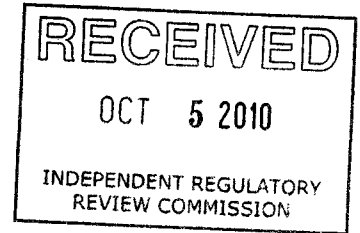


2777

Shomper, Kris

From: Jerry Silberman [ajs805phila@verizon.net]
Sent: Tuesday, October 05, 2010 5:52 AM
To: IRRC
Subject: Regarding proposed Regulation 2777 Dept. of Agriculture 2-160



Dear IRRC,

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 from whom I buy raw milk. I know that his milk is produced at a standard of health and cleanliness both because I see the milking barn and milk room on every visit, and because he has shared with me the tests of his milk which show vanishingly low levels of bacteria, far below the regulatory standard.

The proposed regulations would impose costs on this dairy which would threaten its existence, or force huge increases in the price of milk,

but could not in any way increase the safety of the milk which is guaranteed by the commitment of the farmer and the access of myself, and other customers to his operation.

If a raw milk dairy failed to meet such standards, or provided 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. 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.

Signed

Jerry Silberman
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