

2777

Cooper, Kathy

From: Miller, Sarah E.
Sent: Tuesday, October 05, 2010 9:09 AM
To: IRRC
Subject: Fw: IRRC Website - New Message

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IRRC

2010 OCT -5 A 9 20

Not form letter

From: Independent Regulatory Review Commission [mailto:No-Reply@irrc.state.pa.us]
Sent: Tuesday, October 05, 2010 09:02 AM
To: Help
Subject: IRRC Website - New Message



IRRC

Independent Regulatory Review Commission

A new message has arrived from the IRRC Website

First Name: Gene'

Last Name: Walls

Company:

Email: hands4healinghands2@yahoo.com

Subject: Disapprove proposed regulation #2777 Dept of Ag 2-160

Message:

As a frequent visitor to Pennsylvania, I respectfully submit the following comments. PDA's own website boasts that the agency "encourages, protects and promotes agriculture and related industries throughout the commonwealth while providing consumer protection through inspection services that impact the health and financial security of Pennsylvania's citizens." If this were wholeheartedly the case, PDA employees would not work so hard to put raw milk producers out of business. On one hand the agency is busy licensing producers yet on the other hand, it is generating onerous regulations that hinder their growth and reduce financial viability--essentially making laws that force otherwise law-abiding citizens to rebel. In particular, the new proposed regulations that impact raw milk production are simply posed under the guise of protecting public health. There are foods and processes that are a far greater threat to public health in PA, yet the department is focusing on an insignificant (if any) source of potential food safety issues. Moreover, the "sanitation" requirements are process-oriented and more likely to cause problems than to prevent them. Beyond that, the requirements are economically restrictive especially at a time with the conventional dairy prices are barely covering farm production costs. PDA as a servant of PA citizens, not elected officials, should advise producers what standards to meet rather than dictating HOW to meet those standards. Any mathematician knows there are a multitude of right ways to achieve the right answer. PDA should not restrict farmer creativity by its own one-size-fits-all approach, process-oriented approach. Why should a farmer go to the expense of additional construction when what has been occurring has been working fine? Why should farmers not be able to offer consumers (who seek them out) the ability to provide single-service containers on-site to consumers wanting to purchase them and

then obtain raw milk? Why should Amish producers' hands be tied, simply because they do not have enough rooms to do things the way PDA says it should be done, when what they have been doing is working just fine? I visit Pennsylvania often and enjoy purchasing milk both at the stores and at the farms. Am I supposed to fly into PA with my own empty jugs so I can get the coveted raw milk I seek during my stay in PA? PDA needs not to do as our Congressional leaders often do, making proposed laws so broad and overloaded with multiple issues that collateral damage results in passing most any bill into law. PDA needs to keep its refinement of regulations simple and targeted, offering proposed changes per section instead of a broad swath. I respectfully request that you vote to DISAPPROVE proposed regulation #2777 Department of Agriculture 2-160. Ask PDA to go back and submit proposals for each section and not try to push controversial changes buried in broad proposals. With 136 licensed raw dairy farms and 40 applications pending, these proposed regulation if approved will have far-reaching effect. The proposed requirements could disqualify many existing raw milk producers as well aspiring one. I implore you as Commissioners, to step up to protect the financial security of PA citizens since PDA refuses to do so itself. Thank you for your consideration. Gene' Walls, LMT FL # MA47820 8026 Midnight Pass Rd Sarasota, FL 34242 941-349-4984 hands4healinghands2@yahoo.com