

# Maggie Hallam

I am writing in support of the addition of (18 AAC 32.060) Raw Milk and Raw Milk Products Production and Sales. Additionally, I am ready to register to sell raw milk products today.

I operate a herd share for cow's milk in the Fairbanks area. I began farming twelve years ago as a certified organic vegetable producer. I brought home my first dairy cow eight years ago. From that time to the present, I have gradually transitioned my operation towards a focus on serving my herd share. While I appreciate the option of running a herd share, its limitations have prevented me from increasing milk production.

In 2020, I began construction on a small-scale dairy facility that would satisfy Grade A requirements. Due to unpredictable changing rules and regulations, the new building was designed for flexibility. Plan A was to remain a herd-share, expanding modestly. Plan B was to pursue Grade A certification. When HB22 was voted into law last summer, it offered a Plan C, to keep my existing herd share, but increase production by offering products alongside raw milk.

This proposal for the sale of raw milk and raw milk products is a greater opportunity than I could have hoped for. If I understand the proposal correctly, I could maintain my current herd share while producing a product(s) to sell to the public and/or to a qualified retailer.

Having read through 18 AAC 32.060, the following are my top-most concerns:

## Section (a) (2) veterinarian-client-patient relationship

This is the only portion of the proposal that I strongly object to. There are eight years of hands-on experience behind this objection. My comments are meant to be general and do not point to any individual nor time frame.

Firstly, there is no dairy industry in Fairbanks. At times, it is impossible to even reach a local veterinarian with large animal experience.

If DEC's concern is that a veterinarian should be acquainted with the farm and the animals, then an experienced dairy veterinarian will need to be provided. This could help farmers in underserved areas. Such a person could be a valuable resource. My farm was visited annually for seven years by a certified organic inspector from WSDA. In the beginning, this was enormously helpful and I learned a great deal.

Secondly, the wording of "oversees" (listed in (a)(3)) implies the veterinarian is taking on liability for the milk produced. I am uncomfortable with that. I imagine a veterinarian would be as well, especially one who primarily cares for dogs and horses. The health of my animals and the safety of their milk is my responsibility alone.

Thirdly, because I am an organic farmer, I have looked to the organic dairy industry as a model for the care of my cows. One key to this approach is excellent care and excellent nutrition. Prevention of problems is the idea. This is a sound philosophy for a farmer living outside of dairy country.

Veterinarian care is difficult to find, not necessarily knowledgeable, and always expensive. These are all considerations that I don't feel are taken into account in the suggested regulations. Are you imposing additional costs on a farmer who does not need veterinary services?

I have considered seeking out a dairy veterinarian from the lower 48 states who might visit annually. Once I had such a relationship, he or she could be consulted on matters like lab results or simple medical needs. I work in this manner with a dairy nutritionist in Wisconsin. Her company employs a veterinary tech who has generously helped me at times when I was unable to find advice locally. There are ways, but like everything else here, a solution is often difficult to come by.

Requirements for particular dairy products

My second area of concern relates to the proposal items that don't necessarily make sense with certain products. The following are a few examples:

(d)(2) "... raw milk product's temperature is maintained at 40 degrees"

(f) "... may not be sold to a consumer after four days from production date"

In the case of aged cheese, the temperature of a cheese cave is optimally 45 to 55 degrees. "Four days from production date" is nonsensical if we think of a product like aged cheddar. How will such discrepancies be addressed?

Yogurt is a very stable product with a relatively long shelf life. In the case of yogurt, "four days from production date" does not make sense. Additionally, yogurt is not a raw milk product, having undergone temperatures far higher than those required for pasteurization. Will the "RAW MILK PRODUCT" warning label still be required? I only pose this as an example that each product will take some individual consideration.

In closing, I would like to say that I am ready to participate as a producer of "Raw Milk and Raw Milk Products." I will be the first to register. I am willing to work with DEC to go through each line of the proposal, to be a test case if that would be helpful. I am ready to produce more milk and milk products in a location that is completely void of locally-made dairy.