I am Kim Seeley, dairy farmer and dairy permit holder for Milky Way Farms since 1962. I am also the President of the Board of Directors of PASA. I am not glad to be here today because it meant that my fellow dairy farmer from Northern Pa. and I, had to drive 3.5 hours to get here and we both had to start chores early. However, I am glad that the IRRC has given us a chance to be here to voice our opposition to these unfairly proposed regulations. This process is our only hope of stopping regulations created, without appropriate representation. The amount of letters on the public record and the number of people here today should help you make your decision about voting these proposals down.

We dairy farmers are an endangered part of Pennsylvania's landscape. Pennsylvania's' dairy industry is in trouble right now and it seems like there is no one coming to our rescue. I find it worthy to note that PDA had made a point that we need to tighten up raw milk regulations because of the large increase in raw milk permits in the last few years. Let me tell you about Creameries like mine that have been vanishing over the past 30 years, because of over regulation and under profitability. There used to be over 300, small scale, on farm processors in the 1970's. Today there are less than 20. The same thing is true for small, USDA meat plants. Our state is economically weaker as a result. Consolidation has not given us safety, which is why we stand up today to demand justice.

This huge loss of Pennsylvania infrastructure has not improved food safety. We have more large food recalls than ever before. Consolidation of our food supply is not in the best interest of our children's future. It is not true what you have read in these regulations, about small processors and large processors being equal food safety risks. Small on farm processors have to look their customers in the eye every day. My father always said his most important inspectors were the customers who came through the front door every day and paid to keep us in business, not the ones who tried to put us out of business over ridiculous rules and regulations written by someone in an office pretending to know what really goes on a farm. Food safety is not size neutral. Small scale food processors spread out risk and add diversity to our state.

These documents have understated the actual costs to farmers. There is much speculation and very little accurate financial representation. These numbers could have actually been procured by talking and working, with actual long time permit holders, like myself.

The need for these regulations also is not being statistically proven. The language makes note that there have been many changes in Dairy Science since 1985 causing great risk. However no where in the document is it documented how many people have actually been confirmed ill due to having consumed raw milk products, since 1985.

The addition of these new rules right now jeopardizes any new farmers attempting to get into the business. These rules have been looked at from a very narrow view. The proposals in front of you today have not been fairly negotiated among those of us who actually know the hard knocks of dairy farming and on farm processing. These changes show the arrogance and attitudes of regulators, who are more concerned with helping milk leave Pennsylvania to national processors, than helping Pennsylvania farmers stay in business or grow.

I stand here today speaking on behalf of many dairy farmers who have contacted me and said can't you do something to help us. I have also been in contact with countless other related dairy service providers this past year. I have heard over and over the same story. Who will stand up for us against the lack of common sense and common courtesy with PDA? These past weeks I have been communicating to my hundreds of customers about what these rules might mean. My customers stand with me here today as well.

This injustice must be stopped. If it isn't I want to go on record that this will be the beginning of a period of civil disobedience among honest hard working dairy farmers willing to stand up for their families. When there is no milk in our coolers our customers will stand up as well. They are ready and willing to contact the Governor. Please do the right thing.

Thank you for this democratic opportunity to tell our story.