ATCP 82 Subcommittee Meeting

November 21, 2023 - 9:00 a.m. – 11:00 a.m.

Attendees:

Laura Traas, Max Huebner, John Umhoefer, Tony Lampman, Mick Homb, Andy Johnson, Adam Brock, Jordan Blunt, Brandon Johnson, Leigh Hamilton, Anthony Canavan, Helen Schmude, Alexander Beard, Lynn Thornton

Transcript:

Traas, Laura M – DATCP: So first of all, roll call Adam Brock. I know you were on.

Adam Brock: Here. Still here.

Traas, Laura M – DATCP: Andy Johnson.

Andrew Johnson: Here.

Traas, Laura M – DATCP: Mick Homb.

Mick Homb: Here, if you can hear me.

Traas, Laura M – DATCP: We can hear you, John Umhoefer.

John Umhoefer: Now I can hear you. Yes, good morning.

Traas, Laura M – DATCP: Yeah. Good morning. Helen Schmude.

Helen Schmude: Here.

Traas, Laura M – DATCP: And Tony Lampman.

Tony Lampman: Here.

Traas, Laura M – DATCP: Yeah. Thank you all for being here. We have several guests. Max, do you need to check on anyone for attendance of guests?

Huebner, Max K – DATCP: Uh, let me check here. I don't believe so. I think we should be all set. Uh, yeah, we're good to go.

Traas, Laura M – DATCP: OK, this meeting was posted as an open meeting per the open meeting rule, the state open meeting rules. So just need to make that announcement and I welcome you all to this meeting. I thank you all for being willing to meet on a week that here in Wisconsin is not just Thanksgiving week, but also hunting season week, which is pretty important week to a lot of people here in Wisconsin. So are there is there any open discussion before we continue with working on draft language in ATCP 82? Hearing nothing for those who were unable to be with us last meeting. We got through a just a couple of sections. Uh. 82.06. Let's see. We might have done 04 also and 82.08 we started. On 82.10. There were a couple of things that I had assignments to do from last meeting. One being that the great a bulk milk tanker cleaning facility permit, the question was asked do we need to list all of this information in the rule? If we say it's on an application, the person I need to ask is currently not in the office, so I was not able to get an answer to that question. So last meeting we did some work on 82.10, but made the decision that - because we were not able to have some of our representatives from the inline sampling companies and some of the farms that are organizations that are looking to use inline samplers - that we were going to come back to the beginning of 82.10 to continue that discussion. Any concerns there? So 82.10 we discussed the fact that if a milk if milk from a grade A or grade B dairy farm violates the standard in 65.70 that it shall be collected at least once every two days until a subsequent test shows that the milk complies with standard. We had it discussion about the fact that 65.70 not only discusses bacteria count, but somatic cell count and the consensus of the committee was that yes, we wanted to keep that in there for somatic cells as well that if a farm was experiencing high somatic cell counts that we wanted them to be picked up every two days until they got that situation resolved. Then we had no issues with B. Where we got into the issues was starting with item 2: supplies required for milk collection and sampling, and this section is going to take a lot of rework because the current rule just refers to a sample dipper. And as we are well aware, that's not the only way to pull a sample anymore. So what we did was change the language to, say a sampling device. Uh to collect samples as required under 82.12, and then we included some language that says if you're using a sample Dipper, these are the things you need to do. We included some language with regard to the use of a sampling straw, indicating that it shall be a single use pre sterilized device and then if using an automatic sampling device, the bulk milk weigher and sampler shall have the samples needed as directed by the manufacturers instructions. That way it doesn't necessarily speak to one particular manufacturer or the other, it's just whatever the manufacturer of your sampling device says you need to have.

Leigh Hamilton: And so it's Leigh here from Piper. And first of all, thanks a million for holding on this until we are available to discuss it. Really appreciate that. Second of all, yes, I think so. I think the idea of having a an equipment agnostic language in your regulation I think is definitely the way to go and yes, and putting it to the manufacturer, I think as a you know in principle we would agree that. And whatever we're requiring in terms of new technologies that are coming on stream, if there is an obligation to be

met, it should be on the manufacturer rather than on the regulatory agency to go about, you know, creating what those proper standards ought to be. And one question that I have that I wanted to bring to this meeting, although I don't know if it's maybe beyond the scope or if it's something that that isn't as relevant for the people at the meeting as it is for us, or what you guys will think of it. But, umm, one of the things that we notice when we look at the requirement for having a bulk milk weigher and sampler be the person who operates the inline sampler on the farm and something that strikes me when we look at that is that a bulk milk weigher and sampler needs to be a far more qualified person than a person who is simply operating an inline sampler. And I wondered whether in your regulations we would consider or to consider the idea of having different types of weigher and samplers. So given that the person who is required to sanitize the dipper, agitate the bulk tank, and do everything from A-Z, that's a much more comprehensive qualification than a person who is operating an inline sampler on farm and I wanted to open that question to this meeting as to whether it was something we ought to discuss and consider about whether in Wisconsin you were willing to contemplate having different types of samplers qualified so that Wisconsin has the guarantee of having people on farm and using these pieces of equipment who are qualified, are tracked, are controlled. But maybe we also know they're never going to jump into a into truck and go and pick up a bulk milk tank. That's not going to be a part of their job, so I guess I'll leave that there and try to understand what you guys think of that.

Traas, Laura M – DATCP: Uh yes, we are to discuss that and I believe this might have been something I discussed at the last meeting, is I had asked one of our milk sanitation rating officers to do some number crunching. I do have some numbers. They are very raw at this point, but our concern was right now the way the FDA documents are written, the AMI is for all of the different inline samplers. It says in no uncertain terms that right down to the person who you know at the farm may do no more than unpack the needle and stick it into the septum must be a licensed bulk milk weigher and sampler, so that's the FDA language. And so the concern we had here in the state of Wisconsin is we were told by our FDA milk specialists that if we did not permit the samplers on the farm who were doing that activity, that they would be considered unpermitted bulk milk weigher and samplers and we would be debited for that. So we've recognized that other states are doing this and other states have indicated that they are not running into a problem with failing enforcement scores. But since we had the bad experience of having failing enforcement scores for a couple of years post COVID because of some decisions we made during COVID, we wanted to look at this and wanted to make sure that whatever decision we make for ATCP 82 does not harm the dairy industry as a whole. So what I can tell you about the numbers is that right now it looks like we could make the conscious decision to go away from having those on farm sample people handling the equipment not be licensed bulk weigher and samplers, but we would experience some enforcement failures and we just need to decide is the benefit worth the risk? Recognizing that considering that the chair of the NCIMS Conference is from New York State, and New York State is one of the states that is not licensing on farm handlers of this equipment, that this requirement may change at the next conference. But that would be a roll of the dice.

Andrew Johnson: Can I speak on that, Laura? Because I'm probably, I mean we have a lot of single farm BTU's, which are bulk tank units in the IMS program and I would say industries feeling would be that, you know, if to get a bulk milk weigher and sampler it's not only, you know, will you be doing it every day or not. I think it also it helps that person understand the importance of the official sample and, you

know, we have to have a protocol I believe with these inline samplers as far as washing and sanitizing and agitating. And before we, you know, take the larger sample and make a smaller sample, you know, I don't think it's going to be a bad thing for anybody to be a bulk milk weigher and sampler. Definitely when we have a single firm BTU and in the IMS program and we don't have a bulk milk weigher and sampler pulling that official sample, it's definitely going to cause some enforcement failures. Anytime that happens just from our plant, you know, it's detrimental on where that milk's going to go where product can go. If it's just a simple something as simple as the person on the farm getting a bulk milk weigher and sampler license, whether that it gets written or not as far as industry I could see us requiring any milk that that Grassland buys from a farm using an inline sampler we're going to make you get a bulk milk weigher and sampler license anyway because we're not going to take that risk of failing an enforcement if you don't have it. So whether we make different ones I don't I think we can include it in the bulk milk weigher and sampler and maybe even these you know I'm a bulk milk weigher and sampler it helps me understand that the process of the inline sampling the so if somebody else gets it might never use an inline sampler. If you look at the other side of the coin they might someday and at least now they've had some sort of up front understanding of how they work, what the requirements are, and all that kind of thing so as far as Wisconsin goes until the PMO is changed I think we should still require that person to be a bulk milk weigher and sampler.

Thornton, Lynn: This is Lynn. Can I say something? Umm so and I'm not sure if I've read the same FDA memo that you're referring to. Maybe if you get a chance you could send those to us. In what I read I thought it was an interpretation thing, so my understanding is you guys that are interpreting to mean that whoever sticks the needle through the septum has to be the weigher and sampler and not sure who was just talking, but to think that we are going to get every single milker on these farms as a licensed weigher and sampler simply to stick that needle through the septum, I think is totally unrealistic. I am all on board with having the person that agitates that bag and takes the sample out of the bag being the license weigher and sampler, but I do not see the need for the person sticking the needle through to be that person.

Andrew Johnson: What would be the failure of the person sticking the needle into the septum? Is there any chance that you do not get a representative sample when you do that? I mean, is there zero chance that you're not going to get a representative sample?

Leigh Hamilton: Is that is that to me? And so, first of all is that the person from grassland that I'm replying to there?

Andrew Johnson: Correct, correct, correct.

Leigh Hamilton: I don't know your name? Sorry.

Andrew Johnson: I'm sorry, Andy Johnson,

Leigh Hamilton: Andy. Hi, Andy. So first of all, look in no way would we be suggesting that nobody on the farm where a sample is being taken on the farm is to be a licensed sampler. So I think your view that well look, what harm is it to require a license sampler on the farm? That just makes sure that people really are aware of the requirements and the they know what they're doing. I think we would probably all agree on that. And I think the issue on this point from our point of view is that at the moment Wisconsin has requirements of weigher and samplers and you know them better than most because you are a licensed sampler. But those requirements include knowing about lots of different parts of taking a sample from A-Z and 90% of those are not relevant for the person operating the inline sampler on the farm. And in the case of our own system, which is the piper system and that person is required to uncap a sterile needle and put it through a septum that they should ought to have sanitized and the system does the rest. So they're not required to tell the system what size the load is. They're not required to tell the system when to speed up or slow down. They're not required to weigh the milk. They're not required to do any of those things, and really the system is the sampler, but it requires that the person on farm makes a connection of fluid connection. To say there's zero percent risk, I think wouldn't be correct either, because that person does have to uncap the needle, sanitize the septum, and put the needle in. So you know, but I think the risk there is minimal and to ask that in the case of every sample on every shift being taken in every farm where they have a pipe or system to ask the farm operators to take a test where you know 90% of it is absolutely irrelevant to them and the risk of them being able to influence the contents of the sample because most of it is in automated is so very small. I think you know, given that we're doing this job of work where we're looking at, OK, well, how do people sample? What ought to be we to be requiring them to do, you know, given that we're engaged in in this work now of trying to understand, OK, well, what technologies are out there? What's actually happening on farms? What will promote getting farms to maximize their chances of having good samples? Well, I think then under those circumstances it's a valid conversation to have because I think as regulators and Laura, I don't know if you share this view, but you know, as regulators, fitting your regulation is to what actually goes on in real life is very important as well because you don't want to be in a situation where you know you have a perfectly good law but unfortunately, people don't do things that way anymore. And then the people's whole respect for and adherence to those rules and practices is undermined because, you know it's no longer relevant. So Andy, totally agree with you that what we're trying to do here is, you know, promote better sampling. But unfortunately at the moment the more progressive farms that are putting in these systems to try and get better and more representative samples, they're the ones that are going to losing out because each of their operatives is being asked to do something that's 90% not relevant to how things are really done.

Traas, Laura M – DATCP: So now we go back and answer some questions here. Yes, these are all M-I's. But what the AMI say is the person performing the following steps shall either be the milk producer transports the milk from their own dairy farm, or shall possess a valid bulk milk weigher and samplers license permit issued by the Regulatory agency, and you'll see that these following steps are: washed and sanitized the sampling septum, remove the protective cover from the septum position, put the needle in, position the peristaltic pump so those basic steps, the way the M-I is written, uh, those basic steps do need to be done by a licensed bulk milk weigher and sampler per the M-I. Now you're right. These are M-I's which, M-I's are going to be going away after the 2025 conference. They are either going to be incorporated into the PMO or they are going to go away. But right now, we're being told by our

milk specialist that he is going to enforce these. Now our current milk specialist is going to be retiring sometime soon. So I mean where I stand is I don't know what direction to go. If you tell me I have to follow the PMO completely now, the other question from a microbiology and lab sampling quality person point of view is can the person doing these steps screw up the sample? There are a couple of ways that they could screw up the sample. They'd have to really go against the proper procedure, but it is possible they could uncover the needle and then handle it with dirty hands and then put it into the sampling septum, causing the sample from that farm to have probably a higher plate count and possibly contaminating the load. Contamination to the load would be minimal, but the contamination to the sample might be pretty high. The second thing I could see happen because I've seen it happen with the sampling septum is, for those of you who haven't seen it, you've got a metal cup and then you put this device in there. That seals the system, but still allows you to put a needle in, and this system stays sealed in that metal cup. You've got about a 1 centimeter diameter hole, at least that's what they had when I was working with them. And I've seen some technicians when they're in a hurry slam that needle in and they miss the hole and they bend the needle as it grazes off of the cup itself and gets into the hall. And that can affect how that system pulls a sample, because you've bent the needle now. So those are two ways I can see it impacting sample? Beyond that, I don't know that. Uh, the person inserting the needle into the septum can have a lot of impact on the sample one way or the other.

John Umhoefer: So Laura, I'm willing to go with consensus cause I don't live in this world every day. But I think what you just described as potential concerns are valid, but I don't know if having a piece of paper that says I've got a license makes you a different person than someone who's just properly trained. I mean, either way, it's going to be I have a license and I'm properly trained or I don't have a license and I'm properly trained. You know, I don't think it lowers the risk to have that license in your hand when you follow up or when you don't follow up. Just a thought.

Andrew Johnson: I guess one more thing on that, a real life scenario. I mean, we had a firm shipping a lot of milk like 12 loads a day that we've had this whole discussion on in line samplers with them. I think as far as our example, we felt comfortable that these inline samplers could definitely work as far as you know, getting a more accurate reading on components and things like that cell count and maybe be used for an official sample for monthly. The hurdle that we ran into was when we talked about Appendix which is the antibiotic test before the load is unloaded. We cannot build enough trust and correct me if I'm wrong Laura we and the inline sample from a tanker can be used as a as an antibiotic test at the plant correct as the way it's written now yes? But as far as industry, we could not wrap our mind around the trust factor of using that sample for clearing that load. And so we have bulk milk weigher and samplers at the plant that when the truck comes in and they open it and check it for smell and foreign material they take a sample and that's the sample that we use for the Appendix N. So the farm wanted to go to the inline sampling so they could bring the sample in and obviously with the amount of trucks they had to eliminate the wait time for us running that antibiotic test and we could not wrap our minds around the process enough to build a trust where we would take a sample that's in a cooler and think that if it passes negative that we were comfortable enough to unload that milk. The farm was very, I mean, we worked through this whole process and our biggest concern was the size that we are, you know, if we have one load that comes through and it ends up we have antibiotics in our end product. I mean the recall would be so large to the point where we offered the farm that if something like that

should happen, would they be willing to take that risk. And of course, they did not want anything to do with being responsible for a recall on thousands of tons of product. So it with that in mind, the producer decided not to put the inline sampling in because for him it wasn't going to save any more time in the intake with his trucks. We were going to pull that sample for the Appendix N as long as we're up there, we take another sample for the components and the and the sample like it's sent to the lab that is reported to the state so. You know, I guess if whether they're licensed or not, you know, if we're going to use that sample as an official, I guess in our world, we decided that we can just use our bulk milk weigher and sampler at the plant to pull that sample out of the top of the truck. And that meant the requirement to avoid that enforcement failure.

Traas, Laura M – DATCP: Now I've got two questions for you Andy. First of all, are all of your in plant samplers, folks who do not go out to the farm for any reason? Are they indeed licensed bulk milk weigher and samplers because we do allow permitting of implant samplers under the plants permit to pull the appendix N sample.

Andrew Johnson: Yes, that's correct. I believe we have a page of probably 30 employees that all have a bulk milk weigher and sampler license.

Traas, Laura M – DATCP: Would you see a benefit, and if someone mentioned the possibility of a different type of license, that would be similar to the in plant license that we do employ with other companies where we go in and observe the person take the sample for appendix N purposes, but they're not as necessarily licensed as a bulk milk weigher and sampler.

Andrew Johnson: Again it all ends up being the chain of custody of that sample. I think if you look at the history over time, there's been plants that have allowed, you know, haulers to go up and pull that sample because they were a bulk milk weigher and sampler and you just can't trust that you're not pulling a sample out of the pocket instead of actually taking the one there. So as far as grassland is concerned and you know, and I don't know, the feeling on other industry, but we couldn't find that comfortability of just not having that chain of that custody of that sample for that Appendix M sample.

Traas, Laura M – DATCP: And then the second question is, recognizing that regulatory rules are a floor and not necessarily the bar you want to set for yourself, would it sounds like you're already comfortable with this, but I want to make sure that other folks are comfortable with this. Would we as a group be comfortable with setting a floor that says that these these on farm people using inline samplers do not need to have a bulk weigher and sampler license, but you as an industry can set a higher standard for your farms?

Andrew Johnson: Well, I didn't know you were a mind reader, but that's where I was going. I was alluding to that point that like we said at the last meeting, you know if other companies are comfortable with it and you know are not maybe participating in in the in the IMS program and they're OK with that. As long as the rest of the industry is aware of that, I know if I was out procuring milk and I had a farm

and I wanted to come to grassland and they had an inline sampler and they did not have bulk milk weigher and sampler, well, one of the requirements coming to grassland is now you're going to have at least somebody there that's going to have that license. So that way we meet the enforcement part of the rating system and I'm OK with that. I mean I think as a whole I think if like you say, if we could create a floor, but industry always has that the option of creating higher standards, I guess that's up to that individual. So I if the group is OK with accepting the fact that you know an official sample can be pulled at a firm like that and then I guess you know, I'm open to the understanding that I guess is more of the thing. But as far as industries concerned, it's something that I mean we are aware of our program and what our requirements are and one of the requirements is to pass the federal survey and we have a lot of farms that are on in a single farm BTU. And you know, there's no way we're going to take that risk of failing an enforcement and then, you know, scrambling, you know, once we fail, I'm going to go back to that person and tell them you know what? We're not going to fail it when they do it in the next six months, so somebody here is going have to get a bulk milk weigher and sampler's license.

Traas, Laura M – DATCP: And I think that one of the things we discussed is that there be at least a certain number of people on the farm that are licensed bulk milk weigher and samplers that are supervisory, that are overseeing them. Alex, you have your hand up.

Alexander Beard: Hey, thank you, Laura and I appreciate the invite to attend. Just a question for point of clarification. Uh, and again, I'm Alex Beard. I'm director of Raw Milk services for Dairy Farmers of America. With regard to a lot of encouraging discussion and interesting concept here of possibly a hybrid licensing, you know where would allow farms to proceed with a step down version potentially of weigher and sampler for the person hooking up or disconnecting the inline sampling. That's certainly very encouraging because we know we have a lot of progressive producers interested in this and then getting away from the requirement of having to be agitated at plants and all the problems that occur that's causing for farms that we're trying to take that milk out of state and we have plants that are unfamiliar with agitation and umm, that we're not getting appropriate official samples for payment and so forth. My question for clarification: if just because a farm gets approved in Wisconsin and everybody comes to agreement on this piece of licensing or what would be required a plant in your state that's receiving the milk. Just because the load has an official sample accompanying it in the driver's cooler for producer payment purposes and official regulatory purposes, that doesn't stop anyone of the receiving plants in the state from pulling their own sample off the top if they so choose. Right?

Traas, Laura M – DATCP: Correct.

Alexander Beard: I mean that, uh, that to Andy's point, if they're more comfortable and certainly I could understand the reservations of you know, if there's ever a mix up, is that sample truly you know, because we know that sometimes a once in a while there's a mix up of sample accompanying representative of that milk, they can still pull their own right.

Traas, Laura M – DATCP: Yes.

Alexander Beard: Super. Thank you.

Andrew Johnson: And I don't want to make, I'm sorry, this is Andy, I don't want to make it sound like I'm against them. We did have one farm at one point in my career in Minnesota that had an inline sampler. They had their bulk milk weigher and samplers, which I mean whatever, but it did work great. I mean, it was a great representative sample. We used it for our pay purposes the farm used it for their monthly official that they pulled but and in that regard it worked great. The farm I had one person that hauled the milk that did all the sampling here and set up the sampler and we had trust in that. So I guess I just don't want to make it sound like I'm against the sampling. I'm just, you know, just trying to create conversation.

Adam Brock: This is Adam. I have just one brief question. Should and let's just use this as an example, should a sample fail or there's ambiguity to the results, whatever it may be, who then is responsible for addressing the issue?

Traas, Laura M – DATCP: OK, so let's say that you have the on farm sample that was taken and the plant decides that they're going to do the Appendix N based on their own sample taken off of the truck. But they're going to accept that sample for our component purposes, we have this happen on occasion. So they do the appendix N test the appendix N test comes back positive and they want to go back and test the patron sample to see if the patron sample is also positive and the patron sample comes back negative. We have processes to handle that right now because that has happened on occasion. Usually in this case, it involves a one of two things, either the in plant sampler contaminated the sample in some way, or the hauler violated the system in some way, so I'll talk about the in plant sampler contaminating the sample 1st. I can speak to this from experience because I had it happened twice to me where I had a in plant samplers who went to lunch. We're on, and if they took their antibiotic after lunch, which was the doctor's instructions and failed to wash their hands and then took a sample and contaminated the samples, came back positive, but when we did the producer trace back, none of the producers came back positive. We have a process for going back, agitating that truck as much as we are able to, to pull a new sample that has to be done under at least verbal approval of someone from the department, and then we go back and try and trace what happened. Why did this happen in the second instance where we have the truck test positive but none of the patrons test positive where the hauler may have been approached by a producer and says, hey, I think I milked the wrong cow. Can you take 2 samples at the next farm? This has not happened recently, but it has happened in the past and so we go through that same process of practice. Positive patrons test negative. Let's troubleshoot the problem. We go through the process of agitating the truck. We pull into sample from the truck. Truck test positive again. Patrons test negative again. Then we start testing the patron samples to see if there are two patron samples that are very similar in components which will tell us that it's possible that two of those components, two of those patron samples, are the same sample. I could see that same scenario happening here. We'd have to do a little bit different troubleshooting, but if at the plant the truck tests positive but the sample that the patron took tests negative, we can start going back and troubleshooting. Was it indeed a bad sample from the truck? If it wasn't a bad sample from the truck, what might have gone wrong at the farm and

going back to that farm and doing some troubleshooting to see what might have happened? So one of the things that Tom L, who recently passed away, I learned a lot from that man and one of the things that man talked me is that we can write a rule, but the people who are going to try and violate the rule will find the loophole. So what we need to be conscious of is writing a rule that sets a good floor for everyone to not penalize the people who want to do a good job, but still has enough teeth in it to penalize those who want to violate the rule. So this is the balancing act we'll need to find here. Jordan, you have your hand up.

Jordan Blunt: Hi, good morning again. Thanks for having me as well and I hope I'm not taking the conversation backwards here, but I had one really I think easy question. The issue with the qualified personnel on farm for doing inline sampling. Does that issue only arise when we're doing inline sampling into direct load tankers?

Traas, Laura M – DATCP: No. All of the M-I's there are, I believe, three or four different M-I's that were issued by the FDA and all of the M-I's issued by the FDA say that the person who sets up the unit to sample who take who takes the cover off the septum puts the needle into the septum, must be a licensed bulk milk weigher and sampler.

Jordan Blunt: So if you're doing inline sampling and maybe I'm way off here from the bulk tank on farm into a tanker, that would be done by a mill hauler, presumably, and they would be a licensed personnel already.

Traas, Laura M – DATCP: Right.

Jordan Blunt: But if the sampling device is in the pipeline, if you will be instantly cooled into a direct load tanker, that sampling device could be switched out by a personnel on farm personnel rather than the hauler who is certified in my tracking.

Traas, Laura M – DATCP: Yes.

Jordan Blunt: OK. I think they're clarifies it for me. Thank you.

Traas, Laura M – DATCP: OK. So based on this discussion, I did make one minor change, which is if using an automatic sampling device, the bulk milk weigher and sampler taking the official sample. So I added the words “taking the official sample, shall have the supplies needed as directed by the manufacturers instructions” because it sounds like, and I'll take a poll of the official committee members, it sounds like the direction we want to go or we want to recommend is that we've got the bulk milk weigher and sampler to take the final sample, but we don't necessarily want bulk milk weigher and samplers to do the other work with this sampling device on the farm, is that correct? So I'll go through here.

Traas, Laura M – DATCP: Andy that that what I'm hearing.

Andrew Johnson: Could you repeat that one more time? I'm sorry.

Traas, Laura M – DATCP: That we want the person who takes the final official sample from the farm to be a licensed bulk milk weigher and sampler, but we don't necessarily want everyone who works with the inline sampling at some point to have to be an official bulk milk weigher and sampler.

Andrew Johnson: I would agree with that. You know, until something changes with the PMO, you know I don't, I mean, we're not going to come back to doing ATCP 82 all the time. But I mean to have one bulk milk weigher and sampler not going to deter the use of these samplers on farms. I don't think so. I think in order in order to meet that requirement, you know for the official to meet the rest of the requirements. You know that's fine as far as the rest of them. I can't think of anything that you would add or delete from that statement.

Traas, Laura M – DATCP: OK, Helen.

Helen Schmude: I agree with that. I think the official has to be taken by somebody that holds a license.

Traas, Laura M – DATCP: OK.

Traas, Laura M – DATCP: Mick.

Mick Homb: Yeah, that sounds all good from my standpoint.

Traas, Laura M – DATCP: Tony.

Tony Lampman: Yes, I agree.

Traas, Laura M – DATCP: Adam. Now we might have lost Adam, John.

John Umhoefer: Yeah, I think that sounds like a good middle ground pathway.

Traas, Laura M – DATCP: OK. OK, so I put a note in there that we will need to address the other personnel on the farm because we can't just be mute on them but identify what we will expect the farmer to do. And the other thing will need to discuss is do we want some personnel at the farm to be

licensed bulk milk weigher and samplers. So we did not see any issues with items D, E, or F that they need some type of insulated carrying case to hold the samples. They need a thermometer that is calibrated for accuracy to measure the temperature, and they need a marking device to identify the samples in their cooler. Item G said that they needed a watch or other timing device, we added the exception when bulk tank agitation is required to be timed because there's no need for them to have a timing device if they're not required to agitate the tank for a specific period of time. Item H was up for some discussion if we talked about the previous language was that the weigher and sampler or the person taking the sample needed an adequate supply of forms and a writing device. Let's talk old school here. We changed that language to needs an acceptable method to prepare milk collection records and so that opens the door to if they've got one of the more modern systems where they just take their iPhone, they scan a QR code in the milk house that says you're on this farm and this is the amount of milk I'm pulling from this farm. Don't need a paper. Don't need a pencil.

Leigh Hamilton: And uh, Laura, just on that one. So where so, for example, if they're coming to pick up a form with one of our systems on us and they don't have a mobile manifest, that system on the farm is creating a manifest and printing it so that person won't have an acceptable method with them, but the farm will have an acceptable method if you like. So does this language cover that? Do you think? So what's further up if you know what I mean?

Traas, Laura M – DATCP: So these are the supplies required for collecting milk for milk collection and sampling. Both require a sampler who collects bulk milk shall have the following supplies available.

Leigh Hamilton: So that's fine in my opinion. Great, thank you.

Traas, Laura M – DATCP: And then and the other things on item I, item H. I was an adequate supply of single service paper towels and the discussion last time was they should be provided at the farm. And again this section is headed as they shall have it available. Doesn't necessarily mean they have to carry it with them, as long as they're farms have it available, but we all know that there will be the day you go on to the farm and it's the towel dispensers empty. Now what do I do? But what are the thoughts on this?

Helen Schmude: So, Laura, I think what you said makes sense, right? If they had paper towels in their truck in case they needed them, they're still available because you are right. I mean on the farms they can run out of paper towels and then what do you do when a requirement is to wash and dry your hands, right?

Traas, Laura M – DATCP: Yep, but that happened a lot to me and I don't go out on farms that often. OK. So the next item is just talking about the bulk milk weigher themselves that they shall wear clean clothes when measuring, sampling or collecting milk at a dairy farm shall maintain a degree of personal cleanliness. Observed good hygienic practices. I no one, no bulk milk weigher or sampler who has a

discharge, infected wound, sore, or lesion on their hand or exposed arms. Umm, make some measure sample, collect milk at a dairy farm that's standard language. OK, now we get into another he unique situation that we're going to have to address, which is examining milk by sight and smell with loading milk into silos or into directly into takers. Those are closed systems. The bulk milk weigher and sampler is not able to examine the milk by sight and smell the way we've always done it, which is opened the top of the bulk tank stick our nose in there and see what we smell and see what we see. How do we handle this with these new systems?

Brandon Johnson: Laura, I am wondering, is this something where we could also grab ideas from when I've been in the Southwest for international haulers and we visited farms out there, they have the silos. They do things differently on the major farms out there, so I'm assuming, uh, I'm assuming they have their “this is how we do that” part of it. But maybe it's at the plant after you know when you're taking the load? I don't know.

Leigh Hamilton: Laura is the sequencing on this is before they receive or collect the milk. So it's not before they take a sample, for example. So on a silo or direct load system, you do have the opportunity to examine the milk in the sample vile and both visually. OK, maybe not visually. You're not getting a gross inspection, but you are getting an inspection and certainly by smell that's feasible.

Andrew Johnson: Is it something that you could Simply put in it if able to or some sort of language like that? I mean, we can't discount our farms with bulk tanks, but obviously you know with direct loads and new systems, you are not always going to be able to do that. But I still think it's somewhat important for the for the milk haulers that are picking up from bulk tanks. So I wouldn't want to eliminate it, but maybe add some language that if able to or or something like that. It would maybe keep it simple.

Thornton, Lynn: This is Lynn. So it's possible if they're picking up milk out of a silo, it isn't being weighed and sampled from that silo correct? It could be weighed and sampled at the plant, which in case the bulk weigher and sampler would be at the plant. So to me it's different. It depends on where this milk is being weighed and sampled at. If the intention is it's being weighed and sampled coming out of the silo, then I would think that they need to somehow get a sample to check it before they pump it in, but that's the part I don't know how they do that, but they must have some way to do that on silos.

Traas, Laura M – DATCP: Jordan.

Jordan Blunt: Maybe I can add a little bit of clarity. So milk towers, milk silos have been very popular in Wisconsin, and everyone that we ship has aseptic sampler diaphragm housing in the manway door so that the sample can be extracted real time at pickup.

Traas, Laura M – DATCP: So do we say that every milk tower, or milk silo on the farm has the ability to pull a sample for examination. That might be a little onerous.

Andrew Johnson: No, I agree with, I don't know if it was Lynn or I'm sorry, I think I think if it's a just a requirement of a bulk milk weigher and sampler, you know you can't make it a requirement if they can't physically do it. So like I say, I think if you put in the language that says if able to or something like that, it should be examined, but once it gets to the plant, yeah, that I mean obviously if the plant is concerned, they're going to open that load and look in it and make sure that it, you know, they're checking it for smell or being sour or have foreign material or any of that kind of stuff. And at that point, you're meeting that requirement. But somewhere along the line, it's going to get mad, but it obviously can't get mad at the farm. And these types of farms, there's the milk silo. It's not, you know, the chances of that milk getting partially loaded and then going down the road and picking up somebody else is probably pretty small. So you're going to have that one farm on one truck. It's going to come into the intake at that point. Then it meets this requirement. It just, I think the what we're struggling with is you know you can't, is it a requirement that it has to be done well somewhere along the process, it's going to be done, but it obviously can't be done at the farm, so.

Mick Homb: Hi, this is Mick. I look at that as if you go way back before we had direct ship and stuff that was necessary because you remember in the old days, sometimes you'd look in and there'd be hay or straw or dirt or whatever. Now, with where we're going in this world, I think that was written to make sure it never got on the truck, so it never contaminated other milk with where we're going. Now I don't know how you're going to be able to do that and be able to correct the problem that I think that initially tried to solve just my thoughts.

Andrew Johnson: Yeah. And I agree with that and you know to make an analogy. I mean, I think we still check for sediment on all of our samples and I can't remember the last time anybody had a bad sediment on their sample. Obviously we're filtration and everything else, you know, but I still, I don't think it should be taken totally away because you have these bulk tank farms. You want them to the haulers responsibility to look in, you know because then when that load gets in there and it's full of straw or it's sour, well you know well, I don't have to do that anymore. You know what we don't want that either, so.

Mick Homb: And really and truly, if you do take a sample out of a bolt of a bulk tank, but even out of a silo with a farm or something, I would still think if you're taking a sample and you're putting into a sample vial, I'd still smell it, at least, you know, or at least take another sample and take a small sip of it to make sure I'm not contaminating other things. But that would be me to be on the cautious side.

Leigh Hamilton: Laura, just in terms of language around that, if they are able, if you are going that direction, it may be advisable to say where possible rather than if they're able because it takes it away from the ability of the individual and puts it on to the kind of circumstantial.

Traas, Laura M – DATCP: Good point. Are we comfortable with leaving item 4 just with adding the word where possible?

Andrew Johnson: I am.

Traas, Laura M – DATCP: OK. Item 4B bulk milk weigher and sampler, who rejects milk, may not collect that milk or comingle it with milk from any other producer. If a producer disputes that, they shall contact the dairy plant and that dairy plant operator shall determine whether it was properly rejected. Any reason to change that language? Item 5 should be fairly straightforward. You need to wash your hands before you take a temperature before you measure the milk in the bulk tank before you sample milk. And I will ask the question here. Do we just eliminate those last four words? You need to wash your hands before you sample the milk. Doesn't necessarily mean just apply to if it's in the bulk tank, but if you're going to take a sample using an inline device, you need to wash your hands.

Leigh Hamilton: Yeah, it makes sense in my opinion.

Traas, Laura M – DATCP: Item 6. Temperature. This is where it sets down that the milk needs to cool down to 45 degrees or below if it is more than two hours after last milking. And if it's within the last two hours of the last milking, 50 degrees. Leigh, you'll have a question.

Leigh Hamilton: Not in relation to the latter part of the paragraph, but in relation to the earlier part. It says before, etcetera. The bulk milk, where and sampler shall record the temperature of the milk to be collected as shown on the dairy farm bulk tank indicating thermometer. So that portion as shown on the dairy farm bulk tank indicating thermometer might not apply now in all cases, and I am thinking about this and I am imagining for some silos and maybe that Mueller have in the market and that it's not always a bulk tank indicating thermometer. And in the case of inline sampling, the system is taking the temperature on an ongoing basis. So are we saying that the bulk milk weigher and sampler that they will be required to use their own thermometer and that that temperature will be the officially recorded temperature? Is that what's required here?

Traas, Laura M – DATCP: Well, any milk storage device on the farm that is installed since I believe it's 1994 but don't quote me on that year must have some type of temperature indicating device that can either be a thermometer or a temperature recording chart. If they are a device that is subject to partial pickups, then it must be a temperature recording device of some type of recording chart or recorded to a computer, so there will be thermometers on all of these devices.

Leigh Hamilton: Yes, agreed Laura, absolutely. I suppose what I'm saying is that particular phrase, dairy farm, bulk tank indicating thermometer. Is that the phrase that we're using to define or describe the official instrument that the bulk milk weigher and sampler will use to record the official temperature? I

suppose it's a terminology question. So for example, on our systems, we sat down with Wisconsin, we showed them our temperature recording mechanism, and Wisconsin issued an approval to say that, yes, this will satisfy our requirement in terms of recording. But our instrument, because there's no bulk tank on a direct load form. I don't know if it can properly be called a bulk tank etcetera, so that's where I'm coming from.

Andrew Johnson: Do you add or, you know, as shown on the dairy bulk tank indicating thermometer or the required temperature chart recording device, because obviously we have these electronic ones now too that are starting to replace the actual paper. So I think if you add or from the temperature recording device, I think that would probably help meet requirements on the new systems.

Leigh Hamilton: Yeah. Perfect.

Jordan Blunt: In the event of a direct load tanker. There is no historical temperature recording of the direct load tanker correct?

Leigh Hamilton: And when you say tanker, what are you referring to there? Or the trailer.

Jordan Blunt: So the milk transport tanker, if it's backed into a direct load farm and we are seeing the real time snapshot of the pipeline going into the tanker and that tanker is there for had 20 hours, 18 hours, we do not see the historical monitoring of the tanker itself. Is that true?

Leigh Hamilton: So unless if there's a device on the trailer that's tracking the temperature of the trailer, then you have that data. And what our system tracks is the loaded temperature of the milk overtime, and it also offers a weighted average of that temperature.

Andrew Johnson: In Wisconsin, are not all direct loads required to have a temperature chart for a temperature recording device?

Traas, Laura M – DATCP: Yes.

Andrew Johnson: So I mean, obviously, yeah, I'm just thinking real life, if I if I'm a hauler and I go to pick up a trailer and I have to write down a temperature, you're going to look at, you know, the electronic one, you know, they're getting more advanced. They're probably going to give a pretty accurate reading on what that temperature is on that load on the paper one sometimes. Obviously it fluctuates just a little bit, I mean, as long and maybe this is going down, it's whole different conversation. But if the Hauler wrote less than 45, I mean we we're going to check it at the plant, but if less than 45 meets the requirement, can he write less than 45 or does he need an exact temperature?

Traas, Laura M – DATCP: Because the hauler slip is also used in the in the reporting to the state, when you do your monthly quality sample, that temperature from the hauler weigh ticket is reported to the state. I believe our system needs an actual number. And so what I believe we have told folks is you know, you look at the recording chart and whatever looks like the average for that load is what you're write down.

Andrew Johnson: Right. And I think this is more probably pertinent to these the these inline sampling, you know conversation on our direct loads, we have a lot of haulers that don't have a bulk weigher and sampler and it's sampled at the plant and that's where the temperatures getting recorded by that bulk milk weigher and sampler for these official samples. But you know, they keep that conversation going with the inline, you know, obviously the technology is going to get there where it's going to probably be pretty darn close and you know obviously if somewhere in that you know system the milk has gone over 45. Now we're talking whether it's going to be grade A, grade B, you know it, you know it talks about two or more milkings. Well, at first, if it's just one milking on one tank, you know, as long as it's, you know, once it's on that tanker, it's not going to get cooled less than that. So now we're going to have a load that's going to be over 45 or maybe possibly over 50. And in real life, again, I've run into this situation and what we end up doing because it's technically not great anymore is we try to fight in the market to another plant that's willing to take it as grade B and still meet their requirements.

Traas, Laura M – DATCP: Yeah, and that was one of the things that was in the scope statement item, suggested that we needed to modify the language to indicate that if milk has been outside of the temperature range for an unknown period of time, it should not be picked up. That is the recommendation out of the scope statement. Really needs some retraining because it's like OK, what's an unknown period of time if it's outside of the temperature? Say you go in and the recording chart was recording for 15 minutes and everything before that 15 minutes and everything after that 15 minutes going to into a direct ship tank or what's that proper temperature? Are you going to reject that load?

Andrew Johnson: Well, in what we ran into, I mean, maybe I'm jumping ahead here. But you know the language says if milk from two or more milkings, those collected with two within two hours of the last milking, the you know, they shall reject it. If it exceeds 50, it's that grey area between 45 and 50. Maybe you can clarify, but we've kind of struggled with it. So if we collect it within two hours of the last milking and it's 48 degrees, can I bring that milk in and still meet the requirements of grade A? Or do we have to start processing that within two hours of when it was, you know, last milking because some of this milk obviously coming farther than that. We just don't require or we don't accept any milk that's over 45, because otherwise it, you know, on an audit with it just it creates so many questions and then you've got to try to have everything in writing and have the whole explanation. We eliminated that by just not accepting any milk that's not less than 45 degrees, but you know, obviously there's some plants that are still willing to do that. But anyway, I'm rambling now.

Traas, Laura M – DATCP: And then you get into the question of, OK, if an MSRO goes into a plant and they see that, over the last two years, that the plant has accepted the two loads over those past two

years that exceeded 50 degrees. Is the MSRO going to take that as a debit? Probably not. They're going to make a note and say, you know, you need to watch this, but they're not going to take it as debit because they have professional judgment that says that this facility appears to have their processes in control and had a couple of instances where things were not in control. And we're just going to move on from that.

Thornton, Lynn: This is Lynn, and maybe this is a question for Laura. This whole paragraph seems to really refer to pick up at the farm. It doesn't really seem to address single producer loads that are weighed and sampled at the plant. Is that in a different area or does this paragraph need to be tweaked to do that to compensate for those sampled at the plant?

Traas, Laura M – DATCP: OK, nowhere in this document to we refer to direct. Ah helps if I spell it properly. Maybe that would help. There we go. OK. Where are we? Where in the next section. Yeah. So the next section talks about, and this this is language that I added from I believe 65. But it doesn't talk anything about temperature.

Thornton, Lynn: No, and I'm just thinking if there isn't any other area that addresses that in that paragraph. We were on specifically talks about taking the milk sample from the farm. Do we need to lay out some guidelines because of if it's weighed and sampled at the plant that temperatures taken at the plant with a thermometer correct?

Traas, Laura M – DATCP: Yes.

Thornton, Lynn: So do we need to make sure we're covering that?

Traas, Laura M – DATCP: Yeah.

Andrew Johnson: Could you - so in six, I believe it's in six, if you if you omitted the collect milk at a dairy farm and just put in before a bulk milk weigher and sampler accepts the milk or accepts the milk, I mean then it would be either accepted at the farm or at the plant. Or takes a sample or, you know that samples being taken at the plant or at the farm, I guess it's, I mean we're going to.

Thornton, Lynn: I would think maybe we could leave the word collects, but take out at a dairy farm. Because even at the plant, the weigher and sampler still collects the sample. It's just not being done at the dairy farm.

Andrew Johnson: Yeah, I would agree with that. You know, it's just a matter of wording so that it accepts all the different scenarios.

Traas, Laura M – DATCP: OK, so what I've got right now is before a bulk milk weigher and sampler

connects milk the bulk milk weigher and sampler shall record the temperature of the milk to be collected.

Leigh Hamilton: Laura, I'm wondering about that language collected. Is that what we're calling taking a sample collecting is that a little confusing? Like, should we be saying samples milk if that's what you really mean or.

Traas, Laura M – DATCP: Now this this is actually referring to accepting the whole load of milk so.

Leigh Hamilton: OK, thanks.

Traas, Laura M – DATCP: Yeah, I'm thinking accepted is probably going to be, so now it reads before a bulk milk weigher and sampler accepts milk, the bulk milk weigher and sampler shall record the temperature of the milk to be accepted as shown on the dairy farm bulk tank indicating thermometer or required temperature recording device. So that still does not cover a load of milk that is loaded onto a truck directly and then is accepted at the plant because the plant will use their own thermometer.

Andrew Johnson: But it would, but it would satisfy - doesn't the manifest have to have a temperature on it? It would satisfy that requirement. You know, if they if they take the temperature from the, you know, on that second sentence, if they take the temperature either from the indicating thermometer or the temperature chart or the temperature recording advice or a device.

Thornton, Lynn: Or you could add in as directly read from a certified thermometer? Because that's what our intake should be using, correct?

Traas, Laura M – DATCP: Traceable.

Thornton, Lynn: A certified thermometer to traceable?

Traas, Laura M – DATCP: Yep. Yeah, the certified thermometers are the ones that cost you $300-$400.00. You don't want to use those on your intake.

Leigh Hamilton: So the requirement here is that the sampler, whoever they might be, shall record the temperature, correct?

Traas, Laura M – DATCP: Yes, this temperature needs to be recorded.

Leigh Hamilton: So previously, is it the case that this section only referred to collection at the plant Laura or at the farm rather?

Traas, Laura M – DATCP: Previously it did, but it needs to be expanded to allow for the fact that we are now doing our temperature recording sometimes at the plant because that's the first time a thermometer is being put on it at the time of sampling.

Jordan Blunt: Do you need to add intake facility at the intake facility after traceable thermometer?

Leigh Hamilton: So at the plant, when you have an inline system or sorry on the farm when you have an inline system, you're still requiring that a sample be taken and that a temperature be taken. So where there's a direct load system, it still remains that whether you're picking up out of a silo whether you're picking up out of a bulk tank, whether you're picking up out of an inline system, a sample is still required, and a temperature is still required. So I think that we don't necessarily have to change the language of that section. Then, if we're adding that, OK, I don't think we're taking away a requirement ever to take a sample on the farm or to have a temperature taken on the farm.

Andrew Johnson: I would agree.

Leigh Hamilton: So even, as Andrew was pointing out, OK, well, we may want to take our temperature at the plant. We still want to take our sample at the plant and that's actually the sample that commercially we're going to decide to use. But I don't think that one that what we're trying to do here is create a scenario where the only time the temperature gets red is at the plant, because I think you're leaving too much room at the farm for something to go wrong and for temperature hasn't been taken at the farm.

Andrew Johnson: I would agree with that with expanding it to this, this section talks about a bulk milk weigher and sampler and we just went through all the requirements of a bulk milk weigher and sampler and concluding that they either have a traceable thermometer or a recording device. So if it's done at the farm, then there's a bulk milk weigher and sampler there he's meeting all these requirements of having the equipment and being able to do that. So I think this is more of you know, when does that milk get checked? If the bulk milk weigher and sampler at the farm, there's has to be, you know, the requirement that he has that ability to do that further back. When we talked about the requirements of a bulk milk weigher and sampler, if it's done at the plant, obviously we have traceable thermometers because they are bulk milk weigher and samplers and that's what the requirement of a bulk milk weigher and sampler to have the that equipment. So that I don't think we need to add any more of that into this section. It just this is telling us when that temperature should be recorded by the bulk milk weigher and sampler. By definition, he should have all that equipment. It's just we're trying to add into it. You know the different scenarios because the wording right now is that it's only at the dairy farm. So I believe where the wording that Laura put in there where that's the goal on this one is to try to make it

acceptable in every scenario. But once you put bulk milk weigher and sampler in there, he has to meet all the requirements for the equipment and you know the ability and all that further back that we shouldn't have to read that into this section if that makes sense. That's my opinion.

Traas, Laura M – DATCP: OK. Any thoughts on how to word that? My wordsmithing hammers of little light here right now.

Jordan Blunt: Yes. Is it Leigh from Piper? Is that who's on the call with us?

Leigh Hamilton: Yeah. Hi.

Jordan Blunt: Hi can I ask you a technical question? Your inline samplers do they also always have flow? Through the samplers, do they always have flow monitoring or not?

Leigh Hamilton: Yes.

Jordan Blunt: Thank you.

Traas, Laura M – DATCP: OK, so for those of you that are on the phone, I'll read what we have right now and maybe by reading it, some of it will clarify for someone before a bulk milk weigher and sampler accepts milk, the bulk milk weigher and sampler shall record the temperature of the milk to be accepted as shown on the dairy farm bulk tank indicating thermometer required temperature recording device or as directly read from a traceable thermometer at the intake facility.

John Umhoefer: So being an outsider but wondering, per I think it was Andy's comment, could you just end that sentence at the word accepted, the beginning of the third line? Do you need to name all these devices?

Traas, Laura M – DATCP: Probably not.

Leigh Hamilton: And I guess the other thing is you know where? So there may be a circumstance with this smart technology where you know the temperature is being recorded, but it not actually the bulk milk weigher and sampler that's due in the recording with writing something down or whatever it might be. I don't know. Jordan, do you have any comment to make on that?

Andrew Johnson: And I think that's probably fine, but I think you know, if we're going to pertain to the official samples that the department is going to, you know, assume that the that's the quality of the farm. You know, if this is, if you look at that point of it. I guess that's just my comment on that.

Leigh Hamilton: So yeah, sorry, just a question for Jordan there, because I know that his technology also has the ability to record temperatures. So, Jordan, are you happy with, you know, you might say that it's the technology that's recording the temperature rather than the bulk milk weigher and sampler recording the temperature?

Andrew Johnson: I'm assuming you're alluding to that it prints out. You said like a manifest or a, you know, everything that's went on with that load. You know as long as the bulk milk weigher and sampler or is whether he reads it off of a chart or off of a screen or off of this manifest if the recording chart is printing that out, I think we just want the bulk milk weigher and sampler to acknowledge that he's, you know, he's recorded it either himself or has it on a piece of paper that the device has spit out that he's just acknowledged that this milk is now acceptable, you know, with the further paragraphs down below it meets the requirements. Like if that makes any sense.

Traas, Laura M – DATCP: OK, so I modified that language a little bit to say before a bulk weigher and sampler accepts milk. The bulk milk weigher and sampler shall assure the temperature of the milk to be accepted is recorded.

Andrew Johnson: And I'm just thinking as far as an inspection, whether it's state or IMS, you know with that language, basically the inspector's going to ask how do you do that and by asking that question then it's then it ensuring that the bulk milk weigher and sampler has all those requirements in the prior part of this that requires them to have that either the technology or the actual physical thermometer. But I think that's good, Laura.

Traas, Laura M – DATCP: OK. So we're good with the top part of 6A, but we've still got scope statement kick that says that we should try to modify the language to indicate if the milk has been outside of temperature range for an unknown period of time, it should not be picked up. Does that last sentence actually cover that milk? Which does not meet these temperature requirements may be collected if within 4 hours after collection the milk has begun to be processed exclusively into milk or dairy products not designated for grade A.

Helen Schmude: I think that statement covers it. Laura and I, I can tell you from my side of the world we use that particular paragraph or statement, if you will. If you have, you know the patrons milking right in his compressor goes out. I mean, there's absolutely nothing wrong with the milk, right? So we pick it up and we get it processed. We look at things like smell, you know.

Traas, Laura M – DATCP: Probably try tradable acidity.

Helen Schmude: Yet pH, acidity. Right, those type of things, you know, because in in the real world, right? I mean, things happen, right? So now if a patron forgets to turn out a bulk tank, right and it's been

off for four to six hours, you're in a whole different mindset, right of, you know, it's probably going to get disposed of, cause it's not going to meet the temperature. And it's not to say that, you know, there's some patrons who have their bulk tank, you know, wasn't turned on, and they'll just turn it on and think oh nothing's wrong. Right? It it'll cool. It'll be fine, but when you run your pH and acidity, you find out that oops, something at the farm happened. And I think that, umm, you know, the only the only time for us when this statement doesn't work right is, you know, we don't work Sundays. So if we have milk that might be, let's say, 46 degrees, right, and quality tests is fine, we'll make sure it is blended in a silo with milk that's 38. Right. So that temperature it cools down it's fine. Umm, you know, it's when you get weird temperatures when you know where you, it's really kind of a cut and dry rule right as to the milk has to be disposed of on the farm. But I don't know that any other verbiage needs to be added in there.

Andrew Johnson: Playing devil's advocate. We talk about the four hours after collection. It has to be made into a product. I mean, obviously we talk about how we want to try to write a lot of this with the science around it. And I understand the blending of it back in to make it colder than 45 and you know, I think a lot of people are comfortable with that. But as worded, if you do not make, if you do not make a product a grade B product or manufacturing grade product within 4 hours of collection, are you not in compliance with this? This rule, I mean does that does that need to be in there? Does that create a problem if we really dug into it? I'm just trying to umm, create a conversation on that.

Traas, Laura M – DATCP: Yeah, I was trying to look up where that came from, if that's a PMO thing.

Jordan Blunt: So in these potential edits, have we opened it up to a load of milk could leave a farm without having a real time temperature and it could be performed at the intake facility only? Is that what we've done here?

Traas, Laura M – DATCP: Yes.

Andrew Johnson: I believe we've met that by yeah, before because the acceptance of the milk on that scenario would be at the plant and that's where the bulk milk weigher and sampler is collecting it. Yeah, I mean, correct me if I'm wrong, Laura.

Traas, Laura M – DATCP: Yeah, because that's right. Now what is happening? We look at the chart off of the cooling device for milk that's going into a direct ship tanker and it shows that everything that went into that tanker was at appropriate temperature. But then let's say it is 90 or 100 degrees and for some reason the insulation on that tanker went bad. The official temperature is at the intake when they measure it.

Jordan Blunt: But does it say here that if there is a real time temperature available that it has to be recorded? Or can that just be something that the milk weigher and sampler neglects?

Andrew Johnson: Well, I'll just make a quick comment. I know I shouldn't, but umm, we have a lot of bulk milk weigher and samplers when they bring in a commingled load that every single firm was 40 degrees. So as a real life struggle, it's and then, yeah, but it there's it's when you put people in the middle. Sometimes you just hope that they're doing it right. They're recording a temperature, whether they actually looked at the thermometer or not, I don't know, but.

Traas, Laura M – DATCP: OK, it sounds like a this might be a good stopping place because we still have a fair amount of section 6 to talk about and melt temperature because we need to talk about checking the temperature measuring device at the farm once a month. And things like that. So, I will ask Max when he sends out the minutes from this meeting to also send out this draft to you all. And it will show that we ended here on November 21st, 2023 and that's where we need to pick up and think about how do we handle taking the temperature in all the different scenarios we have. So any based on our discussion today or stuff you've thought about, is there any open discussion questions, comments, concerns? I'll ask for the committee members first. And then I'll ask, hearing nothing from the committee members, anything from any of the guests.

Andrew Johnson: This is Andy. I just want to comment that I think this is a really good. I think we've got a good group. I think we're doing good work and I think this is a very important piece of legislation that'll get us into the future and I'm just impressed by all the patience that everybody on the committee and the ones joining us have on as we slowly get through this. But I think it's super important and I think it's going to put us into the next realm of technology and all that kind of thing. So I appreciate all of you and I'm and I'm, I'm glad we're doing this right now.

Traas, Laura M – DATCP: And I will echo those sentiments. I appreciate the willingness that I've seen of folks to work on this. I am hoping that when ATCP 65 comes open that we have the same types of discussions to open ATCP 65 to write it in such a way that it will be able to grow with new technologies as new technologies become available. We need to plan for a next meeting, which is always a fun time. Trying to plan something between Christmas between Thanksgiving and Christmas and New Year. So what are folks thoughts on meeting dates and times?

Brandon Johnson: Laura, can we do the two weeks thing again and do Tuesday the 5th same time?

Traas, Laura M – DATCP: We could do the 5th. Others thoughts?

Leigh Hamilton: It sounds good to me.

Traas, Laura M – DATCP: OK, well.

John Umhoefer: I'll be iffy, but I don't want to stop the group.

Traas, Laura M – DATCP: And if any of you miss a meeting and you want to know what happened, we not only have the transcript that Max has been sending out from Max has been recording these meetings, so if you want to go back and say, how did they come to that language, you can go back to the recording and see what happened there.

John Umhoefer: Yep.

Traas, Laura M – DATCP: OK so I have put it on my calendar for 9:00 AM December 5th. Another two hour meeting. And so now I will echoes Brendon's sentiments of I hope you have a great Thanksgiving. If you're traveling, please do travel safely and we'll see you in a couple weeks.