



Comments regarding IDAPA 02.04.05 Subchapter C Manufacture Grade Milk. June 18, 2021

1. 321.03 Sediment Content Classification. Leave original language in place or refer to the Incorporate by Reference.
2. 330.01 add "using acceptable USDA testing methods."
3. Leave existing Language for 353, 354, and 355 in place.
4. Section 360 Farm Requirements of Milk For Manufacturing.
5. 01. Health of Herd. a. General Health. Leave original language in place. No problem with Strawman language for Tuberculin Test or Brucellosis Test. The rest of Section 360 should have strike though eliminated.
6. 370 Dairy Farm Certification (eliminate "Permit"). Remove the underlined sentence "Inspections shall be conducted pursuant to the 2019 Pasteurized Milk Ordinance" and remove all strike through portions. The definitions' section refers to certifications not permits. "Dairy Certification", for the production of milk for manufacturing purposes. (not Grade A)! Milk for Manufacturing Purposes.....milk used for manufacturing products for human consumption "but not subject to Grade A". Milk " the lacteal secretion.....for manufacturing purposes".

The dairy industry should have options to legally ship manufacture grade milk (Grade B milk) in intrastate and interstate commerce provided the milk meets states' quality and production standards. Manufacture Grade Milk farms can be more economically conducive to construct and operate than Grade A facilities.

Regards,

Marv Patten, Executive Director, Mpi