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**From:** Patricia O'Leary [PSOLEary@msn.com]  
**Sent:** Tuesday, September 29, 2009 1:20 PM  
**To:** phoge@state.pa.us  
**Cc:** IRRC  
**Subject:** Re: New Dairy Regulations

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2009 SEP 29 PM 2:48

INDEPENDENT REGULATORY  
TECHNICAL COMMISSION

Dear Mr. Hoge:

With regard to the proposed new dairy regulations, I first would urge you to extend the time limit at least another 30 to 60 days and also hold hearings around the state.

As I purchase dairy products from Amish farmers, I would also urge that hard copies of the regs. be either mailed out or widely publicized in relevant public places for those not online.

With respect to §59a.14(f), For example, I disagree that labeling milk as not containing a substance such as added growth hormone, is false or misleading advertising. We deserve to know what is in our food! That is not rocket science.

§59a.111(a)(1)(i) This reg. is redundant since organic, and other certified or non-chemical farmers are by definition pesticide and drug free.

Farmers should be allowed to use the single use plastic containers with no problem at all. The public would not be coming into that area and no one would have to clean previously used containers. Hopefully we will soon have containers that will self-biodegrade so that we won't have to deal with all that plastic in our landfills and waterways.

§59a.416 With regard to so called "illegally" produced dairy products, consider the following: It is stated that if the Secretary has reason to believe they are unsafe, these products may be seized, condemned, denatured, destroyed or excluded from sale if, and only if, the farmer is not following the provisions of these proposed regulations. Shutting down a farmer for something that poses no human health risk hurts the farmer, the consumers, and the local economy. As an out of state consumer, I support the farmers who produce wonderful healthful dairy products and am willing to come to PA and pay top dollar for them. It is not reasonable to use state resources to test for things that don't cause illness in people and that therefore pose no public health threat.

Testing for pathogens should be confined to those that can affect human health. Above 10 coliform per mil. is not a problem for human consumption or human health and is only another barrier for the raw milk producer. Direct transactions between the producer and the consumer do not impact the "public's" health, safety or welfare and are purely private in nature and those states that allow the unlicensed sale of raw milk direct from farmer to consumer have a very good track record for food safety.

Lastly, if you are truly interested in helping and working for the dairy farmers of PA and supporting them in their efforts in opening new markets and surviving and thriving in this down economy, I strongly urge you to completely exempt those farmers engaged in direct transactions from producer to consumer from the regulations. Till now, I have greatly benefited from the consumption of these healthy products and I would certainly hope to be able to continue in the future.

Sincerely,

Patricia O'Leary  
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