

2777

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Shomper, Kris

From: Leo Immonen [limmonen@verizon.net]
Sent: Monday, October 04, 2010 2:16 PM
To: IRRC
Subject: Reject Proposed Regulation #2777 Department of Agriculture 2-160: Milk Sanitation

Dear Sirs:

My name is Leo Immonen. I am a raw milk consumer and I respectfully request that you reject proposed regulation #2777 Department of Agriculture 2-160: Milk Sanitation.

I view the proposed regulation as excessive, and in some cases onerous and unnecessary. These flaws warrant that the proposed regulation be rejected.

There are two particularly onerous requirements in the proposed regulations. First, the regulations would normally require a mechanical bottling machine for producers. Why are you planning on raising the costs on our local dairy farmers?

Second, bottling, single-service container storage, and bottle washing must be done in rooms other than the milk room. Again, this regulation raises costs. You are requiring the local dairy farmers to build additional structures to meet this requirement. Why?

These proposed regulations have nothing to do with protecting the public health but instead subject local raw milk producers to unnecessary expenses that will make it financially difficult to continue in business. Especially at a time when our nation's economy is struggling, you should not be imposing additional burdens upon our local dairy farmers!

I am a discriminating consumer and feel fully capable of deciding what foods I decide to drink or eat. I do not need protection from my farmer-neighbor or local market or store. If they provide an unsatisfactory product or fail to appropriately correct a problem, I will take my business elsewhere.

Where we need government involvement is where the suppliers or markets are no longer our neighbors but rather corporations created by the State. Food safety is not size neutral. Larger operations are more complex, problems have much more far-reaching impacts and we have no direct meaningful recourse if there is a problem. The regulation needs to focus on those operations.

Although some regulations on this latter group are necessary, the regulation could be much simpler if they were performance standards, requiring that the end product achieves a desired result. How that result is achieved is the producers' responsibility, not the State's. That would result in the State's role being to test for compliance, a function that could easily be contracted out, rather than inserting itself in micromanaging the operation.

Sincerely,
Leo E. Immonen
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