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To Whom it May Concern:

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2010 OCT 5 AM 9:21
As a dairy farmer and raw milk and raw cheese permit holder, I would like to offer several comments regarding the proposed changes in the Milk Sanitation regulations that are coming before the Independent Regulatory Review Commission on Thursday.

I appreciate the hours of work that have gone into preparing a document of this magnitude and respect the sincere concern for protecting our food supply. However, I also have some deep concerns about the regulations as proposed.

I am alarmed to see that single use containers are no longer permitted for sales at the farm in lieu of the customer bringing their own container. I've seen the containers customers bring and know with out a doubt that the interests of food safety will be far better served with single use containers provided by the farmer.

It will be a challenge to meet the requirements for facilities to package raw milk and cheese for most farmers. The additional rooms as required in the proposed documents will be costly and, in many cases, prohibitive. I am also having a hard time coming up with the logic that must be behind those requirements in regards to improved food safety. I would especially be interested in the reasoning behind a separate packaging area for raw milk cheeses.

The additional costs for pathogen testing will be a burden for the consumers. I don't know of any farmer selling raw milk that will be able to absorb those costs but will pass them on to the consumers.

The new language substituting *drugs* for *growth inhibitors* is rather vague. I would be more helpful to include a list of drugs that will be tested for. The added costs for these tests will be yet another cost passed along to the consumers.

Although I would hope to keep emotions out of the discussion, it is impossible to discount the non tangible effect these changes may have on the dairy farming community and as a result, the public. Raw milk/cheese permits have been part of the survival tools for a subset of dairy farmers and the sales of raw milk and cheeses serve a growing market of consumers interested in more natural, unadulterated foods. These small farms and the communities they support are a critical part of the fabric and the landscape of Pennsylvania. It would be a loss for everyone to see them regulated out of existence.

At this point in the process, I feel it would be most helpful for the Department of Agriculture to withdraw the proposed regulations for further work. Perhaps there could be face to face discussions with representatives of the various stakeholders, including farmers holding permits for raw milk and raw milk cheeses to further define and refine the regulations. I know that adds time and expense to the process, but would result in a stronger document in the long run. If the Department is not willing to withdraw the proposal, then I would encourage the Independent Regulatory Review Commission to vote the proposal down.

Thank you for your consideration.

Lori Sollenberger
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