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INDEPENDENT REGULATORY
REVIEW COMMISSION

New York, September 1, 2009

Pennsylvania Department of Agriculture
Bureau of Food Safety
Division of Milk Sanitation
2301 North Cameron Street

Harrisburg, Pennsylvania 17110-9408

Attention: Paul Hoge

I urge PDA to make the following changes to the proposed regulations:

- Exempt direct transactions from the producer to the consumer from the regulations
- Direct farm-to-consumer transactions in raw milk and other farm products have been a boon to the Pennsylvania economy. Improving access to raw milk will improve Pennsylvania's economy!
- For non-Pennsylvania residents: Note that you bring money into the Pennsylvania economy by buying from Pennsylvania farmers
- Direct transactions between the producer and the consumer do not impact the "public's" health, safety or welfare and are purely private in nature. I joined CARE to protect both myself as a consumer and my farmers as producers. Having safe access to fresh raw milk for less than a year reversed completely my almost osteoporosis-level bone density scans. My doctors were stunned when they looked at the numbers. I took no medicine and no calcium supplement - just raw dairy, and it's safe.
- States that allow the unlicensed sale of raw milk direct from farmer to consumer have a good track record for food safety. But I appreciate certification processes and orgs. like CARE as long as the non-industrial scale farmers aren't overburdened.
- * Testing "for pathogens" should actually be testing for "pathogens that cause illness in humans"
 1. Not all "pathogens" cause illness in humans
 2. It is not reasonable to use state resources to test for things that don't cause illness in people and that therefore pose no public health threat
 3. Shutting down a farmer for something that poses no human health risk hurts the farmer, the consumers, and the local economy.

Thank you for considering the above when considering the proposed regulations.

Sincerely,

cc PA Ind. Reg. Rev. Commission

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