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February 18, 2022

Shannon Miller  
Department of Environmental Conservation  
555 Cordova Street  
Anchorage, AK 99501

Re: Public Comments on Proposed Regulations Changes to 18 AAC 32 Allowing for Sale of Raw Milk and Raw Milk Products

Dear Ms. Miller:

The Alaska Farm Bureau applauds the Administration's interest in strengthening Alaska's agriculture industry and efforts put in to find ways to expand the dairy sector. We have been seeing a renewed interest in expanding dairy and have seen some great successes in Grade A dairies as well as the herd-share program.

Alaska has two great examples of Grade A dairies, with others interested in going through this process; the high costs of testing fees is a deterrent. The herd-share program is a great option for those who want raw milk, and we're seeing growth with the allowance of including value-added products in the herd-share program.

We would encourage DEC to have continued conversations with the current dairy producers and those interested in getting into dairy to find the best ways to expand as we do have several concerns with the approach taken in the proposed changes to 18 AAC 32 that would allow for the sales of raw milk and raw milk products.

The proposed regulations would open the sales of raw milk and raw milk products to any individual and to retail markets without oversight or a direct relationship between end consumer and farmer. DEC would only get involved if there were an outbreak or complaint, this makes the whole dairy industry vulnerable.

Grade A dairies have vigorous testing requirements for bacteria, pathogens, and antibiotic residue, as well as strict guidelines for bottling, packaging, and transporting. The herd-share program has a very close relationship between consumer and herd manager which provides trust in a good product and easy traceability if something happens. The system in these proposed regulations doesn't provide either safety measure. And would make all our dairy farmers susceptible to scrutiny when there is an illness or outbreak from raw milk allowed under these regulations.

Raw milk and raw milk products are non-insurable, some may think that having regulations to allow the sales of raw milk means they have liability coverage. This would not be the case and makes our farmers extremely vulnerable to lawsuits.

The main requirement for ensuring animal health through a valid veterinarian-client-patient relationship would be very limiting on who would even be able to take advantage of these regulations. Much of the state does not have reliable and regular access to livestock veterinarians.

Again, we applaud the interest in strengthening Alaska's agriculture industry and expanding the dairy sector. We encourage you to withdrawal the proposed regulations as written and continue discussions with the Grade A dairies and herd-share owners to find a path forward to incentivise more Grade A dairies and continue building on the successes of the herd-share program without making our farmers more vulnerable or opening the public to more food safety concerns.

Respectfully,

A handwritten signature in cursive script that reads "Scott Murgage".

Scott Murgage, President  
Alaska Farm Bureau, Inc.