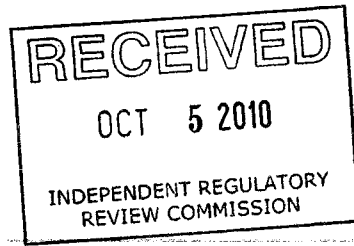


2777

Shomper, Kris

From: Miller, Sarah E.
Sent: Tuesday, October 05, 2010 9:28 AM
To: IRRC
Subject: Fw: IRRC Website - New Message



From: Independent Regulatory Review Commission [mailto:No-Reply@irrc.state.pa.us]
Sent: Tuesday, October 05, 2010 09:17 AM
To: Help
Subject: IRRC Website - New Message



IRRC

Independent Regulatory Review Commission

A new message has arrived from the IRRC Website

First Name: Martin

Last Name: Boksenbaum

Company:

Email: mwb-jg@fast.net

Subject: #2777 Department of Agriculture 2-160: Milk Sanitation

Message:

As I am a raw milk consumer who wants to protect my access to this healthful food, I respectfully request that you reject proposed regulation #2777 Department of Agriculture 2-160: Milk Sanitation. It threatens my access to this wonderful product. The proposed regulation adds additional hurdles and costs to raw milk producers under the guise of public health and safety, some problematic enough to possibly put some of these small farmers out of business. 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.