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The Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, Pa 17101
October 29, 2010

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Dear IRRC Committee Members,

My name is Robin Breeding and I currently work for Dairy Marketing Services which markets milk from over 8,000 farms in the Northeast, many of which reside in Pennsylvania and whose milk market is regulated under the PMO, Pasteurized Milk Ordinance. This document is a joint effort between the States and FDA to develop a set of regulations for the dairy industry that participate in interstate movement of milk. All farms must comply with these regulations as well as milk plants within each state. Pennsylvania has Chapter 59 which is their set of regulations that equate to the PMO and lets them comply with in the NCIMS, National Conference of Interstate Milk Shippers, program. This compliance is critical to Pennsylvania farms and marketing groups like ours that market milk in many different states and depend on this system to move milk in and out of Pennsylvania to appropriate markets that best benefits those Pennsylvania farms.

Thus we were greatly disappointed to learn that The Independent Regulatory Review Commission did not vote in favor of the recent Chapter 59 update as written. For those thousands of Pennsylvania dairy farms this is essential to keep them part of the NCIMS program and allow they are competitive in the milk industry. I cannot emphasis strongly enough how important this issue is to our industry. I understand that this was stopped by the Raw Milk Regulations that are also a part of Chapter 59. The raw milk standards have been part of Pennsylvania Regulation for years due to the public health concerns that this practice brings forward and I commend the State for being proactive in this matter. Many States simply ban the practice and those that do sell raw milk sell it illegally with absolutely no supervision or regulation and this putting the unknowing public at even more risk.

That being said Chapter 59 and PMO are there to protect the public health of all citizens and Pennsylvania farms need to be a part of NCIMS program. I then would ask that this proposal be passed as rapidly as possible in order to protect all family farms in Pennsylvania.

Sincerely yours,

Robin C. Breeding
Robin C. Breeding
Dairy Marketing Services

CC: Secretary Russell C. Reading