

**From:** [Guernsey Goodness](#)  
**To:** [Rulesinfo](#)  
**Subject:** {External}Comments on proposed Raw Milk Rule changes - strawman for June 15 2021  
**Date:** Friday, June 4, 2021 7:33:39 PM  
**Attachments:** [image001.png](#)

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In an email from Dr. Liebsle, dated 06/04/2021, raw milk rules stakeholders were informed that the “Strawman” for June 15 meeting has been put up at the website. The email, and in fact the Strawman, contains the following proposed changes:

*“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. “*

I categorically oppose every one of these proposed changes.

1. If producers are not compelled to either test their product, or have the state test the product, using industry standard tests which have been in place, the product quality is almost certainly going to go downhill generally, and very likely will result in a food-borne disease outbreak among consumers at some level.
2. It’s actually ridiculous that we are going to compel testing for Brucellosis, when in fact the occurrence of the disease-causing pathogen related to it are much less likely than E. coli, listeria, or any number of other pathogens. The SPC and coliform tests were indicator tests for overall milk quality handling and should absolutely not be abandoned.
3. The product warning label provides ZERO value to the consumer. Every consumer of raw milk that I sell to already knows this about the product, and the basic labeling requirement already

in existence states the product is “raw unpasteurized”. This is perfectly adequate. CDC has an entire website devoted to the topic that no matter how carefully produced, it can never totally be considered safe. People already know this and accept the risk. As a producer, I had my own voluntary warning label at one time for at least a full year and my consumers generally told me it was unnecessary. Not only was it unnecessary, but it costs money, and is actually hard to do on a returnable glass milk bottle without creating extraneous “waste” – both cost and garbage. I am strongly opposed to this requirement. It’s wasteful, redundant, and provides zero value to the consumer.

4. No longer limiting herd size and not inspecting for sanitation? Who proposed this? Are we trying to torpedo this part of the Idaho dairy industry? First, this literally removes a significant barrier to entry that is necessary when scaling up an operation. Any of the inspectors and even samplers will tell you that there is a HUGE difference between inspected facilities and non-inspected facilities. By going to a nearly totally unregulated environment, it is going to make it much more difficult to obtain affordable product liability insurance, especially once disease outbreaks begin to occur.

All of the “deregulation” proposals make the warning label practically laughable. These proposals make no rational sense in my opinion, based on experience. The job of ISDA needs to be to provide some assurance that this program meets basic sanitation and health standards lest every mom-and-pop shade-tree operation feel they can go “big time” without regulations in place to force basic standards.

Such folly can only possibly lead to disease outbreaks and even a decimation of the ability to provide raw milk to consumers simply because the product will end up uninsurable. No grocery store will carry it, and no sane producer will produce it.

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