## Shomper, Kris

From:

Lir Alex [lir\_alex@yahoo.com]

Sent: To:

Tuesday, October 05, 2010 2:08 AM

**IRRC** 

Subject:

INDEPENDENT REGULATORY REVIEW COMMISSION

Please reject proposed regulation #2777 Department of Agriculture 2-160: Milk Sanitation

My name is Lisa Ryan, I am a registered voter in Pittsburgh, PA, and I am writing to ask that you reject proposed regulation #2777 Department of Agriculture 2-160: Milk Sanitation.

I purchase raw milk from farms in my area currently, and ideally would love the freedom to purchase milk from anyone who had a dairy cow. I am educated about the risks of raw milk, the types of bacteria that can cause disease, and the steps farmers must take to eliminate fecal (or other) contamination during milking, bottling, or other handling. Still, I believe that the benefits of raw milk outweigh the risks, so I purchase and consume it regularly from farmers I trust who are permitted to sell raw milk.

I do a lot of due diligence on any farms with which I do business, and will not purchase their food until I've satisfied myself of its quality and their proper farming and processing practices. I do not need nor want any government regulation of raw milk at all, but trust in my relationship with the farmers with which I do business, and my ability to "vote with my pocketbook" to sanction any farmers that do not meet healthful standards.

In this very difficult economy, mandating that any farmer selling raw milk needs to incur substantial extra testing costs / purchase additional testing equipment is unnecessarily onerous for the farmers. It may end up driving some of them out of business, but at least it will cause prices to go up. It will add unnecessary costs to the farmers selling raw milk, a product very much in demand and very popular with its consumers, despite having negligible cost-savings in terms of lawsuits and governmental costs.

- No significant decrease in legal costs: This regulation would result in only a "very small" decrease in risk of "milk-related food borne illness outbreaks" and therefore only save only a small amount of money "associated with a reduction in lawsuits and legal claims". "These savings are not quantifiable."
- No decrease in local government costs: From the proposed regulation: "the regulation is not expected to result in any ... costs or savings" (to the local governments).

This regulation, in its own words, proposes to change a process for the sake of increased safety, but admits that "risk reduction would be very small", and that "the regulation is not expected to result in any ... costs or savings" to the government, but quantifies a great deal of cost (section 15, etc.) to the raw milk producer. This regulation will be expensive for little or no gain, and as such should be rejected.

There is not a need for additional regulation in this matter, and so I respectfully request that you not only reject proposed regulation #2777 Department of Agriculture 2-160: Milk Sanitation, but that you do not propose any new regulation on raw milk production in Pennsylvania in its place.

Sincerely,

Lisa I. Ryan 132 1st St. Apt #2 Blawnox, PA 15238 lir alex@yahoo.com