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Pennsylvania Dept of Agriculture
Bureau of Food Safety, Division of Milk Sanitation
230 North Cameron St.
Harrisburg, PA 17110-9408

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Mr. Hogue

It's about time the Dept. of Agriculture in this keystone Ag state took the pulse of where the future economic viability rests for Pennsylvania's dairy farm families.

Pennsylvania is both an "urban" commonwealth with 12 million citizens and a very "rural" state consisting of more decentralized, small towns, villages and boroughs than any other state in the union. Thus, the obvious solution to this (yet another) dairy farm debacle is for the academic and governmental institutions to forge ahead, rapidly, creatively and assertively to create a new generation of cooperative alliances that allow our 12 million eaters, (a.k.a customers) to be able to purchase locally produced foods. This includes raw milk from healthy farms throughout our countryside. Clearly, direct sales to customers by farmers through raw milk and other farm products are substantially more profitable to the dairy industry (including the infrastructure supported by the dairy industry) than what current, conventional options provide. It is an outrage that 80% of the milk in the country is handled by milk cooperatives who were allowed to exist thanks to the Capper-Volstead Act, exempting cooperatives from the anti-trust laws so that they could organize and price milk equitably at the farm gate. They have completely failed their membership blaming "supply & demand", free trade, "inefficient" farmers (over 90% out of business since 1960!), etc. when a fair cost of living milk price was/is within their ability to achieve.

The Pennsylvania economy is a direct beneficiary of direct sales of raw milk, and raw milk sales deserve an exemption from these proposed regulations. Relationships between farmers and consumers, especially when these farmers are providing a mission statement, are self policing, self inspecting, self testing via lab verification, as many are now doing, provides more accountability and traceability than any government agency and its legion of regulations can provide. The failed industrial food system, with all of its recalls, sickness and death is a testament to such a fiasco. CDC counts 5,000 deaths, 300,000 hospitalizations and millions of reported illnesses annually that originate from our "Fast Food Nation", not Farmer Brown selling his own raw milk, yogurt, butter, cheeses and eggs. And yet, this rapidly growing local foods movement countrywide is still a primary target of state regulators and FDA, apparently because the local fresh foods movement does not have the lobbyists in Harrisburg, or D.C. that Kraft, Dean, Tyson, IBP, Cargill, ADM and Monsanto have.

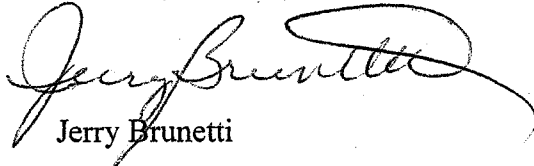
These transactions between local farms and their thousands of clients are private contracts between producers and patrons and have no business being compared to a major concern like a Hood, or Dean as being the same kind of "person", subject to the same oversight, regulations and especially constraints. Good farmers know that their need to consistently produce a healthy, safe, tasty product is not only their best assurance of a sustainable business... it is their only assurance of business longevity.

Let's move into an honest 21st century of laboratory excellence. Enough of the "false positives"; enough calling certain strains of bacteria "pathogens" when in fact they do not cause human illness, thus can't be a human health concern. Publicizing these non-events are bad enough-closing down the farmer on top of it all is catastrophic not only to that farm family, but the local economy as well.

I would propose that the items that PDA doesn't test for such as fat soluble vitamins A, D, E, K, Omega 3 and CLA fats, amino acid profiles, carotenoid pigments such as beta carotene, lutein, zeaxanthin, etc. have a whole lot more health consequences upon consumers not getting these "nutri-ceuticals" than bacterial suspects that are not actual disease-causing organisms and which do not pose a public health threat.

Take the high road here, for the sake of our invaluable dairy industry, the Pennsylvania economy and the health and enjoyment of millions of Pennsylvanian patrons who both need and want these healthy foodstuffs.

Sincerely



Jerry Brunetti