

STATE OF ALASKA

**DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF ENVIRONMENTAL HEALTH
OFFICE OF THE STATE VETERINARIAN**

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Dear Interested Party:

The Office of the State Veterinarian developed a fact sheet to describe the legal bounds of cow, goat, or sheep "shares" in Alaska.

As you know, raw milk for consumption is a commodity that is produced by lactating mammals usually cow, goats or sheep. These animals are usually owned by an individual owner or farm family. State regulations (18AAC32.010) prohibit the distribution or sale of raw milk but are not intended to prohibit the consumption of the raw milk by the owner or owners of the animal. This is based on the premise that the animal owner understands the public health risks associated with raw milk and is responsible for protecting themselves and their own families. The definition of animal ownership has extended to other people owning "shares" of an animal. These "shares" would allow the raw milk to be distributed to several "owners" because it is a raw agricultural commodity from the animal.

The processing of raw milk into cheese, yogurt, kefir, butter or other products can be done by the owner of the raw milk at his or her own kitchen for consumption by the owner or their family. But a single share owner cannot produce milk products and give or sell them to other share holders or other consumers. This would constitute a processing of a raw food into a formulated ready-to-eat food for distribution and the allowance of a share program for raw milk does not extend to other milk products. The processing of dairy products (18AAC 32.010 - 18AAC 32.990) and other food products (18AAC 31.010 - 18AAC 31.990) is regulated by the State of Alaska to ensure that when given or sold as part of commerce; and intended for human consumption; the products are manufactured, sold and delivered in a safe and wholesome condition.

This processing activity cannot be done without meeting the state food processing regulations and being issued a permit. Share owners may not legally make milk products and distribute them without a valid permitted facility. Your awareness of these requirements will help in the unlawful distribution or sale of raw milk or raw milk products. Thank you for your co-operation.

If you have any questions, please feel free to contact the Dairy Specialist at (907) 376-1853; the Assistant State Veterinarian at (907) 375-8213; or the State Veterinarian at (907)375-8214. For further information concerning the food processing regulations you can contact the Food Safety and Sanitation Program at (877) 233-3663 or local Anchorage area number (907) 334-2560.

Sincerely,



Robert F. Gerlach, VMD
State Veterinarian



RAW MILK – COW, GOAT, SHEEP “SHARES”



- **Raw milk may contain food borne pathogens. These pathogens, which may be shed into the milk directly from the animal or enter the milk from the environment, present a health threat to people who consume raw milk.**
- 18AAC32.060 forbids removal of raw milk from a premise unless it is to be pasteurized by a processor or denatured and labeled “FOR ANIMAL FOOD NOT FOR HUMAN CONSUMPTION”.
- The current regulations, **18 AAC 32.010** and **18 AAC 32.060**, were written to safeguard public health and protect consumers. 18AAC32.010 allows for consumption of raw milk and raw milk products by the person who owns the cow, goat or sheep.
- The original intent of these regulations was to prohibit the distribution or sale of raw milk and raw milk products; not to limit consumption of these products by the owner or owners of the animal. **Goat or cow shares allow the owner(s) to take milk from the premises where it was collected and process the milk into products strictly for their family’s consumption.** Only the milk can be distributed among the owners of an animal. **An animal owner cannot collect and further process the raw milk for distribution or sale to others.**
- **A legal contract needs to be established clarifying ownership of the animal.** (Examples may be found on internet sites promoting raw milk, such as, The Weston A. Price Foundation *Real Milk* website. It is your responsibility to determine what is appropriate.)
- The current regulations (18 AAC 32.010 and 18 AAC 32.060) do not permit the public sale or distribution of raw milk or any products made from raw milk at a physical location (e.g., home, farm store), via the mail or the internet.

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- The animal owner is responsible for protecting themselves and their family from any hazards associated with consuming raw milk or products they make using raw milk.
- Certain segments of the population (e.g., the very young, seniors, and any person who is immune-compromised) are at greater risk for severe health problems or sequelae from infections that may be acquired from consuming raw milk. This risk is now even greater with the emergence of antimicrobial resistant pathogens like *Salmonella* and *Escherichia coli*.

There are significant health hazards associated with the consumption of raw milk and dairy products made from raw milk since this milk may contain food borne pathogens. Multiple outbreaks of food borne illness in the U.S. have been reported where unpasteurized milk or cheeses are implicated. Additional information is available from the Alaska Department of Health and Social Services Epidemiology Bulletin “Unpasteurized or Raw Milk ”

(http://www.epi.alaska.gov/bulletins/docs/b2009_29.pdf),

the FDA (<http://www.fda.gov/Food/ResourcesForYou/Consumers/ucm079516.htm>),

the CDC (http://www.cdc.gov/healthypets/cheesespotlight/cheese_spotlight.htm)

http://www.cdc.gov/nczved/divisions/dfbmd/diseases/raw_milk/ ;

and <http://www.realrawmilkfacts.com/>

To reduce the potential for pathogens to be introduced we recommend:

1. Good veterinary care for the animals.
2. Standard hygienic practices when milking the cow, goat or sheep:
 - a. Wash the teats with a sanitizing solution and dip teats in an approved germicidal teat dip before milking
 - b. Use a strip cup to examine the milk for abnormalities
 - c. Dip the teats in an approved germicidal teat dip after milking
 - d. Use clean and sanitized equipment to collect the milk.
3. Proper storage and handling of the milk after it is collected. Milk is a nutrient rich product and encourages bacterial growth, so taking care with the handling and storage of milk to prevent the growth of food borne pathogens is encouraged.
4. Milk from animals being treated with antibiotics or other pharmaceuticals should not be consumed.

