

November 11, 2009

South Dakota Department of Agriculture

ATTN: Secretary Bill Even

500 E. Capitol Ave.

Pierre, SD 57501

Dear Secretary Even:

I am submitting these comments in regard to the proposed raw milk rules scheduled for a hearing on Nov. 17. In the face of a struggling economy, a weakening U.S. dollar, and possible inflation, I hope the department will think deliberately before implementing new rules that make it harder for small and/or beginning farmers to make a living.

First of all, I oppose the proposed increased brucellosis testing because it will escalate costs for the producer while realizing negligible health benefits for the consumer. Dairy animals whose milk is sold must already be tested annually for brucellosis, which is adequate and the norm for other states I checked into (Idaho, Vermont and Utah). If you must insist on more testing, I suggest that you require a milk ring test twice per year rather than blood-testing monthly.

Next, I am opposed to the mechanical bottling and capping requirement. For producers selling small amounts of raw milk, the equipment is cost-prohibitive and may well put many of them out of business. A mechanical bottler/capper costs just under \$9,000; additionally, the bottles and caps will run several thousand more dollars, a needless expense for small dairies. Washington recently abandoned this requirement for these reasons.

Lastly, I am opposed to the customer database that can be reviewed by the Department of Agriculture. I see no reason why the state should be interested in who buys raw milk or why. I believe that is simply one more effort to prevent people from buying raw milk, sending them instead to the grocery store and thus large companies.

For South Dakota truly to have a flourishing local foods economy, we can't have rules such as these. Raw milk producers who sell their milk already have regulations (such as having a commercial kitchen and immediately lowering the milk's temperature to 40 degrees.) These new rules will only serve to make it harder for them to continue in business. Please reject these proposed rules.

Sincerely,

Robin EH. Bagley

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