

**Stefanie Smith**

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Bureau of Food Safety and Laboratory Services  
Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 17110

**Regulation #2-194 (IRRC #3405)**

**Milk Sanitation Rule Public Comment**

**VITAL SAFEGUARDS FOR PENNSYLVANIA’S DAIRIES & CONSUMERS**

Pasa Sustainable Agriculture and the farmers and producers we represent strongly support the Pennsylvania Department of Agriculture’s proposed changes to the “Milk Sanitation” rule, especially as it pertains to the expansion of permitted raw milk products to include raw butter.

Increased marketing opportunities for the Commonwealth’s small- and mid-sized dairies have long been a priority of our organization and our community of farmers. Pasture-based, holistically managed dairies need outlets for their products, and permitted raw milk sales present an attractive option. In the face of increased farmland, processing, and distribution chain consolidation, and staggering farm business losses, our dairy farmers need stable marketing channels and increased diversification. The proposed permitting of raw milk butter sales will be a successful strategy on both counts.

**Raw milk is a healthy source of nutrition that can help dairy farms stay in business.**

Raw milk, and raw milk valued added products like butter, from grass-fed cows is a safe and healthy source of nutrition. Because it is not pasteurized, it maintains a variety of important probiotics, vitamins, minerals, and enzymes. It comes from cows who are allowed to graze freely and live off of mostly grass and hay, and it comes from dairies who recognize animal welfare as the best safeguard against contamination.

While Pasa supports rules and regulations that are aimed at sustaining a healthy planet and healthy people (including the current PDA raw milk permitting rules), we know that overly stringent rules and regulations encourage unregulated activity that puts both consumers and rule-abiding dairies at risk.



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There is no benefit to driving markets underground where there is surely increased potential for harm to consumers.

In a 2018 raw milk survey of Pasa members, 160 respondents (61.07%) answered “yes” when asked if they consume raw milk or raw milk products as part of their diet and 237 respondents (90.46%) supported expanded access to raw milk. Consumers are getting their raw milk and value-added raw milk products from somewhere. Surely we want these purchases to be made from farms engaged in a transparent, legal, and traceable system.

**We celebrate the Department’s decision to respond to confusion and controversy in the industry with workable solutions for farmers, rather than prohibition and punishment.**

The demand for raw milk products and the desire to support the dairies that produce them is robust. We are grateful for the forward momentum with raw milk butter and hope this expansion is a first step toward increased access to an even greater array of other raw milk value-added items from permitted farms.

Sincerely,



Hannah Smith-Brubaker  
Executive Director  
Pasa Sustainable Agriculture

*Pasa Sustainable Agriculture is a Pennsylvania-based 501(c)3 nonprofit that cultivates sustainable and equitable farms and food systems across the Mid-Atlantic and beyond. For more than three decades, we have worked with our network of over 20,000 farmers, changemakers, and food systems professionals to advance sustainable agriculture with our advocacy and programs grounded in farmer-driven training, education, research, and community.*



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