

Cooper, Kathy

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From: Jane Bollinger [janebollinger05@verizon.net]
Sent: Tuesday, October 05, 2010 9:05 AM
To: IRRC
Subject: Raw milk regulations comments for IRRC meeting

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IRRC

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Dear Sirs:

I am writing you regarding IRRC's October 7 meeting regarding proposed new raw milk regulations.

More and more Pennsylvanians (myself included) want to drink raw milk for the health benefits. In fact, as a child in Pennsylvania, I grew up drinking raw milk and never knew anyone to get sick from the practice. In today's world, however, I have been frustrated by the lack of sources for raw milk in my community, which I believe is due to the regulatory obstacles dairy farmers face. Now, new rules are under consideration that will make it more even difficult for dairy farmers to sell raw milk, even at a time when there is rising consumer demand for it.

While I understand that newly proposed raw milk regulations are aimed at protecting people's health, I feel that some of these proposed changes, especially regarding increased laboratory testing (with increased cost to farmers and increased chances for false positive readings) and also especially regarding new packaging rules, will be so burdensome on small family farmers as to make it nearly impossible for them to comply not only with the rules, but also with the costs of implementing and following the rules.

Section 59a.410, which requires the farmer to have a separate room (or rooms) and mechanized systems for filling and capping, needs to be reworked especially to create a safe, common-sense approach to the use of consumer-owned containers. More input from affected dairy farmers is needed, including producers of raw milk cheeses, who may have to construct, at additional cost, additional separate rooms for packaging and storing cheeses.

Additionally, I believe that Amish and Old Line Mennonite dairy farmers have not been given adequate chance to participate in the rule-making process given their inability to use online, computerized methods to receive information and to send communications. (By the way, the milk I grew up drinking as a child came from just such a Mennonite farm, so I have real understanding of the limitations their religion places on their ability to interact with modern regulatory agencies.)

I urge that the proposed "final" regulations to be discussed at this week's IRRC meeting be withdrawn to enable an additional comment period by affected parties in the months ahead. Barring that, I urge IRRC to reject the proposals as presently drafted, to give time for additional changes to the regulations to be considered and the proposed regulations to be rewritten to address farmers' and consumers' concerns.

In summary, farmers and consumers need the opportunity for more input and collaboration in the process of writing these proposed new rules.

Please do not push through these new rules this week!

Sincerely,
Jane Bollinger (raw milk drinker)