



February 13, 2014

Cort Jensen,
Montana Department of Agriculture
302 N Roberts
Helena, MT 59601
cojensen@mt.gov

Dear Mr. Jensen,

On behalf of the Montana Public Health Association (MPHA) please accept this letter in reference to House Bill 630. MPHA is a diverse member driven organization with a mission of seeking optimal health and working to shape the public health policy for all Montanans. MPHA currently has 175 members across Montana. The members provide representation from local public health departments, the state health department and public health focused organizations. MPHA has been actively involved with both the Montana Environmental Health Association and the Association of Montana Public Health Officials on discussing House Bill 630 with a specific focus on cottage food and methods for improving Montana's food laws. The below comments summarize the stance of MPHA on this topic and are in agreement with the guiding principles submitted by the Montana Environmental Health Association.

MPHA recognizes that there is an increased demand for cottage food businesses in Montana and believes that making changes to Montana's food laws and regulations will provide opportunities for these businesses while at the same time protecting the health of Montana residents. MPHA puts forward the following guiding principles regarding cottage food:

- The health and safety of Montana residents and visitors needs to remain first and foremost
- The best available scientific research must be utilized
- The Farmer's Market standards and cottage food standards need to be combined for simplification
- The Department of Public Health and Human Services should be allowed to develop rules regarding cottage food operation
- Cottage food rules should include:
 - Annual registration with a regulatory authority (with an associated fee)
 - No high-risk foods, procedures or packaging
 - Clear labeling indicating that food was not produced in a licensed facility
 - Required food safety training

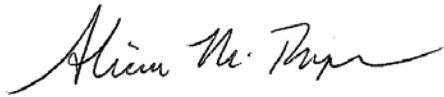
- Limiting of sales to public events
- Allow the regulatory authority the right to inspect and investigate as needed

In addition to the cottage food guidelines above MPHA would also like to see the following changes made to Montana's food laws:

- Allow the Department of Public Health and Human Services greater flexibility in creating rules
- The language in MCA 50-50 should be simplified and modernized

We thank you for the opportunity to provide comment on Montana's food regulations.

Sincerely,

A handwritten signature in black ink that reads "Alicia Thompson". The signature is written in a cursive, flowing style.

Alicia Thompson
President, Montana Public Health Association