NCIMS UPDATE

2017 NATIONAL CONFERENCE ON INTERSTATE MILK SHIPMENTS MAY 12-17, GRAND RAPIDS, MICHIGAN

- Weaving in FSMA language
 - New definitions
 - Preventive Controls Qualified Individual
 - Supply-chain-applied control
 - Very small business
 - New cGMP's
 - current Good Manufacturing Practices

- New cGMP's
 - Added to 15p
 - Food allergen control
 - Holding of food by-products for use as animal food
 - Added to 20p
 - Requirements related to employee health, hair restraint, and chewing gum

- Weaving in FSMA language
 - Appendix T
 - Sub Part C Food Safety Plan
 - Sub Part G Supply Chain Program
 - Compliance will not apply to "very small businesses"

- What will this look like?
 - Compliance with Appendix T
 - Will be evaluated by FDA
 - Every 3 years
 - First part of Check Rating
 - Not evaluated during more frequent surveys

- What will this look like?
 - If plant not in substantial compliance
 - Not defined yet
 - Check Rating will stop
 - But plant not de-listed at this point
 - FDA will notify state
 - State will re-inspect within 60 days

- Compliance target date:
 - September of 2018
- Still many details yet to be determined
 - Encouraged to take good notes on problems that arise and formulate ideas for solutions

- Other Proposals
- Much word-smithing
- Water:
 - Category I Water shall be tested for E. coli
 - Reclaimed and Recirculated Cooling Water
 - Unchanged Stays on a total coliform standard

- "Ghost or Zombie" Loads
 - If a load tests positive for antibiotics, other loads that have already been received at another facility or have already left the farm are tested as normal. Only milk at the farm is held until tested.
- Tetracycline testing pilot program
 - Effective July 1, 2017 for at least 18 months
 - Plants that process Grade A dairy products
 - Screen at least 1 out of every 15 loads quarterly

- New Laboratory Test Methods
 - AccuPoint Advanced Alkaline Phosphatase
 - BetaStar Advanced for Beta Lactams
 - BetaStar Advanced for Tetracycline
 - BactoCount IBC and IBC m
 - Bentley Somacount FC
 - Charm ROSA Tetracycline SL
 - 3M Petrifilm Rapid Aerobic Count
 - Pilot Only: Idexx SNAP Tetracycline

UPCOMING EVENTS

- Publication of IMS-a and 2017 PMO
 - This Fall/Winter
- Next Conference
 - April 26 May 1, 2019
 - Hyatt Regency at the Arch St. Louis, Missouri