

August 29, 2018

Lydia Johnson, Ph.D.  
Director, Bureau of Food Safety and Laboratory Services  
Department of Agriculture  
2301 N. Cameron Street  
Harrisburg, PA 17110-9408



Comment  
# 6

RE: RAW CHEESE COMMENTS

Esteemed Dr. Johnson,

I write to you from Nashville, Tennessee, where I am the Cheese Program Director at Porter Road Butcher. Though I'm not a Pennsylvanian, I follow with great interest the efforts of the Pennsylvania Cheese Guild to encourage a shift in the state's food safety laws with regard to the use of unpasteurized milk in cheese. Despite my geographical distance, this issue is important to me for three reasons. First, I am an advocate of evidence-based regulations regarding cheese safety in general. Second, I wish to support Pennsylvania's artisan cheesemakers, whose efforts express a deep commitment to safety, sustainability, ethics, and quality. Finally, I myself buy and sell Pennsylvania cheese every week, so that which is in the best interests of your state's artisan cheesemakers is in my best interests and the best interests of my customers as well.

I am writing to support the Pennsylvania Cheese Guild's request for amendment to the current state regulation for the production of cheeses using raw milk. Current U.S. federal regulations permit the legal manufacture and importation of raw milk cheese aged for 60 days or longer. The Food and Drug Administration's (FDA's) regulations (at 21 CFR Part 133, Subpart B) are promulgated under authority of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. § 301 et seq.) and establish standardized definitions and requirements for 72 different kinds of cheese. These same Federal regulations allow for 57 of these standardized cheeses to be produced from raw (unpasteurized) milk.

The Pennsylvania Department of Agriculture's current regulation for raw milk cheese is more restrictive than the Federal standards. The proposed regulation would bring Pennsylvania into alignment with FDA standards and allow for the production of cheese from raw milk if: (a) the type of cheese that is being produced is a standardized cheese under FDA's standards; and (b) FDA's standards allow that type of standardized cheese to be produced from raw milk.

Pennsylvania is experiencing a growth in its artisanal cheesemaking community and more certainty and fewer hurdles to enter the marketplace will ensure we encourage revitalization of the rural communities where these cheesemakers are establishing themselves. It is good for consumers and it is good for Pennsylvania agricultural communities.

I support the Pennsylvania cheesemakers in this petition and kindly ask you to consider the harmonization of current Pennsylvania law to Federal standards.

Sincerely,

Mark Bilbrey  
Cheese Program Director at Porter Road Butcher