

2777

Shomper, Kris

From: Keir Skiles [keirski@verizon.net]
Sent: Monday, October 04, 2010 9:13 PM
To: IRRRC
Subject: #2777 proposed regulation

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

I view the proposed regulation as excessive, and in some cases onerous and unnecessary. These flaws warrant that the proposed regulation be rejected. I really urge you to reject this proposal because my and my family's health have been greatly improved because of raw milk. We have been consuming raw milk for over 7 years (both goat and cow milk). We have had less illness, not more, due to the raw milk from a variety of producers in Pennsylvania. Please do not deter this great product from being produced by implementing these restrictions where they are not needed. I greatly fear that such an implementation will lower the overall food quality that I can obtain for my family from a state that is know for producing quality farm products. I have heard of no 'outbreaks' from current raw milk producers, but I have heard of many illnesses and death from larger corporate agribusiness these past few years in particular.

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. This can be seen in many areas dealing with e.coli outbreaks that have occured in the last year throughout the U.S. 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. Thank you for you kind consideration in this matter.

Sincerely,

John K. Skiles