## Pennsylvania Farm Bureau

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September 4, 2018

Dr. Lydia Johnson
Director of Food Safety
Bureau of Food Safety and Laboratory Service
Pennsylvania Department of Agriculture
2301 N. Cameron St.
Harrisburg, PA 17110

SEP - 6 2018
Independent Regulatory



Dear Dr. Johnson:

Pennsylvania Farm Bureau (PFB) is pleased to offer its comments on the Department's proposal to amend its regulations governing milk sanitation (§ 59a.402. Raw Milk; Prohibitions). In particular, Section 59a.402 is proposed to be amended to allow the holder of a raw milk permit to obtain an additional permit from the Department authorizing the manufacture and sale of cheese from raw milk if: 1) the type of cheese that is being produced is a standardized cheese under the federal Food and Drug Administration's (FDA's) standards; and 2) the FDA's standards allow that type of standardized cheese to be produced from raw milk.

PFB is a general farm organization, made up of more than 62,000 members. Since 1950, PFB has provided support, advocacy and informational and professional services for Pennsylvania agriculture and farm families, including those who may produce raw milk and/or cheeses produced from raw milk. PFB concurs with the Department's assertion that the proposed rulemaking will allow manufacturers "...to market a greater variety of raw milk cheeses and able to better compete with counterparts from other states," and that "This proposed rulemaking will also benefit consumers to the extent there will be a wider variety of Pennsylvania-produced raw milk cheeses in the marketplace." For these reasons, PFB welcomes the Department's efforts in this area.

Thank you very much for the opportunity to comment on this document.

Sincerely,

Grant R. Gulibon

Director, Regulatory Affairs

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