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I appreciate the opportunity to testify today regarding House Bill H 0426. I am speaking to you as a cheesemaker who has been involved in the Vermont cheese industry for more than ten years and fully engaged in the cheese community having served for four years on the executive committee of The Vermont Cheese Council. I have been responsible for cheesemaking at Spring Brook Farm since it began in early 2008. Since then we have produced raw milk cheese very much in keeping with traditional practices developed over hundreds of years in the Alpine regions of Europe. We have adapted the production of these cheeses to our milk and landscape, and our regulatory environment, winning numerous awards along the way. My family has consumed raw milk regularly over the past eight years and we have never experienced any negative consequences. I want to make it clear that my point of view regarding this legislation does not necessarily represent that of the Farms For City Kids Foundation.

It is clear that the intention of this proposed legislation is to support and encourage the smallest and least capital intensive of dairy operations in our State. I don't think you would find single licensed cheesemaker in Vermont today who would object to this goal in and of itself. I have seen the way in which the cheesemaking community in Vermont can share and collaborate. It is understood that when we succeed as individual companies we are also building the Vermont brand, which helps support all of us. Supporting small, new dairy producers is part of doing business or us and it is certainly the business of the Vermont Cheese Council.

Though the intent of H0426, as written, is to support and encourage the smallest most vulnerable members of our agricultural community, it could easily have the opposite outcome. It proposes to deregulate in a way that could ultimately harm the smallest of producers, the community of responsible licensed producers and the Vermont brand with it. If the intention is to protect small producers, this is not the way to do it.

Eliminating barriers to entry into the value added market by allowing unlicensed production of cheese undercuts the regulatory foundation supporting a strong and growing sector of the Vermont agricultural economy.

The Agency of Agriculture Food and Markets has, over many years, worked with Vermont cheesemakers to support the growth and success of small-scale cheese

production. Today the Vermont brand is well known for its world-class cheese products, which are sold across the country and abroad. My personal experience with the agency has been that they have firm and clear expectations, which must be met. At the same time they have shown willingness to listen and be flexible where possible. The Agency is setting minimal baseline tied to standards described in the Grade 'A' Pasteurized Milk Ordinance (PMO). This document has been created over many years to define industry standards. "The incidence of milk-borne illness in the United States has been sharply reduced. In 1938, milk borne outbreaks constituted twenty-five percent (25%) of all disease outbreaks due to infected foods and contaminated water."(PMO Forward, piii, HHS/FDA 2011), It has since been reduced to less than 1%. From personal experience over my years as a cheese maker, I have come to view the Agency as a partner in success rather than an adversary.

In the last few years, with the requirements of FSMA and the initiatives being undertaken by the FDA to evaluate the safety of raw milk dairy products, our regulatory environment has changed drastically at the Federal level. There have been cases of foodborne illness and deaths resulting from both pasteurized and raw milk products in the United States. Retailers and their distributors are asking for extensive documentation and verification of food safety plans through third party audits. At this point in our industry, the demands being made of us by our customers far exceed those of the Vermont Agency of Agriculture.

Given this backdrop of increasingly rigorous food safety requirements in the marketplace, I'd like to make two concluding points. 1. It would be irresponsible to lower the bar when it comes to licensing requirements for a specific group of cheesemakers. Pathogens will grow when an opportunity for reproduction occurs, no matter what the scale of the operation or the means of the cheesemaker. 2. It is unfair to create a double set of standards related to licensing. Regulatory inconsistency of this kind would destabilize the existing community of licensed cheese makers, call into question the need for them to cooperate with the Agency of Agriculture and have a divisive effect within the agricultural community.

Over the years that I served on the VCC (two of those years as President), I do not recall any communication from 'Rural Vermont' regarding the issues proposed in h0426 or anything else. However I think that the way forward should include dialog between the VCC and 'Rural Vermont'. The VCC serves as a resource to existing as well as aspiring cheesemakers. There must be a way, with the cooperation of the Legislature, to support the smallest of producers in the agricultural community while maintaining the highest of food safety standards and the stellar reputation of Vermont food products.

Thanks you for your time and the opportunity to speak.

Jeremy Stephenson