



June 17, 2021

Dr. Scott Leibsle  
Idaho State Department of Agriculture  
Idaho State Veterinarian

Mr. Lloyd Knight  
Idaho State Department of Agriculture  
Rules Review Officer

RE: IDAPA 02.04.13 Rules Governing Raw Milk

Dr. Leibsle and Mr. Knight,

This letter is a follow-up from our June 9<sup>th</sup> letter related to the Rules Governing Raw Milk (IDAPA 02.02.13).

The IDA is supportive of the changes made at the latest negotiated rulemaking meeting for Rules Governing Raw Milk. We are appreciative of the efforts made to reduce expenditures from the dedicated dairy fund, which resulted in reduced testing. We feel it is a fiscally prudent approach. We believe maintain Brucellosis and Tuberculosis testing requirement is sensible to protect from the potential of transmission of those diseases.

We also support the addition of Nutrient Management Plan (NMP) for all raw milk operations with 30 or more animal units. That requirement is more than justified given all licensed Grade A dairies, regardless of size, are required by law to have an NMP.

Lastly, the addition of Labeling - 14.03 Product Warning, adds valuable consumer protections for those inclined to purchase raw milk products. We do believe reconsideration should be given to adding back into the Rule sanitation inspections. This process underscores the sanitary process and provides an opportunity for those marketing raw milk products to better understand the on-farm factors that may be linked to food born illness resulting from the consumption of said products.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Naerebout", written over a white background.

Rick Naerebout  
Chief Executive Officer  
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