

From: [Guernsey Goodness](#)
To: [Rulesinfo](#)
Cc: [Lloyd Knight](#)
Subject: {External}Raw Milk Rule Comment
Date: Tuesday, May 18, 2021 4:15:22 PM

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

I propose the wording of 013.02 of 02.04.13 – Rules Governing Raw Milk be changed.

The current proposed wording of the rule related to Tuberculosis is:

Tuberculosis Test

All raw milk must be from animals that have been accredited as tuberculosis free or must have passed an annual tuberculosis test within the last twelve (12) months.

I propose the following wording instead:

Tuberculosis Test

All raw milk must be from animals that have been accredited as tuberculosis free or must have passed an annual tuberculosis test within the last prior twelve (12) months in the period beginning on the first day of the current month in the prior calendar year, and ending on the last day of the current month of the current calendar year.

Comments:

I propose this change because it allows for testing to occur within an anniversary month on any day of the month rather than on a specific day of the month.

For example, if my animal's TB test is dated April 17, 2020, this language would allow for milk produced in May 2020, June 2020, July 2020, August 2020, September 2020, October 2020, November 2020, December 2020, January 2021, February 2021, March 2021, and all of April 2021 to meet the requirement of the proposed wording. Once May 1, 2021 comes, if no new TB test has been performed, the criteria would fail, since there are no valid tests in the period of May 1, 2020 to May 31, 2021.

The effect is that a producer is ultimately going to end up doing an annual test of animals, but the test can fall anywhere within a calendar month, from first day to last, without disqualifying any portion of the month from sale of raw milk. This benefits producers by allowing them to have more flexible scheduling with their veterinarians, keeping TB testing within the same month every year, without having to continually bump up anniversary date as the current practice would force, with weekends and veterinary schedules as they are. It allows for the animals to theoretically go a day under a full 13 months between negative tests, without crossing into the full 13 month duration.

Best regards,

Paul Herndon
Producer, Unlimited Raw Milk
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