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September 9, 2009

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2009 SEP 14 AM 10:07
INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Paul:

Thank you for the time you have spent in putting together our proposed Pennsylvania Milk Sanitation regulations document. There was a lot of work involved by you and your committee in reviewing the current Chap 59 document, updated regulations, and comparing with the Federal Grade "A" PMO. All documents are long and the existing PA document is obviously very outdated and cumbersome to review and has been difficult to understand. The proposed changes you and the Department have made to this document in the form of the proposed Chapter 59a, should be very helpful from an educational perspective for the entire industry.

I just found out about the changes to the milk sanitation regulations recently and am making the time over the next few weeks to review the proposed document (Chap 59a) from an educational perspective. I hope these suggestions will be helpful to you. At this time, I plan to go carefully through the entire document although at this point have just gotten through Subchapter A ☺. This letter provides some suggested changes for just that section. I hope to follow this letter with suggested changes to other subchapters over the next few weeks.

Educational and grammatical suggestions for Subchapter A of Chapter 59a:

1. **3-A Sanitary Standards** – change the word 'promulgated' to 'prepared'
2. **Canned milk** – this term seems out of place; why is it included as a separate term? Is there something special or confusing about this term that it needs to be included in the PA regulations? (Note: not included in Chapter 59 standards or Grade "A" PMO (2007)).
3. **Certified Milk Inspector** – The last sentence does not make sense to me: 'A **certified industry inspector** is the equivalent of a "**certified industry inspector**" for purposes of **conducting certified industry inspections** described in the Grade "A" PMO
4. **Dairy Farm** -
 - a. Grammar change: 'of' to 'or' between part and all
 - b. What about goats, sheep? – proposed definition only refers to cows
 - c. I prefer the way the PMO '07 defines a dairy farm in terms of animals although recognize the need in PA definitions due to 'raw milk for human consumption' and transfer of product to clarify transfer of milk off the farm in the updated version
5. **Department** – The existing definition in Chap 59 more clearly defines the state of Pennsylvania vs. Commonwealth which may relate to other Commonwealths
6. **Grade "A" PMO** – It would be helpful to provide a more specific link to the specific site or web page. I've found it difficult to find items once you get to the general department web site. Maybe at least refer folks to the general milk sanitation section of PDA
7. **Growth Inhibitor** – Grammatical change: change 'A' back to 'any' or to 'an'
8. **HACCP** – refer folks to the PMO '07 definitions for greater detail?

9. **HTST** – I question whether 'High Temperature short time' is actually a definition and there is no further explanation within the Grade "A" PMO ('07); if no definition is considered needed, should it be included?
10. **MILK** – just a comment – this definition seems to be different than PMO '07 which doesn't define MILK but Goat Milk and Sheep Milk. The new definition proposed in PA defines **Milk** to mean the same as **MILK PRODUCTS** in the PMO '07 and a fluid subset of the term **MILK PRODUCTS** in the proposed Chap 59a. The new definition for MILK seems confusing to me despite understanding the PMO is regulation for Pasteurized Milk and PA regulations include regulations for Raw milk for human consumption as well.
11. **MILK PLANT or PLANT** – does this definition only apply to a place from which milk is sold or also one where milk is transferred or distributed (w/o 'sale')?
12. **Official Laboratory** – should 'under the direct supervision' of the Department be further explained here?
13. **PMO-defined milk products** – I still don't understand the differences here between MILK, MILK PRODUCTS and PMO-defined milk products
14. **Raw milk** – I prefer the use of 'raw milk for human consumption' to refer to non-pasteurized milk and milk for manufacturing purposes. I think the department is working toward use of 'raw milk' to mean non-pasteurized milk and not to reflect milk before it goes for pasteurization. Regardless of intention, I think that raw milk by itself is confusing and needs to be defined as 'Raw milk for human consumption' to reflect milk that will be sold or otherwise transferred w/o the intention of pasteurization and 'Raw milk for later pasteurization' to reflect the rest of milk. Otherwise I think we'll all be confused and always need to clarify to which we are referring.
15. Beneath the definitions there is a (b)... and (c). Maybe this will make more sense in the final document. I understand the (a) is used initially for Terms.

Thanks Paul for considering these suggestions to the proposed Chap 59a Subsection A.

Sincerely:

Sandy

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