

From: [Dr. Scott Leiblsle](#)
To: [Dr. Scott Leiblsle](#)
Subject: FW: ISDA Raw Milk Rules
Date: Friday, June 4, 2021 5:01:02 PM
Attachments: [image003.png](#)

Raw Milk stakeholders –

Thank you to everyone who has participated, thus far, in ISDA's negotiated rulemaking meetings for Rules Governing Raw Milk. Regarding the remaining issues left to reach a consensus (i.e. – herd size, product testing and labeling), ISDA has thoroughly reviewed all submitted comments in the rulemaking record as well as testimony provided in the previous 2 meetings. Proposed changes to the rule that address each of these issues, based upon stakeholder input, have been posted to the ISDA rulemaking website. Please go to <https://agri.idaho.gov/main/i-need-to/see-lawsrules/rulemaking/isda-rulemaking-2021-2022/> to review the current version of the raw milk strawman in advance of the final rulemaking meeting, scheduled for June 15th @ 130pm. Please keep in mind all written comments must be submitted to ISDA no later than June 20 to be included in the rulemaking record.

A summary of the proposed changes is as follows:

Section 013. Raw Milk Testing Requirements. All raw milk testing requirements are being removed from the rule. Milk samples will no longer be collected monthly to be tested for bacteria, coliform, drugs or somatic cell counts. Annual brucellosis and tuberculosis testing on all animals in the raw milk program will remain in place.

Section 014. Labelling. All raw milk product labels must now include the warning statement listed below.

03. Product Warning. All raw milk dairy product labels must contain the following language:

- a. "WARNING: This product has not been pasteurized and may contain harmful bacteria. Raw milk, no matter how carefully produced, may be unsafe."**
- b. The warning shall appear within a heavy borderline in a color sharply contrasting to that of the background. The signal word "WARNING" shall appear in capital letters of ten point type or greater. The remaining text of the warning shall be printed in capital letters of six point type or greater.**

Sections .020 and .030. Herd Sizes. There will no longer be any limitations on the size of a raw milk herd or the number of animals that can be milked for sale of their raw milk products. The "small herd exempt" and "unlimited raw" permits are being combined into a single "raw milk permit". No sanitation inspections will be performed on any facility, regardless of the size of the herd.

These changes are being proposed after consideration of stakeholder feedback. The amendments would provide producers greater operational flexibility. If there are any questions on the proposed changes to the raw milk rule, please submit additional written comments to the rulemaking record or participate in the final rulemaking meeting on June 15th. Thank you.

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