

2777



Shomper, Kris

From: Jane Davenport [janepdavenport@gmail.com]
Sent: Tuesday, October 05, 2010 8:41 AM
To: IRRC
Subject: opposition to proposed regulation #2777 re: raw milk dairies

To Whom It May Concern:

I am a raw milk consumer and 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 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 as excessive, and in some cases onerous and unnecessary. These flaws warrant that the proposed regulation be rejected.

In addition, I would like to point out that if there is any sub-group of dairies that needs regulating for better consumer protection, you would do well to focus more of your attention on the small farms that rely on pasteurization to kill pathogens in their cows' milk, pathogens guaranteed to be present under the appalling conditions the farmers raise and milk their cows in. I drive along Route 11 from Carlisle to Newville, and would never trust the milk from some of those farms, even when pasteurized, as pasteurization cannot guarantee clean and healthy milk. I would rather pay a premium for raw milk from family farms such as The Family Cow in Chambersburg, which goes above and beyond health and safety standards to ensure clean grazing, clean milking, and clean bottling conditions.

Sincerely,

Jane McClintock