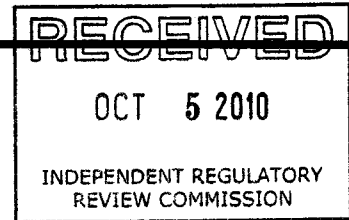


**Shomper, Kris**

**From:** Carrie Hahn [carriehahn@embarqmail.com]  
**Sent:** Tuesday, October 05, 2010 9:47 AM  
**To:** IRRC  
**Subject:** Regulation #27777



To Whom it May Concern,

My name is Carrie Hahn and I am a strong supporter of raw milk. I respectfully request that the IRRC **reject** regulation #2777 – Department of Agriculture 2-160 Milk Sanitation.

I am very concerned that the PDA's proposed regulations will put an increased financial burden on Pennsylvania's permitted raw dairies through increased facility and equipment costs. As consumers continue to learn about the health benefits in "real milk," or milk that has not been pasteurized, the demand for real milk continues to grow. There are currently 136 licensed raw milk producers in Pennsylvania with 40 more applications pending! This country is struggling with an economic crisis, so why put more economic stress, through over regulation, on the one segment of the dairy industry that has continued to grow and prosper?

In a document dated August 3, 2009, the PDA notified all milk permit holders that they had begun the process of revising its regulations relating to Milk Sanitation. Also stated in this document was a notice of the 30 day comment period (which began on August 1<sup>st</sup>, ending August 30<sup>th</sup>) and a Public Hearing scheduled for August 18, 2009. According to this letter "This hearing will be focused only on the proposed changes to bacterial standards – and not on the entire proposed new regulation." Without any further notification, the PDA expanded the scope of the Public Hearing to include any questions or comments concerning proposed revisions to the Milk Sanitation regulations, which included major changes to the sections on raw milk. Farmers and consumers were not given an adequate amount of time to read or prepare for the hearing or the close of the comment period. I appreciate the fact that the IRRC did indeed extend the public comment period to September 30, 2009.

Since that first public hearing and the close of the public comment period, the PDA has not allowed any further discussion of the proposed changes to any interested parties. They have ignored numerous requests by several organizations, working on behalf of consumer and farmers, for a more collaborative process in preparing new guidelines and the PDA continues to show that they are unwilling to accept input from anyone outside their department. No other drafts to the Milk Sanitation regulations were proposed to the public before the final draft was presented and to my knowledge, the PDA has not publicly announced that a final draft has been finalized. The PA Bulletin posted a notice concerning the 2009 comment period and hearing; why didn't the PDA post any information on the PA Bulletin this year concerning their "final" draft? Why weren't permitted raw dairy farmers notified in writing of the final draft? I hope that the IRRC would again take into account, the fact that the PDA has not allowed those affected most by these new guidelines adequate time to review this document, especially considering that the guidelines have grown in size from 167 pages to 207 pages.

In the IRRC response, dated October 30, 2009, the Commission requested that the PDA clarify numerous items in the proposed guidelines, however numerous items still have not been addressed. For instance, in regard to testing, the PDA must specify exactly what testing methods are to be used, which laboratories are approved and specifically which pathogens, as they pertain to human health, are to be tested for. Additionally, the PDA has not presented any information as to the economic impact that the new guidelines would impose on farmers. Nor do they address the fact that these guidelines do not differentiate between small farms which may have only 40 cows in their operation while others may have 100's. Regardless of the size of a dairy operation, they would be required to make the same expensive changes to their operations.

Finally, I would request that the IRRRC consider that no where in the PDA's proposed guidelines do they address the issue of pasture based operations in regard to raw milk production. Raw milk proponents recommend that cows be raised on grass which is part of their natural diet. The proportion of grain directly affects not only the quality of the milk, but the safety as well. Because grain is not a natural part of a cow's diet it disrupts their digestive system and causes strain on their immune system. There are many experts who could advise the PDA on raw milk production and I sincerely hope that they would have the opportunity to weigh in on these issues because raw milk CAN be produced safely.

Please do not allow the PDA to over regulate raw dairy producers out of business in Pennsylvania.

Carrie Hahn

Volant, PA