

Emailed to Senator Wagner, December 13, 2007.

Dear Senator Wagner:

The Virginia Independent Consumers and Farmers Association, Inc. hereby respectfully requests that the Joint Commission on Administrative Rules review the above-referenced regulation.

This regulation is overly burdensome for small goat and sheep owners as it requires that all owners of such animals register their premises with the state, tag their animals, and keep records every time they buy or sell an animal within the state of Virginia. Records must be kept for five years and are subject to inspection by representatives from the Virginia Department of Agriculture and Consumer Services. The penalty for violating the regulation is a first-class misdemeanor, one year in jail, and/or a \$2,500 fine. Many small goat and sheep farmers will simply give up and go out of business if the regulation becomes effective.

Furthermore, such a regulation is unnecessary as scrapie is not a public health threat and there have been no documented cases of scrapie in goats in Virginia and only three cases in sheep. In addition, there is a mandatory federal scrapie regulation for interstate commerce and business may still be done on the interstate level without this proposed regulation on the intrastate level.

The regulation is currently at the proposal stage. A public hearing on the matter was held December 6, 2007 and the Board of Agriculture and Consumer Services intends to vote on the regulation at its March 20, 2008 board meeting.

Thank you for your time and consideration.

Very truly yours,

Laura Russell, Secretary
Virginia Independent Consumers
and Farmers Association, Inc.