

Shomper, Kris

From: "Das Burger Haus" [burgerhaus@hotmail.com]
Sent: Monday, October 04, 2010 2:36 PM
To: IRRC; wchirdon@state.pa.us
Cc: 'Hanna, Michael'; Jake CORMAN
Subject: Pending Raw Milk Regulations

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IRRC

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Ladies and Gentlemen of the PA Independent Regulatory Review Committee and the PA Dept of Agriculture:

I am writing briefly to encourage your pause and fair deliberation on pending regulations regarding raw milk production and sales in Pennsylvania.

I STRONGLY URGE THE DRAFT MILK SANITATION REGULATIONS BE WITHDRAWN AND REMANDED TO PDA FOR REPROCESS AND FURTHER INCLUSION OF PUBLIC AND FARMER INPUT!!

Following a long respite after departure from the family farm, my wife and I resumed consumption of raw milk a few years ago. We are convinced of the healthful benefits of this food as well as its good to agriculture and local economies. While I confess I am not an expert of the pending regulations at hand, I have a fundamental knowledge of same.

I understand the current status of options on the table right now are:

- 1) PDA can withdraw the proposed draft before the scheduled 10/7/2010 meeting; or,
- 2) IRRC can vote to accept or reject the regulations as presented.

Again.... ***I STRONGLY URGE THE DRAFT BE WITHDRAWN AND REMANDED TO PDA FOR REPROCESS AND FURTHER INCLUSION OF PUBLIC AND FARMER INPUT!!***

Though I am personally guarded and hesitant at the urge of government to "help" and regulate *ad infinitum*, the bigger issue is the appearance and risk presented in this process having been rushed due to arbitrary political deadlines and that a much better process could result from a series of meetings between PDA, the "regulated community" (i.e. farmers) and consumers who will be affected by new regulations.

I am a lifetime member / supporter of the Pennsylvania Association for Sustainable Agriculture (PASA) which has offered numerous times to help facilitate such a process.

My understanding is the raw milk section of the proposed regulations has some compositional problems that would make it difficult to implement as is, and that a better process could eliminate most, if not all of those problems. Further, and something you **MUST APPRECIATE**, is the apparent ambiguity and lacking concern at how much cost would be involved for farmers to continue in the business of providing raw milk directly to the public or through retail establishments.

No doubt this regulatory effort of PDA exhibits hard work invested to date, and there is every reason to anticipate positive discussion and participation going forward should you act accordingly in suggesting this proposal return for more input and involvement.

Respectfully,

Brian B. Burger
PO Box 241
Aaronsburg, PA 16820
814.349.8842