Proposal 101
Adulteration Prevention
Study Committee

Proposal 101

The assigned committee is charged to identify and develop appropriate strategies to prevent contamination of Grade “A” milk and/or milk products with chemical sanitizers after the CIP process. In developing prevention strategies, the assigned committee will, at least, consider:

- Which Grade “A” milk and/or milk products should be addressed through the prevention strategies;
- Potential means to minimize contamination: regulatory activities (including guidance, Conference proposals); communication/outreach to industry stakeholders; training gaps (including operator training, food safety plan training); industry best practices; etc.

The assigned committee will report on their activities at the next meeting of the NCIMS Conference.

INCIDENTS SUMMARY

Plant 1

- 1% Lowfat Chocolate Milk
- Half Pints
- 8 cases = 25 gallons
- Children
- Blisters in mouth, esophageal burns

Plant 2

- 1% Lowfat Milk
- Half Pints
- 25 cartons = 1.5 gallons
- Pre-K & K Children
- 30 treated at hospital and same day release

Plant 3

- 1% Lowfat Milk
- Half Pints
- 18 cases = 56 gallons
- K-8 Children
- No injuries reported

Plant 4

- Fat Free Chocolate Milk
- Half Pints
- 35 cartons = 2.2 gallons
- Children
- No injuries reported

Plant 5

- 1% Lowfat Milk
- Half Pints
- 33 cartons = 2 gallons
- Children
- Students reported vomiting

Regulatory Committee Members

- Sofia Stifflemire- TX- Committee Chair
- Eric Glaude- NY
- Brian Wise- Ohio
- Nathan Campbell- Indiana
- Dustin Cox- NM
- Shannon Maloney- Missouri

Industry Committee Members

- Brad Suhling- Prairie Farms- Vice Chair
- Roger Hooi- DFA
- Sabina Alexander- Hiland
- Violet Martin- General Mills
- Denise DuFrense- Saputo

Non-Voting Committee Members

- Dr. Nicole Martin- Cornell University
- John Allan- IDFA
- Brooke Sherman- Ecolab
- Clay Detlefsen- NMPF
- Dr. Beth Briczinski- FDA
- Clint George- FDA

Committee Activities

- The committee had met our first meeting in September. We have met monthly since then.
- The committee members created a risk assessment to properly identify what processes or products are the largest risk to the public.
- The processes and products identified has helped direct the committees focus on how to achieve the objectives outlined in proposal 101.

Best Practices

- Currently the committee has been working on creating a Best Practices document for industry.
- This document provides essential background information on Adulteration of dairy products.
- The document provides scenarios on how adulteration can occur and recommended best practices to minimize the risk of adulteration.

Flavoring Milk

- What does this mean to State Regulatory, FDA, and Industry?
- In the 80's flavoring milk on the production floor for sensory testing was a normal procedure.
- This went away in the 90's due interpretation of Item 20p 5. of the PMO:
  - 5. The use of tobacco products, chewing gum or eating food or drinking beverages is prohibited in all rooms in which milk and milk products are handled, processed or stored, or in which milk or milk product containers, utensils and/or equipment are washed.
- The committee is currently discussing options and potential committee actions centered around this language in the PMO.

Committee Next Steps

- We hope to have the Best Practices document finalized in the committee soon.
- We will present this to the NCIMS Executive Board for approval.
- If approved, the Best Practices document will become an NCIMS document and will be housed on the NCIMS website.
- Stay tuned for other potential committee actions.

Regulatory Approach

1. Evaluate possible ways sanitizer could be inadvertently introduced.
   - Pushing product from one silo past another w/out disconnecting appropriate lines.
   - Failure to drain CIP solution from jumper lines, pipelines, silos or filler bowls/nozzles.
   - Batching/blending connections to silos/fillers.
   - Cross connections with CIP/product lines.
   - Leaking valves.
   - Others?

Regulatory Approach

2. Observe a filling start-up or change over in person. You may need to arrive EARLY

- Ask to be notified when a product or tank changeover is scheduled to occur or ask plant to simulate a product changeover
- Verify procedures during critical times, such as filler startup, product or tank changeovers, mechanical issues, and shift changes.
- Observe rinsing and flushing procedures, and ensure equipment is properly drained of sanitizer before startup.
- Review first-off sampling procedures, including lab product testing and permissions to restart the filler once sampling and analysis is completed.
- Determine if one (1) or two (2) person verification is part of the firm's SOP for filler startup.

Texas Survey of Sanitizer Prevention Strategies

- NY provided a template of a survey they conducted on Sanitizer Prevention Strategies
- We have discussed conducting a similar survey in Texas to understand the different approaches taken in our state.
- **Full Strategy** – Fully written and documented two-party prevention strategy with includes a visual equipment check to ensure drainage of residue sanitizer and product quality testing.
- **Some Type of Strategy** – Facility is missing a part of the system to make it fully documented two-party prevention system; strategy was either missing written documentation, SOPs, conducting visual checks of equipment, or conducting product quality testing.
- **No Strategy** – Facility does not have any prevention strategy in place.

Prevention of Sanitizer in Milk

Does the plant have a prevention strategy?	
Description of the strategy	
Is the strategy a two-party process?	
Is the strategy included in a written plan - food safety plan, HACCP plan, quality plan or an SOP?	
How is the plant, if they are at all, documenting that the product is acceptable for release?	

Thank you