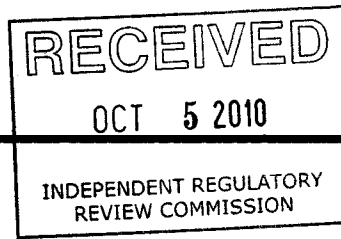


2777



Shomper, Kris

From: Jim Roberts [jimtroberts@gmail.com]
Sent: Tuesday, October 05, 2010 7:02 AM
To: IRRC
Subject: Disapprove regulation #2777 - Small farms are the most effective food supply safety net - we need more not less

My name is Jim Roberts, I am a raw milk consumer and I respectfully request that you reject proposed regulation #2777 Department of Agriculture 2-160: Milk Sanitation.

Small family farms are the best anti-terrorism tools we have available. It is only a matter of time before the terrorist attack our food system. The more diverse it is geographically, will be our survival. Example in point is the recent egg production problem. Two mega eggs producers impacted a huge number of states. Just consider the impact if we only have a few mega dairies and a dangerous agent was introduced to their production even in a proper capped bottle.

The last thing we need is further unnecessary growth in the government. You don't seem to understand the direction our country is going. Wait for November 3rd and allow us to help you fully understand.

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.

Signed
Jim Roberts