). An outbreak from pasteurised milk is much harder to trace – one involving pasteurised ice-cream in the US resulted in an expected 400,000 cases of illness country-wide.