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From  
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Comments on the Rule making process

IDAP 02.04.05 Rules Governing Grade A Milk and Manufacturing Grade Milk

With the changes to the rules as proposed the Department is eliminating manufacturing grade milk. This elimination of manufacturing grade milk does away with an opportunity for producers or processors to utilize this milk in intra and interstate commerce. In addition, it could cause greater economic burden for a small-time operation to get started into the dairy business of producing artisan cheese farmstead or ice cream business.

Sub chapter C – Manufacturing grade Milk

304 Incorporated by Reference

07 – Grade A PMO remove this reference

370 – Added inspections shall be conducted pursuant to the 2019 PMO

I feel there will be an issue with the compliance to the changes.

- 1) If a facility is degraded for compliance with the PMO then the facility will be off the market until such time the facility is reinstated to its grade A status since it does not meet the compliance of the PMO at the time of the degrade. There will be no option for the producer to ship his milk to a non-grade A facility for processing since the facility will need to meet the PMO requirements to be on the market.
- 2) A small cheese plant may want to start up as was in the past with a small herd and processing plant. The milking facility will need to meet all requirements of the PMO prior to start up with no room for any variations.
- 3) As proposed the manufacturing grade farm facility will need to be in compliance with the entire PMO and supporting documents.

310 Definitions

.09 uses the definition Farm Certification 370 is proposed to change certification to permit

321.03 Sediment Content Classification. Leave original language in place

330.01 add language “using acceptable USDA testing methods”

360.01 leave original language in place. June 15<sup>th</sup> straw man has stricken through TB testing also.

Leave the original language in the rest of the section 360

370 Leave the original wording for the heading Dairy Farm Certification, do not change to permit.

Remove the added underlined sentence “Inspections shall be conducted pursuant to the 2019 Pasteurized Milk Ordinance”

Remove all strike outs in 370

It is recommended if the issue is to reference documents for the Manufacturing Grade rules then it is recommended to reference the USDA document Milk for Manufacturing Purposes and its production and Processing Recommended Requirements Subpart D Farm Requirements for Milk for Manufacturing effective July 21, 2011. You are already referencing the Subpart E for the manufacturing grade processing plants.