

2777

Shomper, Kris

From: Christy Birch [cbirch2004@yahoo.com]
Sent: Monday, October 04, 2010 9:50 PM
To: IRRC
Subject: Reject Proposed Regulation #2777 Department of Agriculture 2-160

My name is Christy Birch, I am a raw milk consumer and I respectfully request that you reject proposed regulation #2777 Department of Agriculture 2-160: Milk Sanitation.

My family depends on our local raw milk farmer to provide high quality, probiotic rich and vitamin and mineral rich milk for the health of our young children, one of whom has been chronically ill since birth and can only consume raw dairy because it is more easily digested. We use the milk to make butter, kefir, yoghurt, cream cheese, and whey. We bring our own glass bottles to the farm and feel that a bottling restriction would greatly burden our farmer who provides excellent quality raw milk at a price we can afford. Because we live near our farmer and are able to inspect his cows and his facility and watch as he fills up our bottles from his tank, we do not need additional protection from a state regulation. If our farmer were to provide an unsatisfactory product or fail to appropriately correct a problem he would be out of business quickly. At that level, State regulation does not and cannot provide a higher level policing; every consumer polices that supplier with every transaction and has direct enforcement options. Where we need government involvement is where the suppliers or markets are no longer our neighbors but rather corporations created by the State. Food safety is not size neutral. Larger operations are more complex, problems have much more far-reaching impacts and we have no direct meaningful recourse if there is a problem. The regulation needs to focus on those operations.

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, a function that could easily be contracted out, rather than inserting itself in micromanaging the operation.

Again, I view the proposed regulation onerous and unnecessary to the farmer and detrimental to the consumer in search of high quality raw dairy products at an affordable price. These flaws warrant that the proposed regulation be rejected. In addition, the currently favorable raw milk laws in Pennsylvania as compared to neighboring states, is the reason my husband and I choose to continue to reside in the state of Pennsylvania though we were both raised in Ohio.

Christy Birch
Pittsburgh, PA

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