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Loren & Anna Weaver
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RECEIVED

To: Pa Department of Agriculture
From: Loren Weaver, Hope Springs Farm, East Earl, PA
Re: Proposed changes to Milk Sanitation Regulations

SEP 15 AM 9:37
INDEPENDENT REGULATORY
REVIEW COMMISSION

Thank you for extending the public comment period. I thought it would have been considerate also to give a brief summary of the proposed changes in your hearing notification letter, as many of us do not use the Internet.

As a raw milk permit holder, only one of the proposed changes really concerns me. That is requiring the permit holders to pay for human pathogen testing. Besides soaking up ~~up~~ 3-4% of my milk income, who will own the test results? If test results are sent directly to PDA, what happens with a positive test? Will PDA immediately notify the media, who trumps up the report, warning everyone about this awful dangerous raw milk! In this way the farmer is penalized with his own hard earned money!

If this change is enacted, let the farmer post the test results beside the water test, for the sanitarian to check on his routine inspections.

But really, testing raw milk for human pathogens does not stand up to reason. Let me explain. By the time test results are returned from the lab, the tested milk is already consumed or processed. If that milk is really unsafe, the users are going to be sick before the lab says it's unsafe. It seems a lot like scanning yesterdays newspaper ~~xxxxxxxixixixixsafe~~ for fatal traffic accidents, to see if it's safe to travel on the road today!

Milk safety is a lot like road safety, come to think of it. For traveling to be safe, we need safe roads, (sensible dairy hygiene) traffic police, (third party farm inspections) traffic laws, (Quality standards). But most of all we need safe drivers (strong individual immunity)! To pretend that pasteurized milk is safe and raw milk is dangerous is to deny the role of bacteria in our wellbeing. Our immune system needs to be challenged to be effective. Sterilizing our food and environment only makes us very vulnerable to every ~~bacteria~~ ^{healthy} bacteria and virus we meet. What better way to keep the immune system ^{healthy} than to use lots of dairy products, RAW!

So I would recommend that you drop pathogen testing requirements, especially not saddle us farmers with this illogical expense. And while you're making changes, please drop the TB and Brucellosis testing requirements. It's a lot like searching the Atlantic ocean for pirates before traveling on the road. PA is, after all, free of these diseases, right?

I also recommend allowing and promoting farm to consumer sales of raw butter, yogurt, kefir and fresh cheese. Outlawing these products is working much like outlawing liquor, It only makes for a brisk black market trade!

Yes, do update the PA Milk Sanitation Standards, and take this wonderful opportunity to show that you really do have us farmers' best interests at heart!

Sincerely,
Loren Weaver