

Hello from Cottonwood Creek Farm. We've been operating a dairy goat herd share operation in South Central Alaska since 2003, and my comments come from the perspective of a producer.

For many years herd share has provided an elegantly simple way for Alaskans to obtain local raw milk (and now raw milk products, with the passage of HB 22) from the farm of their choice. One of the key aspects of herd share is an open line of communication between share owners and producers, and a relationship built on mutual trust and knowing your farmer. With the exception of two campylobacter outbreaks in 2011 and 2013, which were attributed to two related operations (same family, same cows, different locations), herd share programs in Alaska have had an excellent overall track record.

At first blush the concept of allowing for open sales of raw milk might seem like a positive step toward greater food freedom in our state, but when you read through the list of required upgrades there are a lot of expensive and potentially prohibitive hoops to jump through before the first "sale" could take place. If these proposed regs pass, I don't know of a single small dairy operation that would be in a position to comply with all of the new regulations and requirements. And even if compliance with the new regs were economically feasible, most herd share producers would see no benefit in trading the security of a two-way commitment and a scheduled weekly pickup for random sales to the general public.

However this proposal goes forward, my biggest concern would be to see language clearly guaranteeing that herd share in its existing form will be safeguarded both now and in the future from being in any way impacted by new regulations. "If it ain't broke, don't fix it" is a principle that should apply here.

Ultimately this issue comes down to whether or not citizens have freedom to choose the food they eat. If Alaska truly wants to take steps toward greater food security, please consider following the example of food sovereignty laws that have passed in Maine, North Dakota, Wyoming, and Utah as a model.

<https://www.neha.org/node/61494#:~:text=Food%20freedom%20laws%20let%20food,%2C%20permitting%2C%20or%20inspection%20requirements.&text=These%20laws%20have%20led%20to%20an%20expansion%20of%20private%20food%20sales>