

## ATCP 82 Subcommittee Meeting

*April 30, 2024 9:00 a.m. – 11:00 a.m.*

### Attendees:

Max Huebner, Laura Traas, Tony Lampman, Helen Schmude, Lynn Thornton, Brandon Johnson, Anthony Canavan, Alexander Beard, Andrew Johnson, JR Neu, Leigh Hamilton, Alex O'Brien

### Transcript:

**Traas, Laura M – DATCP:** Andy is here. Mick, has Mick joined us yet? Yeah, I know. I don't see him yet. I see. John Umhoefer indicated he won't be able to join us because of the highly pathogenic avian influenza thing going on. Helen's here. Tony's here. I don't see Alex O'Brien yet, but we have more than half of the committee here. So we'll go ahead and get started. You should have received a copy of the ATCP 82 document. And I only received one comment back, so I can't believe that I got it that right. So hopefully you folks have some things that you have notes that say we need to fix this a little bit. So we'll go ahead and start off in, uh, ATCP 82.01. The definitions were there. Any comments? Concerns anyone had for that section?

**Andrew Johnson:** I had one question. I know up above it said that a milk tanker does not include a tanker that is used by a milk producer to solely transport their own milk. Are they excluded from any of this or?

**Traas, Laura M – DATCP:** OK, they transport their own milk to their own production facility. So this is the exemption for on farm processors that they can transport the milk from their barn to their processing plant without that transport truck needing to meet these requirements.

**Andrew Johnson:** Thank you for that clarification.

**Leigh Hamilton:** Laura, if we're, if we are and I know it was kind of contemplated under the original draft, if we are allowing people who aren't bulk milk weighers, licensed samplers to operate, for example in line samplers, under those circumstances, do we need to make a definition for that person or do we need to just examine the definition of a bulk milk weigher licensed sampler to understand whether it has an impact on that?

**Traas, Laura M – DATCP:** OK. So let me jump down a bit to...

**Leigh Hamilton:** I think the definition and the definition section says it's any person who handles a sample or transports a sample. So I just wanted to...

**Traas, Laura M – DATCP:** Yeah, that's the FDA definition. Ah, and so it's somewhere in this section.

**Leigh Hamilton:** Apologies, I would have got back with comments, but I was just having trouble accessing the document for whatever reason on that platform.

**Traas, Laura M – DATCP:** OK, so here's the section we have on farm inline sampling the department may approve a farm to use an on farm inline sampling device to take in the sample. The department may not approve the dairy farm to use an inline sampling device unless all of the following apply. The department has licensed it least one individual at the farm as a bulk milk weigher and sampler. The inline sampling device has been approved by the department, the licensed bulk milk weigher and sampler, or samplers at that facility shall train all personnel who work with any part of the device and the dairy farm personnel working with the inline sampling device shall follow all instructions. So we didn't really give them any type of title. We just said here's the farm. There has to be at least one licensed person there, and then they're responsible for the operations at that facility. So what's the thought? Do we need? Do we need to give this person a title and define that then?

**Brandon Johnson:** Leigh, that's a good question. Leigh, have you - what is in other states? But I mean I personally like the way that you did that, Laura.

**Leigh Hamilton:** Yeah, I think it looks good, Brandon, to be honest. And there is a typo in C There we have who work twice in a row. But apart from that, I think it looks pretty good up to you guys obviously. You know, other states? Generally they're silent on it. In all honesty, Brandon, so I think this is probably a better approach.

**Thornton, Lynn:** Well so my question on the ones that we're talking about it and as some of you probably know, we have a piper system installed and we're starting to test it. I would like for the drivers who transport the sample to the intake to not have to be a licensed weigher and sampler, but the way I read that paragraph right there, it's going to make them be a licensed weigher and sampler because it talks about transporting raw milk. So I'll be really honest. What we're trying to do is they'll be a licensed weigher and sampler on the farm, but they will take the whole – the hauler will take the whole sample bag in an ice chest to the plant where our licensed weigher and samplers separate it out into vials. But

the way I read that would mean that all of our drivers have to once again become weighers and samplers, which I would like to avoid.

**Traas, Laura M – DATCP:** OK. So are you in the section that's on the screen right now, or are you?

**Thornton, Lynn:** No, I I'm back to that 1S, but Leigh talked about back on your very first page.

**Traas, Laura M – DATCP:** OK.

**Andrew Johnson:** So when we have a farm that they're a hauler that picks up multiple farms, and the weigher sampler takes it on occasion that load is then brought up by a driver that does not have a weigher sampler, but there's a documentation of the weigher and sampler on the manifest. Could we put that farm weigher or document that with the samples to drive to go with them samples to the plant and possibly avoid those drivers then to have the weigher sampler?

**Traas, Laura M – DATCP:** OK. So. With 1S, the way I read it is the bulk milk weigher and sampler is any person who collects the official sample. Now, transporting the bag from one location to the other will not fall into that. So maybe and this is going to require a global change because it's going to change the definition in 65. Also, I believe, but what if we say the bulk milk weigher and samplers, any person who collects official milk samples period, they may also transport raw milk from a farm or raw milk or fluid milk products to or from a dairy plant. Or do we?

**Leigh Hamilton:** And so, Laura, just like examining that or unfolding that a tiny bit and I think what you what you're suggesting sounds good. I think that umm. The question is whether people are satisfied with the chain of custody from the license sampler or operator at the farm to the licensed sampler and operator at the plant and whether, for example, Lynn and the processors on the call, whether they're satisfied with the chain of custody by virtue of a traveling in, for example, a sealed ice chest, or however that might be. And do you guys as regulators want that to be a part of this document or are you happy with industry and creating protocols around that if you like. I guess what I'm saying is it's under that heading of chain of custody.

**Traas, Laura M – DATCP:** And from the department perspective, we are fine with umm, the industry identifying folks who are approved to transport samples. Most of our full-blown

certified labs in the state have transport people who the lab has trained and has accepted the responsibility for it to say these people know how to handle samples to maintain chain of custody. So the department fine with that.

**JR Neu:** Could we put another section?

**Thornton, Lynn:** I wonder if you just took out that. Oh, sorry, go ahead.

**JR Neu:** So I was going to say can we put another statement in the inline sampler section on farm inline sampler about the possibility of somebody from industry transporting the sample from the farm to the plant.

**Thornton, Lynn:** To Laura's point, I mean, I think most of our plants have a courier system. They pick up these samples from our plants and take them to labs, and none of those are bulk milk weigher and samplers, so I'm just wondering back to that original 1S, if we just need to take out the part about transporting raw milk and take out the transport part, cause what we don't want to do is get ourselves into where all these transport services have to be licensed weigher and samplers just to transport samples.

**JR Neu:** Yeah.

**Leigh Hamilton:** Yeah, I thought I take that point. But I think also the solution that Laura put in place or what Laura was suggesting there suggested there at the start, Lynn avoids that quite neatly and elegantly. So where she says, OK, the person who collects the sample, that's the bulk milk weigher licensed sampler period and then that person may also be responsible for this other thing.

**Thornton, Lynn:** Yeah.

**Leigh Hamilton:** Again, totally up to you guys on that.

**Andrew Johnson:** I think it's an industry wide thing that as long as this person taking the sample has the weigher sampler who transports that sample to the plant, as like I say I have haulers that pick up loads of milk and then once it's loaded their time has run out to drive the truck or whatever. So the owner operators send somebody up that does not have a weigher sampler, and we've been accepting of that. To just back up a little bit, I mean, we talk about having one weigher sampler at the farm. I'm not sure if that meets the PMO requirement. I think we're getting it doesn't.

**Traas, Laura M – DATCP:** No it doesn't.

**Andrew Johnson:** No, I know. But I mean, we're as industry I think as long as we're aware of that, we will. I mean, we can obviously have more than one weigher sampler, but having one meets the state requirement and until the PMO gets changed which you know, I hope in a dream that that happens. I think industry can recognize that we have to have more than one way or sampler at the plant. We can deal with that if we're participating in the interstate milk shippers thing and so I'm OK with, you know, as long as the weigher sampler takes the sample, how it gets to the plant or any of that, we can police that ourselves and build that trust that that's the actual sample that got there so.

**Traas, Laura M – DATCP:** Yeah. And I'm looking at this one definition and yeah. So I've looked at it, it needs to be changed because right now the way this definition is written is if you have a truck driver that transports umm, say, a load of fluid milk products say cream from 1 dairy plant to another, this definition says they have to be a bulk milk weigher and sampler. And that's not how we operate. So I'm thinking we eliminate this whole section on transport entirely. Just say that the bulk milk weigher and sampler means any person who measures milk for payment purposes and or collects official milk samples. Yeah, don't need the for official purposes. And it's licensed under 82.04.

**Andrew Johnson:** I'm very accepting of that statement. I think that's more than like I say, as long as industry is aware what's required in the voluntary program of the interstate milk shippers, we can adjust and make sure that we meet those requirements. I don't know why it shouldn't be the way you just said, because it's happening in real life.

**Traas, Laura M – DATCP:** Yes.

**Thornton, Lynn:** So I just have a question maybe for some other plants, Andy, in that statement it says measures milk for payment purpose. Do we consider that to be scaling or reading a meter at a plant on a single producer load that's weighed in sampled at the plant? Our guys are licensed weigher and samplers, but are everybody's?

**JR Neu:** Ours are, yes.

**Thornton, Lynn:** OK.

**Andrew Johnson:** Our, our plant guys are yes, I mean obviously with direct load anchors,

there's no sample being transported. So I mean the place where it is measured or I mean sampled at least is our intake so that we have probably 20 weigher samplers at our facility. The scale is obviously just certified scale. I mean, obviously the truck is maybe doing the actual weighing, but is I mean all they're doing is collecting the data from the scale that's actually doing the weighing and if it's certified, I wouldn't think that they would need weigher sampler just to push a button on a scale. So that's how we operate every time I have a federal survey, I mean, I have to give that list of our 20 weigher samplers that are pulling those samples at the plant for the direct loads.

**Thornton, Lynn:** Yeah, that's how we do it too. I just wondered if that's what everybody else did.

**Traas, Laura M – DATCP:** Yeah, chances are good. If it's getting scaled at the plant, it has to be sampled at the plant also, and so the folks that are doing that have to be licensed to pull that sample at the plant.

**Andrew Johnson:** And we've done our due diligence on milk that we've sold to other plants. You know, in the last, in my career at least, there's been a couple plants that do not have them. Well then it just becomes part of our contract that they have to get somebody that's a weigher sampler if they want direct load milk delivered to their plant because obviously we can't pull that sample at the farm. So at least at this point, I mean moving forward, yeah, with more inline samplers and stuff like that. That sample could get, but then you know they're going to have to accept that. That's, you know that they're OK with that and it all becomes contractual then when you're selling milk to other plants, but as long as we're aware of it and we cross those T's and dot those I's, we can, we can get through that.

**Traas, Laura M – DATCP:** Come on, don't be difficult, computer. Back up here. OK. For those of you that I haven't reached out to yet, if you received an email from me on the 25th, please just delete that email. My account got hacked so my computer got wiped yesterday and I'm working with a slightly new version of all of my Microsoft programs. So forgive my stumbling here.

**Brandon Johnson:** No worries. I saw that right away and was like this doesn't look right, so I just I just assumed that's how you get new computers around the state. You just do something like that and then you're like, oh, I need a new computer.

**Traas, Laura M – DATCP:** Yeah, no. Same old computer, just a wiped it and they handed it back to me and said hope it works the same.

**Brandon Johnson:** Oh that's such a bother. Goodness, I'm sorry for you.

**Traas, Laura M – DATCP:** OK. So moving on, anything else anybody saw in the definitions? Hearing nothing 82.02, I believe we left unchanged except for the highlights of the fact that I need to update the fees once we determine what the correct fees would be. 82.04. Any comments on this is the section that talks about the bulk milk weigher and samplers that they need to be licensed by our department or an equivalent agency outside the state. They need to pass a field inspection every 24 months. And again, the fees and I believe that's it. OK we did. We did eliminate all of the sections that that talked about grade A because in Wisconsin a milk hauler is a milk hauler. We don't specify grade A milk haulers and non grade A milk haulers. So we eliminated the Grade B sections. Any comments on 82.04?

**Thornton, Lynn:** Hey Laura - for a while. If a bulk milk weigher and sampler sent in their renewal and they didn't have that check off to go with it, weren't you like issuing them some kind of license that was for grade B? Do we not do that anymore?

**Traas, Laura M – DATCP:** We do not do that. We used to do that in the old computer system, but the new computer system that capability was not written in and so no, it's you are licensed or you are not licensed.

**Thornton, Lynn:** That's better anyway.

**Traas, Laura M – DATCP:** 82.06 is construction and maintenance of bulk milk tankers. 82.08 is cleaning and sanitizing about tankers. 82.06 we changed nothing. 82.08 we did just some precision work to eliminate the requirement for a paper tag as long as there is documentation showing that the unit has been properly cleaned and sanitized. And then I do want to have this discussion one last time, because there is still a split decision on this one – thoroughly clean the exterior surface of bulk milk tankers. As we discussed from the department side of things, it's not a food safety issue. But what do folks think?

**Brandon Johnson:** Well, I think where we ended up last time was correct. Like everyone who owns a tank and everyone in the intake, everyone in the Wisconsin dairy would love that to be the case. But sometimes it's not practical, and sometimes the dairies don't allow it. So if we have it in there, you're going to technically force people to find a place to do that, and it might inhibit you actually doing the job.

**Traas, Laura M – DATCP:** Yeah.

**Brandon Johnson:** That's most important, which is picking up the milk. This way they could run out of hours or it could just be not practical. So I think that that's a per my opinion is that's a personal thing. Anyone who owns a tank wants it to look clean. Obviously it's a representation of yourself, your company and the wonderful Grade A Wisconsin milk or Grade B, whatever. I just don't think it's practical. I think it should be out. That's my opinion and I think that I kind of think that's where we were.

**Traas, Laura M – DATCP:** Yeah, that's where we were. But because there was still some discussion, I wanted folks that if anyone has a real strong feeling, I know a couple of my supervisors are for real strong feeling about this. But we will move forward with it out. OK. And then more changing of language to eliminate the requirement for a paper tag and then identifying that if a tag is used, what needs to be done with a tag. Any comments on 82.12.

**Brandon:** I thought it. Yeah, 82 eight.

**Traas, Laura M – DATCP:** 82.08.

**Brandon Johnson:** I thought it looked good. I feel like I remember the conversations we had with it. I feel like what you have in there, that what you put down is what I remember and I feel like it's good.

**Traas, Laura M – DATCP:** We also did add the language that talks about that the facility shall have water supply that meets the requirements of 65. So just to make sure that we say that the water that's being used to wash the tanker shall be potable. 82.10 yeah.

**Brandon Johnson:** I think I was just going to say this is - I'm wasting time, it's redundant - but I was going to say that I feel like a lot of those facilities also have to have that from a - I mean, like, there's so many in the facilities and products are also kosher. So like it's good that we put it in there to verify and validate that, but like kosher requirements which I feel like so many things are under also require those things. So it's I think it's right.

**Traas, Laura M – DATCP:** So 82.10 is where we start getting into changing the language to allow for new technologies. So we talk about a sampling device rather than a dipper, and then we say if you're using a dipper, it needs to be in a, umm, it must be designed for the purpose and it must be kept in some type of sanitizing solution. If using a sampling straw, it needs to be single use pre sterilized and if using an automatic sampling device, the official sampler shall have the supplies needed to take the sample from that device.



**Leigh Hamilton:** Should we change the language there to say the operator taking the official sample, given the intention to allow another person to do that?

**Traas, Laura M – DATCP:** Yeah.

**Leigh Hamilton:** Great.

**Alexander Beard:** That sounds good.

**Leigh Hamilton:** Thanks guys.

**Traas, Laura M – DATCP:** OK. And then, oh my goodness, let's talk archaic in this day and age: an adequate supply of forms and writing devices. Umm, so we changed that to an acceptable method to prepare milk collection records. OK. Then recognizing that there might be silos out there. Uh, so we change the language here to be, yeah, before collecting the milk where possible. So if you're pulling from a silo, they're going to have to collect a small amount of that milk and smell it before they can load it out. But I'm just opening that door a bit. Let's say we are in 82.10 and just a little change in language here to open to new technologies. Any issues with 82.10 milk sample collection?

**Andrew Johnson:** So if a silo is used as a storage container to be loaded on a load, that's basically a single farm pickup. Can that milk be observed and smelled when the samples taken at the plant? Is that acceptable?

**Traas, Laura M – DATCP:** Yes, yes.

**Andrew Johnson:** OK. OK.

**Traas, Laura M – DATCP:** And that's why we put that language in there where it's possible. And so if they're doing a single farm load direct from a silo, it might not be possible for them to do any type of sight smell test on that milk. Because I know there are at least a couple of silos here in Wisconsin that don't have any sampling device on the door or anywhere on the silo.

**Andrew Johnson:** So then, is a silo required to agitate before loading that load is the load represented once it gets to the plant and sampled there.

**Traas, Laura M – DATCP:** While it would be ideal I've got to tame the lab geek in me, while it would be ideal to have it agitated, as long as the plant is willing to receive, you know, one load of milk that is going to be mostly the liquid phase. And you know, the last load that they load out of the silo is going to be a lot of fat phase and they are willing to accept that. And recognizing that that's going to wreak havoc with your drug residue tests and any other testing you do on them milk. I don't believe the Department can say anything against that. As long as that's not the official sample.

**Andrew Johnson:** Correct and if the official sample had a farm with multiple loads, they take an average of all the loads, correct?

**Traas, Laura M – DATCP:** Yes. Yes. So all the all the loads collected in one day shall be averaged for all components and quality items. No, I just think about it, like I said, from a QA perspective and just try to imagine running my plant where I've got the 1st 2 loads of the day are low in fat and then the last load of the day I'm trying to run my separator to separate out all the path that I didn't have earlier in the day. Other questions on 82.10. We did add the language in here that says that if dairy concerned in the state wants their field Rep to do the check, monthly check of the thermometers or temperature measuring devices at the dairy farms, they are free to do that. It does not have to be a licensed bulk milk weigher and sampler, although most of our field reps are.

**Thornton, Lynn:** So I have a question in six there as I read that when we call out or in the case of a direct ship facility in the milk line. So that means we're talking about a temperature recording chart. We do those every six months currently. Are we now saying that's going to have to be done every month?

**Traas, Laura M – DATCP:** Yeah, that's what this is saying.

**Thornton, Lynn:** And even on the bulk tanks with recording charts, we've been doing those every six months.

**Andrew Johnson:** So some bulk tanks that don't have a recording device are required. Correct me if I'm wrong, they're required every month for the hauler to take a temperature check. Umm do chart recorders meet a different requirements that it's every only every six months or?

**JR Neu:** Aren't all bulk tanks required to be done monthly, but just the chart recorders every six months?

**Traas, Laura M – DATCP:** Well, what if the chart recorder is the only thing you have? Yeah.

**JR Neu:** Like the only indicating thermometer.

**Thornton, Lynn:** Yeah. I kind of think JR is right. I think we've always done bulk tanks every month, right? Just with the dial thermometer recording.

**JR Neu:** Correct. Yeah.

**Thornton, Lynn:** But I feel like because we added this in here about direct ship, now we've started rolling in chart recorders.

**Traas, Laura M – DATCP:** Yep.

**JR Neu:** That's what I have some farms where the chart recorder is the only indicating thermometer in the hauler. Still, documents that on his pickup slip every month what his temperature check is, but then every six months I go out and do the official chart calibration. Can we take out the part about the direct ship and just leave that in under the recording chart one?

**Traas, Laura M – DATCP:** Well, yeah, that part definitely needs to come out, but I'm wondering. This once a month. So if you have a farm that has the dial thermometer on the tank, but you also have a recording chart, do you still check the dial thermometer on the tank monthly?

**Thornton, Lynn:** I tell her haulers they're supposed to because the haulers look at that dial thermometer. The haulers don't really look at the chart recorder.

**JR Neu:** Yep. Same for me.

**Traas, Laura M – DATCP:** OK. And so if I now I'll take it to the next step, if it's a digital readout on the wall on the bulk tank do you also require them to check it?

**JR Neu:** We identify one location that they check, so some farms have a dial on the tank,

some have a digital readout. We identify which one if they have multiple ones in the farm is the official tank temperature and I've required them to check that monthly.

**Traas, Laura M – DATCP:** OK.

**JR Neu:** Lot of times we put a duct tape over the one that not using just because they're not matching.

**Traas, Laura M – DATCP:** OK. So the same would be true. OK. How would you handle a silo that has no access?

**Thornton, Lynn:** Lucky for me, I don't have any of those.

**JR Neu:** That my only silo has a port that I can put a thermometer in for verifying.

**Traas, Laura M – DATCP:** OK.

**Andrew Johnson:** The silo I have also has a port that we can check it, but then loads are also being checked for temperature when the samples taken at the plant.

**Traas, Laura M – DATCP:** Mm-hmm.

**Leigh Hamilton:** So are we saying that in the case of a direct ship facility, there's no requirement to compare the temperature? That whatever indicator that is showing there is that it's every six months for a temperature chart recorder. What we're talking is the tradition or the history has been that bulk tanks historically have been checked every month. And maybe this is a - I mean, we talk about different technology and stuff. I mean, we went from a dial thermometer to a digital to a temperature chart recorder. Maybe the risk is less of having it get out of the  $\pm 2$  degrees on a on a dial thermometer versus a digital. I mean maybe I'm just talking too much with what my brain is swimming in, but so I mean, if it meets the requirements of the manufacturer that it has to be checked every six months, is that more of maybe what's going on, you know, where a dial thermometer can get out of whack, basically easier? You know, that's why we do it monthly on the older technology does that, I don't know. I guess hear what I mean not what I say.

**Traas, Laura M – DATCP:** Yeah, that's what's been running through my mind is, I wonder if this monthly requirement goes back to the fact that, yeah, dial thermometers, you look at them cross eyed, they go out of calibration. And so we've always just had this standard that

dial thermometer, you check monthly and are we applying an archaic standard to the new stuff.

**Andrew Johnson:** And I guess maybe my nickname is Mr. PMO, but I think the PMO's wants them checked every six months and as long as we're meeting that standard and most haulers if there is a thermometer, I mean they're checking them or if there is digital or a temperature chart requirement, most of them are checking it monthly because they check all of their tanks monthly. So we can easily overkill the requirement by checking it monthly.

**JR Neu:** And as you said earlier, with all these single farm pickups coming into the plant, we're checking the samples at the plant, every single pickup or the temperature should say. Or catching it long before we go out there and do our monthly or every six months check.

**Andrew Johnson:** I guess I would propose that we continue with the monthly checking of bulk tanks and the dial thermometers, but any of the other you know, as long as we're doing it every six months as is required, obviously we hope as humans, if a load comes in or the milk is not what the temperature chart recorder, the digital thermometer is reading that we would take action and go out and readjust it so that it meets the requirements of the  $\pm 2$  degrees. As an industry, I think we recognize we don't want to reject any milk that doesn't meet the standards that either the department or the plant dictated as necessary so. That's just my thoughts on it.

**Traas, Laura M – DATCP:** OK, so this is this is the way what we what we currently have looks clean at least once each month and more often if necessary bulk milk weigher and sampler or person designated by the dairy plant shall check the accuracy of each dairy farm bulk tank indicating thermometer or other temperature monitoring device by measuring the temperature of the milk in the bulk tank with the temperature measuring device that meets the standards. Bulk milk weigher and sampler designated person shall keep a record comparing the temperatures indicated by the calibrated thermometer with those indicated on the milk temperature measuring device. Record must be readily accessible for at least one year. In the case of direct ship facilities, where milk temperature is measured via a temperature recording device, the accuracy shall be checked every six months. So this should probably also include, umm, any facility that well, are there any facilities that just have a bulk tank but just have the temperature recording device?

**Andrew Johnson:** I would say it grassland. There definitely is, but, but the hauler is checking it monthly, just because it's as normal routine, and you know he doesn't have a list of, ok, I'm going to check these five you know on the 1st of the month and then that one, I'm going

to wait until August or whatever. So I think as a procedure, I think we're meeting that requirement like I say, overkill maybe, but as a practice, I think it's being done and the field reps are watching that it's being done.

**Thornton, Lynn:** So when you say temperature recording device, what's your definition of that?

**Traas, Laura M – DATCP:** The definition of that would be any temperature, recording chart, or any direct download to a computer device that measures the temperature and then downloads it directly to a computer.

**Thornton, Lynn:** So then we're still saying that if it's a bulk tank with a recording chart or a chart that's recording into the cloud like some of the new ones do, then we still have to check it every month.

**Traas, Laura M - DATCP :** No, that that this last line says in the case of a direct ship facility.

**Thornton, Lynn:** But there's farms in our direct ship facilities.

**Traas, Laura M – DATCP:** Well, there's and this is a very significant nuance that might get overlooked for the monthly. It's an indicating thermometer or monitoring device. It's not recording.

**Thornton, Lynn:** So maybe we need a definition, maybe and I'm sorry I'm not trying to be difficult, but maybe this is something that we need to go back and add into the definitions. Because I'm even confused when we say temperature monitoring device, do we include a recording chart or recording to the cloud device in that?

**Leigh Hamilton:** Yeah. And I think Lynn's kind of drawing out a valid point there and respect of the last sentence, which is that, umm for example, just to use our own example because it's easy, Piper systems that are on direct load facilities and then Piper systems that are loading out of bulk tanks or silos where they might be the primary temperature recording device on that farm in the case of a silo farm or thinking maybe like Finger family farm for example, I think they do have temperature recording charts as well, but probably there they could be redundant and then if that is the case if you know there is a temperature recording device loading out of a bulk tanker silo, that's offering kind of all the facets that are required of a temperature recording device and its electronic and that data is available. Or we going

to hold that to the monthly or are we happy to let that go to the six monthly? And again, I'm totally agnostic. It's just for you guys to decide what you want to do on that.

**Traas, Laura M – DATCP:** Yeah. Really, the thing here is it's and I don't know that we can say that is if you're using a dial thermometer, it needs to be calibrated monthly. That's what we say in the labs is if it's a dial thermometer, it has to be calibrated monthly. If it's any other type of thermometer, mercury and glass, alcohol in glass, kerosene and glass or digital? It's every six months.

**Leigh Hamilton:** And there's one other thing, Laura, that you may or may not want to add in here, which is I think you may want to ring fence that to devices that you've approved. So you know, and again I'm going to use our own example in order for our temperature recording device to be approved, we had to come to you guys and say, look, it meets all of these requirements that are set out in the PMO and that you guys have set out and you guys got the opportunity to kick the tires and to understand well actually does it meet those requirements. So just because somebody has or a piece of technology has a temperature recording device doesn't necessarily mean that it's an approved temperature recording device.

**Alex O'Brien:** And I guess I might, I don't know. There's a lot of temperature recording devices. If we're having DATCP approve every one of those like, I mean I get what you're saying, but I think making sure that a it's calibrated and it's a functioning device I think that's the most important part because like if we put in the language that it's going to be approved that we have a ton of thermometers and that's just not something that's sustainable but I get what you're saying.

**Leigh Hamilton:** Yeah, I suppose I'm drawing the distinction between ones where they're saying, well, these are ones we need to look at every month because we haven't gone through a kind of approval type process with these. And then there are these other ones where actually we know them and we're content that that's going to be a a 6 monthly interval I guess.

**Alex O'Brien:** OK, sure, sure.

**Thornton, Lynn:** Maybe we have to incorporate language just like what Laura said. If the device being used to measure the milk temperature on a daily basis has a dial thermometer, it has to be calibrated monthly and maybe we go to some lab language.

**Alex O'Brien:** Yep, Yep, I like.

**Traas, Laura M – DATCP:** Yeah, the problem is, is that one will run afoul of the IMS and I don't see that one changing at the next conference unless someone from this state put something forth and umm, you know, pushes it hard. So is that a direction we want to go?

**Andrew Johnson:** What is the IMS requirement, Laura?

**Traas, Laura M – DATCP:** The IMS requirement says, if there's a thermometer or any type of temperature measuring device on the bulk tank, it must be checked monthly.

**Thornton, Lynn:** Well, so on the bulk tank, the only ones I've ever seen directly on the bulk tank or dial thermometers, most of the digital ones that I see are off on a control panel. So maybe we could use their own language.

**Andrew Johnson:** Right. That is what I was just going to say. Can we use that language to satisfy the requirements on both them?

**Thornton, Lynn:** Have any of you guys ever seen a digital one directly on the bulk tank?

**Andrew Johnson:** No.

**Traas, Laura M – DATCP:** No, but I have seen a liquid and glass one on a bulk tank.

**Thornton, Lynn:** I'm not sure I even know what that one is.

**Traas, Laura M – DATCP:** Well, it looks like the standard old you know you've got a glass tube with red liquid in it, and it's usually got a stainless steel shield on the back and a piece of metal, a piece of glass on the front so that it so that the thermometer is encased in that.

**Andrew Johnson:** So could you word it that all temperature recording devices on a bulk tank need to be calibrated monthly? All other devices in in other scenarios should be calibrated every six months. Could it be that simple or?

**Leigh Hamilton:** I'm what I'm I suppose what I'm driving at here. And Laura, it's probably for you guys to figure out is do you want there to be an obligation on providers of this temperature recording technology to come to you?



**Andrew Johnson:** Yeah, I was going to edit my statement to all other approved temperature devices should be calibrated every six months. And again, I mean, if we talk about the digital boxes that are on the wall and stuff like that, I'm pretty confident that the haulers are going to be checking them monthly. So it's going to meet at least that minimum requirement, so we should be more than fine. I mean, it's not like we're saying they have to be calibrated more frequently than the ones that are on the bulk tanks, so. I guess that's my thought process.

**Tony Lampman:** I have a question. This is Tony.

**Traas, Laura M – DATCP:** OK.

**Tony Lampman:** We have a lot of farms where there's three different ones. There's one on the tank, there's the one on the control panel, and then there's the digital temp recorder with the actual and we, we've always been told that the digital temporary border becomes the official temperature. And then that we, I mean the main reason we check it monthly is so if that becomes out of spec because we have some that will say 37 degrees and it's reading 42, which is out of that plus minus two. So I think that's a way of catching that, you know not going six months as if someone's out of spec for six months you know the whole reason to do it every 30 days within, every once a month is just a catch anything that's out of spec on the farm.

**Traas, Laura M – DATCP:** OK, so looking at the PMO, it looks like the way this language is written is if it is just a measuring device with no recording chart, it has to be checked monthly. It looks like if it is cause here I've got and this is for the dairy farms temperature recording devices shall be verified every six months and documented in a manner acceptable to the Regulatory agency. So maybe we stick with the temperature measuring, not monetary, but measuring divides and those have to be checked monthly in order to stay in good graces with the PMO. And so that would involve the dial thermometers on both tanks, the digital readouts that do not record and if there are a, I don't think there are any left out there, but there were some farms that had picked up umm, old plant bulk tanks and they're those had the blast thermometers on. And then say temperature recording devices every six months.

**Andrew Johnson:** I like it.

**Traas, Laura M - DATCP :** Not going to let me do that. OK, so let's look at that. OK, so let's look at this clean. OK, at least once each month more often if necessary. Bulk milk weigher and sampler or designated persons shall verify the accuracy of each dairy farm bulk tank indicating thermometer or other temperature measuring device by measuring the temperature of the milk in the bulk tank and the temperature measuring device which meets the standards that we quoted above. Bulk milk weigher and sampler shall keep a record comparing the temperatures. Record must be readily accessible and then in the case of a temperature recording device the accuracy shall be checked every six months and then we will need to - I will put a definition up in the definitions to say a temperature measuring device is any thermometer or digital device that you can read the temperature, but the temperature is not recorded in any manner. It is not automatically recorded in any manner. And then a recording device will be any chart or data download to computer or cloud that, umm, can be accessed at a later time. Does that work?

**Thornton, Lynn:** I think it's good.

**Alexander Beard:** Looks good.

**Leigh Hamilton:** Good.

**Traas, Laura M – DATCP:** Yeah. Yeah, stop that. OK, so this talks about umm that they have to sanitize their device and they shall immediately notify the producer and the dairy plant operator if the tank is not cooling properly or the device. Yeah. Now we get into the measuring. And one of the questions that I did not have an answer to with regard to measuring is if the farm is using a metering system onto the truck, I don't think we have any of those, but if the farm had some measuring system onto the truck or I have some type of system where the person hauling the milk is not a bulk milk weigher and sampler, do we allow non certified persons to measure the milk?

**Leigh Hamilton:** So, umm, frankly, I think you do have ones in Wisconsin, but it's not a system of ours and maybe in the west half of the state and I don't know is operating or was it just a test or what the story was. And I think in relation to and look in other states, they have certainly required that the person be a bulk milk weigher and sampler to operate that system. So I wouldn't envision that changing in Wisconsin and I don't think it would be advisable to change that certainly without putting some other assurance in place that that would be conducted properly.

**Andrew Johnson:** Would the bulk milk weigher and sampler at the farm meets that requirement?

**Traas, Laura M – DATCP:** Yeah.

**Leigh Hamilton:** Yeah, it's a good question, Andrew. I think so. If that person were trained and had the ability to carry out that SOP, which would include all of the kind of normal roles that our driver would have in terms of ensuring and hygiene and correct connection, and that the correct valves were opened and closed and things that Brandon would know way more about, I would basically.

**Traas, Laura M – DATCP:** Yeah, I know we don't have any. I don't think we have any producers on this call. But yeah, I think I think to be fair to the producers, I think anyone who measures the milk needs to be licensed and accountable.

**Andrew Johnson:** So if the haulers at the farm, there's this technology that kicks out a ticket that has the weight on it. I mean, he's basically just collecting that data from that piece of equipment. No different than he is at a scale. So as long as that weigher sampler at the farm monitors and the machine and all that and that should help make the requirement, I guess it's not a question, I'm just talking through the process.

**Traas, Laura M – DATCP:** OK. And now we talk about when measuring milk by weight at the receiving facility, they must use a certified scale. Umm. And that care must be taken to ensure that the configuration of the tanker is taken into account for both. The tank comes in full of snow and sitting in the intake and some of that snow melts off and then they go back out and weigh it, and now you've got the weight of the snow included in one of those weightings, and not in the other. It's not anything different than we've been doing in Wisconsin for other types of products that come into our facilities, we've figured out how to how to deal with snow.

**Andrew Johnson:** Yeah. Grassland we make them spray everything off and then rescale again so.

**Traas, Laura M – DATCP:** Yeah. OK. Milk sample for testing. We talk about you know using an approved sampling method shall collect a representative sample of milk. Shall collect according to 82.12 and then after that samples been taken, no additional milk can be added to a tanker. And this item 3 is to deal with - we have some farms that have tried in the past

to put milk into say a 55 gallon drum because they don't have enough room in their bulk tank. And so we're just there trying to say that when you disconnect the hose from the bulk tank, you're done. You don't go and add some milk from a 55 gallon drum or something like that.

**Thornton, Lynn:** I have a question for some of you guys with silos on these silo farms. Are they not pumping into the silo a lot of times when you're pumping out?

**Andrew Johnson:** No, there's one way in and one way out. So at least the ones the one that I have if they are milking while they're taking milk out of the silo, they are possibly direct loading onto a trailer during that time, so that at least that's my experience with the one that I have.

**JR Neu:** The the silo I have where currently we're not doing it, but it is set up that they could do so and the discussion we had is because we would be doing the weighing and sampling at the plant that that would be allowed.

**Thornton, Lynn:** Yeah, I get that.

**Traas, Laura M – DATCP:** Yep. Yeah. And I believe this language allows for that because it says that after you take the sample and measure the milk. So if you know you're allowing in and out at the same time on a silo, but you're going to take that truck down the road and to the plant and have it weighed and sampled there, nothing's being added after that.

**Thornton, Lynn:** So I just want to throw this out in in theory. If somebody had a silo and then they could draw milk out and be pumping it into a direct load tanker while it was being filled, what if somebody put a piper system in there that was sampling and measuring the flow of that milk going into the tanker? So what's going into the tanker is being weighed and measured as it's coming out of the silo, but they're still pumping into the silo at the same time.

**Andrew Johnson:** I think as far as my opinion, I think that would be great, more or less for the payment purposes of that milk. I mean obviously, you know, once it gets to the plant, we can weigh it and sample it there. We're going to sample it for appendix N anyway, but if we have a better representative sample of the actual components for payment purposes, I think industry's going to put their arms around that for sure.

**Thornton, Lynn:** So I was just going to say that part of the beauty of thinking about doing it

that way is then you don't have to agitate and sample at the plant. And I know you don't always agitate anyway, depending on how far it came from, but you're eliminating a lot of work at the plant in that scenario I just gave and I'm not saying it's the right way to do it, but I'm saying if somebody wanted to do it that way, I think the way this rule is written, it would not be allowed.

**Traas, Laura M – DATCP:** OK, from my perspective and maybe we need to shore up the language a bit, but from my perspective, the sampling is happening the truck is off to the side. Samplings happening here. Addition is happening here and the milk is flowing this way. So in my perspective on the additional milk being added to the bulk tank is happening before the milk is sampled.

**Leigh Hamilton:** Yeah, you're I think this is Lee from Piper, just by the way. I'm on the phone now, but I think Lynn has it there. The crucial thing here is sampling point, because the sampling is happening under the scenario that Lynn suggesting the sampling is happening outside of the silo. So actually you're not really concerned anymore with homogenization, for example, or what's in the silo in terms of sampling. You're concerning yourself with are you getting a good representation of what is being transported for sale? So that's a key shift because if you can shift the sampling point downstream to outside the silo to what is being transported for sale, then you can get a representative sample without the requirement to homogenize or complete filling in or without the same critical concern around what's happening inside that silo. So I think with that interpretation, I think that, I don't know if you're with me, I think that the interpretation that you have there covers us. No, I'm not actually looking at the wording this second, so I'm relying on you guys. Anthony is texting me in the background, saying that the current language doesn't allow to do that. So I can't see the word in this second, but I think probably it is something that we need to allow for that that new technology does allow you to sample at a sampling point. That is, is outside or downstream from that silo being milked into.

**Traas, Laura M – DATCP:** Thoughts on how we can shore that up?

**Anthony Canavan:** Laura, if I can suggest what you've written there is perfectly correct where you where you're taking your sample from inside the bulk tank. So, and I suppose that's the normal and or maybe traditional process. So I think what you've written there is perfect for that scenario and needs to be there for that scenario, if you know what I mean, because the idea of when you take a sample from inside a tank is that you're saying I can take a sample from anywhere and it's exactly representative. All the milk, everywhere else in the tank. So that makes complete sense. I think there may either need to be a different

section of the talks about because we do sampling, we do sample as milk is going into the bulk tank. We don't wait to the end of the pickup is complete if you know what I mean. So I just think what's written here is correct. When you sample inside the bulk tank and maybe just be a section for when you sample inline from a bulk tank, I'm not sure if there's an easy compromise unless you're separated out I'm suggesting. Maybe that you cover it in the case of an approved inline sampler. That's after the bug between the bulk tank and the and the tanker. I can't remember the exact wording you used in that in the past. Just a couple of thoughts in that Laura, just it maybe truck mounted in line sampler or maybe more, probably more actually it may actually be the system on the phone.

**Traas, Laura M – DATCP:** Yeah, but if, but if the sampler is before the signal, and we work our samples on a 24 hour day. How do we assure that we synchronize the samples that were taken on the farm with what was delivered to a given plant? Because to those may go to plant A and the third load may go to plant B and you know. So I think I think we need to talk two different things. They're also, if the samplers before the silo versus after the silo.

**Anthony:** No, the sentence, the sampler I think you're spot on. So the use case is where the sampler is after the silo and before the truck. OK. So our particular use case is lots of people, silos are putting them in after the silo but before the truck, so I will completely agree there's not applicable for sampling into the silo because you don't know how many loads or where it goes and all that.

**Traas, Laura M – DATCP:** OK.

**Anthony Canavan:** But what you're actually doing is, as you're loading on to a particular load onto a truck, you're now have a representation of exactly what's going on to that truck. So it is for the location between the silo and the tanker you're loading onto. That's good clarification and in that use case you have everything is associated with that load. And a small and then maybe it may be a relevant point as well as the same potentially applies to top loaded bulk tanks that can take a load. So I know in some parts and I'm not sure in Wisconsin you have some very large bulk tanks and if they're top loaded, the same thing can apply.

**Traas, Laura M – DATCP:** Yeah so I'm going to throw this out there. That I'm I right now, this seems to be a writer's block situation. Umm. And we are probably not going to get through this entire document today. So we're probably going to need to schedule one more meeting. So I am proposing that we leave this item sit and recognize that we need to come back and deal with it at the next meeting.

**Leigh Hamilton:** That's fine from my point of view. Thanks.

**Anthony Canavan:** Probably good.

**Andrew Johnson:** How are we looking at time wise, Laura? As far as getting this recommendation to the Rules Advisory Committee to recommend to the Department.

**Traas, Laura M – DATCP:** Uh, Max, correct me if I'm wrong, I want it out of this committee sometime next month so that we can start the legislative process in June.

**Huebner, Max K - DATCP :** That you are correct.

**Traas, Laura M – DATCP:** Yeah.

**Andrew Johnson:** I guess I would challenge this group that if we get something like this, let's get our questions and and stuff to Laura as soon as possible. We don't want to miss this window and have to wait till the next legislature procedure in order. You know, I just don't want to miss it. I think this is a very important advisory statement that we need to make to the legislators so that we get this approved and I think we all have the best intentions here to get something in writing that going to be for the future, so.

**Traas, Laura M – DATCP:** Yeah. Yeah, I think if we schedule a meeting. It might not be Tuesday and two weeks, but you know that's someday in the next week or two to get back together to just look at these last few items that that we have comments on.

**Anthony Canavan:** Perfect.

**Alexander Beard:** And Laura, am I correct in saying that if we're able to provide something for their consideration in June that it would be likely this time next year before it would become effective?

**Traas, Laura M – DATCP:** Right because what has to happen is we have to identify all of these changes. Max is going to have to write up a document that says we are changing this section in this way and we need to do a fiscal estimate, which means I need to get some answers on fee structure. And then it needs to go to public no, it needs to go to the Department of Ag Board. They need to approve us, to go to public hearing, we need to go to public hearing and then once we're done with public hearing, we go to the legislature.

**Alexander Beard:** OK. Thank you.

**Traas, Laura M – DATCP:** OK. Now collection records. The bulk milk weigher and sampler shall insure with whoever the bulk milk weigher and sampler is shall ensure that the following information regarding the milk accepted is recorded and that's the milk producers identification - the bulk milk weigher license number, the date and time the milk was sampled and accepted because we got rid of the word collected because not all of them are collecting it. If they're at the plant, they're going to sample it, they're going to test it, and they're going to accept it. Uh, temperature. Max temperature of the milk when it's accepted, and the weight and or volume of the milk. And I missed one there. OK, when collecting the milk from a farm bulk tank. Ah. So where we've changed this section to just identify how you load the milk. If you're collecting the milk from a farm bulk tank and uh, if partial removal is allowed, then it must have a seven day recording device. Uh must be cleaned and sanitized when emptied. It must be emptied at least every 72 hours.

**JR Neu:** Or #11 where it says you may not collect milk from anywhere other than a bulk tank. Do we need to include silo in there?

**Traas, Laura M – DATCP:** The definition of bulk tank does include a semi permanent tanks.

**JR Neu:** OK, it says that there. Yep.

**Traas, Laura M – DATCP:** Containers are silos.

**JR Neu:** Perfect.

**Traas, Laura M – DATCP:** OK. 82.12 this is the sampling section. So this is where we did a lot of breaking out of who collects from a bulk tank using a dipper shall do this, collects using an inline sampler shall do this section. And then umm, I left the section about if it's direct ship load. The sampling procedure for dippers is unchanged other than we changed the numbering to allow for the sampling procedures we added below. So if the sample is collected from a silo, and here we say that the silo needs to be agitated. Uh, if we are pulling the sample directly from the silo, and for those of you who read a little faster at the bottom of the page is now the start of the inline samplers. Any concerns on the sampling procedure for silos before I move that off the screen. In line samplers we looked at this a little bit previously. Any other comments on this section? Yeah, that we have a bunch of stuff. That's just an editorial one. And then records. I'm not sure we talked. I think we talked



about this at the last meeting. What I did with the record section is I just added a section on records saying that you need to keep all the records for the time frame required under this chapter shall make them available to the Department for Inspection or copying upon request. Operator may keep the records hard copy or electronic format or both, providing that the department can attain ready access to them and the operator shall take reasonable security measures to prevent record loss, damage or tampering.

**Brandon Johnson:** I think that's good and I like that you added it.

**Traas, Laura M – DATCP:** OK, we have 19 minutes left. We're going to go back up to this troublesome section here. Anybody have thoughts on - so we've got sampling from a bulk tank.

**Anthony Canavan:** And I'm sorry, I don't know the wording, Laura, but the key on this one here is just that concept of we're no longer sampling what's in the bulk tank and but we're sampling what is going on to the truck. So it's just whatever that sits is because it's the key differentiator if you know what I don't know the appropriate wording, but that's the concept.

**Thornton, Lynn:** So how about something that goes in place of or above your point B saying if sampling is going to occur from within directly from the bulk tank vessel, then that's the criteria and then another one down there like you have C if sampling is going to occur outside and between the vessel.

**Anthony:** Correct. Yeah.

**Thornton, Lynn:** And the transport truck, because I think that's what Anthony saying. It's gets to where you're taking that sample from.

**Anthony:** Exactly, yeah.

**Leigh Hamilton:** Yeah, the only thing I would add to that then, so I think you're absolutely right. That's the key. The only thing I would add to that is and the reason that sampling point is key is because we're aiming to obtain a representative sample, so there has to be some kind of guarantee that - and a true representative sample maybe attained you know. So what I would say is they're kind of the two criteria that we're looking for that the sampling point location is downstream from the bulk tanker silo or bulk tank for saying as we have

silo included and that means that just because you're sampling points downstream doesn't mean you have the technology to obtain a representative sample.

**Anthony:** Correct.

**Andrew Johnson:** Could the wording be to try to get all the different scenarios that all milk offered for sale should have a representative sample from each firm associated with the milk, you see where I'm going with that? So if you have multiple pickups, you have multiple samples. If it's one pick up, you have one sample, but that sample has to be representative of the milk that's being offered for sale on the tanker or whatever.

**Traas, Laura M – DATCP:** Yeah. So we do say that about they shall collect a representative sample of that milk, and then these are just some safeguards of how to assure that. So if sampling takes place directly from the bulk tank milk, directly from the bulk tank, no additional milk may be added to the bulk tank until after all of the following: the sampling has occurred, the pickup of milk is complete and the pickup hose is disconnected. If sampling and measuring takes place downstream from the bulk tank.

**Anthony Canavan:** By an approved in line sampler.

**Traas, Laura M – DATCP:** OK. Thoughts.

**Brandon:** I think that works.

**Thornton, Lynn:** Me too.

**Andrew Johnson:** I agree.

**Brandon Johnson:** I think it was good to go away from it and then come back.

**Traas, Laura M – DATCP:** Mm-hmm. OK, let's look at that. Clean. OK. Sampling using an approved sampling method shall collect a representative sample, shall collect according to 82.12. If sampling place takes place directly from bulk tank, no additional milk may be added to the bulk tank until after all of the following sampling or and or measuring has occurred. Pick up of milk is complete and the hose is disconnected. If sampling and measuring takes place downstream from the bulk tank by and approved by approved inline sampling and measuring devices, because they could be two separate devices, milk maybe added to the bulk tank during the loading of the milk.

**Leigh Hamilton:** Laura, do you want to say pre cooled milk because you probably don't want to allow it unless it's cooled milk.

**Andrew Johnson:** If it's not cold, then it doesn't meet the requirements that you should be loading it correct.

**Traas, Laura M – DATCP:** Correct. But yeah, it's probably could just add that language here that precooled milk can be added to the bulk tank. OK. And then one of the other things we have is, ok, when measuring milk at the farm, the bulk milk weigher and sampler shall follow - ah, actually I think I need to copy more than I did.

**Alexander Beard:** So lower that that ensures that, uh, it's uh accurately describing everything that we, uh have all previously agreed on, right, like in the case of Piper, which can both sample and measure.

**Traas, Laura M – DATCP:** Yep. So this language is identical with the exception of identifying the inline measuring device. Now instead of the inline sampling device, so on farm inline measuring the department may approve the farm to use an on farm inline measuring device. Uh, the department may not approve the dairy farm to use the inline measuring device unless the department has licensed at least one individual's bulk milk weigher and sampler. The inline measuring device itself has been approved. The bulk weigher and sampler has trained all personnel who worked with the device and the dairy farm personnel working with the device follow all manufacturer's instructions for the device and use.

**Thornton, Lynn:** This might not be the time or place for this question, and you can tell me if it isn't, but I believe there's was some conversation about different levels of weigher and samplers and whether we wanted to maybe have a specific training regarding these on farm systems. I don't know where those conversations are at and is that anything that would need to go into this document if that's what's decided to do that like if you approve a farm to use, for example a Piper system, is it going to continue that they have to be a licensed weigher sampler? Or is their thoughts of creating a training program where they have to be trained specifically for that system? You know what I mean?

**Traas, Laura M – DATCP:** I know exactly what you mean, and I still hope I can make that happen before I retire. But at this point in time I am stopped by, umm, the capabilities of our licensing system and so at this point I hesitate to write it into this rule because I know I can't make that license happen.

**Leigh Hamilton:** Yeah. And Laura just on that. So in the case I keep using us as an example. I'm thinking to myself this is great advertising. We keep saying the words the Piper system, but what I mean is and in the case of this type of qualification that Laura has thought about, which is a kind of qualification nested under the bulk milk weigher licensed sampler on the farm it is possible and Laura and I discussed this previously but we do have an online training facility as part of the Piper system where we can register users and we can track and record their training. So we may be able to take some of the burden of that off regulatory licensing where you guys as the processor receiving the milk has a way to examine and track first of all who was the person that took that sample or is responsible for that weight because their identity is recorded. But also how was that person trained and were they properly trained using that online system? So there may be a degree of comfort that manufacturers like ourselves can offer into that without having to create another qualification offered by the state.

**Thornton, Lynn:** OK. I mean, that's great. I was just thinking about, like you said, these rules don't get revised very often. So should we be thinking about incorporating a little language in there to set ourselves up for that?

**Traas, Laura M – DATCP:** Yeah.

**Thornton, Lynn:** So we don't have to open the rule again.

**Traas, Laura M – DATCP:** Yeah. And in the case of something like that, we can do what's referred to as an emergency rule. It's usually not umm, dictated by some type of emergency as much as it is, we want to make change to just one section of the rule, we can do that more frequently. But yeah, uh, that's something that we still need to look at. OK. We are at 11:01. Any last comments? What I'll do is I'll send the document out again, but we need to look at. So next we are on at the 30th next week is May 7th, the May 6th and the following week is the 13th. I am committed on the 8th I will not be available, on the 14th and 15th Max and I will not be available. So what else?

**Brandon Johnson:** Are you available on the 13th Monday?

**Traas, Laura M – DATCP:** Work perfect. Max, what did your meeting schedule look like on Monday?

**Huebner, Max K – DATCP:** I'm relatively open. I have things that I can miss, not the most important things in the world, so that is OK with me if it works for you.

**Traas, Laura M – DATCP:** I can miss that I can miss that. Yeah, I could do. I could do 9 to 11 on Monday, May 13th. That give you enough time axe to get the open meeting notice out.

**Huebner, Max K – DATCP:** It should. We don't really have to do much with the template at this point, so it should just be the open meeting group and they've been pretty on it recently so shouldn't be an issue.

**Traas, Laura M – DATCP:** OK, so I work for everyone else. 9 to 11 Monday, 9 to 11 central Daylight Time, Monday, May 13th.

**Leigh Hamilton:** I'm sorry, Laura. I have a conflict on that day and so does Anthony.

**Andrew Johnson:** Yeah, I'm OK with that. I'm OK. Whatever works with everybody.

**Traas, Laura M – DATCP:** OK, Tony.

**Tony Lampman:** I'm good.

**Traas, Laura M – DATCP:** Helen.

**Alexander Beard:** I'm OK with that day.

**Traas, Laura M – DATCP:** OK. We lost Alex O'Brien. We don't have John. I'll make it for here. Ah yes. Anybody have any other options? Hearing nothing, I realized some folks will not be available. I will try to get the written document out as quickly as possible, so those of you who aren't able to make that meeting time can make your comments. Any last things? I'm sorry I held you over an extra 5 minutes. You good? OK. Thank you all very much again.

**Andrew Johnson:** Thank you.

**Brandon:** Thank you.

**Leigh Hamilton:** Thank you guys. Bye.

**Anthony:** Yeah, this is great job, Laura. Thank you very much.

**Tony Lampman:** Thank you.