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Date: Sept 30, 2009

Subject: Chapter 59 Comment

From: Glenn Wise

To: ~~PDA~~ PDA Paul M. Hoge, William E. Chirton

I appreciate your desire to update ch. 59. However I have some questions.

1. Why are we testing for pathogens that will die anyway in good quality, no-grain milk? Also till your lab ever gets a test result back to the farmer, the tested batch of milk is already consumed.
2. Why do you expect the farmer to have money to pay for pathogen testing if PDA doesn't have the money to fund the pathogen testing?
3. Why are we testing for coliform twice a month? That test was developed to confirm pasturization, not to ensure safety of raw milk. A coliform count of 1000 still doesn't say that E. coli: O157-H7 is present.
4. Why are we testing for TB and brucellosis? Human TB and bovine TB are not the and are very unlikely to cross. Brucellosis is rare and is easily controlled by nutrition.

I'm spending ~~over~~ close to \$1,000 on testing that has little real value. Why not skip the twice a month testing if you want to do pathogens twice a year. Better yet, here is my proposal.

1. Add a sentence to ch. 59 stating that a farmer may sell raw milk directly to the consumer. Such a farmer is exempted out of ch. 59. Please make that clear in your revision.

2. Change the 1 cow exemption to 25 cows.

Thank you for your consideration of this matter. P.M.H.