



The Impact that FSMA regulations are having on the Pasteurized Milk Ordinance (PMO)

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History of the PMO

- In **1924** the ***Standard Milk Ordinance*** was created by United States Public Health Service (USPHS)
- In **1927** the ***Code*** was published
- Includes fluid milk, cream products, yogurt, cottage cheese, eggnog, buttermilk and some dried dairy products
- Developed with assistance from Milk Regulatory and Rating Agencies at every level of Federal, State and local governments
- Source: PMO



History of the PMO

- Basic standard used by all 50 states
- ***National Conference on Interstate Milk Shipments (NCIMS)*** holds biennial conferences and recommends changes or modifications to the PMO

- Source: PMO



History of the PMO

- ***Designed for:***
 - Procurement of milk and milk products
 - Sanitary regulation for milk and milk products found on interstate carriers
 - Recognized by many as the national standard for milk sanitation
 - Will continue to provide effective public health protection without being unduly burdensome to regulatory agencies or the dairy industry
 - Represents current knowledge and experiences for milk sanitation standards for the nation

Source: PMO



PMO Compliance

- Grade A milk and milk product facilities operating under the Pasteurized Milk Ordinance (PMO) have until **September 17, 2018** to implement new changes that will align the PMO with the Food and Drug Administration's final Preventive Controls rule under the Food Safety Modernization Act (FSMA)
- Source: FDA



PMO Compliance

- Will incorporate regulatory requirements of the preventive controls into a new *Appendix T*.
- *Requirements:*
 - Written hazard analysis plan
 - Description of food safety preventive controls
 - Testing programs showing effectiveness of the controls



PMO Compliance

- FDA regulators will conduct inspections every **36 months**
- State regulators will still conduct quarterly inspections to verify compliance with the main parts of the PMO. May include checks on control of allergen-containing ingredients
- Regulators must attend training of the Preventive Controls before inspecting facilities

- Source: FDA



PMO and FSMA Requirements

- ***Section 103*** (Hazard Analysis and risk-based Preventive Controls) does not exempt dairy facilities
- ***What is needed:*** written hazard analysis, food allergens, environmental monitoring in the production area



PMO and FSMA Requirements

- Farms who meet the definition are not required to register under **section 415** (FD& C Act requires additional registration information to FDA).
- However, farms that manufacture products must meet the requirements of the Preventive Controls rule



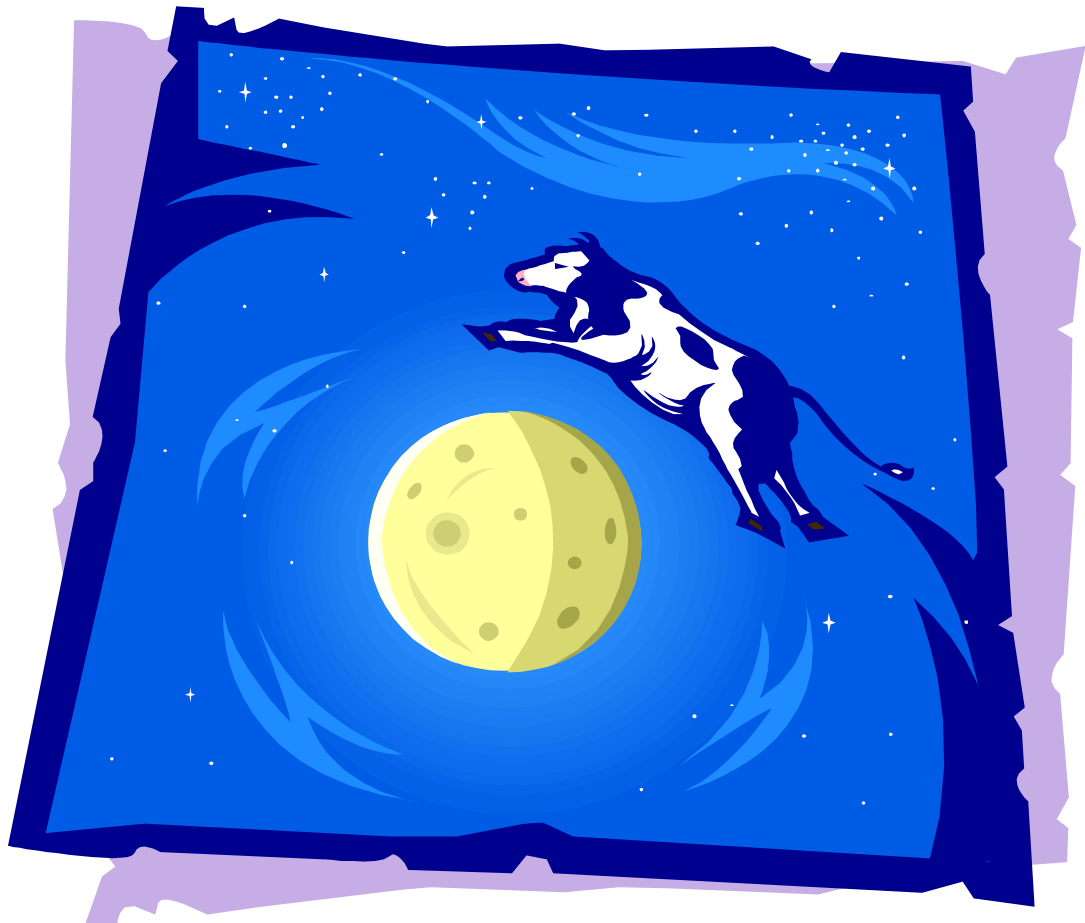
PMO and FSMA Requirements

- Must have an environmental monitoring program in place and finished product testing as a verification activity
- For example: if you making a soft cheese that was exposed to the environment you must have an environmental monitoring program for *Listeria* spp.



References

- <https://www.fda.gov/downloads/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Milk/UCM513508.pdf>
- <https://www.fda.gov/Food/GuidanceRegulation/FSMA/>
- <https://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm247559.htm>
- <https://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm247548.htm>



Questions?