

Cooper, Kathy

2777

**From:** Brian Snyder [brian@pasafarming.org]  
**Sent:** Friday, October 01, 2010 7:54 AM  
**To:** IRRC; 'Bill Chirton'  
**Subject:** Comments on proposed "final" Milk Sanitation regulations  
**Attachments:** PASA Comments to PDA & IRRC.10-1-10.pdf; PASA Exhibit A.IRRC.10-1-10.pdf; PASA Exhibit B.IRRC.10-1-10.pdf; PASA Exhibit C.IRRC.10-1-10.pdf

To Whom It May Concern:

Please note our attached comments to the proposed "final" Milk Sanitation regulations, to be discussed in next week's meeting, along with three attached exhibits. Please let me know promptly if for any reason you do not successfully receive all four attached documents.

Thanks,

*Brian*

Brian Snyder, Executive Director  
 Pennsylvania Association for Sustainable Agriculture (PASA)  
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 (814) 349-9856  
[www.pasafarming.org](http://www.pasafarming.org)

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***Promoting profitable farms that produce healthy food for all people while respecting the natural environment.***



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To: Pennsylvania Department of Agriculture (PDA)  
Bureau of Food Safety  
Division of Milk Sanitation  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

Attention: William Chirdon; Paul Hoge

To: Independent Regulatory Review Commission (IRRC)  
333 Market Street, 14<sup>th</sup> floor  
Harrisburg, PA 17101

From: Brian Snyder, Executive Director  
Pennsylvania Association for Sustainable Agriculture (PASA)  
104 North Street  
P.O. Box 419  
Millheim, PA 16854

Date: September 30, 2010

Re: PA Department of Agriculture Final Regulation #2-160 (IRRC #2777): "Milk Sanitation"

cc: PA Secretary of Agriculture Russell Redding  
PA Senate Agriculture and Rural Affairs Committee  
PA House Agriculture and Rural Affairs Committee

To Whom It May Concern:

With regard to the final draft of potential new Milk Sanitation regulations appearing on the IRRC agenda for October 7, 2010, and in accordance with our responsibility to represent the interests of our members, Pennsylvania farmers more generally and the citizens who utilize Pennsylvania farm products, and with sincere respect for the folks who have worked hard to draft the aforementioned regulations, PASA does hereby advise the following:

**PASA recommends that the Pennsylvania Department of Agriculture withdraw the proposed "final" regulations in advance of the October 7 meeting of the IRRC so that no action may be taken thereon at that time.**

**PASA further recommends that, in the event PDA does not withdraw the proposed regulations, the IRRC take action to reject them as currently drafted.**

The rest of this document is intended to provide reasons as to why PASA has reached the above recommendations and to provide additional, more technical comments for future consideration by PDA in drafting replacement regulations.

## **A. Rationale for withdrawal /defeat of “final” Milk Sanitation Regulations**

There are four basic reasons why PASA has made the above recommendations. They are as follows:

- 1) PDA did not provide sufficient opportunity for input or collaboration on the proposed regulations, particularly with respect to a significant minority group of farmers that would be affected, and may in fact have taken evasive steps to avoid such input.

In order to demonstrate this, we offer **PASA Exhibit A**, a letter dated August 17, 2009 and addressed from us to PDA, regarding an initial hearing scheduled in August 2009 to discuss a very narrow set of topics related to the, at that time, proposed draft regulations. The meeting was at first set to discuss only “the number and character of bacteria in milk” because, as we were told, “that’s all we’re required to talk about.” Later we were informed the meeting would cover a broader array of topics – in fact, whatever anyone wanted to ask – but that was after the initial meeting notice went out, and after we or any other group lost any credible chance of pulling together all the interested parties. But the main point of attaching this exhibit now is to call attention to the offer PASA made at that time. The letter demonstrates not only our specific concern that Amish and Old Order Mennonite dairy farmers have an opportunity to read and comment meaningfully on the proposed regulations, but also PASA’s very sincere “offer to work with the department to ensure that any farmer who wishes to receive a full copy of the proposed regulations, and otherwise does not have access, can receive one in a timely way.”

We also call your attention to **PASA Exhibit B**, a subsequent letter dated October 5, 2009 and addressed from us to then Acting Secretary Russell Redding in which we pleaded with the soon-to-be Secretary for a “collaborative process” in the interest of developing “mutual respect” between the department and the regulated community of farmers. The reader will note just how positive our letter was in tone and intent, in hopes of working toward a favorable outcome for all interested parties, including consumers.

We wish the rest of the story had followed suit with the positive nature of the two exhibits we offer at this time. But the next official interaction we experienced with respect to the regulatory process occurred on August 9, 2010 when, in a face-to-face meeting with PDA leadership, called ostensibly to discuss other issues related to raw milk production and sales, we heard that the issuance of a “final” draft of the new regulations was imminent. At that time we offered once again, and felt that all agreed it would be a priority, to co-host with PDA a meeting for all current raw milk permit holders in order to review the proposed regulations, and to give the farmers – including many from the Plain Community – a meaningful opportunity to ask questions and to have input.

Unfortunately, none of our overtures to help involve all interested farmers, including a significantly disadvantaged minority in particular (in terms of electronic access to records), were acted upon favorably by PDA. Concomitantly, this “final” draft of regulations contains significant changes from the first draft of August 2009 in terms of rooms that may/may not be required and containers that may/may not be used in different manners, and there has been absolutely no opportunity for us or any other group to assemble or even to successfully inform the full regulated community of farmers regarding these latest changes to raw milk regulations. One has to wonder if, at some level, this pattern of neglecting to inform a very concerned and passionate minority of dairy farmers could have been anything but intentional.

Our concerns about how collaborative this process was intended not to be were heightened when, in late August of this year, we were contacted by the policy office of Governor Rendell, and asked to share our thoughts on a the final regulations, even though the caller said she was specifically not authorized to allow us to see the document upon which we were being asked to comment.

- 2) As referred to in the first reason cited above, there have been significant changes in the proposed regulations for producing/selling raw milk between the first and second public drafts of the regulations in question. That alone creates a problem, especially since the changes involve new definitions and basic concepts that the regulated community now has very limited opportunity to comprehend, aside from offering any input for their improvement.

Most of our concerns in this regard are contained in Section 59a.410, which addresses “Raw Milk Packaging” and so much more. We appreciate that at our previous urging, and with strong support from IRRC, PDA has now included an understanding of a third type of container, in addition to the traditional two categories of “farmer owned” and “customer owned.” There is now recognition of single use containers that are provided by the farmer for purchase by the customer, a relatively “recent” innovation in the dairy industry, at least relative to the publishing of the original Milk Sanitation Code.

Unfortunately, we feel that the “baby” has been thrown out here, and the “bathwater” retained, at least in terms of the clarity of this whole section. Single use containers are a significant and mostly positive innovation that has simplified the bottling process for farmers, improved convenience for customers and most likely has increased the efficacy of the system as a whole in terms of food safety. But PDA has gone to great pains here – painful even for the reader – to make sure that what PASA had asked for in previous comments is specifically prohibited. Our intent had been to utilize the advantages of single use containers, making it very easy for a farmer to provide raw milk to eager customers while also decreasing the practice of using customer owned containers (and thereby limiting customers’ access to the milk room) wherever possible. Instead, PDA has made it more difficult for farmers to use such containers – by requiring separate rooms and mechanized systems for filling/capping – while at the same time creating a stronger incentive for customer owned containers to be used.

PDA also failed to clarify, even in response to queries from the IRRC, the situation with the additional rooms that would be needed for a farmer to do business under these new regulations. Taken literally, a farmer might have to install six rooms in his/her barn in order simply to sell both fluid raw milk and aged cheese: a milk room, bottling room, container storage room, bottle washing room, cheese cleaning and preparation room, cheese cutting and wrapping room (see response to Comment #122 of the Preamble). In fact, it's even possible that a room for cheese production itself could become a seventh required room for a farmer to install.

Fortunately, and in response to PASA's rather insistent questions about it, PDA has clarified their understanding of the proposed regulation in a memo dated September 23, 2010 and included here as **PASA Exhibit C**. This exhibit covers a few other issues left unclear in the latest draft of regulations as well. We are grateful to PDA for producing this memo. However, we are worried that such an informal memo could easily be disregarded by future PDA administrations, unless incorporated into the regulations themselves, and feel this whole Section 59a.410 requires reworking and thereby constitutes a significant reason to block approval at this time of the full statement of Milk Sanitation regulations.

- 3) PASA feels that the issue of potential cost to farmers who are producing/selling fluid raw milk and cheese, and the potential price increase to be covered by customers, has been understated in documents submitted by PDA to the IRRC, perhaps deliberately so.

This situation is all the more regrettable in that IRRC did ask rather pointed questions of PDA regarding cost issues, and that PDA only provided minimal cost information concerning milk testing in response. The potential costs are several, and potentially severe, depending on the circumstances, with testing representing only the most basic and routine among them.

First, there is the room and mechanization issue. Even though some separate rooms and mechanization were required in the previous (i.e. currently standing) regulations, they obviously did not apply to any farmer running a fluid raw milk operation out of his/her milk room alone. The newly drafted regulations, as detailed above, have gone to great pains through convoluted container definitions to force nearly all of these folks to add at least one room and a mechanized means for filling/capping those containers. Where is the cost of that room in the PDA cost projections? Keep in mind that the "cost" of a room goes far beyond just the price of building it . . . ongoing maintenance, upkeep and property taxes must also be considered, at a minimum.

Second, consider the very realistic extra costs associated with all the new testing requirements. PDA has explained to IRRC that numerous occurrences of pathogens in raw milk have occurred in the past year. They also described the coincidental occurrence in some cases of illness affecting one or more customers of a farm (PASA takes no position on the scientific validity of assumptions made in this regard). Indeed the occurrence of positive pathogenic tests has increased in the past year, while these new regulations have been under consideration. We make no insinuation about why that

might have occurred, but of course many members of the regulated community do feel the regulatory tide has been working against them. The fact is that several of the positive test occurrences have not been associated with illness of any kind, and yet very significant costs have been borne by several farmers who temporarily had their permits to produce and sell products suspended, especially considering loss of sales and public goodwill. We respectfully ask the IRRC to consider the potential, sometimes even business-killing costs associated with an increased occurrence of “false positive” tests if/when they should occur. If testing is less than 100% accurate, the likelihood of a costly mistake is doubled every time the frequency of testing is doubled.

Finally, we draw your attention to what we believe are unfortunate misstatements or mischaracterizations offered by PDA in the Preamble of the proposed “final” regulations. In response to Comment #4 on page 8, PDA states that “When sold as raw milk for human consumption, raw milk is typically sold at a price several times higher than a consumer would pay for the same quantity of pasteurized milk,” suggesting that a raw milk permit holder has plenty of slop in his/her price to absorb any/all increases in cost. The assertion made by PDA is blatantly false – while there are a few anecdotal situations, in high end markets, where prices paid for bottled raw milk do soar, the price to consumers for raw milk, more typically falls between the same price for conventional pasteurized milk and a single multiple of the same. However, most consumers of raw milk, if forced to switch, would not purchase conventionally produced milk, but would choose organic pasteurized milk instead, which is frequently priced higher than the bottled raw milk!

We also draw attention to the PDA response to Comment #169 on page 64 of the Preamble. Here, in response to questions about cost, PDA asserts that “If these costs are prohibitive to a given raw milk producer, then the producer should cease producing raw milk for human consumption.” We are still rubbing our eyes over that one . . . is it really our Department of Agriculture speaking to dairy farmers who are doing whatever they can to serve their customers while keeping their farms afloat? PASA feels that the attitude displayed in the highlighted examples exposes a certain predisposition on the part of PDA to minimize the plight of the regulated community in this case, and possibly even to prejudice the IRRC using false and misleading statements about costs.

- 4) Yet another indication of intellectual predisposition and potential bias is contained in several places throughout the Preamble to the proposed “final” regulations. A good example can be found on page 45, in the response to Comment #127 (in which IRRC joined), where PDA asserts “As stated elsewhere in this document, the Department is not inclined to reduce basic food safety requirements simply because the food producer or processor is a small-scale operation.” We applaud PDA’s commitment to food safety, and draw the IRRC’s attention to the fact that this seemingly benign statement actually has huge implications on not only a statewide, but national scale, specifically concerning massive new Food Safety legislation now moving through Congress, wherein much of the debate has been whether or not the regulation of food safety is a “size neutral” issue with respect to the food “facilities” involved (as defined by the Food and Drug Administration). The IRRC may want to be aware that even the U.S. Senate is beginning

to acknowledge – through deliberations that have lasted nearly a year – that the “risk” built into the basic safety of our nation’s food supply is, in many ways, dependent on the scale of an operation.

All that aside, anyone who continues to believe that size of an operation is not a major factor in the safety of our food supply, especially following the discovery of details related to the recall of half a billion chicken eggs across the nation this past summer, is thinking with the unfortunate handicap of quasi-scientific blinders. PASA believes that the entire document of proposed Milk Sanitation regulations needs to be reviewed with an eye to make sure that regulations are not only scientific in nature, but risk-based according not only to size, but nature of a food producing or processing operation.

## **B. Technical considerations for redrafting new Milk Sanitation Regulation**

There are technical considerations with regard to the newly proposed “final” draft of Milk Sanitation regulations where PASA feels that more examination and discussion needs to occur before the document can be finalized. There are several concerns in the document as presented, as follows:

### 1) Nomenclature of organisms for which there are tests required

In multiple places in this document, testing for pathogenic bacteria is described. Said bacteria are listed as *Salmonellae*, *Listeria monocytogenes*, *Campylobacter*, and *E. coli* 0157:H7. Is it the intent of the Department to test for all species of *Salmonella* and *Campylobacter*, or are there certain species of interest and concern? If it is the former, in the interest of absolute clarity and proper nomenclature, the bacteria should be cited as *Salmonella spp.* and *Campylobacter spp.*. If it is the latter, then it seems appropriate to cite the species of concern. At best, it seems appropriate to use the same convention of nomenclature for all organisms cited throughout the document.

### 2) TB and Brucellosis testing

TB and Brucellosis testing are required for all animals producing milk. Since the scope of species producing milk under permit has been expanded to include “all hooved mammals,” is it reasonable and realistic to demand TB and Brucellosis testing in those species that do not have a susceptibility to either or both of these diseases?

### 3) Growth inhibitors and/or drugs in milk

The term “growth inhibitor” has been replaced by the term “drug,” a word that has a much broader scope than that of the former. In 59a409c, for example, it speaks to “if a raw milk sample tests positive for the presence of a drug...” It seems that there needs to be some clarity here around this question of “drug.” There is potential that this statement could be expanded to include, or demand, that the milk be tested for a myriad of drugs, ranging from growth inhibitors and antibiotics, through non-steroidal anti-inflammatory

agents and other possibilities. The statements around drug testing, without offering more specific parameters concerning the medicament in question, may open the door to unintended consequences.

4) Single cow permits

Appreciating that the Secretary has not granted such an exemption in the recent recorded history of the Department, it still makes sense that the verbiage around this is representative of the language of the document. As such, the exemption would not necessarily be limited for a cow, but for any “hooved mammal.”

5) Somatic Cell Count testing in goats’ milk

It is well known that the methodology of SCC testing of goats’ milk does influence the results of the test. Does the Department intend to differentiate among methodologies when assessing the results of SCC testing in goats?

6) Identification of bacteria

Comments in the Preamble and response to commentators’ questions about identification of bacterial contaminants (pg 64, for example) give pause. This comment could suggest that the microscopic identification of bacteria is the “gold standard.” That is tenuous ground. Certainly there are some species of bacteria that may be identified strictly by their gross morphological characteristics – however, this does not comprise the majority of species. There are many species of bacteria that are morphologically indistinguishable and that must be identified on the basis of other methodologies. It is also possible to accurately identify some species of bacteria without the need to visually inspect them under the microscope.

7) Confusion between bacterial counts and SCC counts

This comment also refers to the Preamble and response to commentators. In the text found on page 29, comment #71, the Department is confusing bacteria and somatic cells. “In fact, the USDA Recommended Requirement suggests the appropriate standard should be *500,000 bacteria per milliliter.*” This should probably read “500,000 somatic cells per milliliter.”

8) Positive pressure ventilation areas

Appreciating that there has been extensive discussion around rooms vs. areas and around the number of rooms that are required under the regulations, it seems appropriate that the Department consider also the manner in which ventilation might be used to segregate areas and reduce/eliminate contamination and cross contamination. Would the Department entertain any potential for “positive pressure ventilation” over the areas involved in cheese cutting, wrapping and packaging in lieu of a separate room for these functions?



### **C. Summary of Comments**

As a summary of our comments related to the recommended withdrawal or rejection of new Milk Sanitation regulations, PASA wishes to reiterate its admiration and respect for all those individuals who have worked so hard in putting together the various drafts. We understand that such work is usually done without many thanks from those who are regulated or the public at large. We also wish to express our gratitude to PDA for talking with us at all, and especially to working closely with us to resolve most issues related to positive tests for pathogenic bacteria in some permitted supplies of raw milk. However, we feel that the standard for achieving public understanding, input and buy-in that would be necessary to for the new regulations to succeed has not been met. We therefore strongly recommend that PDA withdraw the latest draft from consideration, or in the absence of such action, that IRRC reject the proposed “final” draft at this time.

At PASA, we see it as our job to make sure that when new regulations are proposed, having a potential effect on the public at large, that the less than 2% of the population who farm (but feed us all), the less than 15% of our farmers who run dairy operations (but keep Pennsylvania at #5 in the nation for milk production), and the various minorities among our dairy farmers who are often forgotten (but give Pennsylvania its rural character, recognized worldwide), are all brought into these discussions in a positive and forthright manner. That goal can only be accomplished in the present situation if our recommended actions are adhered to, regardless of whatever arbitrary political circumstance or deadlines might apply.

Finally, we thank the IRRC for the opportunity to offer these comments.

End.



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

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September 23, 2010

Brian Snyder, Executive Director  
PASA  
P.O. Box 419  
Millheim, PA 16854

Re: Milk Sanitation Regulations, IRRC Regulation#2-160  
7 Pa. Code § 59a.410 Raw milk packaging

Dear Mr. Snyder:

We are happy to answer PASA's questions about the above-referenced section of the Final Form Milk Sanitation Regulations. In response to your questions, here is some further clarification.

1. Any permitholder authorized to sell raw milk and who is compliant with the requirements of § 59a.410 can sell that milk at any off-farm retail outlet.
  - Any other regulations that apply to the transportation and temperature requirements of packaged milk for sale also would apply, but your question was simply concerning the authority to sell off the farm at retail outlets.
  - If there are any local ordinances prohibiting raw milk sales in a particular jurisdiction, permitholders would need to check with the local jurisdiction involved. I am aware that Allegheny County once had such an ordinance but I don't know its current status.
2. With regard to § 59a.410's requirement for "separate rooms for bottling, single-service container storage, and bottle washing" only one additional room beyond the milk room is necessary for the combined functions of bottling and container storage, subject to the following:
  - Containers have to be stored in a clean and dry area, up off the ground and protected from sources of contamination.
  - Any bottle washing of returnable containers would have to be in another room, not a room devoted to bottling and container storage.
  - The room set aside for bottling under a raw milk permit can also be used to manufacture cheese under a cheesemaking permit, provided bottling is not conducted simultaneous with cheesemaking in that same room. Cross-contamination can occur. This does not affect the long-standing room requirements of 7 Pa.Code § 59.771 regarding cutting and packaging cheese.

- Further details regarding room requirements for cheesemaking is best taken up with the Bureau of Food Safety.

3. You will see that the terms "pre-packaged" and "customer owned container" are no longer used. That is to eliminate confusion. The essence of subsections § 59a.410(a) and (b) of the Final Form regulation are that every container has to be filled by a mechanical filler, including any single-service containers -- no matter who supplied them -- with one exception: those instances where something other than a single-service container (e.g. a mason jar) is involved and the permitholder has no role in supplying or selling that container to the customer. Those types of containers can be filled according the provisions of § 59a.410(b).

Thank you.

Sincerely,



D. Holbrook Duer  
Chief Counsel

DHD/dhd

Cc: William Chirdon, Director, Bureau of Food Safety  
Dwight-jared Smith, Esq.  
Douglas Kilgore, Deputy Secretary



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August 17, 2009

Pennsylvania Department of Agriculture  
Bureau of Food Safety  
Division of Milk Sanitation  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

Attn: Paul Hoge

Re: Proposed Rulemaking, Milk Sanitation [39 Pa.B. 4677; 8/1/09]

cc: PA Independent Regulatory Review Commission  
PA Governor Edward G. Rendell  
PA Senate Agriculture and Rural Affairs Committee  
PA House Agriculture and Rural Affairs Committee

Dear Mr. Hoge:

Please consider this as our testimony pursuant to the discussion of proposed new regulations for milk sanitation to be discussed at the announced hearing on August 18, 2009 at the Department of Agriculture, Room 202 at 1:00 p.m. As this hearing is, by your insistence, limited to discussions of "the number and character of bacteria in milk," we will address our principal concern in that manner and will reserve the right to address several other concerns about the proposed new regulations through the public comment process.

We are greatly distressed that changes as momentous and comprehensive as the current proposal represents have been limited to a 30-day public comment period, particularly when those 30 days are scheduled to pass entirely within the month of August, a time of the year when many affected farmers and consumers will have a very difficult time responding in a timely way. This unfortunate situation is compounded by the fact that many of the Commonwealth's dedicated dairy farmers are Amish or Old Order Mennonite and do not have direct access to a computer or the Internet. We have spoken with a number of farmers (Plain and otherwise) who have not seen the notices sent out by the department, and some who are wondering how they'll ever get all the information they need in order to respond intelligently on their own behalf by the deadline.

Therefore we propose that, in order for all farmers and other interested parties to be able to respond in a reasonable and informed manner on bacterial standards, as well as other aspects of the proposed regulations, the public comment period should be extended to 90 days, i.e. to the end of October. We further propose that such an extension be implemented forthwith and communicated to all interested parties as soon as possible in order to ease the stress caused by the suddenness of the proposed rulemaking and the busy time of year.

Finally, the staff and Board of Directors the Pennsylvania Association for Sustainable Agriculture (PASA) do hereby offer to work with the department to ensure that any farmer who wishes to receive a full copy of the proposed regulations, and otherwise does not have access, can receive one in a timely way. Some may also want to see the existing regulations, to understand what changes have been made – the hundreds of pages involved is the basis for our emphasis on a 90-day comment period.

We realize the department is not required by law to do what we ask, even to the extent of notifying all affected parties concerning these proposed new regulations. But we also understand that a successful effort to update and extend new regulations for such an important segment of the Commonwealth's agricultural community requires an effort that goes "above and beyond" what is specifically required by statute. We feel certain that such a successful process is in fact the department's primary goal, and that you will work with us to get there together.

We look forward to your timely reply.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Brian Snyder". The signature is fluid and cursive, with the first name "Brian" being more prominent than the last name "Snyder".

Brian Snyder  
Executive Director



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October 5, 2009

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Acting Secretary Russell Redding  
Pennsylvania Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 17110

Dear Acting Secretary Redding (Russell):

We first want to congratulate you on the new position, and then thank you for the mention made of the Chapter 59 issues in your remarks to the AHDC meeting last week. It really means a lot to get our issues acknowledged in front of a respected group of folks like that!

The main purpose of this note is to emphasize to you the tremendous importance, and opportunity, involved in getting these milk sanitation regulations right. Please don't take it lightly! As you are surely aware, people everywhere are feeling disillusioned and impatient regarding government process of any kind, and farmers – especially dairy farmers – are no exception. The sense of disgruntlement for many of the folks we work with is compounded by the dual realities of a dairy crisis that had long been foreseen and predicted (regardless of the actual antecedents involved), and the promising opportunities they now face to serve new and expanding markets. There is very significant risk that regulatory changes of any kind will be interpreted as a move by PDA to restrict creativity and innovation at a critical time, particularly when considering the Commonwealth's smaller dairy farms. This is another reason why a thoughtful and collaborative process is critical at this time.

We do not expect the department to simply bypass appropriate caution when considering its handling of farms with raw milk permits or those that are manufacturing value-added products (be they pasteurized or raw). We are simply asking that PDA use this opportunity to demonstrate, in as positive a manner possible, its support for some of our most innovative dairy farms by giving them the maximum amount of flexibility allowed by the constitution and statutes of the Commonwealth, and by common sense.

Furthermore, please keep us involved in this process, since it will be difficult for PASA to publicly endorse any set of new regulations if we have not been a party to the process. You must realize that, while our support would hardly be necessary to get these regulations enacted, such support would be important nonetheless in promoting mutual respect between farmers and the PDA personnel with whom they must work. It may not be possible to get everyone to agree on what the regulations should say, but for new rules to be successfully implemented, the prevailing spirit and intention of the process will need to be clear, collaborative, positive and forward-looking.

Yours sincerely,

Kim Seeley, President

Brian Snyder, Executive Director