

**From:** [Jen Hays](#)  
**To:** [Rulesinfo](#)  
**Cc:** [Lloyd Knight](#)  
**Subject:** {External}Rules Governing Raw Milk  
**Date:** Tuesday, May 11, 2021 4:55:29 PM

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Attention Agency members for Rules Governing Raw Milk:

I am writing because I was unable to attend the rules governing raw milk meeting on April 20th. I raise dairy goats and I am a very small producer operating on a small herd exemption raw milk permit. I am not profiting from selling my milk but having the ability to sell my raw milk helps pay for some of my expenses like buying hay for my goats. One of the larger expenses in my small operation is the yearly TB and brucellosis testing required for my permit. To save on my expenses, I coordinate the yearly testing for my permit with other biosecurity tests I run yearly that are above and beyond what is required by my permit. Having the veterinarian come out once and only needing to have a blood draw once a year for all the testing is most efficient, most cost conscientious, and best for the goats to only have to have one blood draw per year.

The breed of my goats is Nubian and Nubians are seasonal breeders. This means they only come into heat for part of the year. My goats typically come into heat from September through February so I have a limited window as to when they can be bred. I like to run my biosecurity tests before I breed them so I know the goat is in good health before breeding. I would not breed a goat who tested positive for any diseases. I had a routine of doing my testing in October and then if the results come back negative for diseases I would go ahead and breed them in November. The way the TB and brucellosis testing is set up for my permit makes it problematic to stay on that routine. According to the letter I receive every year "The test(s) results **must** be received by the ISDA, prior to the one year anniversary of each animal's last test result to remain qualified to sell or distribute raw milk for human consumption." So after being involved in this program for several years, my testing has had to move up slightly every year and I am now testing in September. Last year my testing was on September 14 so in order to accommodate the way it reads in the letter means I'll have to schedule at the beginning of September in order to have my results back before September 14. And it continues to get pushed earlier every year. This is not ideal as it's best to do the biosecurity tests as close to breeding as possible. I don't understand why it can't be an annual test - for example if you tested in October last year, you need to have the results back to ISDA by October this year. It does read as annual testing in the Small Herd Exemption (IDAPA 02.04.13 Rules Governing Raw Milk) but the letter specifies "The test(s) results **must** be received by the ISDA, prior to the one year anniversary of each animal's last test result." This throws off everyone's routine. I have talked to several other producers who feel the same as me on this issue. This is not a big ask. Can you please be more accommodating for us?

Thank you for your time,  
Jennifer Hays  
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