April 15, 2026

Chairman Casey Murdock
Chair, Senate Agriculture and Wildlife Committee
2300 N. Lincoln Blvd., Rm. 431
Oklahoma City, OK 73105

Re: NMPF and IDFA Oppose HB 3056

Dear Senator Murdock,

The National Milk Producers Federation (NMPF) and the International Dairy Foods Association (IDFA) oppose HB 3056 which would allow raw milk to be sold beyond the farm, making it more readily available. Consumption of raw milk and raw milk products has been opposed by every major health organization in the United States, including the American Medical Association and the American Academy of Pediatrics. Multiple studies support the findings that state laws increasing the availability of raw milk are associated with more outbreak-associated illnesses.

Consumption of raw milk and raw milk products is a demonstrated public health risk. The link between raw milk and foodborne illness has been well-documented in the scientific literature, with evidence spanning nearly 100 years. Raw milk is a key vehicle in the transmission of dangerous and sometimes deadly human pathogens, including *E. coli* O157:H7, *Campylobacter*, *Listeria monocytogenes*, and *Salmonella*.

The Centers for Disease Control and Prevention (CDC) and the Food and Drug Administration (FDA) do not support the sale or consumption of raw milk. Supporting the sale of raw milk in Oklahoma increases the risk to public health, opening up the state's consumers to the inevitable consequences of falling victim to foodborne illness. No matter how carefully it is produced, raw milk is inherently dangerous. Americans have become ill after consuming raw milk and raw milk products obtained from farms of varying sizes, from cow-share programs, and from licensed, permitted or certified raw milk producers.

Based on a study which analyzed Foodborne Disease Outbreak Surveillance System data from 2013-2018, it was found that jurisdictions where unpasteurized milk sales were allowed were estimated to have 3.2 times more outbreaks and 2.9 times more outbreak-associated illnesses compared with jurisdictions where retail sales were prohibited. Of the 74 single-state outbreaks, 78% occurred in states where the sale of unpasteurized milk was expressly allowed in retail stores,

at farmers markets or on the farm where it was produced. [1] Based on data collected between 2009 and 2014, researchers concluded that unpasteurized milk is 840 times more likely to cause food-borne illness than pasteurized milk, and such illnesses have a hospitalization rate 45 times higher than those involving pasteurized dairy products.[2]

Alarmingly, nearly two-thirds of all outbreaks associated with raw milk or raw milk products involve children. The list below is just a handful of the outbreaks that have involved children-

- Last year, 21 people, six of which who were under the age of 10, were sickened by *E. coli* and *Campylobacter* bacteria after consuming raw milk in Florida. Of those 21 cases, seven were hospitalized.[3]
- In October 2023, a *Salmonella* Typhimurium outbreak sourced to a dairy farm selling raw dairy products in California sickened 171 people. Of the 171 cases, 120 (70%) cases and 18 (82%) of the cases requiring hospitalization were among children and adolescents aged <18 years.[4]
- In 2023, outbreaks in Wyoming, Minnesota and Utah all involved children getting sick from *E. coli, Campylobacter* or *Cryptosporidium parvum* after drinking raw milk. [5]
- In 2022, two 10-month-old infants in Tennessee were infected with shiga toxin-producing *Escherichia coli* linked to raw milk consumption. The herd where the milk was obtained included 7-10 cows being hand-milked. Health department staff upon completing a site visit observed possible fecal contamination during milking and possible milk storage at higher than recommended temperatures. One infected infant developed hemolytic uremic syndrome (HUS) requiring hemodialysis and hospitalization for 27 days.[6]
- In 2018, a dozen Tennessee children experienced an *E. coli* outbreak with four developing kidney failure. Several of those children spent more than 50 days in the intensive care unit at Tennessee Children's Hospital.
- In 2011, five children in California were infected with *E. coli* O157:H7 after drinking raw milk; three of whom required hospitalization after developing HUS.

It is the responsibility of Oklahoma's leaders to make decisions to protect the health of the public, most especially those who are minors and are unable to make fully informed decisions that could have profound consequences on the rest of their lives.

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[1] Koski, L., Kisselburgh, H., Landsman, L., Hulkower, R., Howard-Williams, M., Salah, Z., . . . Nichols, M. (2022). Foodborne illness outbreaks linked to unpasteurised milk and relationship to changes in state laws – United States, 1998–2018. *Epidemiology & Infection, 150*, E183. doi:10.1017/S0950268822001649

[2] Costard, S., Espejo, L., Groenendaal, H., Zagmutt FJ., Outbreak-related disease burden associated with consumption of unpasteurized cow's milk and cheese, United States, 2009-2014. Emerging Infectious Diseases. 2017; 23(6):957.

[3] https://publications.aap.org/aapnews/news/32799/6-children-among-those-sickened-by-raw-milk-from

[4] Weinstein E, Lamba K, Bond C, et al. Outbreak of *Salmonella* Typhimurium Infections Linked to Commercially Distributed Raw Milk — California and Four Other States, September 2023–March 2024. MMWR Morb Mortal Wkly Rep 2025;74:433–438. DOI: http://dx.doi.org/10.15585/mmwr.mm7427a1.

[5] 2023 Raw Milk Recalls and Outbreaks. Wisconsin Center for Dairy Research. https://www.cdr.wisc.edu/assets/pipeline-pdfs/recall-outbreak-tables.pdf

[6] Thomas CM, Marr JH, Durso LM, et al. *Notes from the Field:* Shiga Toxin-Producing *Escherichia coli* O157:H7 Linked to Raw Milk Consumption Associated with a Cow-Share Arrangement — Tennessee, 2022. MMWR Morb Mortal Wkly Rep 2023;72:469–470. DOI: http://dx.doi.org/10.15585/mmwr.mm7217a4.

One critical aspect of this high-profile issue is the tremendous amount of misinformation that has been disseminated regarding the supposed health benefits of raw milk. It is important to emphasize that no claim related to the health benefits of consuming raw milk has been substantiated in any of the medical literature. The scientific consensus is that raw milk can cause serious illnesses and hospitalizations, as well as result in life-long negative health complications and death.

Another misleading claim is that testing or regulating the sale of raw milk will protect consumers from the risks of raw milk consumption. This is also unfounded. Product testing and no amount of added procedures on-farm can ensure the same level of safety as pasteurization. A sample of a farm's raw milk may come back negative for all bacteria one day and the next sample might be positive. Expanding opportunities for the sale of raw milk sends a signal to consumers that drinking unpasteurized milk is safe when, in fact, the opposite is true.

Nationally, our dairy industry benefits from a very high degree of consumer confidence - confidence built in large part on the excellent food safety record of milk and dairy products. Current statistics estimate only 1-2% of reported foodborne illness outbreaks are attributed to dairy products. However, of those, over 70% have been attributed to raw milk and inappropriately-aged raw milk cheeses. In a 2007 report, the CDC concluded that "State milk regulations and methods for their enforcement should be reviewed and strengthened to minimize hazards of raw milk."[7]

Supporting the sale of raw milk would be a step in the wrong direction and create unnecessary food safety risks for consumers and liability for dairy producers.

While choice is an important value, it should not pre-empt consumers' well-being. To support the sale of raw milk and raw milk products is an unnecessary risk to consumer safety and public health. As such, we strongly oppose HB 3056 and any expansion of the availability of raw milk in Oklahoma.

Please do not hesitate to contact us with any questions or if we may be of further assistance.

Sincerely,



Clay Detlefsen
Senior Vice President and Staff Counsel
National Milk Producers Federation



Chelsie Keys
Senior Vice President, Government Relations
International Dairy Foods Association

The National Milk Producers Federation (www.nmpf.org), based in Arlington, VA, develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's

[7] Bhat, M, et al. *Escherichia coli* O157:H7 Infection Associated with Drinking Raw Milk- Washington and Oregon, November- December 2005. MMWR. 2007; 56(8):165.

cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of nearly 25,000 dairy producers on Capitol Hill and with government agencies.

The International Dairy Foods Association (IDFA), Washington, D.C., represents the nation's dairy manufacturing and marketing industry, which supports more than 3.2 million jobs that generate $49 billion in direct wages and $794 billion in overall economic impact. IDFA's diverse membership ranges from multinational organizations to single-plant companies, from dairy companies and cooperatives to food retailers and suppliers, all on the cutting edge of innovation and sustainable business practices. Together, they represent most of the milk, cheese, ice cream, yogurt and cultured products, and dairy ingredients produced and marketed in the United States and sold throughout the world. Delicious, safe and nutritious, dairy foods offer unparalleled health and consumer benefits to people of all ages.