

2777

Shomper, Kris

From: Stephanie Zonis [sdziadwm@nac.net]
Sent: Monday, October 04, 2010 4:12 PM
To: IRRC
Subject: Comment on proposed regulation #2777 Department of Agriculture 2-160

RECEIVED
IRRC

2010 OCT 04 P 4: 22

Ladies and Gentlemen:

With respect, I urge you to REJECT proposed regulation #2777 Department of Agriculture 2-160. Pennsylvania has one hundred thirty-six licensed raw dairy farms, and forty more are currently seeking approval. Because of this high number, Pennsylvania is a model state for raw dairy farms, and what happens in Pennsylvania can easily impact raw dairy farms in other states.

In the consumption of dairy products, the choice of whether they are raw or pasteurized should belong to the consumer. The proposed regulation, while it would not outlaw raw dairy products outright, contains provisions that would pose a serious economic threat to the continued operation of many raw dairy operations. Requiring a mechanical bottling machine for raw dairy producers (banning handcapping) would necessitate the purchase of expensive machinery. How has it been demonstrated that a mechanical bottling machine renders raw dairy products any safer for the consumer? Have there been significant outbreaks of foodborne illness traced to the practice of handcapping in Pennsylvania?

Even worse is the provision requiring bottling, bottle washing, and single-service container storage in rooms other than the milk room, with bottle washing not allowed in the room devoted to bottling and container storage. This would force raw dairy producers to construct entire rooms devoted to these procedures, an expense that, when combined with the cost of a mechanical bottling machine, would put some out of business. Again, I ask why this provision is necessary. Has illness been traced back to single-room bottling, bottle washing, container storage milk rooms?

These raw dairy producers are not agricultural titans. They're small farms, small businesses just trying to survive in tough economic times by offering consumers an alternative many of us want: unpasteurized dairy products. In fact, large agricultural operations are more complex; have more far-reaching impacts when problems occur; and don't provide consumers with any kind of direct, meaningful recourse should there be a problem with a product. The proposed regulation is excessive. Therefore, I urge you to "do the right thing" by REJECTING proposed regulation #2777 Department of Agriculture 2-160.

Sincerely,
Stephanie Zonis