

A Pasteurizer Subcommittee to DRAC

Wisconsin Cheese Makers Association, in discussion with WDATCP Food and Recreational Safety, proposes a new subcommittee to WDATCP's Dairy Rules Advisory Committee (DRAC). This subcommittee, including a manageable number of industry technical experts, experts from academia, and WDATCP technical experts, would take up key, current issues surrounding alterations to pasteurization regulation in Wisconsin: a Pasteurizer Subcommittee, in short.

The Goals

This subcommittee would be asked to:

1. Clarify regulatory procedures related to broken seals on dairy industry pasteurization equipment, including:

- Review the broken seal report issued by WDATCP
- Clarify WDATCP inspector actions and responsibilities when onsite at a facility with a broken seal
- Clarify industry personnel actions and responsibilities when onsite at a facility with a broken seal
- Clarify the status of dairy products produced while a seal is broken, related to holds, product status and product labeling
- Clarify the role of the phosphatase test in validating milk pasteurization when a seal is broken
- Clarify the role of the phosphatase test in validating pasteurization in finished dairy products. [A separate subcommittee is proposed to develop a research study for this validation.]

2. Build Wisconsin adoption of industry certification to apply emergency seals, per PMO Appendix I

- Review the current proposed training and certification process
- Consider a long-term timeline and any pilot programs regarding industry adoption of this new opportunity
- Discuss opportunities for timing and sealing equipment to be shared, or for this certification to be offered to third-party pasteurizer experts
- Clarify WDATCP policies with regard to the status of milk from the pasteurizer and dairy products produced from this milk at a plant with an emergency seal applied by certified personnel, including regulatory action when WDATCP concludes the emergency seal was properly employed and when WDATCP determines the seal was not properly employed.
- Clarify WDATCP policies that will apply to dairy plants that do not adopt industry certification to affix emergency seals.

3. Review the potential for electronic records to serve as valid, regulatory proof of pasteurization.

- Review redundant automation in dairy plants for potential as back up, supporting documentation to official pasteurization electronics, particularly when official pasteurization electronics fail or are unsealed for a short period.
- Consider safety/security measures required by regulatory to allow redundant automation information to be used as back-up for risk analysis discussions.

The Outcomes

This subcommittee would create one or more regulatory guidance memoranda, possibly supplemented with decision trees, timelines and related regulatory references, for uptake by DRAC.