

From: [Dr. Scott Leibsle](#)
To: [Sydney Kennedy](#)
Subject: FW: ISDA Milk Quality Negotiated Rulemaking meeting #2 (1:30pm)
Date: Tuesday, August 4, 2026 1:19:10 PM
Attachments: [image001.png](#)

Please post to website



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From: Shawn Burton <SBurton@HIGHDESERTMILK.COM>
Sent: Tuesday, August 4, 2026 9:51 AM
To: Travis Jones <travis.jones@impa.us>; Dr. Scott Leibsle <Scott.Leibsle@ISDA.IDAHO.GOV>; Holm, Ryan <ryan.holm@darigold.com>
Cc: Chanel Tewalt <Chanel.Tewalt@ISDA.IDAHO.GOV>
Subject: RE: ISDA Milk Quality Negotiated Rulemaking meeting #2 (1:30pm)

CAUTION: This email originated outside the State of Idaho network. Verifv links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.

Folks,

I must express my concern that many of the individuals who will ultimately be responsible for implementing and complying with these rules are not represented in this discussion. While milk procurement personnel and IMPA members have been invited, the practical impact of these rules will fall upon proessor owned and third party laboratories, that will be required to perform, validate, document, and defend their test for testing procedures established not even called out through the rule making this process.

Idaho Code § 37-506 gives the Department authority to approve testing methods, inspect laboratories, examine samples, and audit payments based upon those testing methods. As a result, these rules will directly affect laboratory operations, laboratory qualifications, quality systems, and regulatory compliance—not simply milk procurement practices.

The quality parameters now being considered are not as straightforward or repeatable as traditional component testing. Developing rules governing milk payment using various analyses without meaningful participation from laboratory managers, quality professionals, and independent third-party laboratories risks creating requirements that

are difficult to implement, difficult to reproduce consistently, and challenging to defend during audits or disputes.

For that reason, I believe this rulemaking effort would benefit from broader technical representation. At a minimum, I would encourage the Department to solicit input from laboratory managers and third-party laboratories before these rules are finalized. The individuals who will ultimately be held accountable for complying with these requirements should have an opportunity to help shape them.

My 2 cents,

Shawn Burton

Operations,

High Desert Milk

208-677-8562

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-----Original Appointment-----

From: Travis Jones <travis.jones@impa.us>

Sent: Thursday, May 14, 2026 7:33 AM

To: Travis Jones; ryan.holm@darigold.com; rdekruyf@glanbia.com; Shawn Burton; gary.halverson@dfamilk.com; nick.luth@agropur.com; rfranco@glanbia.com; shoy@idahomilk.us

Subject: ISDA Milk Quality Negotiated Rulemaking meeting #2 (1:30pm)

When: Tuesday, August 4, 2026 1:30 PM-3:30 PM America/Denver.

Where: Virtual

The Idaho legislation later this year passed a bill requiring a arbitrary process for milk payment on quality parameters other than components OK what follows is a rule making session which is being attended by the milk procurement employees of Idaho processors at not the labs that will be affected by having to complete and comply with testing procedure I wrote this short blerb and want to have it polished prior to sending. Please review Idaho code section 37-506 and strengthen my case.

This event has been updated with a note:

"All - I added the virtual call info to the calendar invite to this second meeting of the milk quality negotiating group. Thanks! - Travis"

Changed: location, conferencing, description

CHANGED Description

Virtual Location

<https://teams.microsoft.com>

Meeting ID:

276 038 921 528 056

Passcode:

U5UB25x7

Dial in by phone

+1

208-985-2810,,617232772#

United States, Boise

Find

a local number

Phone conference ID:

617 232 772#

Join on a video conferencing device

Tenant key:

idahogov@m.webex.com

Video ID:

117 881 491 6

When

Tuesday Aug 4, 2026 · 1:30pm – 3:30pm (Mountain Time - Denver)

CHANGED Location

Virtual

[View map](#)

.TBD

Guests

[Travis Jones](#) - organizer

ryan.holm@darigold.com

rdekruyf@glanbia.com

sburton@highdesertmilk.com

gary.halverson@dfamilk.com

nick.luth@agropur.com

rfranco@glanbia.com

shoy@idahomilk.us

[View all guest info](#)

Reply for sburton@highdesertmilk.com

[Maybe](#)

[No](#)

[Yes](#)

[More options](#)

Invitation from [Google Calendar](#)

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