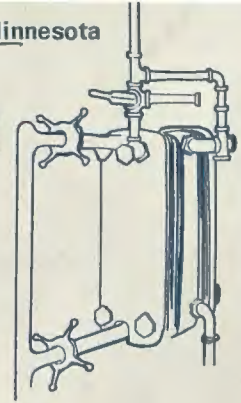


## 3 MINNESOTA DAIRY PRODUCTS PROCESSOR



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After years of painstaking efforts, a sound control program has been achieved for grade A milk supplies. Under voluntary agreements reached at The Interstate Milk Shippers Conference, state and federal regulatory agencies managed to break down barriers to the free flow of milk between states, and to provide for sanitary control that today makes it possible to travel anywhere in the U.S. and consume fluid milk with essentially no health risk. The record was - and is - a good one, and it was achieved with a reasonable commonsense approach to regulations. At the heart of the program was the Grade A Pasteurized Milk Ordinance. Since its first publication in 1924, the "PMO" has been revised 13 times. It is now proposed for further revision, but with a twist - the possible codification - publication as a federal regulation - of this basic standard of milk control. It is a big step from a voluntary program of state/federal control of milk-borne disease to a binding regulation. A few items from the new 400-page proposal point out some of the serious implications to industry and the consumer.

ITEM: Though scarcely changed in wording and context from its predecessor, the revised farm inspection form has been turned upside down in format.

Implication: New forms will have to be printed. At what cost? At what benefit?

ITEM: Commingled milk will have to be tested for antibiotic residues by the Sarcina lutea procedure, some 5 to 10 times more sensitive than the disc assay procedure proposed for (and now used on) individual producer milks.

Implication: While sensitivity will be increased, testing time increases from 4 - 5 hours to 14 - 16 hours. Can a plant always wait that long before processing? Is it reasonable to expect such an extended waiting period?

ITEM: The bacteria standard of commingled milk is reduced from 300,000 to 100,000 bacteria per ml - with no public health hazard at stake. The producer standard remains unchanged at 100,000 bacteria/ml.

Implication: If plant milk cannot contain over 100,000 bacteria, can the plant accept a similar standard on its raw supply? Milk often is held overnight or even over weekends at a plant. Counts rise during those intervals. A bacteria count of 100,000 on producer milks will no longer fill the bill.



ITEM: On the farm, milk must be cooled to 45°F or less within 2 hours of milking with no provision for a higher blend temperature (when fresh warm milk is added to previously cooled milk).

Implication: Many older bulk tanks could not provide cooling adequate to meet this standard. Many new tanks would have difficulty meeting it, at least between first and second milkings. Will it be necessary to beef up the refrigeration capacity of bulk tanks to meet this proposal? What are the implications in energy usage? Do benefits truly outweigh the possible cost?

ITEM: The 1965 PMO states that the milkhouse must be "free" of insects and rodents. This is unchanged in the proposed revision.

Implication: As regulation, in the hands of a by-the-book inspector, this requirement means not one fly in the milkhouse. Probably no inspector would interpret the requirement absolutely, but there is precedent for such knit-picking.

ITEM: Metal or wooden feed storage containers shall be of tight construction with dust-tight covers.

Implication: Feed can be placed in front of cows at feeding time, but an open feed storage cart debits the dairyman.

ITEM: Insecticides cannot be stored in the milkhouse or milkroom.

Implication: While there is justification for this requirement, it also prohibits storage of even those insecticides approved for use in the milkroom. Producers can be, and sometimes are, debited for just such a violation.

ITEM: Under the current program, the FDA spot checks state and/or municipal inspections of dairy farms. This relationship is expected to continue. Grade A milk supplies are defined as supplies which have a sanitation and enforcement rating of 90%. If reason and common sense don't prevail or if the PMO is published as regulation (and probably even if it isn't) too-literal check-raters may find that certain grade A farms do not score 90 or better during spot checks.

Implication: There is no probationary consideration for the above requirements. The dairy plant can lose its certification - its outstate market for 90 days - and based entirely upon a technical judgement, often of an ambiguous requirement, that effects a numerical score which has nothing to do with public health or quality aspects per se.

ITEM: Check-ratings made by FDA officials do not serve the routine survey function of farm inspections.

Implication: Check-rated farms may have to be reinspected - within a week or month (or other such short interval) - by the local inspector; because regulations require official inspections on a routine basis. This is duplication of effort that adds to the cost of fluid milk.

#### AT THE PLANT

ITEM: All working areas must have 30 foot-candles of light.

Implication: Taken literally, this also means the cooler where milk is stored and where light may cause off-flavors.

ITEM: Separate rooms are required for cleaning and sanitizing facilities for bulk transport tanks in plants receiving milk in such tanks.

Implication: If you don't now have four walls (including doors, perhaps) around your bulk intake area, you might have to erect them. At what cost? At what implications for gas fumes, even under good ventilation, seeping into processing and storage areas?

ITEM: All sanitary piping welds must be inspected with a borescope or other appropriate available inspection device as they are made.

Implication: An inspector will have to be present whenever lines are being welded - day or night. No regulatory agency will be able to enforce such requirement.

#### Summary

These are only a few of many such controversial and potentially dangerous items that appear in or are proposed for addition to the PMO. If interpreted literally, these regulations could be disastrous to dairying and to the milk quality control effort in this country. Such literal interpretation hopefully would never occur, but in fact it has, and one can only assume that current trends favor its happening again.

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