

Retail Raw Milk

A Quick Guide for Producer-Processors

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“Retail Raw Milk” is Grade “A” raw milk (unpasteurized milk) legally produced for human consumption within Washington State. In this guide you’ll find information about key requirements and good practices for producing and selling Retail Raw Milk. Here are some things to keep in mind:

- **There is a market for Retail Raw Milk, but there are also potential health hazards associated with it.** People can get sick or die due to bacteria or other pathogenic (disease-causing) microorganisms that may be found in raw milk, such as *Campylobacter jejuni*, *Salmonella*, *Listeria monocytogenes*, *Shiga toxin producing E.Coli* (STEC), and *E. coli* O157:H7. It’s possible to contract tuberculosis and undulant fever from consuming raw milk.
- **Safe, clean and legal production is a must.** It reduces the risk of the milk being contaminated, reducing the risk to the consumer. It is particularly important for protecting children, the elderly, pregnant women and other individuals with weakened immune systems.
- **Retail Raw Milk is different from many food products in that it *must* be produced and processed at the same site.** When the Retail Raw Milk leaves the farm, it is raw (unpasteurized) and may go to a wholesale distributor, but it has already been packaged for the *retail* consumer.
- **Retail Raw Milk includes fluid whole milk, hand-skimmed cream and milk which has been hand-skimmed.** This means a plant cannot use a separator, homogenizer or any other mechanical device to separate raw cream from raw milk. Retail Raw Milk does not include chocolate or flavored milk, or cultured fluid milk (buttermilk). *Retail Raw Milk cannot be used to produce other food products such as yogurt, butter, puddings, or ice cream.*

The Washington State Department of Agriculture’s (WSDA’s) interest in Retail Raw Milk is to protect consumers and producers in our state by enforcing the rules and regulations designed for safe food production. The WSDA Food Safety Program carries out this work through inspection, testing and technical assistance. (See page 15.) This guide is not a substitute for the laws and rules it refers to, but it should give you a good idea of what it takes to be a Retail Raw Milk producer-processor in Washington State.

About “Cow Shares”



Some farmers use cow shares or farm share agreements as a marketing approach to sell their cows’ milk. The consumer purchases a “share” of a cow (or goat or sheep) and in return receives a portion of the milk produced. WSDA considers this a sale.

Legal cow shares can exist in the State of Washington as long as the producer obtains proper licensing with the Washington State Department of Agriculture (milk producer and milk processing plant licenses). Producers may not use a cow share agreement to avoid meeting state requirements.

Laws and Licenses

Retail Raw Milk producer-processors need to be familiar with the state laws and rules that regulate the production, processing and sale of Retail Raw Milk:

Laws: REVISED CODE OF WASHINGTON (RCW)	Chapter 15.36 RCW Milk and milk products Chapter 15.44 RCW Dairy Products Commission Chapter 15.130 RCW Food Safety and Security Act
Rules: WASHINGTON ADMINISTRATIVE CODE (WAC)	Chapter 16-101 WAC Milk and milk products Chapter 16-101X WAC Degradates, license suspensions and revocations for dairy producers and processors Chapter 16-125 WAC Farm milk storage tanks and bulk milk tanker-requirements Chapter 16-139 WAC Penalties Chapter 16-165 WAC Food inspection Chapter 16-167 WAC Intrastate commerce in foods

Washington State also has adopted two federal standards: the **Pasteurized Milk Ordinance (PMO)** and **Good Manufacturing Practices, 21 Code of Federal Regulations (CFR) Part 117**. True, Retail Raw Milk isn't pasteurized or commonly thought of as manufactured, but key parts of these standards still apply to Retail Raw Milk. For example, only Grade "A" raw milk can be sold as Retail Raw Milk. So, even though Retail Raw Milk is not pasteurized, as a producer-processor, you must meet the standards for raw milk set by the Grade "A" Pasteurized Milk Ordinance (United States Public Health Service/Food and Drug Administration).

The laws, rules and standards include requirements concerning your herd, facilities, equipment, production, processing, sales and distribution. Copies of these regulations, along with the *Milk Producers Licensing Handbook*, can be found in the Milk Producer licensing packet, available from WSDA.

Milk-Related State Licenses

To sell Retail Raw Milk, you must obtain both a **Milk Producer License** and a **Milk Processing Plant License**. Both of these state licenses are required because Retail Raw Milk bottling must occur at the site of milk production.

Milk Producer License

The Milk Producer License covers the production of milk from your animals. There is no fee for the license, but you must submit a completed application form, water testing results, animal herd health records, and a farm diagram. You can download the application from the WSDA website or request a Milk Producer License application packet from our Food Safety Program office.

Definitions

MILK PRODUCER

A person or organization that operates a dairy farm and milks animals. This can include cows, goats, sheep and other milk-producing animals

MILK PROCESSING PLANT

A place, premises, or establishment where milk or milk products are collected, handled, processed, stored, bottled, pasteurized, aseptically processed, or prepared for distribution, except an establishment that merely receives the processed milk products and serves them or sells them at retail.

See Chapter 15.36 RCW



Milk Processing Plant License

The Milk Processing Plant License covers the processing and packaging of the final product. The licensing fee is \$250, and the license must be renewed annually. Applications for milk processors include an application form, water testing sample results, floor diagrams, labeling information, animal herd health documentation, and processing information.

A licensed Retail Raw Milk processing plant can sell fluid whole milk, hand-skimmed cream and milk which has been hand-skimmed. This means a plant cannot use a separator, homogenizer or any other mechanical device to separate raw cream from raw milk.

Retail Raw Milk does not include chocolate or flavored milk, or cultured fluid milk (buttermilk). *Retail Raw Milk cannot be used to produce other food products such as yogurt, butter, puddings, or ice cream.*

If you decide to begin processing products other than Retail Raw Milk, you will need to obtain additional licenses and should contact the Food Safety Program to discuss the process and potential hazards.

Dairy Technician Licenses

In some instances, a Dairy Technician license may be required in your Retail Raw Milk operation. Contact the Food Safety Program for additional information.

For more dairy license information:

WSDA Food Safety Program

Phone 360-902-1876

<http://agr.wa.gov/FoodAnimal/Dairy>

Other Legal Requirements

Other federal, state and local regulations concerning land use, building codes, water supply, manure management and other aspects of farm-based businesses may apply to your Retail Raw Milk operation. Those regulations are not covered here, but compliance with them can be as important to your success as those that target Retail Raw Milk specifically.

Check with your local jurisdiction and the appropriate state or federal agencies.

- For state business and specialty licenses:
Department of Licensing - <http://www.dol.wa.gov>
- For certification by the WSDA Dairy Nutrient Management Program (re: manure management): Phone 360-902-1982

Note: This guide is not a substitute for the laws and rules it refers to.

Are inspections required?

Yes. WSDA will first inspect your setup as part of the licensing process. Later, periodic inspections will check that your operation is complying with the Retail Raw Milk rules and regulations.

Will my employees and I need food handler permits?

No, but you all will need to have an overall knowledge of good employee hygiene and sanitation practices. You'll need to follow good practices such as washing your hands and minimizing bare hand contact during filling and bottling.

This will reduce the potential for contamination of the finished product, consumer complaints and related illnesses.

Herd Health

A successful Retail Raw Milk operation requires healthy animals. All milking cows, goats, and other mammals must meet the **animal health requirements**. Selling or delivering milk or milk products from diseased animals is illegal. (See Chapter 15.36 RCW)

Your animals must test negative for diseases that can be transmitted to people through raw milk. Only an accredited veterinarian can collect and submit official samples for these animal health testing requirements:

- Your animals must be tested for Brucellosis and Tuberculosis (see chart, next page), as well as for any other diseases as required by the state veterinarian. (If new diseases emerge, the state veterinarian may require additional tests.)
- Your animals must be tested before WSDA can issue you a Milk Producer License, and they must be tested annually after that.
- Additions to the herd must test negative for the diseases within the previous thirty days before they can be introduced into the herd.

There are other animal health requirements, too:

- Any animal showing chronic mastitis, whether producing abnormal milk or not, shall be permanently excluded from the milking herd. Animals producing bloody, stringy, or otherwise abnormal milk, but with only slight inflammation of the udder shall be excluded from the herd until re-examination shows that the milk has become normal. (See RCW 15.36.161.)
- Animal health testing records must be kept for **each animal** that is used (or intended to be used) to produce milk for Retail Raw Milk products. These records must be updated on an annual basis and must be available for review by WSDA.

Good herd inventory and animal health records provide information that helps WSDA monitor public health disease concerns.

Good herd management and biosecurity (see page 13) practices can help keep your animals healthy and productive. Having all the right licenses, equipment and facilities won't matter if your animals are sick and the milk they produce can make people sick. Work with your accredited veterinarian to develop a herd health plan.

For more information on animal health:

WSDA Animal Health Program – Phone 360-902-1878
<http://www.agr.wa.gov/FoodAnimal/AnimalHealth/>



Having all the right licenses, equipment and facilities won't matter if your animals are sick and the milk they produce can make people sick.



Keeping Your Herd Healthy

Your vet can help you create a plan to address:

- Vaccination.
- Nutrition.
- Animal comfort and safety.
- Mastitis prevention.
- Early identification and treatment of ill animals.
- Effective and appropriate treatment protocols.

DISEASES, REQUIRED TESTS, AND PREVENTION AND CONTROL

DISEASE	REQUIRED TESTS (as of 7/1/2010)	PREVENTION and CONTROL
Brucellosis One of the most serious livestock diseases. Mostly affects cattle but may affect other animals. In humans it causes <i>undulant fever</i>, a chronic disease characterized by recurrent fever and general malaise.	Animals must have been tested for Brucellosis within the previous 12 months. The test is a blood test in which the sample must be drawn by an accredited veterinarian and tested at a state-approved laboratory. See: RCW 15.36.161, Chapter 16.36 RCW Chapter 16-86 WAC Chapter 16-89 WAC	Vaccination of young animals and annual testing of adult livestock can prevent Brucellosis in cattle.
Tuberculosis A contagious disease of cattle and other animals. It has a wide range of hosts and can also be contagious to humans. Tuberculosis can be transmitted to humans through the consumption of raw milk. Tuberculosis affects mainly the respiratory system but may affect other organs.	Animals must be tested for Tuberculosis within the previous 12 months. The test is a skin sensitization test in which 0.1 ml of tuberculin is injected into the skin at the base of the tail. The area is observed 72 hours after injection for the detection of any response. An accredited veterinarian must perform the test. See: RCW 15.36.161	Control in livestock is accomplished by annual testing.

RCW = Revised Code of Washington
WAC = Washington Administrative Code

Facilities and Equipment

Many of the decisions you'll make about your Retail Raw Milk operation involve facilities and equipment:

- How and where the animals are housed.
- How and where the animals are milked.
- How the milk gets from the animals to the bottling/packaging facility.
- How and where the milk gets packaged.
- How and where the milk gets stored.

In a Retail Raw Milk operation, these decisions are particularly important because you must take special care to reduce and prevent contamination. **Separation and sanitation** are two of the most important considerations when choosing facilities and equipment.

Taking the time to carefully plan your operation can pay off. Check with the WSDA Food Safety Program to avoid costly mistakes.

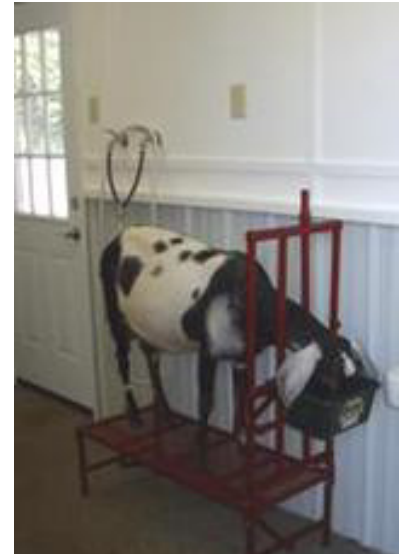
Facilities

A Retail Raw Milk operation needs facilities for both **production and processing**. Although a Retail Raw Milk processing plant is located on the same site as the dairy farm, milk production and processing (bottling) activities **must remain separate** to reduce potential contamination.

For example, milking production equipment may not be stored or cleaned in the milk processing plant. Milk processing rooms designed as processing plants may have a milk tank installed. All other traditional milk house activities should be done separately (i.e., equipment cleaning). Also, it is highly recommended that the milk house not be used for storing or selling the bottled milk, in order to reduce foot traffic in the milk house and thus reduce potential contamination. Other options for milk storage and sales include a small storefront or a refrigerator located outside in a covered and protected location.

The Milk Producer and Milk Processing Plant license applications require you to include the location and distance of the animal house areas, milk parlor and milk house from the milk processing plant. All farms vary in layout and design, but by building clear separation into the design of your facilities from the start, you can make it easier to prevent contamination. Contact the WSDA Food Safety Program if you have questions.

In some cases, with approval from the Food Safety Program, time could create adequate separation. This will generally only apply to very small operations. Ask for technical assistance to help determine the best option.



Some facilities and equipment will need to accommodate your animals, yet protect the milk from contamination.



Milk processing facilities need to be easy to clean and dedicated to milk processing only.

Some Facility Basics

Keep in mind these basic requirements for the operation:

- Floors are concrete or other impervious material so they are easily cleanable.
- Walls are washable and finished light in color.
- Doors and windows are tight-fitting and screened when open.
- Lighting and ventilation are adequate.
- The space is large enough to handle maximum milk production and milk processing.
- Product contact areas are accessible for cleaning and inspection.
- Hot and cold water are plumbed for hand-washing and cleaning.

Remember: Bare or unfinished wood is not allowed because it encourages bacteria survival and growth.



Light-colored walls and good lighting make it easier to see “dirt” that could contaminate your product.

What facilities do I need?

Do I need separate buildings, or can I have one building with separate areas?

You’ll need facilities for each of the four main functions. See chart below. Ideally, to prevent contamination of your product, there will be four separate and distinct areas. They all can be in one building or separated into individual buildings. The design of your facility can be creative and still meet the requirements. There is no one-size-fits-all model.

Barn	where the animals are housed.
Milking Parlor	where the animals walk in to be milked.
Milk House	where milking equipment from the parlor is washed, rinsed, sanitized and stored in a clean condition between milkings. This room needs at least a 2-compartment sink, and may house a bulk milk storage (holding) tank, or other milk cooling equipment and cold storage for the milk prior to bottling.
Milk Processing Plant/Room	where the raw milk is handled for the final time and filled into the finished product container. Sanitation and good employee practices are of utmost importance in this room. Foot traffic through this area should be limited to the bare minimum that is needed to accomplish the final processing or bottling operation. It is highly recommended that doorways in and out of this room should not lead directly into the milk house, the milking parlor or barn area. A hallway or other closed area that separates these rooms helps minimize the potential for contamination in the processing or bottling area. Wash facilities for the washing of bottling and filling equipment, bottles, and a hand-washing sink are required, and are usually located in this room, in addition to a cold storage unit or refrigerator for the bottled milk.

Toilet Facilities

All employees must have access to plumbed toilets that are convenient and maintained. Portable toilets and/or composting toilets are only acceptable for meeting the requirements on the farm side of your operation. Composting toilets would need written approval from your local health district. Flush toilets must be provided for use by employees involved in bottling of the milk. The door to the toilet room must be tight and self-closing. Windows must be screened.

If only members of the immediate family work in your operation, the home bathroom may be used if it is located on the premises, is easily available for use and adequately satisfies the requirement.

Hand-Washing Facilities

Hand-washing sinks must be plumbed for hot and cold or tempered water. Sinks must have soap and single-service hand toweling, and a covered trash can should be provided. A hand-washing sink must be provided and accessible for after using the restroom. Additional hand sinks are required for use in the milk house and any milk processing areas where milk is handled.

Equipment

Equipment—especially equipment that comes in direct contact with the milk—must be made of food-grade material that is easily cleanable and has smooth, impervious surfaces. Accumulations in even tiny cracks and crevices can host undesirable bacterial growth, contaminating your equipment and the milk.

Milk containers and other utensils should:

- Have flush joints and seams, if any.
- Have smooth, easily cleaned, and accessible surfaces.
- Be made of durable, non-corrodible material such as 300 series stainless steel, glass or food grade rubber, silicone or hard plastics.

Milk pipelines, if used, must be rigid design and supported so as to maintain slope to allow proper draining. This is true for the piping used to supply cleaning and sanitizing solutions to the milk pipeline as well.

Single-service articles that are not manufactured and/or handled in a sanitary manner may contaminate the milk or milk contact surfaces.

ALWAYS check with the Food Safety Program before purchasing new, or used equipment. Different countries and even different states vary in standards, and what works somewhere else may not be acceptable here.

For more information or technical assistance:

WSDA Food Safety Program

Phone 360-902-1876

<http://agr.wa.gov/Food Animal/FSP>



Self-closing doors and separate hand-washing sinks reduce the risk of contamination.



Look for smooth seams and welds.



Stainless steel is a common material for dairy equipment.

Production and Processing Practices

Good practices are an essential part of a well-run Retail Raw Milk operation. Poor practices can undermine the safeguards built into a well-designed facility and good equipment. Preventing contamination relies on the procedures you and your employees follow.

While there is no way to guarantee the safety of raw milk, try to identify steps in your process that will help you to produce it as safely as possible. Look at all stages, from milking through processing. Look at the order of how things are done, the route the milk takes and how it is handled, what equipment is used and who does what. Then establish practices and procedures such as the following:

- Restrict traffic through the processing areas.
- Do not work in plant facilities when you are ill, such as with diarrhea, vomiting, or fever.
- Wash your hands twice after using the toilet – once in the restroom, and then again when you return to the processing area.
- Properly use gloves or utensils instead of bare hands when processing.
- Wash, rinse, and sanitize all equipment used for production with appropriate cleaners and sanitizers.

Your WSDA Food Safety Officer can help you identify areas where there is potential for cross-contamination and ways to make the process safer—from production to packaging. Some key requirements for various stages of the process are outlined below.

Milking

To prevent contamination during milking, the animals, equipment, and milking personnel all must be clean.

Be careful, too, with the process of transferring the milk from the animals to any room where it will be cooled and bottled. The separation between these facilities can be breached by dirt/manure on shoes or clothing. Equipment used to transfer the milk must be kept clean as well.



Cleanliness and Sanitation

Cleanliness and sanitation are important throughout production and processing.

See the Good Manufacturing Practices and the Pasteurized Milk Ordinance for specific requirements. Here's a sample:

Properly clean the product-contact surfaces of all containers, equipment, and utensils used in the handling or storage of milk after each use. Milk cannot remain clean and free of contamination if permitted to come into contact with unclean containers, utensils or equipment.

Sanitize all product-contact surfaces before each use. Cleaning alone does not insure the removal or destruction of all potentially present disease organisms.

*See PMO.
See Chapter 15.36 RCW.*

Hand Milking

Hand milking is an option for raw milk production. Take extra care when meeting the requirements because Retail Raw Milk is a ready-to-eat food.

Requirements for hand milking include:

- Milker's hands are clean.
- Proper hand-washing facilities are convenient to milking operations, including hot and cold water under pressure and plumbed. Soap and single-service towels are available.
- Dry hands with a clean towel before milking.
- Do not practice wet-hand milking; it will increase the likelihood of contaminating the milk.
- Use a properly designed pail for capturing milk. Covered pails are preferred for protection against contamination.

Additional recommendations include:

- Repeat cleaning and drying process after any interruptions in the milking process.
- Rinse hands with a bactericidal solution.
- Remove all excess hair, and maintain udder cleanliness.



Use clean, dry, single-use towels and covered pails.

Quick Cooling

Milk must reach 40° Fahrenheit within 2 hours of milking. Proper recording of temperature and time is required to demonstrate that this requirement is met. A hand-written log can be used.

The most efficient way of achieving quick cooling of the milk is by using a water or ice bath. Do not plan on using refrigeration as your main cooling method; it takes too long and may never reach temperatures low enough to meet requirements. Effective agitation of the milk will also assist in reaching the cooling requirements.



Monitor temperatures to assure effective cooling.

Filling

Bottling and capping shall be done in a sanitary manner by means of approved equipment and operations. This could mean one machine with integral filling and capping or be as simple as hand pouring through a funnel and hand capping. The WSDA Food Safety Program will work with you to establish a safe and sanitary system.

Hand Filling and Hand Capping

If you plan to bottle your raw milk using only hand filling and hand capping, the guidelines established in 21 Code of Federal Regulations (CFR), Part 117 Current Good Manufacturing Practice in Manufacturing, Packing, or Holding Human Food would apply. This covers such areas of concern as hand-washing, protective clothing, employee health, and education and training.

Containers

Packaging material must protect the product from contamination and must not impart any toxic or harmful substances to the product. The cap or cover must cover the pouring lip to at least its largest diameter. You may want to consider using a tamper-proof cap. Purchase caps in a sanitary container and store them in clean and dry location until ready for use.

Single-service or reusable containers both offer advantages; consider your marketing plan to decide which would be better for your operation.

Remember: *If you are reusing returnable containers, proper cleaning and sanitation are your responsibility. Realize that these containers have been out of your control in a variety of storage conditions. Cleaning, sanitizing and thorough inspection of the individual glass containers is in your best interest. Lids are not to be reused.*

Can I hot fill after milking?

Yes. However you cannot do partial fills (i.e., you could not partially fill a container, chill it and then hot fill into that same container). Chill milk from each milking process before blending. Remember that all milk must reach 40° Fahrenheit within 2 hours of milking.

See RCW 15.36.221



Choose containers and a fill method that meet the standards, work for your operation, and protect your product.

You must label all containers (RCW 15.36.231/WAC 16-101-800). Foodborne illness outbreaks associated with raw milk or raw milk products occur every year. This is why properly labeled raw milk intended for human consumption is a requirement for any sale. All Retail Raw Milk products must be labeled with this warning:

Additional labeling requirements include name and location of business, contact information, pull dates, product identity (use common name), and volume. When milk has been hand-skimmed, the resulting products are cream and a lower fat milk. The label must be accurate to reflect the cream or lower fat milk product.

Sales and Distribution

You can sell your Retail Raw Milk only directly to the end consumer or to locations that sell to the end (retail) consumer in labeled containers. For example, you can sell your product to grocery stores, at farmers markets or on-farm stores and through delivery. Taste-testing product sampling demonstrations are not allowed. “Cow shares” are considered a sale.

You may not sell your Retail Raw Milk to restaurants or institutions such as schools, nursing homes or hospitals, and Federal regulations prohibit selling Retail Raw Milk products across state lines. Check with the WSDA Food Safety Program if you have concerns about your markets.



Raw Goat's Milk

64 FL.OZ. (1/2 GAL.) 1.89 L
Whole Goat's Milk

PULL DATE: __month/day/year__

Keep Refrigerated at 40° F or below

WARNING: This product has not been pasteurized and may contain harmful bacteria. Pregnant women, children, the elderly and persons with lowered resistance to disease have the highest risk of harm from use of this product.

X.Y.Z. Dairy

Address - City - State - Zip

You can customize your label, but it must include the warning and other required information.



Ads are sometimes seen for sales of raw milk for pet food or craft use. Such milk must be denatured (color added- not white) and is not for human consumption. Producers may not use such advertising as a way to avoid meeting state requirements for Retail Raw Milk. See Chapter 15.37 RCW Milk and Milk Products for Animal Food.

Other Considerations

Biosecurity

“Biosecurity” is about preventing infectious diseases from spreading to and from livestock. It can help protect not only your herd, but also your business and the consumer’s food supply.

Federal agencies work to keep new animal diseases from entering the country, and in Washington State, WSDA works to protect animals and humans from contagious animal diseases. To prevent animal diseases from entering the state, veterinarians examine animals and monitor health certificates that are required for all animals entering Washington.

Biosecurity is not just a matter for government agencies. Measures you take can prevent highly infectious animal diseases in your livestock:

Know who is on your farm at all times.

- Limit access of nonessential people.

Keep things clean.

- Require livestock and feed haulers to clean and disinfect their vehicles before hauling livestock or feed to or from your operation.
- Provide disinfectant and appropriate disposable footwear.

Keep disease away.

- Develop and enforce a policy for family members and employees who visit other livestock facilities.
- Be careful when you buy livestock. Isolate new stock for observation.
- Be careful where you buy feed and equipment.
- Use separate equipment for healthy and sick animals. Prevent contact between healthy animals and those suffering from illness.
- Keep dogs, cats, and other animals confined to the farm. Do not feed or encourage wildlife to come onto your farm.
- Control rodents and insects.
- Keep livestock away from raw household waste, bones or swill.

Look for and report changes.

- Call your veterinarian immediately if you observe unusual disease symptoms in livestock. Your veterinarian and state or federal veterinarians can help diagnose and prevent a disease from spreading.



For more information on biosecurity:

- USDA Animal and Plant Health Inspection Service – <http://www.aphis.usda.gov>
- WSDA Animal Health Program
Phone 360-902-1878
<http://agr.wa.gov/FoodAnimal/AnimalHealth>

Employee Training

If you have employees, it is important to work with them to ensure safe food handling practices and a clean environment.

Your efforts to create a successful Retail Raw Milk operation can be undermined if your employees develop bad habits or don't know the proper procedures to follow. Training for new and existing employees can make a difference and help prevent product contamination.

Consider what new employees need to know and what existing employees need to stay on-track and up-to-date.

Recall Plan

When an unsafe or otherwise violative (violates the legal standard) food product has left the control of the manufacturer, it must be removed from the market. When the producer-processor does this voluntarily, the process of removing the product is called a *recall*.

Despite careful production and processing, there is a chance that, someday, you may need to recall your Retail Raw Milk.

If you needed to remove a product from the market right now,

- Would you be able to do it?
- Would you be able to remove the product quickly?
- Would you be able to remove all of the product?

A **recall plan** can make the difference. The plan can be designed in a way that will work for you and your customers. The key idea is to be able to identify the product(s) affected and how much was involved, and then be able to locate it and let the customer know as soon as possible.

Your plan needs to be specific to the product in question. Here are some general tips:

- A good record keeping system is important to help identify particular codes, lots and quantities.
- Pick the person you want to have in charge. This could be the owner, a manager or anyone who knows the operation well.
- Be able to organize a list of customers, distributors, accounts. This could be based on invoices, phone orders, retail store receipts, etc. Have an idea before you contact them if you want the product returned, thrown away or held for pickup.
- Be proactive. Be willing to notify the WSDA Food Safety Program when you suspect a problem, and ask for assistance.

Risk to the Consumer Creates Risk for the Producer-Processor

Any person with a compromised immune system, children, the elderly and pregnant women are especially at risk from foodborne illnesses associated with raw milk consumption.

United States product liability law allows people harmed by unsafe products, including food contaminated by microbial pathogens, to take legal action to claim monetary damages for their injuries.

Talk with your insurance agent or lawyer for more information on liability and liability protection.

Working with WSDA



The Washington State Department of Agriculture (WSDA) Food Safety Program's general role is to protect public health. It carries out this duty through inspection, testing and technical assistance.

Inspection

WSDA performs inspections to verify that your business is complying with the legal requirements. The initial licensing inspection is done to approve your operation for milking and sale of products. Subsequent inspections are to monitor conditions and ensure continued compliance. Retail Raw Milk operations are inspected at least four times per year; however, this may vary with the seasonal milk production of your animals.

Testing

WSDA will collect and test your Retail Raw Milk approximately once a month. Legal test results must not exceed the standards listed below.

- Bacterial Count 20,000/ml
- Somatic Cell 750,000/ml (cow & sheep) 1,000,000/ml (goat)
- Coliform 10/ml

WSDA also tests products for antibiotic residues and performs surveillance testing for pathogens and pesticides. Currently, WSDA conducts surveillance testing for these human pathogens: *Campylobacter*, *E. coli O157:H7* and *Shiga toxin producing E. coli*, *Listeria monocytogenes* and *Salmonella*. Other testing for possible contaminants of human health concern may be added as testing becomes available. WSDA does not do product quality testing.

If the test results are above the standards listed above or are positive for antibiotic residues, pesticides or strains of human pathogenic organisms, you will receive a notice of non-compliance, which may trigger a recall. Although some recalls are due to illness outbreaks, others are due to failing test results. WSDA will work with you on recall procedures. See page 14 about recall plans.

Technical Assistance

We understand that clean, safe food is as much your goal as it is ours. If you need any technical assistance in clarifying the rules and regulations or answering questions concerning safe food production, contact the Food Safety Program.

Talk with the Food Safety Program about developing a Hazard Analysis Critical Control Plan (HACCP) to help you identify different areas of risk and their control points. HACCP is defined as a system to identify and correct errors as they occur throughout the flow of food and a process of assuring food safety. Because Retail Raw Milk is a ready-to-eat food, use a risk-based inspection for identifying where Sanitation Standard Operating Procedures (SSOPs) can address areas of concern.

Can I set up my own laboratory on site?

Yes, but only if it is used only for quality testing. No pathogenic bacteria lab testing will be allowed in any ready-to-eat food operation because of the potential to contaminate the food environment.

If you want to set up a quality testing lab, carefully consider foot traffic and potential cross-contamination when choosing the lab location. Anything that is not necessary for milking and processing may not be stored in the milk house or bottling area.

The WSDA Food Safety Program can help you identify potential problems when deciding where and how to set up a quality testing area.

You can also hire a private laboratory to do your quality testing or pathogenic test monitoring.

Contacts



Washington State Department of Agriculture (WSDA)

1111 Washington Street

PO Box 42560

Olympia, Washington 98504-2560

Phone: 360-902-1800

Customary business hours: Monday - Friday, 8 a.m. - 5 p.m.

Visit us on the Web!

agr.wa.gov

- **Food Safety Program**
Phone: 360-902-1876
Fax: 360-902-2087
- **Animal Health Program**
Phone: 360-902-1878
- **Dairy Nutrient Program** (re: waste and water quality)
Phone: 360-902-1982
- **Animal Health, Dairy and Food Safety Laboratory**
Phone: 360-753-2228
- **Organic Food Certification Program**
Phone: 360-902-1805
- **Weights and Measures Program**
Phone: 360-902-1857

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Foodsafety@agr.wa.gov

Do you need this information in an alternate format?

Contact the WSDA Receptionist at (360) 902-1976 or TTY Relay (800) 833-6388

***NOTE:** The information in this guide was current at the time of publication. However, laws and regulations can change. Please refer to the contacts listed for the most up-to-date information.*