FACTORS GOVERNING THE RESPONSIBILITY OF INDUSTRY FOR THEIR INSPECTION OF NEW YORK STATE MILK SUPPLIES

MEREDITH H. THOMPSON

Bureau of Environmental Sanitation
New York State Health Department, Albany

The New York State Sanitary Code change in reference to quality milk control was made to give definite recognition to the basic authority and responsibility of the dairy industry for quality control of its own product in the production, processing and delivery of milk, while the New York State Health Department maintained its overall responsibility for supervision and control of milk for the protection of the public health. It is no change in policy but a change in emphasis for economy, efficiency and public health protection carried out through continued cooperation. This is not a new philosophy. The milk industry has always been directly responsible for the milk product they produced. The new code is merely spelling out some of the specifics for which the complete industry should assume direct responsibility. This philosophy, of course, is not restricted to the milk industry.

A community or a private water corporation is responsible for the quality of the water product which they deliver to the consumer. Although the State Health Department has a direct responsibility to see that water plants are operated continuously in an effective and efficient manner by qualified personnel and that the water supply to the consumer is of a safe, potable character at all times, it is the direct responsibility of the community or private water corporation to maintain adequate facilities, to process and deliver a safe and potable water supply at all times and to make necessary chemical, bacterial and biological determinations. This is also, of course, true in the area of food and drugs. In this instance, it is necessary that the industry actually determine and indicate that nothing is contained in the food or drug which may be injurious to public health. This is the type of responsibility which the dairy industry has been assuming progressively over the years. As the number of dairy farms and pasteurization plants decrease, with larger dairy farms and pasteurization plants increasing and with fewer companies encompassing larger areas, it is progressively more important that these companies become more directly involved with the quality control of the production, processing and delivery of their product over a large area.

It is, therefore, a matter of economics and efficiency that the milk industry continues to recognize and accept its expanding responsibility. In the past, some areas of the State received little routine inspection of dairy farms from health agencies. Consequently, the quality control on the dairy farm was done by industry itself. On the other hand, there are areas where dairy farm and processing plant inspection involves duplicate, triplicate and quadruplicate inspections. Duplicate inspections are inefficient and it is impossible for the farmer or processor to conform to the many different interpretations and recommendations made concerning one item. This duplication of inspection, or in some cases no inspection at all, by health agencies can be eliminated only through a coordinated industry inspection and quality control by its own facilities. The health agencies will maintain their responsibility by spot-checking the dairy farms, milk processing plants and laboratory facilities to make certain that the work was not only being done but being done in a satisfactory manner. This role of the New York State Health Department makes it impossible for the New York State Health Department to certify milk supplies shipped intra-state from one community to another without requiring duplicate and triplicate inspections. Industry is able to pool its inspection staffs and to use its own inspectors over as large an area as is feasible.

Actually industry is already in this field and has the best opportunity of anyone to make certain that dairy farms are satisfactory. This, of course, refers to the first time that a dairy farmer is taken on as a producer. This, of course, is the golden opportunity to make certain that all sanitary conditions on the dairy farm are satisfactory to the industry intending to purchase that milk. Industry at this time must not accept dairy farms which have been excluded from some milk plant for not meeting code requirements. The problem cannot be solved if one milk plant excludes a dairy farm and another milk plant will accept that milk. If dairy farmers know that if they are excluded by one milk company, another milk company will not accept their milk, it will be easier to secure compliance with Health Department rules and regulations.

One of the big problems in the past, and may con-

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Responsibility Of Industry For Inspection

Continue to be a problem, is that of the uniformity of inspection of dairy farms and processing plants. Industry and Health Department personnel must, as possible, be able to look at the same condition on a dairy farm or pasteurization plant and arrive at the same interpretation of the code and recommendation. I am certain we are all familiar with trying to interpret what is adequate lighting on a dairy farm. One inspector may say lighting is adequate if there are a certain number of foot-candles at a specific area. Another inspector may say lighting is adequate if he can read the score sheet in the darkest part of the barn. These two inspectors would probably have different recommendations. These are the kinds of problems which must be solved. Training must be provided to industry and health agency personnel so as to develop uniformity of interpretations and recommendations. The milk industry has taken a big step in this direction by its adoption of a uniform industry score sheet for dairy farms. The New York State Health Department has and will continue to assist in the training of industry dairy inspectors, so that a satisfactory and uniform inspection can be made of all dairy farms throughout New York State. Training for uniformity of interpretation and recommendation involving joint field inspections by industry and health agency personnel is necessary.

There is, therefore, no change in the basic responsibility of the dairy industry for the quality control of its milk product, but merely a restatement of this responsibility with an indication of definite activities which they must undertake. The health agencies will continue to assume their full responsibility for the overall protection of the milk supply sold to the consuming public. With fewer large dairy farms and fewer large pasteurization plants, it is more economical and efficient for industry to increase specific activities in the production, processing and delivery of milk. This can be accomplished through continued mutual respect and cooperation.

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