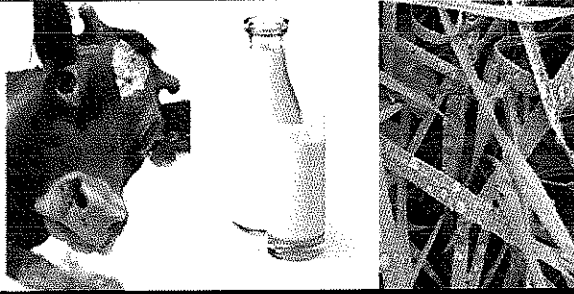


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# Little Bear Dairy



Raw Milk *from* Troy, ID

Willows Family Farm

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Soils 416  
Betty Joe

# Little Bear Dairy

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## Raw Milk *from* Troy, Idaho

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### I. Whole Farm Goals

The goal of Little Bear Dairy (LBD) is to raise healthy dairy cows and goats, be able to provide the Moscow/Troy community with high quality raw milk and be able to bring in additional income. Raw cow and goat milk will be sold through a herd share program, where costumers pick up their product directly from the farm, or through the Moscow food Coop. The overarching goals of the Willows family are to learn to operate a profitable small farm business and create potential future business opportunities for their children. Because of their strong faith, environmental stewardship and healthy animal husbandry should be practiced while working toward these goals.

### II. Evaluation of Current Resources

A property map indicating major physical and natural resources is attached in appendix 1.

#### *Human resources*

The Willows family lives on approximately eight acres of land just outside of Troy, Idaho. The property, named 'May's Ranch' is bordered on two sides by Sue's relatives; her parents on the upper side and her aunt and uncle on the lower side. The family has several years of experience working with cows and goats. Sue home schools their five children (age ranging from 4-12) and Bob is self-employed as a house painter and handyman. Time is currently the major limitation in running the business. Sue does all the milking twice a day. Bob would like to work less off farm and have more time to work on the farm and spend time with the family. The children, mainly the three boys, help with the chores around the house and farm. The girls are currently still very young, but could become more involved over the coming years.

Faith is an important and distinct part of the Willows family lifestyle. This is reflected in the business in several ways. The family does not want to take loans, which means the business will need to work on a small budget until revenue is made. Furthermore, the intention is to use technology only when absolutely needed, and not just for convenience. As a result, most work is done by manual labor, meaning there will be no need to invest in expensive machinery.

#### *Natural resources*

The farm has about 5 acres of well-established pastures. However, the productivity of the pastures is limited by soil quality and local climate. The soil type is a sandy loam which is impacted from years of grazing animals, has poor infiltration, and is prone to run off and erosion. There are several water sources on the property including a well, a spring and a seasonal creek. The well is used for the household and to water the animals. The seasonal creek is also used as a source of water for the animals. The annual rainfall there is approximately 36 inches, which is more than sufficient.

### *Physical resources*

The Willows property is already established as a farm, meaning that minimal adaptations are needed to get started with the raw dairy. Besides the house, there are several structures on the property, including a large barn, garage, and woodshed. There is fencing around most of the property, although the quality is relatively poor. Of the eight acres approximately five are in pasture and two are forested. The family's firewood is gathered from onsite and effort is made to not overharvest. Although mechanization of the farm is kept to a minimum, a small tractor has recently been purchased to assist in heavy lifting and hauling. Over the years, the family has collected a considerable amount of reclaimed materials such as wood, roof paneling and fencing, which may significantly reduce the costs of upgrading facilities such as shelters.

### *Market resources*

Currently the local community members who are part of the farm's herd share represent the majority of the costumers. The Moscow Food Coop represents a previously untapped outlet for LBD's products. There is also the potential for seasonal farmer's market sales in the future. As the awareness of food and health issues grows, so does the potential market for locally produced raw milk. A direct connection to existing and potential costumers, in the form of a farm website, a monthly newsletter, or a clear presence in the Food Coop (e.g. article in the Coop newsletter) could go a long way to educating the community on LBD and raw milk issues.

### *Financial resources*

LBD operates within modest means and makes a conscious decision not to go into debt and therefore can only grow at a slow but sustainable pace. The Willows' extended family is a potential financial resource but asking for an operating loan from the bank is not. In time the farm operations can be diversified (egg and meat sales) and possibly generate more income. Tim has seasonal off farm work as a painter which contributes substantially to the family's financial well being. The family has some small savings that may be used for specific initial costs.

### *Community resources*

Luckily the Moscow/Pullman/Troy community has an educated customer base that values local food and family farms. It is urban enough for a small family farm business to make money because the demand seems to be high for raw dairy products. The Willows family is also very engaged with their local community and their church. They help others when it is needed and in return there are people that support them. This reciprocation and level of engagement is crucial to the survival of a small family farm business in rural Idaho, because the success of others is directly linked to the success of the family farm and community as a whole.

### **III. Capsule Definition**

Little Bear Dairy supplies the Moscow/Troy area with high quality raw milk through a herd share, farm & retail sales. Customers involved in the herd share make a commitment for one full year to come to the farm to pick their gallon on a weekly basis (\$50 feed and maintenance & \$30 per month). Alternatively, customers can get their raw milk at the Moscow Food Coop in reusable quart jars (\$3). This is legal in the state of Idaho because of a small herd exemption (Title 37, Chapter 11).

#### IV. Marketing Assessment & Plan

The ideal customer for Little Bear Dairy has a family with multiple kids, disposable income, is educated on food safety and environmental issues and is committed to supporting our local food economy. The academic community around the University towns of Moscow/Pullman is an excellent potential customer pool. The majority of LDB's current customers is part of the herd share and receive half to one gallon per week. The business will be further expanded by drawing in more herd share costumers, and by selling bottled raw milk at the Moscow food Coop.

##### *Market trends*

Milk is generally accepted as healthy, in part thanks to the successful 'Got Milk' campaign. Over the last decades, pasteurization has become the norm for dairy products, thereby largely outlawing the production of raw milk products. But as the laws on raw milk are softening, a new market is opening up for raw dairy products. Market and sales figures for raw milk are hard to find, because the supply is low and the market is as yet very small and fragmented. In contrast, the market for standard pasteurized milk, and to a lesser extent, organic milk, has been studied in detail. A web-search of governmental websites indicated that the national average per-capita consumption of milk equaled \$ 138 per year per household. The best consumers are householders aged 35-44, mainly married couples with children at home. Among ethnic groups, Hispanics consume the most milk, and spend 12 percent more than average on this product.

##### *Consumer base*

Extrapolating the market data on standard milk to raw milk products is hard to do. Besides LBD, in Idaho there is currently one other raw milk dairy, producing goat milk in Buhl under the small-herd exemption. In the area of Moscow/Pullman/Troy there are currently no other dairies at all. Simultaneously, the market for organic milk is growing rapidly, with several large producers available to consumers in Idaho, including Spokane family farms, Strauss creamery, and Organic Valley. Buyers of organic milk are willing to pay a premium for a healthier and tastier product, expect less or no processing of natural foods, and may be more concerned with supporting local farm businesses. It may be expected that the potential consumer of LBD products can be found in this group. Because of its educated population, the Moscow/Pullman/Troy area has a relatively high demand for local organic products, making it an ideal location for raw milk sales. However, the risks of raw milk products for children and the elderly should be carefully considered, and may repel an important group of traditional milk consumers from buying LBD products.

##### *Anticipated sales volume*

The potential market size for LBD products is limited by the amount of milk produced by 3 cows and 7 goats under the small herd exemption. This equals an estimated 100 consumers (and their families) buying 0.5-1 gallon per week over a 10 month period per year (in the months December and January no milk will be available). Sales will take place through the Moscow Food CO-OP as well as through direct marketing on the farm (herd share). Milk will be sold in quart, half-gallon or gallon volumes. An estimate of sales volumes under optimal and minimal conditions, considering number of animals, milk production and sales price, is given below. The calculation is based on the assumption all milk can be sold.

Major anticipated threats to meeting optimal sales include unforeseen legal obstacles, animals getting sick or not meeting expected milk production, and one or more consumers getting sick, scaring other (potential) costumers.

	Animals	Total production	Sales price	Annual total*
<b>Optimal</b>	3 cows	9 gal. /day	\$ 8 /gal.	\$ 21,600
	7 goats	4 gal. /day	\$ 10 /gal.	<u>\$ 12,000</u>
				<b>\$ 33,600</b>
<b>Minimal</b>	1 cow	2 gal. /day	\$ 5 /gal.	\$ 3,000
	3 goats	1.5 gal. /day	\$ 5 /gal.	<u>\$ 2,250</u>
				<b>\$ 5,250</b>

\*: based on 10 months production per year, assuming all milk can be sold.

## V. Enterprise Requirements

For the successful operation of a raw dairy, a number of requirements need to be critically considered. These include the conditions of local climate, soil and water, but also the availability of proper facilities and sufficient labor. Specific considerations should also be given to legal and regulatory factors.

### *Climate, soil and water*

The climate in Troy, ID (elevation 2400 ft) is relatively harsh for agricultural activities. The growing season is short and the temperature fluctuation throughout the year typically ranges from -20°F to 100°C. There is no guaranteed frost-free period, as frost can occur as late as July, and start as early as August. These challenges can be overcome by providing animals with adequate year-round shelter from wind, rain and snow. When choosing the breed of the goats or cows, their hardiness to cope with harsh weather should be carefully considered.

Daily water requirement is in the order of 100 gallons per day, mainly for drinking water. Pastures do not need to be irrigated. With an average of about 36 inches, annual precipitation is enough to provide all water needs for the farm by two seasonal streams and a well. The farm has water rights to use these sources. Because the cows have direct access to the streams, erosion of the banks should be monitored. It may be advised to restrict access to the stream to just a few locations, protecting the rest of the stream from erosion by setting up an electric fence.

The farm is located on silt loam, at a low pocket surrounded by hills with slopes of up to 35%, resulting in poor drainage. As a result, the farm needs to deal with very wet conditions year round, resulting in occasional mild flooding, muddy conditions, soil compaction, erosion and run-off of manure into the streams. Some of these issues may be mitigated by improvements in infrastructure, such as the construction of drainage pipes in key locations, and elevated boardwalks in muddy areas. The quality of the pastures, especially in the most humid locations, could be improved by seeking the help of a soil expert. Reducing soil compaction should be a major goal, in order to improve the water retaining capacity of the soil. Acidification of the soil by accumulation of manure is another potential issue, and should be monitored. Excess manure should be collected and composted.

### *Facilities*

The existing farm has been family property for quite some time, and is blessed with the presence of a large barn, established pastures, fencing, and some animal shelter. However, some critical improvements are needed in order to bring these facilities to an acceptable level for commercial production of raw milk. The barn is used mainly for the storage of hay and supplementary feed, and is also the location where the animals are milked. The barn contains an improvised milking station, both for the cows and the goats, but this facility needs a major upgrade. After milking, further processing (filtering, bottling) and cleaning of milking implements takes place in the kitchen of the house. Ideally, such activities should be carried out in a dedicated space, for example in a section of the barn. Fencing is present and suitable for keeping the cows contained, but it is not of sufficient quality to prevent the more agile goats from escaping. As a result, the goats currently need to be kept in a limited size pen. Although the purchase of proper equipment for milking, bottling, and capping is required for larger dairies, this is not demanded for operation under the small herd exemption. Because LBD operations are not on a scale to justify such investments, all these tasks will be performed manually instead.

### *Labor requirements*

Dairy animals need to be cleaned, milked, and fed once or twice each day, making the operation of LBD very labor intensive. The dairy generally operates year round, with at least 28 hours of labor needed per week. However, no salaries are currently paid, as labor is readily available. After all, the Winsentsen family consists of 7 family members, all with a strong interest in the family business. As the kids grow older and take up an increasing share of the business, the workload should go down significantly. The family has several years of experience with dairy animals, and is very capable of handling the farm side of the business. However, as the dairy grows and needs to become more professional, a further development of business, book-keeping and budgeting skills is crucial. In order to allow for an occasional vacation, business trip or illness, sufficiently trained substitutes need to be available, even though the level of skill or knowledge required is only moderate. The use of interns may be considered, also because this may result in an interesting learning experience for both parties. Time and resources spent on non-dairy related animals (ducks, rabbits, chickens) could be further reduced.

### *Legal and regulatory affairs*

Raw milk is a highly regulated product, and regulations vary per state. No specific federal requirements exist. Since 2009, the sale of raw milk is permitted in Idaho, as described in detail elsewhere in this report. Raw dairies need to register with the state (ISDA) in order to obtain a (free) permit. All animals need vaccinations and inspections by a certified vet, and the milk products need to be tested on a regular basis. The total costs of these requirements for a maximum size herd (3 cows, 7 goats) would add up to several hundred dollars per year. Liability insurance is highly recommended, costing about \$1,300 per year. Because of the complexity of raw milk regulation, LBD is a member of the Farm-to-Consumer Legal Defense fund (FCLDF), for an annual (producer) fee of \$ 125. Shareholders are also advised to have a FCLDF (consumer) membership for a \$50 annual fee.

### *Estimate of Investments needed*

Although some of the improvements mentioned may be accomplished by a change in organization, a clean-up, or the use of existing, reclaimed, materials, at least some critical investments should be considered. The most important goal of these investments is to live up to the expectations of consumers, and, perhaps more important, to guarantee safety and hygiene. A list of recommended improvements, including estimated cost, is shown below.

<b>Item</b>	<b>Purpose</b>	<b>Modifications required</b>	<b>Estimated cost</b>
Milking station	Restrain animals for cleaning and milking	Rebuild with reclaimed materials	\$ 300
Washing & bottling area	Create dedicated area	Install sink, water, bench space, fridge	\$ 500
Heating/light in barn	Increase comfort during winter months	Install power in barn	\$ 100
Fencing	Fix weak spots, make goat proof	Rebuild with existing materials, buy electric fence materials	\$ 400
Cow/goat shelter	Accommodate growing herd, upgrade existing shelter	Build two shelters with reclaimed materials	\$ 400
Drainage	Reduce flooding & humidity problems	Install drainage pipes, build boardwalks in muddy areas	\$ 100
<b>Total</b>			<b>\$ 1800</b>

## **VI. Livestock Production Plan**

### *Animal stock*

The goal of the livestock operation is to produce raw milk with a maximum of 3 cows and 7 goats. Organic certification is not a goal. Instead, all steps of production are intended to be as sustainable as possible, choosing organic or natural methods where possible, supplemented with conventional only when needed. Animals are currently obtained from a variety of sources, including befriended farmers, or other dairies in the region. All cows are Jerseys (because of the high fat content of the milk), while the goats are of several different breeds. In the future, LBD aims to buy only high grade A2 genetic heifers for breeding. Only natural breeding practices will be used. Raising and selling high grade Jersey heifers is expected to meet a currently unmet market demand and may become another source of income. Animals need to be replaced when milk production dries up, which is typically after about 8 years. Older animals will be culled for meat.

### *Feed and care*

The cows are kept in pasture year round. The forage mix consists of naturally occurring grasses, and clover. There is currently no management of preferred grass species, but it is recommended that more attention is given to pasture fertility and productivity in the future. Cows forage on a rotational scheme over 5 acres as long as weather and pasture conditions permit it, typically from mid-May till August. The rest of the year the feed is supplemented with approximately half a ton of grass- and alfalfa-hay and 180 pounds of dairy chow per cow per month, plus mineral salts as needed. The goats are currently kept in a pen of limited size, because the quality of the

fencing is not good enough to prevent the goats from escaping the pastures. A major improvement of fencing is however planned for the near future. Goats are fed about 6-7 pounds of hay, and 3 pounds of feed pellets per animal per day.

All hay is purchased directly from local farms, while pelleted feed is purchased from Primeland Cooperative. A continuous effort is made to identify high-grade local organic sources of these products. Water for drinking is available in sufficient quantities (300-400 gallons per day) from the seasonal spring, supplemented when needed by a well. As protection from the elements, all animals have unrestricted access to simple wooden shelters, bedded with straw. No system for heating or cooling is present, nor does such a system seem to be needed. An upgrade of all shelters is currently under way, as the herd is slowly growing to its maximum size of 3 cows and 7 goats. All shelters are produced from reclaimed materials as much as possible.

### *Animal health and inspections*

After arrival on the farm, animal will not leave the site until the animal is replaced. For each animal a paper file will be kept to register all veterinary health inspections, vaccinations, and sanitary test results of the milk. The laws governing the sales of raw milk demand that all animals are individually marked by ear ID tags. Furthermore, vaccination is required for Brucellosis, and animals must be tested for TB and BRT.

Besides these mandatory treatments, LBD will maintain animal health as much as possible by natural methods, such as vitamin, herbal and mineral supplements. Typical pests such as flies are controlled by allowing chickens and ducks to freely roam the pasture, eating maggots and other insects. Vicks menthol rub is applied to animals to keep flies away from sensitive areas.

## **VII. Financial Plan**

In section IV of this report, an estimate was made of revenue created under minimal condition and optimal conditions, taking into consideration the number of dairy animals involved, their productivity, and the price of the product per gallon. Because the demand for raw dairy is expected to exceed the (small-scale) production of LBD, it may be assumed that all milk can be sold. Based on these assumptions, the annual income generated from raw milk sales may range from \$ 5,250 (minimal) to \$ 33,600 (optimal).

Clearly, a business needs to be profitable in order to be worth the investment of time, energy and resources. However, it is not always easy to visualize all costs involved, especially over the longer term. In the table below, an attempt was made to list all costs that are expected to be needed to operate the dairy over the next 3 years, which is a standard period of time for determining the viability of the new business. If Little Bear Dairy is able to reach a break-even point (total revenues equal total investments) in the coming three years, it may be concluded that the business has been a success.

The financial plan distinguishes between fixed cost and variable costs. Fixed costs include all expenses that are independent of the amount of animals, or the scale of the business. This includes items such as the presence and maintenance of buildings, the need for a tractor, and liability insurance. The variable costs are those which increase with the scale of production, and include the purchase of animals, their health care and their food costs. An initial investment of around \$ 1800 is needed to bring the existing facilities to an acceptable level to get the business started, as outlined in section V.



	year 1	year 2	year 3	Comments
<b>Fixed costs (\$):</b>				
Facilities: upgrading	1,800	-	-	For details, see section V
Facilities: depreciation	600	600	600	Maintenance fund
Car and tractor	100	100	100	Gas costs
Liability insurance	1,300	1,300	1,300	-
FCLDF fee	125	125	125	Legal defense fund
Savings account	1,200	1,200	1,200	\$ 100 per month
<i>Total, per year</i>	5,125	3,325	3,325	
<i>Total, over 3 years</i>			11,775	

**Variable costs (\$): minimal production**

Feed	3,650	3,650	3,650	\$ 10 per day
Health care/vet	200	200	200	\$ 50 per animal per year
Replace animals	500	500	500	Saving for replacement
Jars for bottling	200	100	100	200 jars plus re-use
<i>Total, per year</i>	4,550	4,450	4,450	
<i>Total, over 3 years</i>			13,450	

**Variable costs (\$): optimal production**

Purchase of animals	6,000	-	-	Add 2 cows and 4 goats
Feed	9,000	9,000	9,000	\$ 25 per day
Health care/vet	500	500	500	\$ 50 per animal per year
Replace animals	1,200	1,200	1,200	Saving for replacement
Jars for bottling	400	200	200	400 jars plus re-use
<i>Total, per year</i>	17,100	10,900	10,900	
<i>Total, over 3 years</i>			38,900	

Although the financial plan is based on rough estimates only, it does allow for some interesting conclusions. Most importantly, when the scale of production is low, and the product is under-priced, the dairy is essentially paying its costumers to drink raw milk. Over a period of the coming three years, based on the 'minimal' conditions, the total costs of production equals about 25 thousand dollar (\$ 11,775 fixed, \$ 13,450 variable), while only about 16 thousand dollar is earned (three years times \$ 5,250). In contrast, when production is 'optimal' with 3 cows and 7 goats in production, and a competitive price per gallon, the total costs equal about \$ 50,000 over three years (\$ 11,775 fixed, \$ 38,900 variable) while earning a potential \$ 100,000 in the same period.

In order to be able to operate the dairy in the future, money should be set aside for the replacement of animals, the maintenance of facilities (depreciation), as well as for unexpected events (e.g. change of legal requirements). In the financial plan below, some suggested amounts are included for factoring in such expenses.

## VIII. Risk Management Plan

### *Production*

Keeping production consistent is extremely important. For this reason a second dairy cow has recently been purchased to meet the demand for milk while the production of the first cow's (named Butterscotch) decreases. The increase in available milk also allows for customers on the waiting list to be offered a cow share and allows for milk to be sold through the Moscow Food Coop.

### *Marketing*

No marketing efforts have been made previously. Even with no advertising, LBD has not been able to meet the local market demands for raw milk and continues to have a waiting list of potential customers. All new customers have heard about LBD by word of mouth and usually have at least one current customer reference. There is already a demand for LBD's raw milk at the coop even before sales have begun. When sales start, there will be even more word of mouth advertising.

To maintain good customer relations, a small but consistent supply should be met. Even if the milk sells out consistently, it would be beneficial for the supply not to fluctuate at all, this way regular customers can make it a part of their regular shopping routine to pick up their raw milk. LBD should place considerable emphasis on transparency and availability. The demographic of customers currently receiving LBD's raw milk (and projected future customers) value the producer-consumer relationship. Maintaining honesty and openness with the community will help build trust and loyalty among costumers.

### *Financial*

A cow share is similar to a CSA in the way the money is handled. The customer pays upfront for all the feed and maintenance costs (\$50/yr) for the entire milking season. They also pay upfront for the month's worth of milk (\$30/mo). This pay schedule allows for cost to be covered before they are incurred which substantially lowers the financial risk for LBD. Any raw milk delivered to the Moscow Food Coop will be sold on consignment. Milk that does not sell can go back to the farm and be used for home consumption, cheese making or animal feed. This ensures that none is wasted lowering the financial risks. Another way LBD minimizes its financial risk is by not going into debt. All new purchases are only made if the money is available. Although it could be argued that this makes LBD more vulnerable because it may not be able to withstand financial emergencies. One way to deal with this is to maintain a savings account to deal with any financial issues that could happen.

### *Legal*

In order for LBD to sell their milk legally they must have their small herd and herd share exemption from the Idaho State Department of Agriculture. By having this permit they are legally able to have a cow share operation and retail sales. Because raw milk is a high risk food product all food safety issues need to be addressed. Milk must be tested on a regular basis to ensure there is no microbiological or drug contamination. Excellent records need to be kept so that any issues can be tracked and dealt with in a timely and responsible manner. Liability

insurance is also required for retail sales and there should be no lapses in coverage at any time. LBD is also a paid member of the Farm to Consumer Legal Defense Fund. This membership allows LBD to get legal advice on any issue regarding raw milk and consumer rights, they also are provided with educational resources that can be passed on to consumers.

*Human Resources*

LBD has no employees, therefore all the labor is done by the family. If anything were to happen to them there is the potential for the lapse in production which could seriously hurt LBD. For this reason it is important to have at the very least 2 fully trained substitutes who can step in and take care of the milking needs. If financial compensation is not available to substitutes, then some sort of barter or exchange could be arranged to motivate the substitutes to maintain their availability.

*SWOT Analysis*

<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>• Small scale business</li> <li>• Manageable work load</li> <li>• Experience with cows and goats</li> <li>• Naturally produced</li> <li>• ISDA permit already obtained</li> <li>• ROI high with current raw milk prices</li> </ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>• Little capital available</li> <li>• 5 children to home-school and feed</li> <li>• Other animals to take care of</li> <li>• Everything done manually</li> <li>• Lack of business management skills</li> <li>• Irregular supply because of lactation cycles</li> </ul>
<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• Only raw milk producer in the area</li> <li>• Educated customer base</li> <li>• Coop willing to sell in consignment</li> <li>• Local foods gaining in popularity</li> <li>• ID laws support raw milk sales</li> </ul>	<p><b>Threats</b></p> <ul style="list-style-type: none"> <li>• Milk contamination</li> <li>• Coop could back out on retail sale</li> <li>• Shareholders could choose not to renew</li> <li>• Laws could change</li> <li>• Potential lawsuit</li> </ul>

## Additional resources

### Farm-to-consumer legal defense fund

- [www.ftcldf.org](http://www.ftcldf.org)

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### ISDA report forms on raw milk

- [www.agri.state.id.us/Categories/Animals/Dairy/dairyRawMilk.php](http://www.agri.state.id.us/Categories/Animals/Dairy/dairyRawMilk.php)

### Latah County extension office

- Cinda Williams *Extension Educator*  
[cindaw@uidaho.edu](mailto:cindaw@uidaho.edu) (208) 883-7161

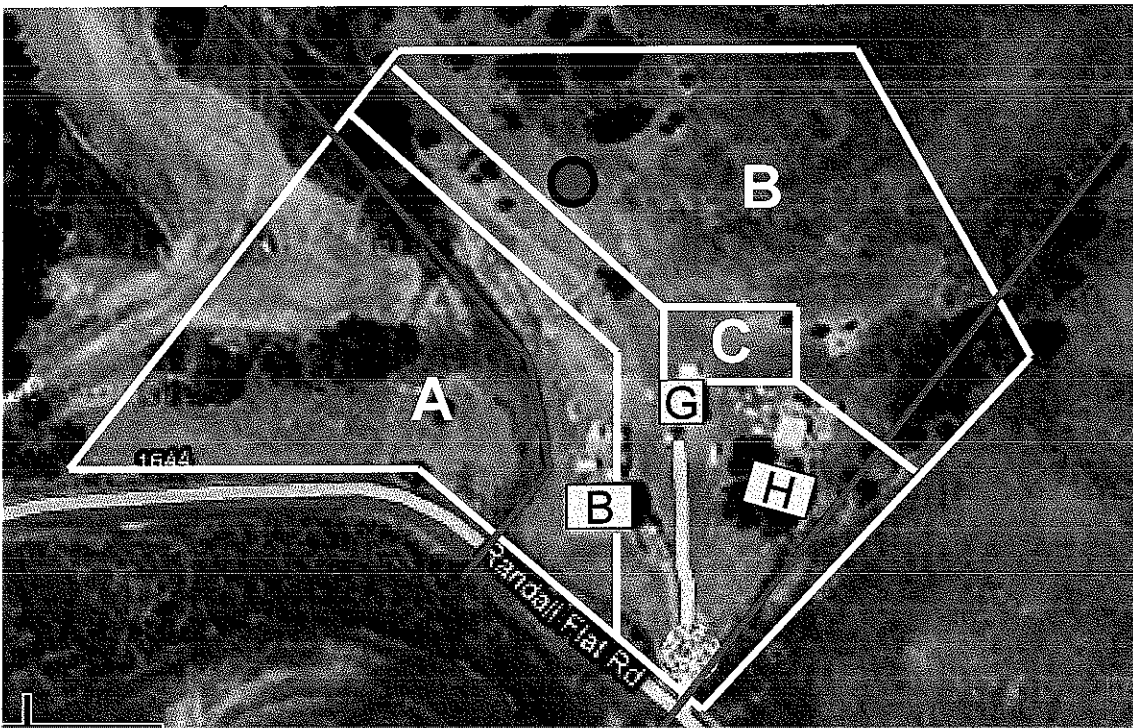
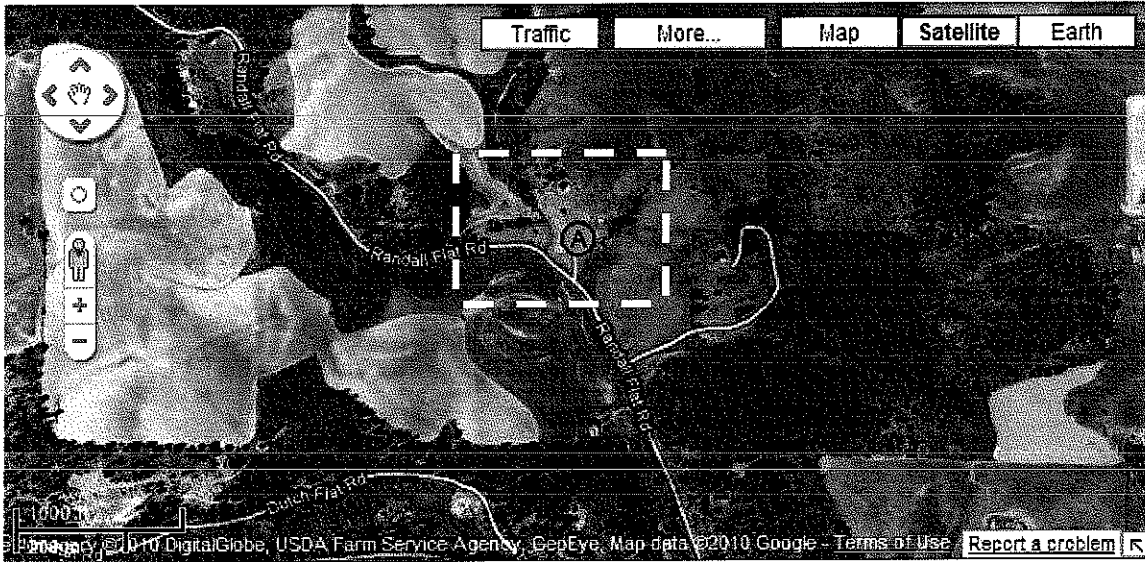
### Raw Milk information websites


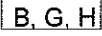




- [www.raw-milk-facts.com](http://www.raw-milk-facts.com)
- [www.realmilk.com](http://www.realmilk.com)
- [www.rawmilk.org](http://www.rawmilk.org)

### Raw milk on Facebook: Idaho alliance for raw milk (ID-ARM)

- [www.facebook.com/idaho.arm](http://www.facebook.com/idaho.arm)

Appendix 1: property map



- |   |                              |   |                       |
|---|------------------------------|---|-----------------------|
|  | : property boundary, fencing |  | : Barn, Garage, House |
|  | : seasonal streams           |  | : cow pastures        |
|  | : well                       |  | : goat pens           |

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**IDAPA 02  
TITLE 04  
CHAPTER 13**

**02.04.13 - RULES GOVERNING RAW MILK**

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**000. LEGAL AUTHORITY.**

This chapter is adopted under the legal authority of Title 37, Chapters 3, 4, 7, and 8, Idaho Code. (3-29-10)

**001. TITLE AND SCOPE.**

**01. Title.** The title of this chapter is "Rules Governing Raw Milk." (3-29-10)

**02. Scope.** These rules will govern the production, processing and sale of raw milk for human consumption, but not intended for pasteurization. The official citation of this chapter is IDAPA 02.04.13.000 et seq. For example, this section's citation is IDAPA 02.04.13.001. (3-29-10)

**002. WRITTEN INTERPRETATIONS.**

There are no written interpretations of these rules. (3-29-10)

**003. ADMINISTRATIVE APPEAL.**

Hearing and appeal rights are set forth in Title 67, Chapter 52, Idaho Code. There is no provision for administrative appeal before the Department of Agriculture under this chapter. (3-29-10)

**004. INCORPORATION BY REFERENCE.**

The following document is incorporated by reference, and copies of the document may be obtained from the Idaho State Department of Agriculture central office at 2270 Old Penitentiary Road, Boise, Idaho, 83712: The Grade A Pasteurized Milk Ordinance 2009 Revision, U.S. Department of Health and Human Services Public Health Service Food and Drug Administration ("2009 Pasteurized Milk Ordinance"), except those provisions establishing raw milk standards for raw milk for pasteurization. (3-29-10)

**005. ADDRESS, OFFICE HOURS, TELEPHONE, AND FAX NUMBERS.**

**01. Physical Address.** The central office of the Idaho State Department of Agriculture is located at 2270 Old Penitentiary Road, Boise, Idaho 83712-0790. (3-29-10)

**02. Office Hours.** Office hours are 8 a.m. to 5 p.m., Mountain Time, Monday through Friday, except holidays designated by the state of Idaho. (3-29-10)

**03. Mailing Address.** The mailing address for the central office is Idaho State Department of Agriculture, P.O. Box 790, Boise, Idaho 83701. (3-29-10)

**04. Telephone Number.** The telephone number of the Division of Animal Industries, Dairy Bureau at the central office is (208) 332-8550. (3-29-10)

**05. Fax Number.** The fax number of the Division of Animal Industries, Dairy Bureau at the central office is (208) 334-4062. (3-29-10)

**006. IDAHO PUBLIC RECORDS ACT.**

These rules are public records and are available for inspection and copying at the Idaho State Department of Agriculture central office. (3-29-10)

**007. DEFINITIONS.**

The following definitions shall apply in the interpretation and the enforcement of this chapter: (3-29-10)

**01. Adulterated.** The addition or inclusion of unclean, unwholesome, inferior, impure or foreign material into a food product, or the production and sale of raw milk or raw milk products from a facility that does not possess a valid permit from the Department. (3-29-10)

**02. Cow Share.** The investment of monetary value into the ownership or care of cows, goats, or sheep in exchange for raw milk or raw milk products. (3-29-10)

**03. Dairy Farm.** Any place or premises where one (1) or more cows, goats or sheep are milked, and from which a part or all of the raw milk or raw milk products are produced and are not intended for pasteurization, but are sold or offered for sale for human consumption without pasteurization. (3-29-10)

**04. Denatured.** To change the usual or normal nature of a material or substance by either chemical or physical means. (3-29-10)

**05. Department.** The Idaho State Department of Agriculture. (3-29-10)

**06. Director.** The Director of the Idaho State Department of Agriculture or his designee. (3-29-10)

**07. Milk Plant.** Any place, premises, or establishment where raw milk is collected, handled, stored, bottled, or processed into raw milk or raw milk products for sale or offered for sale for human consumption. (3-29-10)

**08. Official Laboratory.** A biological, chemical, or physical laboratory that is under the direct supervision of the State or the Department. (3-29-10)

**09. Person.** An individual, plant operator, partnership, corporation, company, firm, trustee, association or institution. (3-29-10)

**10. Raw Milk.** The lacteal secretion, practically free from colostrum, obtained by the complete milking of one (1) or more healthy cows, goats, or sheep, and that has not been pasteurized and is sold or offered for sale for human consumption. (3-29-10)

**11. Raw Milk Products.** Raw milk products include any milk product processed from raw milk that has not been pasteurized. Cheese made from raw milk that has been processed and aged for a minimum of sixty (60) days at a temperature greater than thirty-five degrees (35°) Fahrenheit (F) in a licensed dairy processing plant is exempt from these rules. (3-29-10)

**12. Sanitization.** The application of any effective method or substance to a clean surface for the destruction of pathogens, and of other organisms as far as is practicable. Such treatment shall not adversely affect the equipment, the raw milk or raw milk products or the health of consumers, and shall be acceptable to the Department. (3-29-10)

**13. Small Herd.** The production of raw milk or raw milk products for human consumption, for use by people other than members of their immediate household or non-paying guests, in a facility with no more than three (3) lactating cows or seven (7) lactating goats or sheep. (3-29-10)

**14. Sterilized.** The condition achieved by application of heat, chemical sterilant or other appropriate treatment that renders the piping, equipment and containers used for raw milk and raw milk products free of viable microorganisms. (3-29-10)

**008. -- 010. (RESERVED).**

**011. ADULTERATED OR MISBRANDED RAW MILK OR RAW MILK PRODUCTS.**

No person shall produce, provide, sell, offer, or expose for sale, or possess with intent to sell, within the State or its jurisdiction, any adulterated or misbranded raw milk or raw milk products for human consumption. Any adulterated or misbranded raw milk or raw milk product may be impounded and disposed of as directed by the Department. (3-29-10)

**012. -- 019. (RESERVED).**



**020. PERMITS.**

**01. Requirements.** It shall be unlawful for any person who does not possess a permit from the Department to produce, process, sell or offer for sale raw milk or raw milk products for human consumption. Raw milk shall not be sold or offered for sale through restaurant type establishments or establishments where the consumer may not know that raw milk or raw milk products are from a raw milk source. Grocery stores and similar establishments where raw milk or raw milk products are sold at retail, but not processed, are exempt from the requirements of these rules, provided those stores and establishments receive raw milk or raw milk products from Department-approved facilities. (3-29-10)

**02. Obtaining a Permit.** Only a person who complies with these rules may receive and retain a permit. Permits shall not be transferable with respect to persons or locations. (3-29-10)

**03. Permit Suspension.** The Department may suspend a permit whenever it has reason to believe that a public health hazard exists; whenever the permit holder has violated any of the requirements of these rules; or whenever the permit holder has interfered with the Department in the performance of its duties. (3-29-10)

**a.** Prior to suspending a permit the Department will serve a written notice of intent to suspend permit on the permit holder. The notice will specify the alleged violation(s) and afford the permit holder a reasonable opportunity to correct such violation(s) in a manner agreed to by the parties. In the absence of such agreement, the corrective actions may be designated by the Department. The reasonable opportunity to correct will be given before the permit suspension order becomes effective. A permit suspension will remain in effect until the violation has been corrected to the satisfaction of the Department. (3-29-10)

**b.** In cases in which the raw milk or raw milk products create or appear to create an imminent hazard to the public health, or in case of a willful refusal to permit an authorized inspection, the Department may immediately suspend the permit without the prior notice procedure set forth in these rules. The Department will provide notice and opportunity for hearing after the suspension, in accordance with Title 67, Chapter 52, Idaho Code. (3-29-10)

**c.** Upon written request by any person whose permit has been suspended, or any person who has been served with a notice of intent to suspend, the Department will proceed to a hearing, and upon evidence presented at such hearing may affirm, modify, or rescind the suspension or intention to suspend. (3-29-10)

**d.** The Department may forego permit suspension, provided the raw milk or raw milk products in violation are not sold or offered for sale or distributed for human consumption. (3-29-10)

**04. Permit Revocation.** Upon repeated violations, the Department may revoke a permit following reasonable notice to the permit holder and an opportunity for a hearing. This Section is not intended to preclude the institution of court action. (3-29-10)

**05. Permit Reinstatement.** Any raw milk producer whose permit has been suspended or revoked may make written application for the reinstatement of his permit. (3-29-10)

**a.** When the permit has been suspended due to a violation of any of the bacterial, coliform, or cooling-temperature standards, the Department may issue a temporary permit after raw milk samples show that the conditions responsible for the violation have been corrected. (3-29-10)

**b.** When the permit has been suspended due to a violation of the somatic cell count standard, the Department may issue a temporary permit if resampling of the herd milk supply indicates that the milk supply is within the somatic cell count standard. (3-29-10)

**c.** Whenever the permit has been suspended due to a violation of a requirement other than bacteriological, coliform, somatic cell count or cooling-temperature standards, the application for reinstatement must show that the violation has been corrected. Within one (1) week of the receipt of such application, the Department will make an inspection of the applicant's establishment, and may make additional subsequent inspections as deemed necessary. If the inspection shows that the raw milk or raw milk products meet the applicable standards and are in

compliance with these rules, the permit will be reinstated.

(3-29-10)

**021. -- 029. (RESERVED).**

**030. LABELING.**

**01. Requirements.** All bottles, containers, and packages enclosing raw milk or raw milk products shall be conspicuously marked with the word "raw," the quantity of contents and the identity of the packaging facility. The word "goat" or "sheep," if applicable, shall precede the name of the raw milk or raw milk products. (3-29-10)

**02. Misleading Labels.** It is a violation of these rules to use any misleading marks, words, or endorsements upon the label. Registered trade designs or similar terms on the bottle cap or label may be used if the Department determines that the designs or terms are not misleading and do not obscure the labeling required by these rules. Any misleading labeling on the final container will cause the product to be considered misbranded. (3-29-10)

**031. -- 039. (RESERVED).**

**040. INSPECTION OF RAW MILK PRODUCERS.**

Each dairy farm whose raw milk or raw milk products are intended for human consumption within the state of Idaho shall be inspected and approved by the Department prior to the issuance of a permit. (3-29-10)

**01. Inspection Frequency.** Following the issuance of a permit, the Department will inspect each raw milk producer and raw milk processor at least once every three (3) months. (3-29-10)

**02. Sanitation Requirements.** All raw milk dairy farms and milk plants that process raw milk or raw milk products for human consumption into final containers, for use other than for members or their immediate household or non-paying guests, shall meet the requirements of the 2009 Pasteurized Milk Ordinance, in addition to Section 060 of these rules. (3-29-10)

**03. Processing Location.** All raw milk and raw milk products must be produced and processed on the same premises. (3-29-10)

**04. Cow Share Programs.** Cow Share programs are allowed, provided that the raw milk and raw milk products are produced and processed in facilities with raw milk dairy farm and raw milk plant permits issued by the Department. (3-29-10)

**05. Applicability.** Persons or a person with more than three (3) lactating cows or seven (7) lactating goats or sheep may sell raw milk and raw milk products for human consumption, provided that the raw milk and raw milk products are produced and processed in facilities with raw milk dairy farm and raw milk plant permits issued by the Department. (3-29-10)

**041. -- 049. (RESERVED).**

**050. SMALL HERD EXEMPTION.**

The production of raw milk and raw milk products for human consumption by a person or by individuals participating in a Cow Share program is exempt from the sanitary construction and operation standards of the 2009 Pasteurized Milk Ordinance, provided the following conditions are met: (3-29-10)

**01. Testing Frequency.** The raw milk and raw milk products comply with the testing frequency set forth in the 2009 Pasteurized Milk Ordinance and quality standards set forth in Section 060 of these rules. (3-29-10)

**02. Applicability.** The number of animals in lactation does not exceed three (3) cows or seven (7) goats or sheep. (3-29-10)

**03. Permit.** The person or the Cow Share owners obtain a small herd exemption permit from the Department. The permit will indicate the physical location of the facility; the mailing address of the owner or operator in charge of the herd's care and milk quality. (3-29-10)

**04. Test Results Made Available.** Milk quality test results shall be available from the permit holder to all individuals who purchase raw milk or raw milk products. (3-29-10)

**05. Restriction for Sale.** The raw milk or raw milk products may not be sold or offered for sale through restaurant-type establishments or other establishments where the consumer may not know that raw milk or raw milk products are from a raw milk source. (3-29-10)

**06. Labeling.** All raw milk and raw milk products must have approved labeling by the Department if sales take place at locations other than the point of production. (3-29-10)

**051. -- 059. (RESERVED).**

**060. STANDARDS FOR RAW MILK AND RAW MILK PRODUCTS.**

**01. Requirements.** All raw milk and raw milk products shall be produced and processed to conform with the standards listed in Table 1 below. Raw milk and raw milk products shall meet the sanitation requirements of the 2009 Pasteurized Milk Ordinance, unless the facility has a small herd exemption. (3-29-10)

**02. Chemical, Bacteriological, and Temperature Standards.**

RAW MILK	
Temperature	Cooled to forty degrees Fahrenheit (40F or 5C) or less within two (2) hours after milking provided that the blend temperature after the first and subsequent milking does not exceed forty-five degrees Fahrenheit (45F or 7C).
Bacterial Limits	Raw milk shall not exceed fifteen thousand (15,000) per ml.
Coliform Limits	Raw milk shall not exceed twenty-five (25) per ml.
Drugs	Milk must test negative by a test method approved by the Department.
Somatic Cell Counts	Raw milk shall not exceed five hundred thousand (500,000) per ml. Goat or Sheep Raw Milk shall not exceed seven hundred and fifty thousand (750,000) per ml.
Tuberculosis Test	All Raw Milk shall be from animals which have been accredited as tuberculosis free or shall have passed an annual tuberculosis test.

(3-29-10)

**061. -- 069. (RESERVED).**

**070. PENALTY.**

Any person who violates any of the provisions of these rules shall be subject to the penalties provided in Section 37-408, Idaho Code, or may have their permit to sell raw milk or raw milk products for human consumption revoked or suspended. (3-29-10)

**071. -- 999. (RESERVED).**

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TITLE 37  
FOOD, DRUGS, AND OIL  
CHAPTER 11  
ACQUISITION OF RAW MILK

~~37-1101. ACQUISITION OF RAW MILK AND RAW MILK PRODUCTS BY~~  
OWNER. (1) The acquisition of raw milk or raw milk products from cows, sheep or goats by an owner of such cows, sheep or goats for use or consumption by the owner or members of the owner's household shall not constitute the sale or retail sale of raw milk or raw milk products and shall not be prohibited. The acquisition of raw milk or raw milk products from cows, sheep or goats by an owner of a cow share, sheep share or goat share for use or consumption by the owner or members of the owner's household shall not constitute the sale or retail sale of raw milk or raw milk products and shall not be prohibited provided the following conditions are met:

(a) Unless otherwise permitted by the Idaho state department of agriculture, no more than seven (7) cows, fifteen (15) sheep or fifteen (15) goats may be kept as part of a cow share, sheep share or goat share program.

(b) The owner of a cow share, sheep share or goat share shall receive raw milk or raw milk products directly from the farm or dairy where the cow, sheep, goat or dairy herd is located and the farm or dairy shall be registered pursuant to subsection (2) of this section. A person who is the owner of a cow share, sheep share or goat share in a cow, sheep, goat or dairy herd may receive raw milk or raw milk products on behalf of another owner of the same cow, sheep, goat or dairy herd. A person who is not an owner of a cow share, sheep share or goat share in the same cow, sheep, goat or dairy herd shall not receive raw milk or raw milk products on behalf of the owner of a cow share, sheep share or goat share.

(c) The raw milk or raw milk products are obtained pursuant to the ownership of a cow, sheep, goat, cow share, sheep share or goat share. A cow share, sheep share or goat share is an undivided ownership interest in a cow, sheep, goat or herd of cows, sheep or goats, created by a written contractual relationship between an owner and a farmer that includes a bill of sale, stock certificate or other written evidence satisfactory to the director of the Idaho state department of agriculture of a bona fide ownership interest in the cow, sheep, goat or dairy herd. Such written contractual relationship shall also include boarding terms under which the cow, sheep, goat or

dairy herd are boarded, milked and cared for. Such written contractual relationship shall also clearly set forth that the share owner is entitled to receive a share of milk or milk products from the cow, sheep, goat or dairy herd and contain a conspicuous notification that the milk or milk products are raw and not pasteurized.

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(d) Information describing the standards used by the farm or dairy with respect to herd health, and in the production of milk from the herd, is provided to the share owner by the farmer together with results of tests performed on the cows, sheep or goats that produced the milk, tests performed on the milk and an explanation of the tests and test results.

(e) A farm or dairy operating a cow share, sheep share or goat share program with more than three (3) cows, seven (7) sheep or seven (7) goats shall test such raw milk or raw milk products at a frequency of at least four (4) separate months during any consecutive six (6) month period. Each batch of raw milk shall test negative for drugs. Milk quality tests and drug tests shall be conducted utilizing testing methods approved by the Idaho state department of agriculture. In no event shall such raw milk or raw milk products contain:

(i) More than fifteen thousand (15,000) bacteria per milliliter;

(ii) More than twenty-five (25) coliform per milliliter;

(iii) More than five hundred thousand (500,000) somatic cells per milliliter of raw milk from a cow or more than seven hundred fifty thousand (750,000) somatic cells per milliliter of raw milk from a sheep or goat.

(f) Whenever three (3) of the last five (5) consecutive bacteria, coliform, or somatic cell tests exceeds any of the milk quality standards listed in this section, the cow share, sheep share or goat share owners shall be notified and no milk shall be offered for human consumption until such time it meets the standard.

(g) Milk testing positive for drugs shall not be used for human consumption.

(h) All cows, sheep or goats kept as part of a cow share, sheep share or goat share program shall be tuberculosis and

brucellosis free and shall be tested for tuberculosis and brucellosis annually.

(2) Registration of a farm or dairy as required by subsection (1)(b) of this section shall be accomplished by delivering to the Idaho state department of agriculture a ~~written statement containing:~~

- (a) The name of the farmer, farm or dairy;
- (b) A valid, current address of the farmer, farm or dairy; and
- (c) A statement that raw milk or raw milk products are being produced at the farm or dairy.

(3) No person who obtains raw milk or raw milk products in accordance with this section shall sell such raw milk or raw milk products. Unless otherwise permitted by the Idaho state department of agriculture, it shall be unlawful for an owner of a cow, sheep, goat, cow share, sheep share or goat share to sell, offer for sale or advertise for sale to any person or distribute to any restaurant or food establishment, grocery store or farmers market any raw milk or raw milk products produced as provided herein. Any person who violates the provisions of this section shall be guilty of a misdemeanor and upon conviction shall be subject to a fine not exceeding two hundred dollars (\$200) or imprisonment in the county jail not to exceed three (3) months, or by both such fine and imprisonment. The director of the Idaho state department of agriculture may bring civil actions to enjoin violation of the provisions of this section.

(4) No producer of raw milk or raw milk products as provided in this section shall publish any statement that implies approval or endorsement by the Idaho state department of agriculture.

(5) The Idaho state department of agriculture is charged with the responsibility of administration and enforcement of this chapter and is empowered to promulgate and enforce rules not inconsistent with this chapter.

(6) The Idaho state department of agriculture is authorized to issue a hold order to stop the distribution of raw milk or raw milk products when it is deemed necessary to protect human health.

<http://www.legislature.idaho.gov/idstat/Title37/T37CH11SECT37-1101.htm>

Legislative Services Office • P.O. Box 83720 • Boise, ID • 83720-0054 208/334-2475 • FAX 208/334-2125

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## **Herd Share Program for Acquiring Raw Milk (Title 37 Chapter 11):**

Herd share “owner” is a person who has a contractual agreement for the ownership or care of cows, goats, or sheep that produce milk for human consumption and receive raw milk or raw milk products for such care or ownership.

Applicable for raw milk from 1 to 7 lactating cows, 1 to 15 lactating goats or lactating sheep intended for human consumption.

1. Facility and responsible party (herd share) are issued a Herd Share Registration from the Idaho State Department of Agriculture (ISDA).
  - a. Completely fill out registration form. (*see registration form*)
  - b. Provide copy of Tuberculosis testing results on all animals used in the herd share raw milk program.
  - c. ISDA will conduct a Brucellosis Ring Test (BRT) at least semi annually on Raw Milk samples collected from the monthly milk quality collection for cow milk.
  - d. BRT tests on goat and sheep milk are not official, therefore goats and sheep must be blood tested annually by a licensed Veterinarian for Brucellosis and documentation of testing results provided to ISDA.
  - e. Provide individual animal identification for animals participating in the program, such as ear tags, or tattoos.
  - f. All female bovine dairy animals must be brucellosis vaccinated between four (4) months and twelve (12) months of age.
  - g. If your bovine is over (12) twelve months of age and is not vaccinated for Brucellosis, your veterinarian must draw a blood sample. If test results are negative, the animal can be adult vaccinated through a permit issued by the state veterinarian, if the animal originated in Idaho.
  - h. Submit a copy of the contractual arrangement between the herd share owners and the farmer.

**Milk/Drug Testing Criteria:**

1. ISDA will test raw milk a minimum of four (4) times (in separate months) in any consecutive six (6) month period for SPC, SCC, Coliform, Drugs, and Temperature.
2. Each batch of milk shall be tested and test negative for drugs using ISDA approved drug testing protocols.
  - a. Each commingled batch of milk intended for human consumption must be tested negative for drugs. (Delvo, Snap, or Charm type tests).
  - b. In lieu of certified analysts, the person conducting the test must be able to demonstrate acceptable ability to conduct the tests.
  - c. If other than B-Lactam drugs are administered to animals Delvo or equivalent test needs to be used.
  - d. Any batch of milk that tests positive for drugs must not be used for human consumption.
3. See Table below:

	Standard Plate Count	Coliform	Somatic Cell	Drugs	Temp
cows	15,000 mg/l	25	500,000	neg	40°
goats	15,000 mg/l	25	750,000	neg	40°
sheep	15,000 mg/l	25	750,000	neg	40°

4. Whenever three (3) out of the last five (5) tests exceed SPC, Coliform, SCC, or Temperature requirements the raw milk cannot be used for human consumption until the milk meets quality standards.

**Other Requirements:**

1. Raw milk or raw milk products cannot be sold.
2. A person who is not a herd share owner can not receive raw milk or raw milk products from a herd share owner.
3. Provide share owners milk quality and cow testing results.
4. Raw milk and raw milk products must be obtained at the point of production.

IDAHO DEPARTMENT OF AGRICULTURE  
BUREAU OF DAIRYING  
PO BOX 790, BOISE ID 83701-0790  
(208) 332-8550

# HERD SHARE REGISTRATION FORM

1. Name of responsible person for the herd share farm: \_\_\_\_\_

2. Physical location of herd share farm:

Street: \_\_\_\_\_

City/State/Zip \_\_\_\_\_

3. Mailing address of herd share farm (If different from physical location):

Street: \_\_\_\_\_

City/State/Zip \_\_\_\_\_

4. Phone number (home): \_\_\_\_\_

5. Phone number (cell): \_\_\_\_\_

6. E-mail address: \_\_\_\_\_

7. Type of animals and how many (cow, goat, sheep): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

8. Verification of annual Veterinarian Tuberculosis tests for each animal (proof of documentation from Veterinarian must accompany registration form).

9. Verification of annual Brucellosis blood tests for each animal goat/sheep (proof of documentation from Veterinarian/ISDA Lab must accompany registration form).

10. Please list individual animal's identification (such as ear tag, or Brucellosis tag):

\_\_\_\_\_

\_\_\_\_\_

11. Submit contractual arrangement between the herd share owners and the farmer.

12. \_\_\_\_\_

Signature of Responsible Party

Date

### **Small Herd Exemption (IDAPA 02.04.13 Rules Governing Raw Milk):**

Small herd (no more than 3 lactating cows or 7 lactating goats, or 7 lactating sheep (wanting to legally sell or provide raw milk for human consumption for other than immediate household or non paying guests) may do so if the following criteria is met:

1. Facility and responsible party (small herd) are issued a Small Herd Permit from the Idaho State Department of Agriculture (ISDA).
  - a. Completely fill out registration form. (*see registration form*)
  - b. Provide copy of Tuberculosis testing results on all animals used in the small herd raw milk program.
  - c. ISDA will conduct a Brucellosis Ring Test (BRT) at least semi annually on Raw Milk samples collected from the monthly milk quality collection for cow milk.
  - d. BRT tests on goat and sheep milk are not official, therefore goats and sheep must be blood tested annually by a licensed Veterinarian for Brucellosis and documentation of testing results provided to ISDA.
  - e. Provide individual animal identification for animals participating in the program, such as ear tags, or tattoos.
  - f. All female bovine dairy animals must be brucellosis vaccinated between four (4) months and twelve (12) months of age.
  - g. If your bovine is over (12) twelve months of age and is not vaccinated for Brucellosis, your veterinarian must draw a blood sample. If test results are negative, the animal can be adult vaccinated through a permit issued by the state veterinarian, if the animal originated in Idaho.

### **Milk /Drug Testing Criteria:**

1. ISDA will test raw milk a minimum of four (4) times (in separate months) in any consecutive six (6) month period for SPC, SCC, Coliform, Drugs, and Temperature.
2. Each batch of milk shall be tested and test negative for drugs using ISDA approved drug testing protocols.
  - a. Each commingled batch of milk intended for human consumption must be tested negative for drugs. (Delvo, Snap, or Charm type tests).

- b. In lieu of certified analysts, the person conducting the test must be able to demonstrate acceptable ability to conduct the tests.
- c. If other than B-Lactam drugs are administered to animals Delvo or equivalent test needs to be used.
- d. Any batch of milk that tests positive for drugs must not be used for human consumption (other than members of immediate household).

3. See Table below:

	Standard Plate Count	Coliform	Somatic Cell	Drugs	Temp
cows	15,000 mg/l	25	500,000	neg	40°
goats	15,000 mg/l	25	750,000	neg	40°
sheep	15,000 mg/l	25	750,000	neg	40°

- 4. Whenever three (3) out of the last five (5) tests exceed SPC, SCC, Coliform, or Temperature the milk cannot be used for human consumption outside the immediate household.

**Other Requirements:**

- 1. Raw milk or raw milk products cannot be sold to restaurants or other establishments where a consumer may not know the milk is from a raw milk source.
- 2. Must have ISDA label approval if sales take place at locations other than the point of production.

IDAHO DEPARTMENT OF AGRICULTURE  
BUREAU OF DAIRYING  
PO BOX 790, BOISE ID 83701-0790  
(208) 332-8550

# SMALL HERD RAW MILK PERMIT REGISTRATION FORM

1. Name of responsible person for the small herd: \_\_\_\_\_
2. Physical location of small herd:  
Street: \_\_\_\_\_  
City/State/Zip \_\_\_\_\_
3. Mailing address of small herd (If different from physical location):  
Street: \_\_\_\_\_  
City/State/Zip \_\_\_\_\_
4. Phone number (home): \_\_\_\_\_
5. Phone number (cell): \_\_\_\_\_
6. E-mail address: \_\_\_\_\_
7. Type of animals and how many (cow, goat, sheep): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
8. Verification of annual Veterinarian Tuberculosis tests for each animal (**proof of documentation from Veterinarian must accompany registration form**).
9. Verification of annual Brucellosis blood tests for each animal goat/sheep (**proof of documentation from Veterinarian/ISDA Lab must accompany registration form**).
10. Please list individual animal's identification (such as ear tag, or Brucellosis tag):  
\_\_\_\_\_  
\_\_\_\_\_
11. Submit label for approval if raw milk is sold at locations other than the point of production.
12. Submit an **additional** label for approval for **each** raw milk product.
13. \_\_\_\_\_  
Signature of Responsible Party Date