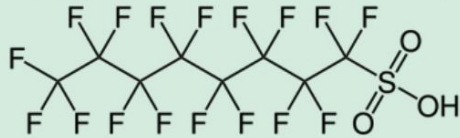


Per- and Polyfluoroalkyl Substances (PFAS) Milk Sampling Project

Liaison Committee Update: NADRO 2024

PFAS

PFOS (Perfluorooctanesulfonic acid)



PFOA (Perfluorooctanoic acid)



Stephen Beam, PhD

NCIMS Liaison Committee Chair

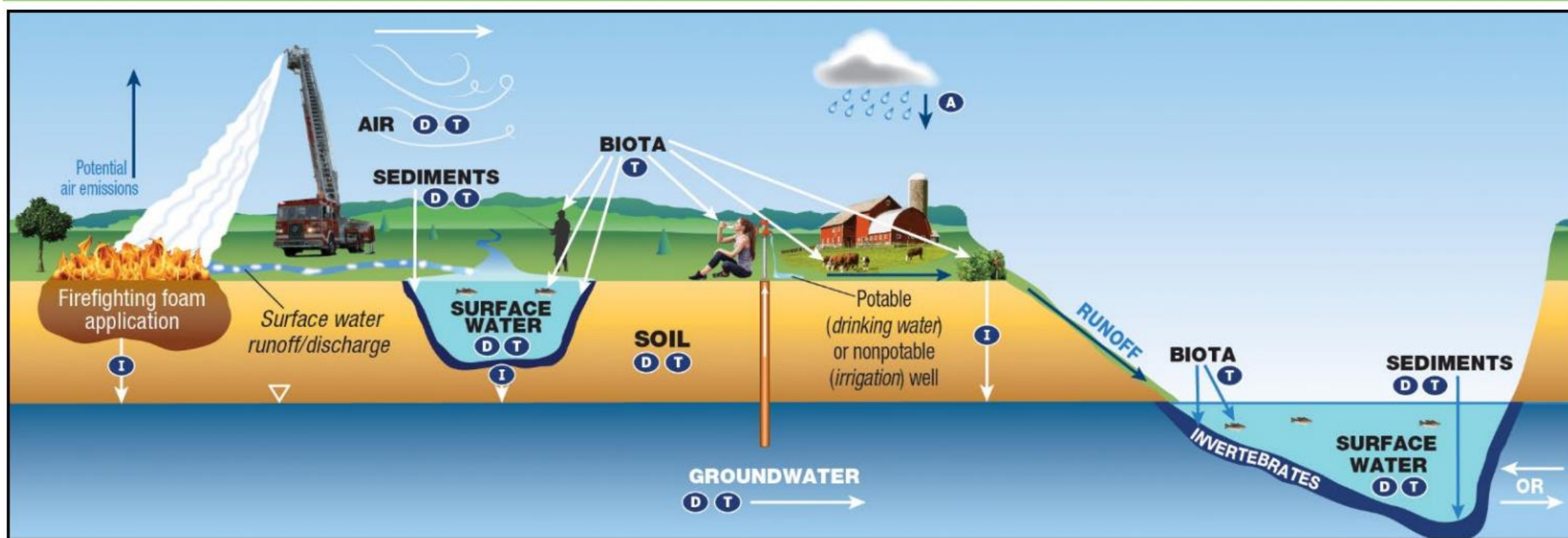
California Department of Food and Agriculture



What are PFAS?

- **Per- and polyfluoroalkyl substances (PFAS)** are chemicals that resist grease, oil, water, and heat.
- Used in stain- and water-resistant fabrics and carpeting, cleaning products, paints, cookware, and fire-fighting foams
- Comprise thousands of different chemicals, but all have a carbon-fluorine bond, do not degrade easily, and can persist in the environment.
- Science on potential health effects of bioaccumulation continues to evolve. Per FDA and National Academies of Sciences, exposure to some types of PFAS have been associated with serious health effects.





Regulatory Levels: Summary

April 10, 2024

Chemical	Maximum Contaminant Level Goal (MCLG)	Maximum Contaminant Level (MCL)
PFOA	0	4.0 ppt
PFOS	0	4.0 ppt
PFHxS	10 ppt	10 ppt
HFPO-DA (GenX chemicals)	10 ppt	10 ppt
PFNA	10 ppt	10 ppt
Mixture of two or more: PFHxS, PFNA, HFPO-DA, and PFBS	Hazard Index of 1	Hazard Index of 1

*Compliance is determined by running annual averages at the sampling point

2024-27; 2029

'Forever Chemicals' Are Found in Some Milk, Including Organic

A Consumer Reports investigation highlights gaps in how the U.S. tests and regulates PFAS in food

May 2, 2024



PHOTO ILLUSTRATION: CHRIS GRIGGS/CONSUMER REPORTS, GETTY IMAGES

By Lauren Kirchner · Data visualizations by Andy Bergmann

Modified FDA Method

 PFOS or PFOA detected

 plastic bottle  carton

Brand A



Brand B



Brand C



Brand D



Brand E





“What we found does not mean that anyone needs to stop drinking milk. But this highlights shortcomings in how federal food safety agencies and manufacturers monitor milk and other food for these clearly harmful chemicals.”

–James Rogers, PhD, head of food safety testing at CR

April 12, 2024: FDA-CFSAN requested a meeting of the NCIMS Executive Board to discuss PFAS in dairy, to share current thinking, and to seek NCIMS perspectives

April 16, 2024: NCIMS Executive Board Meeting

- **FDA-CFSAN Dr. Paul South** presented FDA's thinking on PFAS in milk.
- 2019 Total Diet Study (TDS) – 55 retail milk and 80 milk products, “no PFAS detected” (LOD = 20-30 ppt)
- Data does not show a public health issue from PFAS in milk; however there is a data gap that needs to be addressed to better answer questions
- New EPA MCL of 4 ppt in drinking water is causing more questions
- FDA proposed a nationwide sampling project for PFAS in milk

Motion passed by the Board:

“For the NCIMS Liaison Committee to initiate discussion on a plan to close the data gaps on PFAS in collaboration with FDA.”





Liaison Committee



- Stephen Beam (Chair) – California Dept. of Food and Agriculture
- Dustin Cox (Vice Chair) – New Mexico Dept. of Agriculture
- Casey McCue – New York State Dept. of Agriculture and Markets
- Nicole Neeser – Minnesota Department of Agriculture
- Sofia Stifflemire – Texas Dept. of State Health Services
- Brian Wise – Ohio Dept. of Agriculture
- Clay Detlefsen – National Milk Producers Federation
- Roger Hooi – DFA Dairy Brands
- Antone Mickelson – Northwest Dairy Association
- Brad Suhling – Prairie Farms
- Roberta Wagner – International Dairy Foods Association

FDA Participants:

- Paul South (rotated off)
- Beth Briczinski
- Eileen Abt
- Tabitha Miller



*The 500 lb. gorilla that's always in the room is -
"You don't know, what you don't know."*

Liaison Committee Discussion

- Samples should be nonregulatory and double-blinded
- Samples should be of retail fluid milk (retail or packaged for retail)
- Communication and messaging plan needs to be developed (Q&A)
- Reimbursement for sampling costs incurred by states should be provided by FDA if possible

Goal:

May 9, 2024

“For the NCIMS Liaison Committee to collaborate with FDA to develop and implement a double-blinded nationally representative sampling survey to close the data gap for potential PFAS in retail fluid milk, and to develop a communication plan for affected stakeholders to interpret the survey’s findings (prevalence and levels) in the context of milk safety and human health risk, if any.”

Executive Board Approved 5/17/24

Know your **WHY**

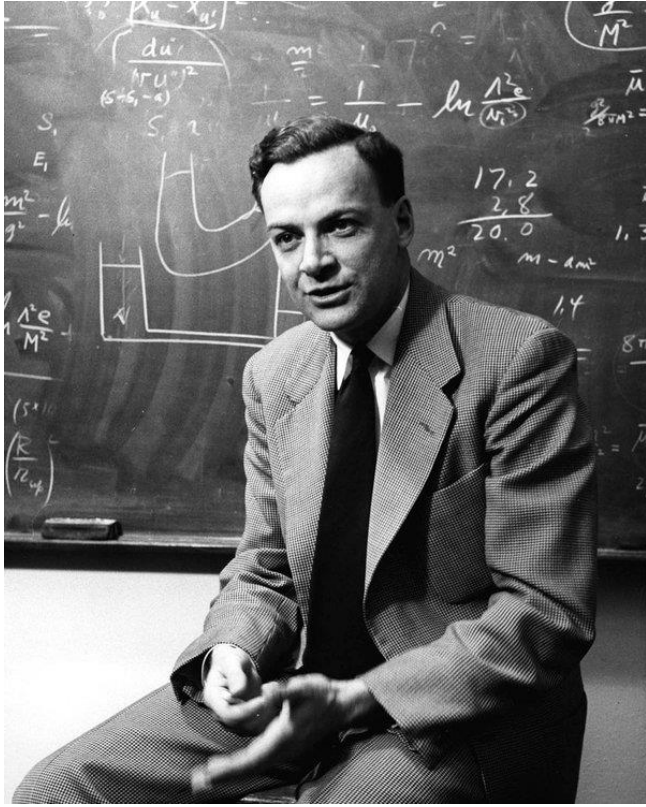
Objectives

- Determine scope of problem, if any
- Inform need for official threshold (e.g., action level; investigative level)
- Inform achievability of a threshold
- Inform development of a uniform PFAS response plan
- Reaffirm milk safety and consumer confidence

What's ahead?



- Draft Project Description Developed:
 - Double-blinded (IFSH)
 - Retail Fluid Milk (whole, white)
 - FDA lab and method (30 PFAS)
- Feedback from NCIMS Executive Board and NASDA
- Specific sampling SOPs need to be developed
- Communication plan and FAQ document
- Target is July or August for finalized plan
- Funding for participating states still being explored
- Webinars for states and industry
- Letters requesting participation



“When it comes to a new technology, science must take precedence over public relations, for nature cannot be fooled.”

-Richard Feynman

Happy cow?...or worried cow?

