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Pennsylvania Department of Agriculture
Bureau of Food Safety
Division of Milk Sanitation
2301 North Cameron Street
Harrisburg, Pennsylvania 17110-9408
Attention: Paul Hoge

INDEPENDENT REGULATORY
REVIEW COMMISSION

2 September 2009

Dear Mr. Paul Hoge,

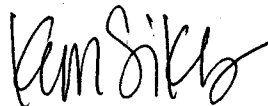
I'm writing to you in regards to the proposed revisions of the current Milk Sanitation regulations at 7 Pa. Code Chapter 59a.

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

1. Exempt direct transactions from the producer to the consumer from the regulations.
 - o Direct farm-to-consumer transactions, in and out of state, 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.
 - o Direct transactions between the producer and the consumer do not impact the "public's" health, safety or welfare and are purely private in nature.
 - o States that allow the unlicensed sale of raw milk direct from farmer to consumer have a good track record for food safety.
2. Specify that the testing "for pathogens" should actually be testing for "pathogens that cause illness in humans".
 - o Not all "pathogens" cause illness in humans.
 - o It is unreasonable to use state resources to test for things that don't cause illness in people and therefore pose no public health threat.
 - o Shutting down a farmer for something that poses no human health risk hurts the farmer, the consumers, and the local economy.

Thank you for taking the time to consider my comments.

Sincerely,



Kim Sikes

cc. Pennsylvania Independent Regulatory Review Commission
Senator Mark Warner
Senator Jim Webb
Congressman Gerry Connolly