



2015 NCIMS Grade “A” Conference - The 500 Year Storm that Never Was - May 2015

The 2015 National Conference on Interstate Milk Shipments (NCIMS) was held April 24th – 29th in Portland, Oregon to consider 100 changes (proposals), with state delegates passing 49. Two sets of proposals had the potential to create significant divisions between the US Food & Drug Administration (FDA), the state dairy regulatory agencies and the dairy processing industry. This never happened as all parties worked very hard to find common ground on both subject areas.

The first was to make changes in the Grade “A” dairy plant requirements so the Pasteurized Milk Ordinance (PMO) requirements would be closer to the Food Safety Modernization Act’s (FSMA’s) proposed “Preventive Controls for Human Foods.” This US Food & Drug Administration (FDA) proposed regulation has no exemption for Grade “A” dairy plants and will be published in final form at the end of August, 2015 with enforcement expected in late 2016. Some attending the Conference believed that FDA would demand that all of the Preventive Controls requirements would have to be added to the PMO for FDA to continue to accept the NCIMS Grade “A” program.

The other potentially controversial subject was the expansion of the Grade “A” program for animal drug residue detection. This expansion has been studied for years by NCIMS Committees and FDA. FDA’s released its four-year “Multicriteria-based Ranking Model for Risk Management of Animal Drug Residues in Milk and Milk Products” study on the first day of the Conference. This FDA study provided a risk ranking of animal drugs used by dairy farmers and prioritized them (risk ranking). The ranking is intended to be used to determine which animal drug residues should be added to the mandatory testing program for beta lactam (penicillin-type) drug residues (began in the mid-1990s). The states and industry supported a pilot program to establish and fine tune an expansion of the existing mandatory testing for animal drugs in raw milk coming from the farm while FDA wanted a specific list of animal drugs added to the existing program and implemented within two (2) years. The current animal drug residue testing program has kept the nation’s milk supply safe from the accidental addition of animal drugs since 1995.

Fortunately, after much discussion and negotiation, the outcome in both subject areas was a reasonable compromise.

For the animal drug issue, two proposals were adopted by the Conference. The first established a two (2) year pilot program to add raw milk screening for flunixin, amphenicols, sulfonamides, macrolides, tetracyclines, aminoglycosides and/or avermectins. The pilot was assigned to the NCIMS Appendix N Modification Study Committee to oversee and report to the 2017 NCIMS Conference. The other important drug residue issue will allow the industry and state dairy regulators to use and take regulatory action when a drug residue test that was not approved by FDA, but was reviewed and verified by the NCIMS delivers a positive result (animal drug residues in the raw milk).

The proposals to add FSMA Preventive Controls requirements also resulted in a compromise whereby dairy plants will be required by August 30, 2016 to have a written hazard analysis along with a written environmental monitoring, allergen and recall program along with a documented supplier management program for both dairy and non-dairy ingredients.

In general, a number of proposals were adopted that accepted the use of the “TEMPO” drug residue test, changed in pasteurizer testing protocol, brought water testing into alignment with new EPA requirements on testing for ecoli versus coliforms (effective date April 1, 2016), updated requirements for plants making primary packaging for use by Grade “A” dairy plants and extended farm and plant water sample transport time from collection to arrival at the testing laboratory from 30 hours to 48 hours.

Re-elected to the NCIMS Executive Board were Chairman Dr. Steven Beam (State of California) and Michael Wiggs (State of Idaho). Newly elected were Antone Michelson (Darigold), Randy Chloupek (State of Nebraska) and Rebecca Piston (HP Hood).

The remaining steps for all changes to be officially adopted is a review and report from FDA (expected by mid-July 2015) and an Executive Board meeting with FDA (expected in late September 2015). All proposals agreed to at this meeting will be officially enforced by state dairy regulators one year after this meeting, unless an adopted proposal has already had a date included for it to be effective.

For more information on any proposals, please contact Allen Sayler with the ADPI Center of Excellence (asayler@cfsrs.com), sign up to participate in a webinar on the outcomes of the 2015 NCIMS Conference and their impact on the dairy processing industry (www.cfsrs.com, click on the “Webinar” tab) or call Dan Meyer, Technical Director for ADPI at (630) 530-8700 x224.

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