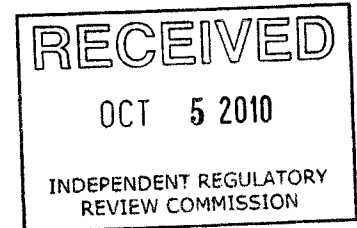


Shomper, Kris

From: Anne Kretschmann [kretschmann.anne@gmail.com]
Sent: Tuesday, October 05, 2010 12:21 AM
To: IRRRC; wchirdon@state.pa.us
Subject: Comments: Final Draft of the Pennsylvania Department of Agriculture Final Regulation #2-160 (IRRC #2777): "Milk Sanitation"
Attachments: Milk Regulations_Kretschmann_Comments.doc

Pennsylvania Department of Agriculture (PDA)
 October 1, 2010
 Bureau of Food Safety
 Division of Milk Sanitation
 2301 North Cameron Street
 Harrisburg, PA 17110-9408



Independent Regulatory Review Commission (IRRC)
 333 Market Street, 14th floor
 Harrisburg, PA 17101

To Whom It May Concern,

I am writing in regard to the final draft of the Pennsylvania (PA) Department of Agriculture Final Regulation #2-160 (IRRC #2777): "Milk Sanitation". I would like to encourage the PA Department of Agriculture to withdraw the proposed final regulations prior to October 7, 2010 so that no action can be taken on them at that time. If they are not withdrawn, I would like to strongly encourage them to be rejected as currently drafted.

The primary reasons for my recommendations for withdrawal or rejection of the proposed 'final' Milk Sanitation Regulations are the following:

1. The regulations were prepared without proper informing, input, or collaboration of affected farmers.
2. There have been major changes in the regulations between public drafts, including new definitions and basic concepts which the affected farmers and consumers have poor comprehension of and which are not clarified in the proposed final regulations.
3. Many of these changes will cause undue hardship for farmers, particularly those producing and selling raw milk and cheese. The potential costs of testing milk, adding separate rooms, and mechanizing were understated and not clarified in the proposed final regulations.
4. All milk testing should be scientific, comprehensive, and accurate for both conventional and raw milk. The testing of raw milk has been based on non-scientific methods in which testing is less than one hundred percent accurate, and the regulations do nothing to address this. The overreaction of positive test occurrences that were not stringently scientifically processed in the laboratory has cost farmers significantly.
5. At a time when dairy farmers nation-wide are struggling to make a living more than any other time in our nation's history, the government owes small farmers to not put undue burden on them. As such, risk should be evaluated based on the size of a processing and producing operation. A large-scale conventional farm such as the large egg farm in Iowa poses a much larger health risk on a large basis due to the amount produced and distributed than a small farmer providing raw milk to twenty families.

I would like to encourage you to carefully review and address the comments offered by the Pennsylvania Association for Sustainable Agriculture in re-writing the regulations.

Thank you for your consideration in this matter.

Anne Kretschmann
257 Zeigler Road
Rochester, PA 15074

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