

2777

Shomper, Kris

From: Gary Cohen [surlok@tds.net]
Sent: Monday, October 04, 2010 10:32 PM
To: IRRC
Subject: vote to DISAPPROVE "proposed regulation #2777 Department of Agriculture 2-160

RECEIVED
IRRC
2010 OCT -5 A 10:00

My name is Gary Cohen, I have a Ph.D. in chemistry from Northwestern University. I have been consuming raw milk products for several years with remarkable improvement in my health. I respectfully request that you reject proposed regulation #2777 Department of Agriculture 2-160:
Milk Sanitation.

I am an intelligent, discriminating consumer and do not need protection from my farmer-neighbor or local market or store. If they provide an unsatisfactory product or fail to appropriately correct a problem they will 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 the small scale farmer 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 as excessive, and in some cases onerous and unnecessary. These flaws warrant that the proposed regulation be rejected. Remember, as a member of a State administrative body you have a legal responsibility to uphold the Constitution of your state and the United States. One of the most basic of human rights is the right to eat the food we want to based on our understanding and experience. Your regulation will be severe enough to make that more difficult as there are few farmers in Pennsylvania that provide raw dairy products.

Also know that this has nothing to do with food safety. During a raw milk symposium in Madison, WI this year I spoke to retired pathologist/MD Ted Beals. At the symposium, I heard and spoke to Ted. He has compiled perhaps the largest database in the U.S. of all cases of alleged food poisoning from raw and pasteurized dairy products. If the evidence made it likely, not necessarily certain, that a raw milk product caused food-borne illness he considered it to have done so. Based on these numbers, he calculated that the chances that one would get food poisoning from raw milk was 1 chance in 20,000 per year versus 1 chance in 4 from all the conventional food sold in the U.S. The latter figure is from the CDC. He also figured that you were more likely to be injured driving to pick up your raw milk, than from drinking the milk itself!

Don't destroy the health of the American people and drive this country into bankruptcy. Raw dairy products from healthy cows is far superior to conventional pasteurized dairy products, an inconvenient truth, spelled out in the book "The Untold Story of Milk," by Ron Schmid, ND. At least, give your committee the extra time it needs to educate itself on the issues before voting to put more farmers out of business.

1
Yours truly,
Gary Cohen, Ph.D.