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From: yekrutmot@gmail.com
Sent: Monday, October 04, 2010 1:58 PM
To: IRRC; wchirdon@state.pa.us; Hricik, Thomas
Subject: Raw Milk Regulations- A consumer perspective

As a consumer of local food I am writing to voice my opposition to the proposed IRRC regulations regarding Milk Sanitation.

I understand and fully support the need to have reasonable regulations related to the safety of the food system in Pennsylvania. However, there is a balance between the relative risks versus rewards and the impact on the marketplace for local food.

Under the IRRC regulations regarding raw milk, the regulatory requirements are so onerous that the State is essentially shutting down the market for farmers and the consumers that want to buy their products. It is not reasonable to impose the multi-room requirements as well as the excessive testing requirements.

Have you ever gone to a farm or farmers market to buy raw milk, eggs or cheese? I have many times and I bring my own sterilized jugs, buy my products from a farmer that I know and trust, and I am confident that I am getting products that are good for my family of six. In fact, I will pay a significant premium to access raw milk in terms of the cost per gallon, travel time to access the product and investment in getting to know "my" farmer. The farmer, on the other hand, get's to know his/her customers, and profits from people like me willing to pay a premium.

That seems like a pretty good economic model for Pennsylvania farmers and consumers. The decision of where, how and why I buy the product should be my decision and not a decision of the State. The raw milk regulations essentially impose a cost structure on farmers that make the products prohibitive to sell and results in the economic encouragement to sell milk through pasteurizers at whatever price the market will bear and the government will subsidize.

If you are going to establish these types of regulations then why not require that every single egg be pasteurized, all meats radiated, all field greens sprayed with chlorine, every apple x-rayed for bugs? In fact, related to milk, why not just require that everyone buy powered milk since you can be sure that the product is "safe" to drink?

My suggestion to the IRRC regulations is that you reject the proposed regulations and think about ways to create markets for farmers and consumers versus destroying them. A possible market model might include creation of milk clubs for consumers that want these products, waivers from litigation signed by consumers, reasonable testing requirement, exemptions for small farmers, temperature requirements, reasonable methods to access products directly from farms and markets that meet threshold standards? The objective is to make markets for local products that meet a consumer demand and improve the revenue model for farmers.

Thank you for your consideration.

Tom Hricik
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