

ATCP 82 Subcommittee Meeting

November 7, 2023 9:00 a.m. – 11:00 a.m.

Attendees:

Laura Traas, Max Huebner, John Umhoefer, Tony Lampman, Mick Homb, Andy Johnson, Brandon Johnson, Helen Schmude, Lynn Thornton

Transcript:

Traas, Laura M – DATCP: Thank you all again for coming back to the second meeting of the ATCP 82 Rule Revision Advisory Committee. As is required by state law, this was posted as a public meeting and the public meeting notice, I did check, was up and available so that we meet that requirement. Unless there are items that folks want to bring up, I would suggest we go right back into discussing the document. Hearing nothing. Okay, so hopefully on your screen you should be seeing the ATCP 82 working document that we're working on and we are currently in ATCP 82.08 which is the cleaning and sanitizing of bulk milk tankers. We had gotten through sub item three, where the last decision we made last meeting was that we decided that thoroughly cleaning all of the exterior surfaces of bulk milk tanker is not a food safety issue and should not be a mandate. So now we start getting into where some of the rubber is going to meet the road here in cleaning documentation and I see Brandon has joined us. Perfect timing, Brandon.

Brandon Johnson: Sorry about that.

Traas, Laura M – DATCP: Nope, that's quite all right. This is where we're going to start talking about the documentation needed to show that a bulk milk tanker has been cleaned. Right now, our current rule says that the bulk milk tanker must have a cleaning tag attached to it that includes all of the following information, and I recognize with new technologies there might be another way to do this. So let's talk about, I think I talked about this the last meeting, but I'll talk about it again: wanting to move our rules from saying "you must have a tag" to saying "you must be able to provide this information which would meet our ends" and then identify what things or what guidelines need to be followed to provide that information. Things like the information must be readily accessible to the regulatory agency. The information must not be able to be altered in any way once it is recorded. Just those kinds of things. So I'll stop talking and ask for thoughts here.

Brandon Johnson: Laura, last time we talked about, I think it was Leigh from across the pond, used the word "evidence" and I really think that that was the correct wording. That's where I'll start my commentary. Would it be "unless there is evidence that includes all of the following information?" I mean, is it that simple?

Traas, Laura M – DATCP: Thoughts from the committee? Andy, Mick, Tony, you all work with this everyday.

Andrew Johnson: I am trying to in my mind, envision a tanker coming into our facility without A tag. I think if we use, I mean, correct me if I'm wrong, industry can go above and beyond requirements. I mean, grassland could have a requirement saying that it they must provide a tag. So if there's other facilities that don't want to use a tag, I think you could use the word evidence whether it's a tag or evidence. If industry wanted to say that we wanted a tag, I mean, we just make that part of our requirements coming into our facility that you need to have a tag and whether that's something that's printed out or whatever. I'm struggling trying to find, you know, in my mind, figure out how we're going to provide that information electronically in an audit, whether it's the state or the IMS showing that that tanker met the requirements unless we have something physical that we can show them. That's where my struggle is on it. But if it's something that we want to include as an or, I think if other factories can document that and have it electronically available to regulatory and it meets that requirement, I guess, I guess that's up to them. I mean, and maybe that's something we can as far as our facility, we can look at doing you know we're continually looking at going paperless. We scan a lot of our documents and put them in a file, but you know, I guess I just struggle with that a little bit on how that would all work.

Traas, Laura M – DATCP: And that's, as regulatory, we have some farms now that have their bulk tank recording charts going directly to computer which is then uploaded to the cloud and so far we have been able to access that information. Some of the farms will leave us a computer with instructions on how to access their data from the computer. Others have totally uploaded it to the cloud and we can go on our phones anywhere and look up how a particular farms bulk tank is operating, what temperature it's holding at that given time. So it is doable. The question is, is it feasible when we start getting into, Andy, your neck of the woods and further north to upload things to the cloud. And Brandon, maybe you can speak to some of that.

Brandon Johnson: Yeah. What I was just going to say is Andy, this can be a conversation that you and I could have off line off this call, but maybe I should just have it right now. So I am working with DATCP and Cedar Grove Cheese and we are bringing the short version of its digitization of the records and having a QR code on the tank that you are tracking the events of the tank that is backed up by blockchain. So it's immutable. It's a situation where all you'd have to do in theory and what we're proving out is scan the tank and you'd have all the evidence where it was washed by the individual person who washed it, who logged into the iOS or Android device to log the type of wash, prior product seals used, those sorts of things. So we're, I'm thinking we should push to in this world is to just make sure that we can include from the legislative side that we can include something other than paper because paper is just as faulty as anything else, whereas I do feel a better process is using technology today. Obviously, there are the hurdles to get over to make that be sound for the state and any specific processors such as grassland and yourself. One of the things I was thinking with putting in and I guess I'm curious, Laura, the way that the state looks at this, if you could provide is, I feel like evidence would be the higher order of things. So I'm just wondering is if we could say "bulk milk tanker if there is evidence" and then you could put "such as digital wash tag wash paperwork" you know just to give an

example. I mean, I think it's fine as is. I guess I just am thinking of the order of things and I feel like evidence covers a wash tag, paperwork, digital any of those things, but I don't know.

Traas, Laura M – DATCP: Yeah, and I'm thinking right now because we're kind of in a bridge between exclusively paper, true, it's starting to incorporate more digital. I think I'm more comfortable with including the old technology as specifically and then opening the door for new technology. Tony, Mick, Helen, thoughts?

Mick Homb: Brandon, when you were talking about doing your trial at Cedar Grove, where you're putting the identification on the tanker, where are you putting that at in order, you know where it doesn't wear out or get damaged? Can you elaborate on that a little bit more?

Brandon Johnson: Yeah, that's a great question. So the tank owner, whoever owns the tank, would be responsible for that QR code. The long range plan I've been talking with Wabash, Trem Carr, the tank manufacturers and saying we need a laser etched QR code in the back of the stain in both bulkheads, front and back. That way, if the trailers parked in your lot and you're at the plant and you want to go see what's on that trailer, you just go scan the QR code and you are able to see the events that you need to make your decision of what to do with it in the interim. This is as simple as what we're doing in our trial: Avery labels and then a piece of clear tape over it right by the back valve. And obviously that QR code is linked to the VIN number and any of the information about that trailer that's pertinent. Does it have 3A? The right polish? The right valve configuration setup?

Mick Homb: OK. Got it. Thank you.

Helen Schmude: So in the world of digital, so I can tell you from Belgium, so perspective, we already have QR codes on all of our bulk tanks and our haulers have iPads. They scan the code, then they can enter in their weight and temperature and so forth. When they come back to the plant, we can link it up and download it and it's on our server. From a cyber-security perspective, I know everybody loves the cloud, but I think in the back of all of our minds, right, that's a scary concept of in the world we live in right now with, you know, ransomware, and all that kind of stuff. I kind of agree with Andy, right? If I'm an intake person and you know I want to see a wash tag, it's faster for me. I grab the wash tag. I look at the date, the sanitizer, the seals. My information is there, you know instantaneously I don't have to go searching on a computer and or, you know, maybe calling the plant for verification and then proof. I think on the digital side, we can be certainly open to it. But I think we have a long way to go as to perfecting that and I think you know papers always a good backup, right? If you have a power outage and you're running on a generator, you know what's up and running if the servers down, you know you may not have access to that information.

Traas, Laura M – DATCP: And we're not here to talk about, you know, corporate personal preferences.

What we're here to do, and I heard you say this, Helen, it's your open to it. If someone else wants to try it, you know, while we're looking to do here is write the rule so that it still protects Product Safety, but opens the door for the new technology.

Helen Schmude: Absolutely. I agree it I think both right digital and paper should be an option.

Andrew Johnson: And I totally agree with that too. And that's why I, you know, if we're going to write that into the rule, if we use the word "or" that opens up that door for this technology. But it also leaves in place the current way that it's being used.

Traas, Laura M – DATCP: So it sounds like we're okay with the verbiage for the opening of four. Now the question is the information that we're requiring adequate information? Is anybody out there going, "you know, I really wish I had more than this"?

Brandon Johnson: I was just going say, I think the ones that I remember from my history of operating our receiving station was that we had the type of sanitizer listed on there and I don't know if that's common, but that's the only thing I don't see on there.

Traas, Laura M – DATCP: Yeah, I don't think that's a requirement, but I think of a lot of places include it.

Thornton, Lynn: This is Lynn from Grande. So we put the seals the seal numbers on the wash tag and I think most plants are doing that and I kind of think that would be a good idea to require the seals to be put on there.

Brandon Johnson: Yeah, I agree. I did miss that I think they should require the security seals.

Mick Homb: Do you differentiate between top and rear to make sure they're clear on them both?

Thornton, Lynn: We do we on ours, we have a place that says top back and then we have a place for other for tankers that have a probe seal.

Traas, Laura M – DATCP: I'll ask one question there, which is there are some facilities that have talked about, I don't know if they've switched, to this using padlocks.

Brandon Johnson: From my experience, when they were picking up milk and delivering them, the ones that did use padlocks, they still wrote whatever was the identifying number for that lock. So I still feel like it should be open to not constrict anything anywhere because there are people that are making

digital seals like ATMs, doing some technology with that. So I don't know that we want to restrict anything, but I think it would be prudent or pertinent to have something in here about that.

Traas, Laura M – DATCP: So I added some verbiage there. I don't know how long it'll take to upload.

Thornton, Lynn: The think on our wash tags we might have last product hauled. Does anybody else have that on their wash tags?

Andrew Johnson: We don't only because if it's washed correctly, then we're not sure if that's a concern. I don't know. I mean one thing I do want to bring up though is there a difference between a grade A wash and a non-grade A wash? I mean, maybe that's something that needs to be addressed to.

Brandon Johnson: Well, there's also an IMS grade A and IMS Certified I think I can just say in the in the food grade world, which isn't in this situation, it's more wash paperwork than wash tags and some facilities require three prior products, some require one prior product. I choose to believe, like Andy does, that if you're saying anything more than one or whatever you're saying more, you're actually like discrediting the tank wash because like, if we believe that the tank wash does the job it's supposed to do, then it really shouldn't matter.

Helen Schmude: I would agree with that as well.

Traas, Laura M – DATCP: OK, so there was the question about a Grade A wash. That is item 6 in here where we talk about grade about tank cleaning facilities. Specifically we're required on the tag that you identified that the facility was a grade A or grade A IMS listed tank wash. It was always deemed to be incumbent upon the receiving plant to look up the identity of the location of the facility where the tanker was clean to determine if that facility is meets the standards they need either IMS listed or at least grade A.

Andrew Johnson: And that's probably suffice in my in my line of thinking.

Helen Schmude: So if you look back at number three name and location of facility where bulk tanker was cleaned and sanitized and the facilities create a permit number went that cover it.

Traas, Laura M – DATCP: Yes. And this part of the world covers it, because if it's not a grade A facility, it just says, you know, if you're grade A, you need to record your Grade A permit number. What we have though is we have some of those non grade A facilities that the wash part of them is approved under another IMS list as a grade a bulk milk tank wash facility. Okay, the identity is seals or other devices used to secure.

Mick Homb: Is there anybody, Laura, in the state of Wisconsin that still are allowed to get in a tanker and wash it by hand and sanitize it by hand? Or is that no longer allowed?

Traas, Laura M – DATCP: That is not allowed under the grade A program I believe. Yeah, I believe there might be some Grade B places that still do that, but more of the issue rather than us is OSHA. And what you have to go through, I know, I know. I was the small person in the plant, so I got to go in and do that stuff on occasion. It's no fun when they look at you and go you can stand up in the tanker. Okay, so we suggested a modification to say "used to secure all access points to the vessel."

Andrew Johnson: Could you could you say that again?

Traas, Laura M – DATCP: OK, so we added the item five, which said that somewhere either on the tag or in the electronic record, we need the identity of the seals or other devices used to secure all access points to the vessel. So I know this one will bring up some conversation where we go to public hearing because there will probably be some facilities that go "We've never recorded these seals numbers in the past" so I ask, especially those of you who are committee members, be prepared to speak to why you believe this is important.

Mick Homb: Well, I think one of the reasons it's important is they do that anyhow. I mean, if you get a tanker in our facility and the security or the seals don't match, you have to start asking questions. So to me, it's just a another way of securing what's being done is being done properly.

Traas, Laura M – DATCP: Right, but I know in Wisconsin, we have some smaller facilities that pick up three farms. They use their own truck and they don't ever send that truck anywhere else, and it's like, "why do I need to do that?" kind of thing. So we need, we just need to be prepared to speak to it.

Andrew Johnson: And are those are those facilities Grade A Laura or can they, I mean obviously this is a grade a document, correct? This is all milk?

Traas, Laura M – DATCP: No. This is all milk. So yeah, so you know like I said in item three, it says the facility's grade a permit number, if any, because this applies to everyone who's hauling milk we want milk to be protected in this way even if it's going into a cheese or other manufactured products.

Andrew Johnson: I think it's a legitimate food safety concern. So yeah, I'll be prepared to give my opinion on that.

Thornton, Lynn: So are you saying there's some plans that don't even put on seals at all or just that they'll?

Traas, Laura M – DATCP: Oh, they put on seals. They're required to put on seals. What I'm saying is they don't record the identification, they may not even have a method to record the identification. They might still be using old, they're a white metal, they'll pull the wire through the white metal, crimp it, and...

Thornton, Lynn: And there's no number on that. There's nothing on there that, yeah.

Traas, Laura M – DATCP: Correct. Yeah.

Thornton, Lynn: I still think it's a food safety issue.

Traas, Laura M – DATCP: Yeah, I agree. It goes better in a hearing if it comes not just from me, because they just look at me and go well, you don't understand. And it's like, excuse me, I spent some time in the dairy industry. I understand that you know, some of this is annoying to have to write down seal numbers, but yes, it's a food safety item.

Brandon Johnson: I would just agree with everyone else that that's just the progression of things. I think it's a necessary thing. You know, if they ever receive anything from any other place in that plant, they should be recording these things. I don't think there's any industry, in any of the food stuff that we do, dairy or whatever, that that would not record seal numbers. So I think they are the exception.

Traas, Laura M – DATCP: Yeah. Okay. So are we comfortable with the five items? Is that what we believe needs to be on a tag or some type of information? So moving on to item B. The bulk milk tanker shall have a tag and say, what language did I use above, item B reads the bulk milk tanker shall have a tag or other sealing device attached as required under part A to the outlet valve or inside the pump cabinet of the tanker. No person may remove the tag or seal except as provided under the next paragraph under parts C.

Brandon Johnson: I think it should be a bulk milk tanker shall have a tag attached or other evidence. So I have a tag attached or other evidence of whatever's on a tag. Shall have a tag attached or other evidence.

John Umhoefer: You're saying it's not about seals?

Brandon Johnson: Right, right.

Traas, Laura M – DATCP: So that batch is the language we used above.

Helen Schmude: So should it specify wash tag?

Brandon Johnson: Wash evidence. Yeah.

Traas, Laura M – DATCP: Cleaning tag.

Brandon Johnson: Well, have a yeah. So in in between other and evidence, because this is what we're working on with you, Laura, should it be in between other and evidence attached or I was going to say or other readily available evidence or, you know, like, whatever.

Traas, Laura M – DATCP: Actually, I don't think we need the readily available because I believe somewhere else in this rule it says all records must be readily available.

Brandon Johnson: Okay, great. Great.

Mick Homb: Just a question, Laura, and to the group: when you say "tanker or other evidence", do we want it to be that specific or should it say, and I'm just asking the question, does it have to be one or the other, or if somebody wanted to provide both? I'm just wondering.

Traas, Laura M – DATCP: Well, we're only going to require one if folks choose to have more than one then they can have more than one, but we're only going to require one. You need to have one or the other.

Mick Homb: Okay. That's okay. I was just making sure.

Traas, Laura M – DATCP: Yep. Thanks for asking.

John Umhoefer: So Laura, B seems to be the "where is it" regulation, right? And do you think we've done that with the other evidence? Does that mean, I mean, should we say where that other evidence should be? Or is it nice that we don't, which means it could be anywhere?

Brandon Johnson: That's great. I think it should have somewhere in the proximity of the evidence. Inside the pump cabinet of the tanker, you'll have a clean tank temps. I mean, it can. Can you say "within arms reach" or, I mean like, you know, how do we? "Within arms reach of the same location", you know, because we're saying the outlet valve or inside the pump cabinet of the tanker cleaning tag is used.

Andrew Johnson: Could you word it as being readily available? You know, I mean, that leaves it, you know, the information of the tank has to be readily available.

Brandon Johnson: I like what you're doing there. Yeah, that's good.

Traas, Laura M – DATCP: Okay, for those of you who can't see the screen, what I did with item B was changed it to "if a cleaning tag is used, the bulk milk tanker shall have a cleaning tag. Attached as required under part A to the outlet valve or inside the pump cabinet of the tanker. No person may remove the tag except under part C other forms of evidence must be readily accessible."

Brandon Johnson: I like that.

Andrew Johnson: Yep, very good.

John Umhoefer: Yeah, I agree.

Traas, Laura M – DATCP: And like I said, last meeting, don't worry if you know tomorrow morning at 2:00 o'clock, you wake up and go "no." We're going to come back and look at all of this language again. So I don't see "whenever the bulk milk tanker operator or bulk milk tanker cleaning facility employee cleans and sanitizes a bulk milk tanker, the last cleaning tag attached to the bulk milk tanker under this subsection shall be removed before attaching a new tag. The remove tag shall be retained for at least 15 days at the location where the bulk milk tanker was cleaned and sanitized." This ones going to be fun.

Brandon Johnson: Laura. I'm just wondering like to where you put in B at the end, "other forms of evidence must be readily accessible." Should we just add to the end of that or should it be its own? Well, Okay, so other forms of evidence must be readily accessible for a period no shorter than 15 days or for at least 15 days, or for three years. Because in the digital situation, there is nothing to remove that, you do. We just need access, the state and the location need access to that information for a period of defined time defined of whatever length.

John Umhoefer: I really think B&C are an apple and an orange, though I think B is just where you're going to find the evidence. C is how long you're going to store it.

Traas, Laura M – DATCP: Okay, so what I did was I added to that second sentence of part B. Other forms of evidence must be readily accessible and must be retained as provided under part C, so that if we have to change part C, B just refers to it. We don't have to worry about changing two different paragraphs.

Helen Schmude: I like it.

John Umhoefer: Yeah, you're referring to C for both cases. Yeah, it makes sense.

Traas, Laura M – DATCP: And that way - I'll ask this question, because in my mind it does this but I want to make sure I'm thinking right. It also says that the other forms of evidence just need to follow the retention schedule, we don't have to worry about the removal of the tag and putting the new tag on, it just says other forms of evidence must be retained based on part C and it skips over that removal and putting the new one on.

Mick Homb: Does that sentence that you have highlighted there then also bring into effect what we changed up on number five? We added the identity of the seal, so to me, if they're going to retain them if we need to retain the tag for 15 days, shouldn't we, in turn, also retain all the seals and everything for 15 days? They all go hand in hand, or no?

Traas, Laura M – DATCP: But I would propose that once you perform an act in in the dairy plant, the paper record is what we look for past that point. So yeah, we don't ask you to retain your drug residue test strips. We just ask you to record what your drug residue test strips indicated and those can be thrown away. I think that seals kind of fall in that same category, as we've verified the seals we're throwing the seals away. We're keeping our paper record. I'm willing to listen if someone else thinks I'm thinking wrong cause you know I have one perspective.

Tony Lampman: Hey, this is Tony. I have a question. We have a lot of where we deliver one day to one plant and get a wash ticket and then the next day that hauler of that truck would say pick up three loads and go to a different plant and then they usually just cross off and the initial and write new tag numbers or seal numbers. I mean and then, but if it's digital, how are we going to record that on the wash ticket? Cause the wash ticket usually has the date and time you know when the truck was washed. Just so you know, because it's got to be washed within 24 hours after you're starting to pick up milk. I just wondered how we going to record the seals, you know, for the next two loads after that first load, okay?

Brandon Johnson: Laura, do you want me to just say what we're proposing? So, in the idea that we're proposing in rolling out at Cedar Grove, the name of our product is Vessy, so it's easier if I describe it that way. So Vessy - anyone who does one of the critical components to the tank, so this would be at a shipping place or a tank wash place or a receiving place. You would be logging in whatever it is you are doing as your own unique user ID, so the intake person would scan the QR code and say what it is they're doing. There's drop downs based on locations, so you would be resealing with these new seal numbers. No data is lost. You're only adding to the chain of evidence on that trailer for its life.

Traas, Laura M – DATCP: So does that answer your question, Tony?

Tony Lampman: No, that answers it. We're, I mean, we're doing a similar thing. We're doing digital manifests with different with different handlers and stuff, so it's just we right now we enter in the seal numbers are solved you know and then the you know the wash date time and everything. So then we can email it to the plants, you know, for the plants that don't have the capability of cloud, you know retrieval.

Traas, Laura M – DATCP: So are we good with be where it stands right now? And then C will need to add something along these lines. Leaving the first sentence untouched whenever it's clear the bulk milk tank operator or tank cleaning facility sanitizes the truck. The last cleaning tag attached to the tanker under this subsection shall be removed before attaching a new tag. The remove tag or other forms of evidence shall be retained for at least 15 days at the location where the bulk milk tanker was cleaned and sanitized.

Brandon Johnson: I think that sounds good.

Traas, Laura M – DATCP: Others?

Thornton, Lynn: I kind of want to move back to Tony's point. Tony mentioned the seals and when the tank doesn't get washed but it goes back out again. I'm kind of going back up to .5. Do we need to clarify the initial seals upon wash? Because I'm thinking about what Tony said and that may make it hard if you're using the tank or multiple times. So you put on new seals and it goes back out with the same wash tag.

Brandon Johnson: I'm just wondering if that's something we add to the end of the sentence because in both situations it would be fine. The identity of the seals or other devices used to secure all access points to the vessel. Something like, be it the initial, you know, be it the initial loading or a transloading, you're not a transloading but a but a secondary sealing situation.

Traas, Laura M – DATCP: Yeah, if the seals are important initially, are the seals also important? It's saying you're sending the truck out to go pick up a second load.

Andrew Johnson: Doesn't this come back to where, once it was verified, you know that everything met that you have the information that it was washed and sanitized somewhere, and to have the actual tag from when that happened. I mean, you see where I'm going with that? If I mean we have multiple, we have a lot of haulers that pick up multiple loads and when we write a new seal on that tag, I'm always thinking about what we call third party mouth that we get in. You know, if we take that information verified that it was OK, but he's going to go now and pick up a second load and take it to a different facility, I'm sure our procedure is we take that tag and we write on our seals, put it back in the truck. But you know, somewhere we have written down that we verified that everything met the requirements.

We don't have that physical tag to be able to provide for regulatory when they want to see it. But I believe it suffices that we verified it and not actually, you know, because we written down that we verified it, that we don't actually have that actual tag we're scanning a lot of them documents. So once we've scanned it, we could take that tag, then write the new seals on it, put it back in the truck and let it go with that. But we have our verification that meets the requirements for regulatory when they come and want to see it. Does that make sense?

Traas, Laura M – DATCP: And it makes sense to me, now I'll ask the question for the group. So are we comfortable with saying that what we're looking to verify is the cleaning of that tanker and so the only seals we need the identity of are the ones that were used to secure the access point when the vessel was cleaned? Or is the group thinking we need to document every seal as this truck moves through its day.

Brandon Johnson: We would, we would definitely need to see seals. I mean, if that truck was coming back to us on a second load, we would not, we wouldn't accept that if the only seal numbers were from the original wash, we wouldn't, we wouldn't accept it because there's obviously been, you know, the seals were broke and something was opened and they were resealed. So it's kind of along the same line as, I mean, we seal everything up when it goes out, but obviously you can't pick up milk unless you break that seal on the door in the back. So the haulers write in the new seal for that door. I think it runs along that same premise that whenever a seal is broken, it has to be documented and there needs to be a chain of ownership or whatever that the Hauler isn't, you know, recognizing that a seal is broken that he replaced it. And so I, you know, as far as you know in, in my opinion, anytime a seal has changed, it needs to be documented somewhere. I agree with Andy.

Thornton, Lynn: And I do too. But I think some of that account documentation happens on the manifest, so I'm afraid that some of the wash tags could get really messy. So I mean, if you were our comingled hauler and you go out and you break that back seal to put on the first stop. And I don't know if you seal it up again, but now you document that on the wash tag and if you seal it before you go to the next farm and then you document it again, you could get an awful lot of seals on there.

Traas, Laura M – DATCP: But would that still meet the standard? Because we're saying there is a cleaning tag or other evidence that includes the following information. And so if you've got a manifest that includes the identities of those other seals, you've got other evidence.

Andrew Johnson: I think I think each individual plant could make that call. I think as far as our plant, we like to write it on the wash tag just because that's where we want to see it all. So when they replace the seal, we only want a single line through the one that was taken off. I've seen wash tags where they flip it over and sometimes there's five to six different seal numbers. It shows the whole chain of events as it went down and it's pretty easy to see and I think in a digital world you would be able to see it like you can add information if there's something that says you removed a seal, replaced with this seal. I mean, ultimately you could make that as long as you want and then you know, the tank just needs to be washed within that 24 hour period or end of days use or however.

John Umhoefer: Is there anybody on the call that represents the kind of plant that's picking up six farms on a tanker? We're getting all the perspectives?

Brandon Johnson: I can just say like when we did have the haulers come in that were picking up 15 loads or whatever they had that was the situation where they would have a lock and they wrote that lock serial number on the back. You know, they would just lock it in between farms. So you weren't changing per se. But in the situation where there was a resealing event, I agree with Andy and his way it was draw a single line through the seals, put the new seals on it somewhere that it's legible and go forward.

Traas, Laura M – DATCP: Hellen, you were going to speak up.

Helen Schmude: So I guess I look at this two different ways, right? So at the end of the day, right at the end of each day, as you use the tanker has to be washed. So we do the wash tag, right? We seal all ports, top, bottom, the tanker goes back, sits in the haulers drive way. Right till he starts his next route at whatever the seals are on there to make sure that no one has tampered with the tanker right before. It's under the custody of the hauler, so if I'm not a driver, right, a hauler when I get to my first stop, I break the seal, right? I go pick up my three stops, six stops, whatever it is, I reseal the truck and I head back into the dairy plant. I get to the plant top seal is verified. Bottom Seal is verified right? You go through your procedure. But unless that haulers really stabbing, I mean he's in in and I guess my opinion right, the milk and the tankers under his custody, right. He's the one that's driving. No one and no, you know, no one's tampering with the truck as he's going on his route. We've told our haulers right, if you're going to stop it at a truck stop and grab something to eat, we want the truck sealed up so you can see that no one tampered with it when it was not under your control or custody. If our tankers are not sealed between pickups, they're sealed at the end of the load and then after the, you know, first drop off if you will. And then as they go back out to their next route and then at the end of the day, after they're washed and the seal numbers are written on the wash tag.

Andrew Johnson: We follow that same procedure. I think one thing we do not allow though is the locks. Just because we don't know who might have a key for it. All of our seals are in one time use and I guess that's up to the facility. But in our realm of thinking, is it just eliminates 1 less scenario of something that can get taken off and put back on and nobody knows what happened in between.

Traas, Laura M – DATCP: So are we okay with the language for sub A, one through five. Lynn, you brought up the initial question. Are you okay with it just saying the identity of the seals or do you think it still needs clarification?

Thornton, Lynn: I guess it's okay, it has not been our practice to document the back seal being broken on the wash tag. We do that on the paperwork so I guess that's my only question. Is that going to be a change that we want to see all seals documented on the wash tag with the way we have it worded?

Traas, Laura M – DATCP: No, because we have up in A or other evidence. So if it's on your manifest, that's other evidence.

Thornton, Lynn: Okay, then I'm good.

Helen Schmude: So you know, as we go through and we do this right, these are the rules that at a minimum, right? The state says that we need to follow as a company. You're certainly more than willing or you can do more, right?

Traas, Laura M – DATCP: Right, yes.

Helen Schmude: So I think it's important to keep in mind that this is the minimum that the state wants to see and actually regulate. As a company, you can certainly do more to provide your assurances based on the risk that you have assigned to each one of your plants activities.

Andrew Johnson: I totally agree.

John Umhoefer: Yeah, and here's a layman's question. I'm sorry to interrupt. There's a manifest. Also have one through five. Are you generally capturing that in a manifest?

Thornton, Lynn: We don't capture the cleaning date and time on the manifest.

John Umhoefer: So the manifest, the manifest might not be a one for one acceptable alternative then?

Thornton, Lynn: Right.

Traas, Laura M – DATCP: Right, the manifest cannot replace the cleaning tag unless they add that cleaning and sanitizing and facility number and all of that to the manifest. And most folks, they're manifests are busy enough.

Andrew Johnson: But as a combination you could have all of that information between the two under other evidence, correct?

Traas, Laura M – DATCP: Absolutely. Yeah, but I've had it, you know where I've asked, you know, show me your information and I'll have three to four pieces of documentation just following that truck through its day.

John Umhoefer: Okay, as long as the combination can suffice, that's great.

Traas, Laura M – DATCP: Yep. So I believe we were on item D. Whenever the bulk milk tank operator or cleaning facility employee cleans and sanitizes a direct ship tanker, the operator employee shall apply a seal to each access port. I don't know that that needs to change at all.

Brandon Johnson: Agreed.

Andrew Johnson: Yep, that's good. Not to back up a little bit, but just for the wording on C the last sentence says that the remove tag should be retained for at least 15 days at the location where the bulk tanker was cleaned and sanitized. I mean, we have several trucks that were clean and sanitized somewhere else. Is that a verbiage thing that, I mean, should it - I'm just playing devil's advocate here - should have just say it should be removed and retained where it was unloaded as well. I'm just trying to look at that verbiage and understand not all trucks are going to deliver where they were cleaned and sanitized. Or am I reading it wrong?

Traas, Laura M – DATCP: No you're reading it right, I'm just trying to think of the different words we can use.

Brandon Johnson: Why wouldn't it just be at the location where the bulk milk tanker was unloaded?

Traas, Laura M – DATCP: Because it does need to stay with the truck until it's next cleaned and sanitized. So if you have a truck that gets unloaded and then goes out to pick up something else before the 24 hours are up that they need tag needs to follow that truck through its 24 hours. So I'm thinking of, you know, needs to be retained for at least 15 days at the location where the bulk milk tanker was next cleaned and sanitized.

Andrew Johnson: No, you're on the right, right track. The way I'm thinking is, you know, once you replace once you wash that truck, you're starting over with the evidence. So, but the old evidence is what we're looking at retaining for 15 days.

Traas, Laura M – DATCP: Right.

Thornton, Lynn: Or what about verbiage of where the bulk milk tanker has its next cleaning and sanitizing.

Brandon Johnson: I'm just thinking in this situation so and maybe this is me, just not understanding so, maybe I should be quiet but in the situation where a hauler is going to pick up more milk and doesn't

need it washed, they could communicate that to the plant. I yeah, I see what you're saying, yeah. I was only thinking of the situation that I was envisioning, Andy said, whereas a milk plant unloads a truck but they're not where it gets washed. It goes somewhere else and gets washed and that situation, I think it should stay with the place where the milk was unloaded. But I see what you're saying. I don't have any conflict then.

Traas, Laura M – DATCP: Okay, we have been at this an hour and we've gotten through one paragraph, but I knew these ones were going to be tougher. Okay, so we get into paragraph six, which talks about the bulk milk tanker cleaning facility. No person may operate a bulk milk tanker cleaning facility to clean grade a bulk milk tankers unless the person holds valid grade a permit from the department for that facility. Permit is not transferable now. This is where we get into the only grade A stuff again. Person shall apply for create a permit under part A on the form provided by the department. The application shall include the name, address, telephone number, address of the cleaning facility, including the street address and post office, and county and other information that the department reasonably requires for purposes of issuing a grading permit. Any issues so far?

Thornton, Lynn: Laura, this is probably a stupid question, but so the 54 permitted wash stations, are you considering them a grade a permitted facility or not?

Traas, Laura M – DATCP: Yes, they are a grade a bulk milk tank wash facility. So the only thing they can do in the graduate program is wash.

Thornton, Lynn: So they would fall into this.

Traas, Laura M – DATCP: Yes.

John Umhoefer: Laura, is there a reason those one, two and three are needed and B, you just say on a form provided by the department.

Traas, Laura M – DATCP: I don't know. I'll have to ask our rules expert if there's a reason that we have to spell this stuff out in rule. There might be a reason we have to spell stuff out in rule because I know when we've gotten into dealing with some of the sovereign citizen people that they've, they've said if it's not in rule, I don't have to provide it to you and it's like well it's really kind of hard to find your location if you don't provide me an address.

John Umhoefer: Okay, that could be the reason.

Helen Schmude: So for be there, right, a person shall apply for a grade A permit under part A on an application provided by the department. If you use the word application right, you need to fill out the

mailing address, the physical location. All that information's already requested and on that form. So then do you need to, you know, reiterate it here because you could update your application as needed and it would still contain all this information?

Traas, Laura M – DATCP: Okay, so I've got that marked as Andrea Northwood is our rules guru, so I will ask her if this is required based on the fact that I see it in all of our rules, I'm thinking there's something that says we have to spell this out. Item C the department shall grant or deny within 40 days after the department receives a completed application. And in order for the bulk milk tank cleaning facility to hold that valid permit, they have to do a semi annual inspection by the department. Anything on that paragraph? Now we're going to get into another tough one. And this one we might want to carry over until the next meeting, since none of our inline sampler folks could be on this call, but we can at least start on it. But I will make a note. If milk from a grade A or grade B farm violates any standard under 65.70 on any single test, milk from that farm shall be collected at least once every two days until a subsequent test shows that the milk from that dairy farm complies with the standard. Now, ATCP 65.70 says that if you have a high plate count that you cannot extend the frequency of pickup, you have to pick up the milk from that farm every two days. Now the thing that confuses me about 65.70 is it also says if the somatic cell exceeds standards and so I question do we really need to pick up the milk every two days if the somatic cell is outside of acceptable ranges?

Andrew Johnson: This is Andy. I'll comment on that. I think obviously more frequent pickups is not going to help change the cell count, but it provides documentation that the guys trying to lower the cell count. You know you're not going to get a sample and you know every four days or whatever, it's not showing and I'm struggling with my words a little, but you're not collecting data showing that he's trying, unless of course the field man goes out and pulls a sample in between pickups and can provide that. But the pickup sample is going to show that he's trying to get it down. So I guess my personal opinion is that I wouldn't change it. I mean, if he's having trouble with his cell count like that, he probably wants to know if what he's doing is working or not, you know sooner than later as well. So I don't think it's a big deal that you know, obviously the science isn't going to show that picking up more often is going to change it. But if he's aware of it and he's trying some things, picking it up more often and it's going to help him provide information that it's working or not. So I don't think it's a big deal to leave it.

Traas, Laura M – DATCP: Other thoughts? And so following along the concept up here of every two days, it is the dairy plant operators responsibility to notify the farm and the hauler whenever the milk from that farm must be collected more frequently than every two day pickup. And then the last sentence of that line says that no dairy plant operator may receive milk collected in violation of part A. So to be clear, what that means is, if you have a farm that has a high plate count and should be on once every two day pick up and it was not picked up every two days or was picked up every third day, the dairy plant then is in violation of this rule.

Thornton, Lynn: Is there a lot of milk that only gets picked up every three days?

Traas, Laura M – DATCP: No, there's very little that's picked up every three days. I would say most of

what I see that it's being picked up every third or fourth day is canned milk in the winter. They're not going to let canned milk set three to four days in the summer, but in the winter you might see canned milk go three to four days.

Thornton, Lynn: So then this would have in this rule of two days, would be forcing those canned producers to be picked up every two days in the winter potentially right?

Traas, Laura M – DATCP: Correct, yes.

Thornton, Lynn: Is that a hardship? I mean, do we? I just don't have any knowledge of this, so do we feel like it would be? It's a hardship for some of them.

Andrew Johnson: I don't think it's a hardship. I think it just it makes the farm meet the standards. If they're not meeting the standards, I mean it can be done, but if the farms not meeting the standards, then he has to get picked up more frequent. I mean it, it forces the farm to try to meet the standards, you know, do a better job of cooling or cleaning and all that kind of stuff. So I wouldn't go under the hardship thing. I think it just helps the plant make sure that the farms are doing everything they can to meet the standards.

Thornton, Lynn: So if they're out of standard on plate count, this definitely plate count can be affected by that three day pickup, right? But I think to Laura's point, the cell count not really going to be affected by two day pickup versus three. Although we have to test official cell counts within three days of pickup too, right?

Traas, Laura M – DATCP: Yes, unless you preserved the samples.

Thornton, Lynn: Yeah, I guess I can see that the plate count is definitely should be two days, but I guess I just, I agree with Laura. Like cell count doesn't matter whether it's two days or three days from a food safety standpoint, I'm guessing it doesn't really matter.

Helen Schmude: But I think we need to take a look at exactly what 65.70 addresses. If it addresses somatic cell and plate count in the same rule, how do you pick one over the other?

Traas, Laura M – DATCP: Well, what we can do is say if a Grade A or Grade B dairy farm violates the standard under statute, ATCP 65.70(a)(2), which would specify bacteria count because somatic cell count is (a)(4).

Andrew Johnson: I'm okay with that if that's what we want to do.

Traas, Laura M – DATCP: The other thing to keep in mind is for the Grade B farmers, which is this, which are the ones that more likely are going to be picked up every three to four days, their bacteria count is 300,000. But the somatic cell count is the same for A&B. Somatic cell count has 750 per mil for both A&B, so we can move this one over because as I said, we're going to start at 82.10 next meeting and hopefully we can have the inline sampler folks here. So then we get into the one other sections that's going to change radically. Supplies required for milk collection and sampling. The bulk milk weigher and sampler who collects milk in bulk shall have the following supplies available, and adequate supply of sample containers. I believe that applies whether you're using an inline sampler or a dipper. Any concerns about 2A? 2B is where things get fun, because if you're using an inline sampler, you do not need a sample dipper.

Andrew Johnson: Did you change that? And then that creates more opportunity for that for the inline sampling.

Traas, Laura M – DATCP: One thought that ran through my mind was B and C both only apply to dippers. Do we make just a subsection that says if you are sampling from a - I don't want to call it a traditional bulk tank - but have some definition of if you are collecting from a bulk tank where you can pull the sample from the top of the bulk tank in the milk house, you need a sample dipper and you need a sanitizing solution. If you are using an inline sampler, you need the equipment as outlined by the manufacturer of the inline sampler.

Andrew Johnson: It's kind of using bulk tank. Could you use the word vessel? Maybe we, you know, to address the samples that are being taken at the intake from direct load tankers.

Thornton, Lynn: There are also sample straws and I know that probably haulers don't use them much, but as field reps go out, maybe to check and collect an official sample, we use straws that are already sanitary. Which would, if you change that to a sampling device, it would fit. But the straws then we don't have to sanitize them. They're packaged sterility.

Traas, Laura M – DATCP: Okay. So what I did here, this is going to take some work. Sample device to collect samples under 82.12. If using a sample dipper, it shall be kept in a sample dipper well designed for that purpose, and the sample Dipper well shall contain a sanitizing solution of not less than 100 parts per million, or more than 200 parts per million chlorine or equivalent. The bulk milk weigher sampler shall carry a sanitizer solution test kit to test the strength. That's a sanitizing solution. And then we need to include something, are all sampling straws always, do they always come pre-sterilized or can you buy reusable sampling straws?

Thornton, Lynn: I've never seen ones you can reuse that come in a tube. The plastic ones that we use I've never seen reusable ones.

John Umhoefer: Laura, doesn't this make you just want to say any sampling device should be kept clean and sanitized? Period not have any of this.

Traas, Laura M – DATCP: Yeah. And that's kind of what I'm going to do here. So I added a four, if using automatic sampling device, it shall be used and maintained according to manufacturer instructions.

John Umhoefer: Could put one and two together.

Thornton, Lynn: This paragraphs really talking about the supplies we need, though. Also, should you add in there supplies needed according to manufacturers instructions also.

Traas, Laura M – DATCP: You're right. Okay, so if using an automatic sampling device development, where and sampler shall have yes, the supplies needed as directed by the manufacturer's instructions.

Tony Lampman: I have a question about that. I mean, shouldn't we leave it in there that it has to have the dipper with sanitizing solution? You know, because if the inline sanitizer or the inline sampler failed, then there wouldn't be a way to sample. You know, there's always chances of things failing or it's good to have that back up, you know, manual.

Traas, Laura M – DATCP: Well, the issue we're running into is we're starting to talk about silos that cannot be sampled or direct ship loads. And so the bulk milk weigher and sampler who picks up the milk may not be able to sample at all if the inline sampler isn't working. And then they will have to go to the plant and the plant will have to sample the tank when it gets there. So I don't know that having the dipper as a backup is something that we want to mandate because as we move into these newer technologies, we're going to require them to have a piece of equipment that they can never use.

Tony Lampman: So in that case, if so, if you had a load that was bad and you weren't able to find out because usually you have the farm samples and you could see what which farm caused that load to be bad, then that farm would have to be cleared again before it could be picked up. But now we don't know, I mean, how do we find out which farm? You know, because sometimes we have 11 farms. It's kind of hard to go out and sample every farm before we can pick up that load again.

Thornton, Lynn: So Tony, it sounds like you're talking about an inline sampler that would be installed on a truck like so you're picking up comingled samples and it's an inline sampler installed on the truck. Is that kind of what you're talking about?

Tony Lampman: Yeah, I'm not talking on the farm in line sampler. I'm talking like the Piper system where they have it mounted in a truck.

Thornton, Lynn: I haven't looked at that like on a truck, but I'm just assuming that the hauler driving the truck as he starts pumping that milk on, he has to ensure that that sample is being taken appropriately and that if he sees he is not getting a sample as he starts pumping on that he would be required to stop somehow to make sure that that he is getting that sample.

Tony Lampman: Right. But then we'd run into hardship problems where we can't get that milk picked up and it's a, you know, we're like a lot of haulers. They do a lot of miles where they can't just run back and get a different truck with a different. I just wondered if we kept the manual dipper on there, they're, you know, just like with electronic, I mean not to change the subject, but like electronic logs for, for haulers, they have to have a backup. And also if that fails, they have to be able to.

Traas, Laura M – DATCP: Yeah, the issue I'm having here is walking the line between what do we mandate versus what is good operating practice. For me, from the regulatory side, I'm looking at it and saying all I can mandate is that they have a sampling device. I don't know that I can say that if you've got an automatic sampling device, you still need the dipper as a backup.

Helen Schmude: So I'd like to ask a question to those who have and inline sampling devices on a truck, right? If you're not picking up a full load, why would you even use that and not pick up or not sample individual farms through the ball tank so you can, you know, do all your procedures? Because obviously if the milk is spoiled, you don't even want to put it on the truck.

Traas, Laura M – DATCP: So what I don't know that there are any truck mounted samplers in this state at this time. I've seen them in operation in other states and other countries. What they do is one of the advantages of the inline truck mounted samplers is the hauler does not have to wait for the tank to agitate before they start pulling their sample, because the set sampler is supposed to pull a small draw through the entire pumping of that load from that that farm. And so what they normally do to check the milk before they start loading is they will do a short drop, pull it, pull some sample in, pull that into a vial and do their sniff test there. It's a radical shift from how we do things because we are so used to going and turning on the agitator, looking at the milk, smelling the milk. That's something we're going to have to discuss.

Helen Schmude: So from a regulatory perspective then, if I'm a hauler and I pick up six farms, right, and I use this inline sampler and then I get to the dairy plant and they say no, I refuse this load because the acidity shows you have spoiled milk in your truck, who pays the farms and who disposes of the milk then?

Andrew Johnson: And I take that one step further. You know, if you have six stops on a load and you have an antibiotic load you know now you've got, are you really getting the representative sample from that inline sampler? Now you're going to have two guys that are going to show up positive, and you

need to clear both of them. And maybe it was only one of them. There's a lot of questions I think for that.

Traas, Laura M – DATCP: Ah, on that topic, I can speak to New York has had very good success with the truck mounted in line samplers that they have been using, clearing the lines between farmers so that one farmer's milk does not get contaminated with another farmer's milk.

Thornton, Lynn: I think one of the big selling points of the inline samplers for these trucks is eliminating shrink. You take all the people factor of measuring that milk out and it's good for the plants. You probably eliminate a lot of shrink.

Traas, Laura M – DATCP: So as I said, we're going to come back to this one next meeting, but right now do we think we've got at least a base to cover the different types of sampling devices that might be used to collect a sample?

Andrew Johnson: I think it's a really good start.

Traas, Laura M – DATCP: Yeah, let's look at the other equipment, an insulated carrying case with rack to hold the samples while carrying. The carrying case shall comply with 82.12. We'll get to that in a bit. A dial or digital thermometer calibrated for accuracy against the thermometer traceable to NIST certified thermometer at least every six months, accurate to ± 2 degrees Fahrenheit what can be used to check the accuracy of the farm. Bulk tank indicating thermometers. This is another one that I am not sure how we are going to handle this if we have a silo that the hauler cannot access in any way. Then how do you check the temperature of the silo?

Andrew Johnson: Well, I think if we go up to the above, it says that they're available, not necessarily that you have to use them. You know, if a silo is required to have a temperature chart recorder of some sort, whether it's electronic or a paper one, that they can use, that's been calibrated by the field rep basically, I mean, it's not necessary that all these things are going to have to be used, but they're that they're available. You know if that recording device is not working and, you know, somehow they want to be able to make sure that that milk is cold. I mean, first thing they do obviously is called the field rep or the farm. But I think if we focus on that these are items that should be available. I'm not necessarily sure that they have to be using them every time depending on the situation, but I think you know any bulk mouth way or should have a thermometer just in case.

Traas, Laura M – DATCP: Okay. Marking device to identify the samples. And that includes labels label that's marking device or other timing device. An adequate supply of forms in a writing device to prepare milk collection records. Here we go again. What if, and I've seen this also, what if they're all electronic? I've seen bulk milk weigher and samplers that come into the milk house pull out their iPhone, record what farm they're at or the iPhone has location detection. It says you're at this farm and her card, the

temperature of the bulk tank record the weight of the bulk tank. Do we need to say anything here with regard to supply of forms and writing devices?

Brandon Johnson: Should it just be changed to state that there needs to be a way to record the necessary information for the milk collection records? And do away with the supply of forms and a writing device.

Thornton, Lynn: I was going to say the same thing.

Traas, Laura M – DATCP: So I got rid of the adequate supply of forms in a writing device and just said an acceptable method to prepare milk collection records under sub 10.

Brandon Johnson: Yes.

Thornton, Lynn: I wonder if under G the other timing device you need to add something in there when bulk tank agitation is required to be timed or something like that.

John Umhoefer: All of these are supplies that refer to another section, basically.

Traas, Laura M – DATCP: Yes.

John Umhoefer: And so I don't think we need to repeat every time what they're for because it's really just referencing the supplies you need to do something somewhere else in this chapter. But to that point I don't think you need to change at all if you tell them they have to collect records. They have to collect records, whether it's a pen and paper or a iPad. You're demanding they collect records so they have to do it, and basically you're saying you do it any way you want. So you're sort of saying nothing. And acceptable method will be probably be questioned by the legal saying that's unclear.

Brandon Johnson: I like that a lot, John, but that makes sense. Removing it if it's possible, I agree.

Traas, Laura M – DATCP: And then there's this next one, an adequate supply of single use single service paper towels.

Helen Schmude: Why does the hauler need to supply single use paper towels when they should be available at the farm?

Traas, Laura M – DATCP: Okay, so we've gotten through item two and as I said, we're going to go back through items one and two.

Mick Homb: Laura, on where it said about the thermometers and stuff, and am I so out of touch? Do ball tanks that are going to be put on the farms that are already in the plants, don't they have petcocks? So then my question is if you take a sample out of your bulk tank out of the petcock, is that milk acceptable to do an antibiotic test or a thermometer check? Or is it not?

Traas, Laura M – DATCP: As long as the tank or the silo has been properly agitated, you would be able to get an acceptable drug residue or temperature record.

Mick Homb: And what does that limit? What does that limit for time of agitation? 20 minutes?

Traas, Laura M – DATCP: Well, there again that would be determined by the manufacturer of that tank.

Mick Homb: It was just a question I haven't done in a plant in a long time.

Traas, Laura M – DATCP: Yeah, most plants, they're agitators, are just running at a, you know, a minimum speed constantly just to keep the milk in the tank constantly. So yeah, that's one of those things we're going to have to look at is do we require in rule once we start talking about silos on a farm. And that's ATCP 65, which is probably not going to be open for three to five years. But do we look at when we get to 65 saying that if you're going to put a silo on the farm that it needs to have a sample clock on it? But we are at 10:51. We are at something of a stopping point because we've gotten through paragraph 2. So I'll ask: what do we want to do as far as a next meeting date as we are getting close to the holidays? So let me pull up the calendar. So we are here at the 7th. I cannot do anything the week of the 14th as we have our dairy section meeting next week. Probably shouldn't have said that, cause now you'll know that hey, there aren't going to be any sanitarians out for a couple of days. The 21st is Thanksgiving Week, which is also a hunting season week.

Brandon Johnson: I could do the morning of the 21st, but maybe that doesn't work with everyone else.

Traas, Laura M – DATCP: I suspect there at least a few hunters in this group.

Mick Homb: I'm okay with the 21st.

Thornton, Lynn: I'm okay with it.

Tony Lampman: I'm good with it.

Helen Schmude: Works for me.

Andrew Johnson: That'll work for me.

John Umhoefer: Before three, OK.

Traas, Laura M – DATCP: Oh yeah, that would be the next thing we need to talk about. And because we would be hoping to get our guests from Ireland on the call, they would probably prefer it be 9:00 o'clock in the morning again.

Brandon Johnson: Yeah, I needed to be in the morning 9:00 o'clock would be great.

Helen Schmude: That works for me.

Mick Homb: Me too.

Traas, Laura M – DATCP: Okay. So Max, I will ask you to do your open meeting magic again to formally announce that the ATCP 82 group will be meeting. Tuesday, November 21, at 9:00 a.m. Central Standard Time so that the folks from Ireland and hopefully at least one of them will be able to make it. Any last comments, concerns. Oh, I want to go back and look at this section kinds of things.

Brandon Johnson: I just have a comment that I think it was great we covered, I feel like even though it didn't seem like we covered a lot, we I feel like we did.

Traas, Laura M – DATCP: Yeah, we covered some very difficult sections and now the we got the one section completely done. We got another section where we started laying some base work. The next thing we're going to get into, and I'll forward you all that, we're going to get into talking about the bulk milk weigher and samplers and who needs to be a licensed bulk milk weigher and sampler. Everyone on the farm who touches an inline sampling device need to be a licensed bulk weigher and sampler because the test they would take has nothing to do with what they do in real life on the farm. And that's going to be a major topic of discussion of are we going to require to be about bulk milk weigher and sampler when they're pulling a sample from a device that has been set up by the farmer?

Brandon Johnson: Laura, I am curious if you're saying New York has had good success with the inline samplers. I'm just curious. Do they have that situation? And if they do, what have they determined? And maybe you don't know that. I'm just curious.

Traas, Laura M – DATCP: I've talked with Casey McHugh and Chris, pretty extensively on these inline samplers. What they are doing is they are not requiring the farm employee who takes the needle out of

the aseptic package and sticks it into the septum to be a licensed bulk milk weigher and sampler. This goes against all of the FDA M-I's with regard to inline samplers. All of the FDA M-I's say everyone who handles any part of this inline sampler must be a licensed bulk milk weigher and sampler. New York is not doing that. What New York is saying is there needs to be some folks on the farm who are licensed bulk milk weigher and samplers who come in and check to make sure that the device is set up properly and then either the farmer who is probably going to be one of those licensed bulk milk weigher and samplers or the licensed bulk milk weigher and sampler who comes to the farm to pick up the milk is going to take some of these have a large one liter, 2 liter bag is going to agitate that bag and pull the samples they need to be a licensed bulk milk weigher and sampler. But, you know, as far as, you know, who puts the the needle into the septum at the start of milking, this is mostly direct ship loads right now, they are not saying that those people need to be permitted as bulk milk weigher and samplers and they have not had major problems with their survey enforcement scores and that's one of the things that I've got the MSRO's digging into right now is how it impacted our enforcement scores because we've already been told by our milk specialist that they will enforce the requirement that everyone who handles that device is to be licensed. And so how will that impact our enforcement scores and will that cause a problem for the entire dairy industry and a whole as a whole if our enforcement score is start failing because we're not enforcing that part of the FDA rule?

Brandon Johnson: Okay, wow, there's a lot there. Thank you.

Traas, Laura M – DATCP: So I'm hoping that on in at the next meeting or the meeting after that, I will be able to come back with some data that says and what I'm hearing right now is that it should not be a problem for our multi farm BTU's, but it may be a problem for a single farm BTU.

John Umhoefer: Laura, do you think there's any stomach at the NCIMS to kind of lead this instead of follow the PMO and get two big states moving in one direction?

Traas, Laura M – DATCP: Well, let's put it this way. Casey McHugh is currently the chair of the NCIMS Executive Board. So does that tell you if there's stomach? There is definitely stomach there to bring the NCIMS into the 21st century. The problem is they would either need to do a mid conference special meeting or we'll have to wait until after the 2025 conference and just take our licks in the meantime.

John Umhoefer: Well, these rules take two years anyway. So timing is everything.

Brandon Johnson: I have to leave for another meeting.

Traas, Laura M – DATCP: Okay. Thanks, Brandon. Anyone else have anything else? It is a one minute after 11:00 o'clock. Thank you all very much and we'll talk to you again in two weeks.