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**From:** vredpath@aol.com  
**Sent:** Monday, September 28, 2009 2:25 PM  
**To:** phoge@state.pa.us  
**Cc:** IRRRC; susan@pasafarming.org; stbarclay13@verizon.net  
**Subject:** A consumer's response: PASA summation of concerns re PDA milk handling rules/changes

**To:** Pennsylvania Department of Agriculture (PDA)  
Bureau of Food Safety  
Division of Milk Sanitation  
2301 North Cameron Street  
& nbsp; Harrisburg, PA 17110-9408

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2009 SEP 28 PM 2:28  
INDEPENDENT REGULATORY  
FARMER COMMISSION

Attention: Paul Hoge

Dear Mr. Hoge:

I am a consumer of milk from local dairies. I am a food journalist. I am a Slow Food leader and regional governor. I am a PASA member. I am particularly interested in the expansion of small local dairy operations as a source of quality milk.

I greatly appreciate the growing number of choices of milk from small W. Pennsylvania dairies in my area.

I like the idea that milk from these dairies is usually single-herd and not commingled with huge quantities of milk from other dairies. To me, this is a plus both for traceability and for tasting the characteristics of the milk. I like particularly that the animals are truly pastured, thus likely to be as healthy as possible and to give milk that may pass on healthful components. I like that these dairies do not use added bovine growth hormone and do not use antibiotics preventatively.

I like that I know these dairymen and women.

I regularly purchase both raw and pasteurized cow's milk from five of these small local dairies and occasionally local goat milk too.

< div class="MsoNormal" style="margin-left:48.0pt;mso-pagination:none;mso-layout-grid-align: one;text-autospace:none"> I have been following-- from a consumer viewpoint-- the areas where PDA rules on milk handling impact these local dairies that supply the milk that my family and I seek out to drink.

I received PASA's summation of its response to the PDA on this matter.

< span class="Apple-style-span" style="font-size: medium;">Below are the three areas that I would endorse particularly. They have to do with  
--costly extra testing,

--penalties regarding bacteria count for raw milk permit holders  
--appropriate and fair publicity regarding alleged problems, most important, here, follow-up when a perceived threat to public health has been resolved.

Exerpted and bolded from the summation:

...we feel that PDA should consider anywhere else in the proposed regulations where **farmers whose primary markets are direct to the public, with appropriate labeling, and/or those whose operations have been certified by independent third parties, should be relieved from costly extra testing or unnecessary repetitive procedures.**

... §59a.409(a)(2) states that “If three of the last five tested raw milk samples exceed the bacterial count, somatic cell count or coliform count standards or cooling temperature requirements described in §59a.408, the Department will proceed to revoke or suspend the raw milk permit, and the raw milk permitholder shall be subject to summary criminal prosecution under the act.” **Taken literally, this means that a farmer can be put in jail for failing a milk test, and one begins to wonder where the facilitated partnership highlighted in the *Purpose* has gone.**

< o:p>

As this has been a very problematic area of concern in the past, particularly when public notices appear upon discovery of an alleged problem, and **without corresponding coverage if the problem is later resolved or found not to be credible**, we propose that some **clear guidelines** be made explicit. In particular, we believe it is **incumbent on PDA to make an extra effort, on behalf of the farmer involved, to overcome the tendency of the press to only cover the more flamboyant statement of a problem – as opposed to its resolution – and to get the word out with any means possible whenever a perceived threat to the public has been resolved.**

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Sincerely,  
Virginia Phillips

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