

From: [Guernsey Goodness](#)
To: [Rulesinfo](#)
Cc: [Lloyd Knight](#)
Subject: {External}Raw Milk Rule Comment #2
Date: Tuesday, May 18, 2021 4:41:19 PM

Please enter the following proposal into the raw milk rule comments to be discussed.

I propose the following changes be made to 010.13 of IDAPA 02.04.13 – Rules Governing Raw Milk:

Current wording:

13. Small Herd. The production of raw milk or raw milk products for human consumption, for use by people other than members of their immediate household or non-paying guests, in a facility with no more than three
(3) lactating cows, seven (7) lactating goats, or seven (7) lactating sheep. The dairy farm herd may include other cows,
goats, or sheep that are dry or are producing milk for purposes other than human consumption. (4-7-11)

Proposed wording:

13. Small Herd. The production of raw milk or raw milk products for human consumption, for use by people other than members of their immediate household or non-paying guests, in a facility with no more than three
(3) lactating cows, ~~seven (7)~~ twenty one (21) lactating goats, or ~~seven (7)~~ twenty one (21) lactating sheep. The dairy farm herd may include other cows,
goats, or sheep that are dry or are producing milk for purposes other than human consumption. (4-7-11)

Comments:

I propose this change because it allows for sheep and goat owners to produce at or nearly an equal volume to what cow owners can produce, with what are arguably cleaner animals, so there should not be an increase in nutrient management or other sanitation issues. It puts sheep and goat small herd owners on equal financial footing to the cow owner, given revenues are typically going to be measured in dollars per gallon produced.

Best regards,

Paul Herndon
Producer, Unlimited Raw Milk
Pleasant Meadow Creamery Inc