

**From:** [Greg Collett](#)  
**To:** [Rulesinfo](#)  
**Subject:** {External}Comments for the June 15 meeting  
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I am sorry for submitting these comments so close to the meeting time, but I was just able to read the comments in opposition to the latest proposed strawman and felt I needed to address them. I want to go on record as being in favor of any measure that will reduce the burden of regulation, and the proposal does that to a large measure.

As I mentioned before, I believe the statutes of Idaho do not make the sale of raw milk unlawful in the state of Idaho even though it may be implied. I therefore believe the administrative rules should not make it unlawful and should not regulate the production and sale of raw milk outside of what the statute states with regard to herd shares. The proposal is a step in the right direction.

The current proposal would eliminate most of the cost of the program which addresses the concerns of the Idaho Dairymen's Association. It addresses my concerns about the validity of testing. It addresses the concerns others have had about herd size. It addresses concerns that many of us have about regulation in general.

If any producer has any concerns about removing regulation I would question their motives.

Now, to address specific comments:

To say that stopping industry standard testing will result in poorer quality products and disease outbreaks begs the question: Why do producers have sanitary measures in place? If it is because of state oversight rather than providing a quality product for consumers then I feel sorry for their customers. A nanny state is not necessary for quality products.

I have already commented on general bacteria and coliform testing and why they are not necessary and it has been made clear that it is not feasible to test for actual pathogens. The current tests are based on a number that was admittedly made up and not based on science. It does not accommodate for time controls and fat content, both of which significantly affect the results. It is meaningless, and even detrimental, to a product that should contain bacteria.

I would like to say that I agree that a warning label is unnecessary, but not for the reasons given. Why is the raw milk industry willing to accept the narrative of the CDC, FDA, and others as to the danger of raw milk? It is misleading. Do the research. Why would a producer want to sell raw milk if they believe it is any more dangerous than other accepted foods? There are easier ways to make money.

Nobody is saying there is no chance that someone could get sick from drinking contaminated raw milk; but there is a much higher likelihood they will get sick from many other contaminated foods that do not carry warnings and are not regulated as though they are inherently risky. Why is a warning necessary for raw milk?

I would like to make it clear that I do not agree with the sentiments with regard to scaling up. I have a larger operation, but I see no need to denigrate smaller operations and I do not know of anyone who does not realize that proper infrastructure is necessary to scale up. I would welcome anyone who has the desire to do so to enter the market. It is a hard business and there is demand. Should someone be allowed to use the state create an artificial barrier of entry for a larger operation? It sounds more like trying to protect one's own interest.

There is no need to force anyone to provide a quality product. Individuals can do that on their own. There is no need to try to scare people about disease outbreaks if the state is not involved. If a producer needs the hand holding of the state then they should not be in the business anyway.

As for product liability insurance, there were no questions asked of me about whether the state tested my products or inspected my facilities. I think that is a non-issue.

To summarize, I support every measure of the proposal that simplifies and removes regulation. I do not think a warning label is necessary and I cannot support the idea; however, if all of the other proposed "deregulation" is made possible in the eyes of the state by having a warning on the labels, then it is a small price to pay to be relieved of the cost and burden of the current rules.

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