“Food Safety and Defense: A Dairy Processor Perspective on Being Proactive”

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got security and traceability for bulk milk? we do.

Join us for a demonstration of the “tanker of tomorrow” at the National Milk Transport Security and Traceability Demonstration
9 am to 3 pm, Thursday, October 9, 2008
Go to www.uky.edu/milktransport for more information.

INTERNATIONAL DAIRY FOODS ASSOCIATION (IDFA)

Who Are We?

- Over 500 Dairy Processors, Manufacturers, Marketers, Distributors and Suppliers
- Represent 85% of all dairy products produced and manufactured in U.S.
- Includes Milk Industry Foundation, National Cheese Institute and International Ice Cream Association
International Dairy Foods Association Groups

- Regulatory Affairs
- Legislative and Economic
- Communications
- Education and Meetings
- International Trade
- Administrative

IDFA Regulatory Affairs Group

- **Clay Hough**, Senior Vice President, International & Regulatory Affairs
- **Cary Frye**: Vice President, Regulatory Affairs
- **Clay Detlefsen**: Vice President & Counsel
- **Allen Sayler**: Vice President, Regulatory Affairs & International Standards
- **Michelle Albee**: Director, Labeling & Food Technology
- **Katie Sparrow**: Manager, International Affairs
- **Brian Fields**: Administrative Assistant
- **Kyle Shreve**: Administrative Assistant
The world changed after the September 11 attack and so did the need to ensure safety and security of dairy products from the farm to the consumer.

Is the present risk higher or lower?
Homeland Security Advisory Alert System

**Elevated** - increased surveillance of critical locations, coordinating emergency plans, with nearby jurisdictions, implement emergency plans.

**Guarded** - Update emergency response procedures, release information to the public.

**Low** - refine protective measures, train personnel, assess facilities for vulnerability

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**Severe** - redirect personnel to emergency needs, assign emergency response personnel and preposition, maintain and redirect transportation system, close government facilities.

**High** - coordinate efforts w/Federal, State, and local law enforcement, National Guard and Armed Forces; add precautions at public events or cancel, prepare to execute emergency procedures to disperse work force.
A disease agent that is introduced deliberately, may be indistinguishable from one that is introduced inadvertently or from one that arises naturally.

**Flow Diagram**

*Government and Industry must work together at all steps*

Food can be contaminated with microbes, toxins, drugs, chemicals, heavy metals.
Overview of Biosecurity Measures for the Dairy Industry

1) Educating Employees and Suppliers

2) Tanker Security

3) Dairy Plant Security - Not today

FIRST LINE OF DEFENSE

• The most effective first line of defense for the dairy industry are the employees!

• Take time to educate them on the importance of vigilance!

• They need to look for unusual events or suspicious behavior
Educating Employees (Continued)

Develop an action plan with:

- Objective
- Actions required
- Who is responsible
- Cost
- Completion date

Food Industry Plant Poster

The 3 "L's" of Food Transport Security

- Light It.
- Lock It.
- Limit Access.
Voluntary Guidelines for Sealing Raw Milk Tankers

Formally accepted by NCIMS Executive Board and recognized by FDA, November 2001

Voluntary Guidelines for Sealing Raw Milk Tankers

GOAL:

• To ensure dairy products are protected.

• To prevent safe milk from being unnecessarily destroyed.

• To create a complete tamper-evident system
Voluntary Guidelines for Sealing Raw Milk Tankers

**In a nutshell:**

Have all openings on milk tankers sealed at all times, except when the tanker is being loaded/unloaded/washed.

Voluntary Guidelines for Sealing Raw Milk Tankers-General

1) Seal all points of access to the interior of the tank.

   - Sealing Device: plastic ties or wire with a pressed metal seal. All seals should be numbered.
   - Points of access: inlet/outlet valves, manhole cover, vent tube, CIP, connections, etc.
   - Include identification number for traceability purposes.
Voluntary Guidelines for Sealing Raw Milk Tankers

2) Plant personnel inspect seals and record seal number (“seal record”) on designated record.

3) Do the numbers on the seals match the numbers in the seal record?
   • If yes, initialize on the record.
   • If seal is broken? Missing? Follow crisis management plan, i.e. Notify the plant or cooperative.

Voluntary Guidelines for Sealing Raw Milk Tankers

Wash tags, Manifest or Producer Record:

• Record seal’s unique identifier(s) (e.g., company logo, plant I.D., number, etc.).

• Account for all seals and seal numbers - must directly correspond.

• If seal record is washtag, maintain as per the Pasteurized Milk Ordinance (PMO)

• If seal record other than the washtag, maintain in secure location for at least the life of the product or one month, whichever is less.
4) Driver checks integrity of all seals or locks prior to leaving the washing facility.
   • This includes verifying the correct seal numbers are recorded on the washtag or other seal record.
   • Driver initials the seal record.

5) If seal(s) are broken with or without the knowledge of the driver, information on the time, date, location when noticed, brief description of circumstances should be recorded and the owner and receiver of the milk should be notified.
Voluntary Guidelines for Sealing Raw Milk Tankers

6) At the first farm, the driver rechecks the integrity of all seals. The driver then breaks the rear door or rear outlet valve seal, stores it in a secure location in the truck cab and records the broken seal event on the seal record (washtag).

7) Whenever the tanker is not under the direct supervision of the driver, after washing, all openings into the tanker must be secured with a lock or seal.

Voluntary Guidelines for Sealing Raw Milk Tankers

8) At the last farm pickup, the rear door or rear outlet valve must be secured with either a number seal or a padlock. The seal number must be written on the seal record.

It is strongly encouraged that once the tanker is full or has completed its run, the most direct route be taken to the unloading point to minimize the possibility of tampering.
Voluntary Guidelines for Sealing Raw Milk Tankers

9) Upon arrival at the transfer station, receiving station or plant:
   -- Driver identification, background checks and other identity verification measures;
   -- Receiving personnel should be able to verify the identity the driver (Picture I.D.s are helpful).

10) At the receiving location, authorized personnel compare the seal record numbers with the intact seals for the inlets to the tanker.

11) If all openings are sealed and the driver can produce broken seals for those noted on the seal record, the tanker can be unloaded.
12) If the seal record does not match the intact seals, if the driver can not produce broken seals for the seal numbers noted on the seal record but not in-place, the pre-established protocol should be followed for determining the acceptability of receiving the milk from the tanker in question.

The pre-established protocol should be established in advance, be communicated to the owner(s) of all milk received and include plant management.

13) If a tanker delivers milk to a receiving plant more than once a day and is not washed between deliveries, follow the previously outlined procedure each time the tanker exits the plant.

- The cycle for the tanker begins again with sealing of all openings and recording seal # on the wash tag.

14) Drivers must verify the integrity and seal record for tankers setting idle and unattended prior to loading milk.
Voluntary Guidelines for Sealing Raw Milk Tankers

The Voluntary Guidelines for Sealing Raw Milk Tankers has been supported by the IDFA, NMPF, and the Executive Board of the National Conference on Interstate Milk Shipments.

FDA has given its verbal support for use of these guidelines by the Dairy Industry.


(A) Milk Tankers

• Never leave the truck unlocked and unattended.

• Only tamper-evident access to the inside of the tanker, unless unloading or cleaning it.
What about Tracking & Traceability?

- Bar Coding
- RFID technology
- Micro-sensors
- Advanced Labeling systems

Hauler Security & Traceability Responsibilities During FMD Outbreaks
Overview of Global Food Traceability Pilot

Advanced Labeling systems: PURPOSE

- Tracking food and food components between producers, manufacturers and the end customer
1. Global ID - standard lot identifier that all food and food components will display.

2. Record Keeping Guidelines - criteria to allow small to large companies to adopt

3. Data Center - record storage center with advanced search capabilities

Global Food Traceability Pilot - Global ID

16 character and digit identifier -

U3DX7NQ081311432

- First character is country of origin - U
- Next six characters and numbers assigned to each facility exit point when producer or manufacturer registers - 3DC7NQ
- Final nine digits are date and time in format of year, julian day, hour and minute - 081311432
Global Food Traceability Pilot - Data Center Component

1. Registration of new manufacturers, producers and exit points - issuance of 7 character/digit identifier.

2. Electronic input point for association of Global ID records. Records are typed, imported or automatically uploaded.

3. Search point for authorized investigators. Entering Global ID of various food packages suspected of causing illness to yield common contributing components throughout the global life cycle of product. Searching will yield every point of consumption in seconds.

IDFA Views on Food Security & Tracking

1. The dairy industry has always taken food safety, food security and traceability very seriously.

2. We have clearly taken action where others have only pondered the consequences, i.e. sponsoring Carver-Shock, FMD emergency preparation and Global Food Traceability Pilot.

3. We are continually evaluating the issues and firmly believe that pursuing research and rigorously identifying mitigation strategies is the appropriate strategy.

4. We have supported DHS's efforts in developing the FBADS system, the KY tanker project, and are in the midst of developing a traceability system, and have played a key leadership role in the DHS sector partnership.
The Ultimate Goal of Tanker Security?

• Safe to the last drop…

QUESTIONS?