



International Dairy Foods Association
Milk Industry Foundation
National Cheese Institute
International Ice Cream Association



Voluntary Guidelines for Security of Raw Milk at the Farm

The International Dairy Foods Association and the National Milk Producers Federation have developed security guidelines to enhance dairy security and ensure dairy products are protected. Additionally, these guidelines will help prevent safe milk from being unnecessarily destroyed. These voluntary guidelines are provided as general advice. Individual farms or companies may choose to modify these guidelines to increase the level of security according to their specific needs and circumstances. These guidelines also serve as a companion to the previously released *Voluntary Guidelines for Sealing Raw Milk Tankers*.

Background

Food has historically not been considered a focus for terrorism, but with recent events around the world, increased efforts to protect the safety of our food supply are prudent. High level government intelligence and industry leaders have indicated the need to evaluate and adapt countermeasures to eliminate the exposure of our food supply to acts of terrorism or lone-wolf vandalism.

The Federal Anti-Tampering Act makes it a federal crime to 1) tamper with a food product, 2) threaten to tamper with a food product, and/or 3) file a false report alleging product tampering. The Act further provides for prison sentences of up to life in prison as well as monetary fines for violations. While the Act addresses some product safety and procedures that need to be in place to prevent intended acts of terrorism or vandalism, the Act is most effective in prosecution, and falls short in terms of prevention. Thus, additional actions to prevent opportunity for a tampering are needed.

Initial steps to block potential avenues of product contamination have focused a great deal on security at and within farms and processing plants as well as sealing bulk milk tankers. With that accomplished, focus on other vulnerabilities is necessary. Specifically, the raw milk supply on the farm prior to pickup needs to be examined. In particular, areas where raw milk is stored on the farm should be secure when the dairyman or their employees are not present in the facility.

The proposal detailed below is a series of procedures designed to reduce the risk of deliberate contamination of raw milk during the various steps employed in the collection and storage of raw milk at the farm. The ultimate goal is to have the milk secure at all times, either by having individuals present, or by preventing access to milk storage areas.

General Guidelines

1. During normal operations, employees need to be aware of the working environment. Employees should be adequately trained to watch out for inappropriate individuals or actions on the farm, and, in particular around the milking and milk storage areas.
2. Answering machines should be used at the dairy to record any malicious or threatening phone calls.
3. The boundary of the farm should be secured to the greatest extent possible. “No Trespassing” signs should be posted.
4. Alarms, motion detection lights, cameras, and/or other appropriate security equipment should be used in key areas, as needed.
5. A system to identify employees and visitors should be developed. This system should include a schedule for arrivals and departures of any visitors to the farm. Visitors include delivery and maintenance personnel, inspectors, veterinarians, etc. Ideally, such a system will include keeping a record of who visits the farm.
6. All hazardous materials and potential adulterants should be kept under lock. This includes chemicals used for cleaning and sanitizing as well as drugs used to treat animals.
7. Access to milking or milk storage areas should be limited to only essential personnel.
8. If an owner or employee is not in the immediate vicinity of the milking or milk storage areas, those areas should be locked. Arrangements must be made with the State regulatory agency, when applicable, to ensure that they have access to areas needed for routine inspections.
9. Keys to locked areas should only be provided to known individuals who need access to the milking and milk storage areas.
10. If at any time a previously locked area is found to be unlocked or evidence of break-in is found, the cooperative or plant should be contacted immediately. In addition, the milk should be held until an investigation determines that no tampering has occurred.