

"Reverting again to the suggestion that there is no rigid set of gazetted regulations, we submit the following instance of the difficulty of framing general rules to cover individual cases. In the Dairy Industry Act the whole of a farm may be a dairy within the meaning of the Act. The regulations under the Act and the Act itself provides that a privy must not be within a certain distance of a dairy. In other words, it must not be within a certain distance of the farm itself, which is manifestly absurd. To summarise our suggestions, we think,—

"1. There should be no gazetted general regulations, but that the question of issuing a license be left entirely to a Dairy Inspector.

"2. Right of appeal from an Inspector's opinion to that of a departmental Veterinarian should be granted.

"We trust that this letter in itself proves that no reflection upon the Dairy Inspector for this district is intended. On the contrary, we have pleasure in assuring you that his suggestions and assistance regarding certain part of dairying work has been most valuable, and have been given most cheerfully. Nor do we wish you to think for one moment that we wish in the slightest degree to plead for any relaxing of the attempts your Department is making to improve conditions on dairy farms. On the contrary, we think that every improvement made will in time mean more profit to the dairy farmer, as well as being more beneficial to the public.

"If you desire to have any further expressions of the opinion of dairymen on the suggestions we make, we have no objection to the publication of this letter, provided our name is kept out of the Press; otherwise we may be accused of seeking cheap advertisement.

"Yours, &c.,

"THE RIVERSIDE DAIRY COMPANY."

In the letter, proceeds Mr. Carey, I have made the suggestion that there should be no regulations whatever, and that the question of regulation of dairies should be left to the Inspector, with right of appeal as indicated. Seeing that the regulations are drafted, I should like to make a few comments on them seriatim. In regulation No. 1, the definition of a "dairy": It appears to me in the second part to conflict with that in the Act. I am presuming that the regulations were issued under the Dairy Industry Act of 1898. Paragraph 1 of the regulations says, amongst other things, that the dairy does not include any milk shop or factory, &c., whereas in the Act (section 3) it says it does. We do not know quite where we stand, as that is the regulation. So far as registration is concerned, I have not very much to say, but I think the fee of 10s. is altogether too high. Coming to regulation A, section A: Apart from my standpoint of this, I was asked by a man who has a half-acre section, and is milking one cow, what objection would there be to his milking a cow for his own use while not supplying neighbours. He has no milking-shed, but he maintains it is better for him to milk in the open paddock than to have a very cheap shed or stop altogether. In paragraph C of 8 it says the floor of every cowshed shall be of an even surface, &c., and that a suitable gutter shall be provided and be connected with the outlet drain. I would like to know where the outlet drain is to be, or if you can do what you like. This is the biggest difficulty in connection with the yards. Further down in paragraph (p) of the same regulation it says, "No liquid manure or other offensive matter shall be discharged or allowed to flow into any watercourse or other place whereby the water-supply of any stock is like to be contaminated." As a matter of fact, where we are there is no other place you can take it except into a creek or on to flat land; so I do not know exactly what that outlet drain means. Then, paragraph (h) of the same regulation: "No cowshed, or building where cows are kept, or milking-yard, or stock-yard used in connection with the milking of cows shall be within 30 ft. of any stable, fowl-house, fowl-run, calf-pen, &c." I do not know whether that means you cannot have a calf-pen opening off the stockyard; if it does, it is pretty severe. I do not see what objection there is to having the calf-pen opening off the stockyard. In regulation 9 it says that every dairyman shall "notify the Inspector at least fourteen days before commencing to make any structural alterations in or about his dairy premises, and shall in such notice give brief notice of the proposed alterations." I would like to suggest that it would be very much wiser to make it in the case of new buildings, so that the approval of the Department could be obtained to the plans before the buildings were started. Then, regulation 13: "No dairyman shall place, or allow to be placed, in any milk-house or cowshed anything of a character likely to endanger the purity of the milk." There is nothing to say as to who is to decide what will endanger the purity of the milk. In the next regulation, paragraph A: "Strain all milk through an approved strainer." Who is to approve? Then, regulation 16: "Every dairyman shall, immediately after the milk is cooled, keep it in a cool place, and at all times thereafter while it is in his possession securely cover it and protect it from the sun's rays." I do not know what is meant by that phrase "securely covered." Regulation 17 provides, amongst other things, that everything is to be allowed to air. We deliver the bulk of our milk in bottles, and it would be absolutely impossible after taking bottles out of the steam chest to put them to dry in the air, as it would then be impossible to prevent them becoming covered with dust. It is difficult enough in the factory to keep them free from dust. Does the regulation mean we must do them outside? In paragraph (e) of the same regulation it says, "In the case of cans or other utensils used in the conveyance of milk or cream consigned by a dairyman by rail or otherwise to a factor or milk-vendor, milk depot, or other place, such cans and utensils shall, within one hour after arriving at the consignee's premises, be emptied and cleansed by the person to whom they are consigned." How does that apply to the case of milk sent into the city over night? We send every night twenty gallons in bottles in locked crates. Does this mean that the bottles would have to be emptied within two hours? If it does, the whole scheme of bottled milk falls to the ground. In regulation 27, paragraph (b), it says you must not give away "any milk from any cow that has calved until four clear days at least have elapsed from the day of calving." As a matter of fact, men come to our place for the sake of this milk for their pigs and calves, and, provided it is not