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Update of FDA Drug Residue Testing in Milk

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Traditionally, drug residue testing on milk has been limited to the beta lactam testing requirements explicitly stated in the Pasteurized Milk Ordinance (2011 PMO, Appendix N, p. 342):

"Industry shall screen all bulk milk pickup tankers, regardless of final use, for Beta lactam drug residues."

Over the past twenty years, testing requirements have remained fairly limited in scope, despite the availability and common use of a wider variety of veterinary drugs on dairy farms. Increased concerns with antibiotic use and residues, especially those concerns stemming from meat residues in dairy cull cows, are causing many in regulatory agencies and industry to reexamine the scope of testing.

Early in 2011, the Food and Drug Administration (FDA) proposed a milk testing project that was intended to collect information about milk residues on farms that had previously been found to have tissue residue violations. The objective was to collect samples of milk from these farms and test the milk for a wider variety of drugs to determine if there was a residue risk in the milk as well as the tissue. Industry and some State regulatory agencies were extremely concerned with the logistics involved in performing this testing project as well as the potential consequences if a sample was deemed to be positive several days after it was taken.

As a result of these concerns, FDA delayed implementation and reassessed their project by holding a series of listening sessions to gather input on how industry, States and academia felt this question could be addressed with as little disruption to the industry's daily routines as possible. One such session was held in Minnesota. After gathering information, the FDA decided to conduct a double blinded, controlled study for this project. This study was to be initiated in late 2011. Samples would be collected from laboratories after bulk tankers had already been screened for the routine required drugs. Samples would be collected from tissue violator farms as well as non-violators in order to provide a comparison. This project did begin in early 2012 with a number of samples already collected. Study results are expected to be available in October 2012 and are expected to be released as a part of a risk assessment.

In response to the concerns about a lack of testing for certain types of drugs, the industry has reacted and begun doing some tanker testing on their own. Some of this testing is also being conducted in response to the requirements of importing countries for a wider variety of testing at a lower level than the US currently uses as a safe tolerance level. In Minnesota, as well as other States, dairy producers found with residues of any type of veterinary drug, regardless of whether it is PMO required testing, will be considered to have a violation on their record. The response to that positive is the same whether it is conducted because of the PMO requirements or for another reason as milk with veterinary drugs in it above safe tolerance levels is considered adulterated. Dairy veterinarians should be aware that increased levels of testing, much of it random, is occurring – as always, it is important to work with your clients to use veterinary drugs properly and adhere to the proper milk and meat withholding times.