

## **J. Armstrong, Montana Milk Laboratory Supervisor and LEO, Synopsis of Milk Laboratory Functions and Role**

- 1) Each state is responsible for the oversight of all raw and finished milk and finished milk products made in their state. This is the structure of the system.
- 2) Milk Lab analyzes samples utilizing up to approx. 27 different regulatory and non-regulatory testing procedures depending on product type and testing requested.
- 3) Support the Sanitarians in the Milk Testing Program with testing results (see #2 above).
- 4) Maintain certification to comply with required regulatory testing through a valid qa/qc program, complying with annual FDA splits testing and Triennial On-Site Laboratory Evaluation (again, see #2 above-it all goes back to validating our testing results)
- 5) Provides direct oversight of regulatory testing by all plant laboratories in the state. The Laboratory Evaluation Officer duties are:
  - a) Supervising regulatory testing compliance to 2400 forms (FDA/NCIMS requirements) and adherence of each plant laboratory to the Grade 'A' milk program.
  - b) Training of analysts in the required testing procedure(s) of their choice.
  - c) Conducting an annual Montana Splits testing proficiency testing program. Write a report and send to FDA/LPET.
  - d) Conducting On-Site Laboratory Evaluations of each plant laboratory on a biennial time line OR as needed. Write a report for each event and send to FDA/LPET.
  - e) Review monthly reports from each plant laboratory. Monitor for continued compliance. Take actions, if needed. (ie. additional training, additional audits, call for additional records, etc.)
- 6) See attached document for additional "what do we do" and "what we are required to do" in some more detail.

### **Potential Impact of loss of laboratory to the State and producers**

- 1) No compliance monitoring for the Grade 'A' milk program in the state. Testing of samples is time critical. Long travel time of samples may make remote testing untenable. Some certified entity would also have to take over this testing responsibility (other state's laboratories) and if not, milk production in the state could be affected.
- 2) No more small plants in the state. They would likely not be able to get support like the larger plants.
- 3) Pay another state to administer program. Costs uncertain.
- 4) Raw milk could not be monitored if legalized sale was granted.

### **What will it mean to lose it for the producers?**

- 1) Narrows the market to sell your product. Fewer plants that may be willing to accept your product.
- 2) Transportation costs could increase.