

2777

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Shomper, Kris

From: C. Walker [rwalker@pa.net]
Sent: Tuesday, October 05, 2010 8:00 AM
To: IRRRC; wchirdon@state.pa.us
Cc: 'Brian Snyder'
Subject: Reject Proposed "Final Milk Regulation"

Greetings,

We are raw goat milk producers, owners and operators of Caprine Delight Goat Dairy in Gettysburg, PA.

*We respectfully request that you **reject** proposed regulation #2777 Department of Agriculture 2-160: Milk Sanitation.*

*This regulation has been changed in important ways that **exceed the boundaries of the law.***

Examples of this are their extension of this regulation to cover milk from species not currently recognized by the law, including goats.

Another example of excessive regulation is the new requirement that a producer use a bulk tank, while in the past it was incumbent upon the producer to chill the milk but the way that was accomplished was left up to the producer.

*Additional room requirements and testing requirements can put small producers out of business, which is **not "in the public interest"** as "the public" wants to be able to obtain locally produced fresh raw milk.*

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 rather than inserting itself in micromanaging the operation.

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

Candace and Randall Walker