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Pennsylvania Independent Consumers and Farmers Association, Inc.

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Protecting the farmer-consumer relationship in Pennsylvania, the state of independence. ©

To: Pennsylvania Department of Agriculture (PDA)
Bureau of Food Safety
Division of Milk Sanitation

Attn: William Chiridon; Paul Hoge

To: Independent Regulatory Review Commission (IRRC)

From: Hannah Smith, Executive Director
Pennsylvania Independent Consumers and Farmers Association, Inc. (PICFA, Inc.)

Date: October 4, 2010

Re: PA Department of Agriculture Final Regulation #2-160 (IRRC #2777): "Milk Sanitation"

To Whom It May Concern:

Please find below our association's recommendations and comments regarding the most recent draft of the new Milk Sanitation regulations due to be reviewed at the October 7, 2010 IRRC meeting.

The membership of the Pennsylvania Independent Consumers and Farmers Association, Inc. (PICFA, Inc.) - primarily comprised of farmers and consumers involved in raw milk trade - its board, and staff, recommend the PDA withdraw the proposed new Milk Sanitation regulations. Should the PDA not withdraw the proposed regulations, PICFA, Inc. recommends the IRRC reject the most recent draft.

Putting aside for now our association's position that any regulation of direct farm-to-consumer sales of raw milk is unnecessarily burdensome to small farmers whose personal relationships with consumers, rather than regulations, are our best assurance for safe trade of raw milk, **PICFA, Inc. stands in support of fellow associations**, such as the Pennsylvania Association for Sustainable Agriculture (PASA), **in expressing deep concern over the lack of sufficient opportunity for farmers to provide input for these proposed regulatory changes.** Additionally, **we express equally deep concern for the likely significant cost increase of raw milk for our consumer members** as a result of farmers carrying a much greater financial burden for testing and physical space requirements.

End.

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Shomper, Kris

From: PICFA [info@picfa.org]
Sent: Monday, October 04, 2010 9:35 PM
To: IRRC; wchirdon@state.pa.us; phoge@state.pa.us
Subject: Comments re Milk Sanitation regulations
Attachments: PICFA Milk Sanitation Regs Comments to PDA and IRRC - Hannah Smith.pdf

To Whom It May Concern:

Please find attached our association's comments regarding the proposed Milk Sanitation regulations in advance of the October 7, 2010 meeting on the subject.

Sincerely,
Hannah Smith, Executive Director
PA Independent Consumers and Farmers Assoc, Inc.

Please note: This is the only official comment being submitted by the Pennsylvania Independent Consumers and Farmers Association, Inc. regarding the proposed "final draft" of the Milk Sanitation regulations. Any other comments submitted under the auspices of PICFA should be considered unofficial and have been inappropriately attributed to the Association.

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