National
Conference on
Interstate
Milk
Shipments

Date: March 18, 2020

To: State Delegates and Stakeholders

From: Roger Hooi, Chairman, Appendix N Modification Committee

Subject: Appendix N Modification Committee Update - 2015 Proposal 211 Pilot Program

Proposal 211 of the 2015 NCIMS Conference charged the Appendix N Modification Committee to develop a pilot program, establishing a regulatory framework by which testing raw milk for veterinary drugs would be required for drugs other than Beta-lactams. The parameters of the pilot were created by the committee, approved by the NCIMS Executive Board, and then implemented from July 1, 2017 through December 31, 2018, with tetracyclines as the drug family for which raw bulk milk pickup tankers were tested. A violative rate of 0.002% was reported from over 406,000 tests, indicating that tetracycline residues are not an issue in the nation's raw milk supply.

Based on these results, at the NCIMS Board Meeting in October 2019, FDA stated that they conclude the pilot had completed its objective. In addition, FDA recommended, and the NCIMS Board supported, that the current drug residue testing pilot initiated by Proposal #15-211 be discontinued and that the Appendix N Modification committee explore a new approach in partnership with the NCIMS and FDA – to strengthen our system to minimize the risk of drug residues in milk, including means of verification to ensure the system is being effectively implemented.

FDA encourages the Appendix N Modification Committee:

- To develop a comprehensive approach to minimizing the risk of drug residues in milk, considering dairy farms, processing plants, and retail.
- To identify and implement mitigation strategies to reduce the prevalence of drug residues in milk, as well as to develop a means of verification to make sure the system is being implemented and is effective, including consideration of a continuous multi-drug random surveillance program.

FDA also expressed that they welcome the opportunity to collaborate with NCIMS on this approach to minimizing the risk of drug residues in milk.

Based on these conclusions and recommendations from FDA coupled with the motion passed by the NCIMS Executive Board, the Appendix N Modification Committee in partnership with FDA will be exploring different strategies to strengthen our system in minimizing the risk of drug residues in the nation's milk supply.

Posted on the NCIMS website is the January 2, 2020 memo to the Appendix N Modification Committee from Dr. Mark Moorman, FDA-CFSAN. Should you have any questions please let us know.

Roger Hooi
Chairman, Appendix N Modification Committee