



COVID-19 Dairy Processing and Manufacturing Plant Inspection Approach

Conducting food safety-based inspection work is important to ensuring our food supply remains safe. This work is especially important to ensure that the disruptions in processes and procedures that occur during an emergency do not impact food safety. Inspection staff are expected to follow all biosecurity and health precautions instituted by dairy manufacturers during in-person visits and MDA's primary inspection approach will continue to be in-person inspection work.

However, MDA understands some facilities may be concerned about allowing inspectors to visit their facilities. During the COVID-19 situation, MDA Dairy Inspection staff are willing to conduct routine inspections 'virtually' upon request of the dairy processing facility in lieu of conducting an in-person inspection. The following guidance describes the approach that will be used for conducting these inspections.

Records Review

Facilities opting for a virtual inspection will be required to submit copies or photos of the following records for review by inspection staff:

All plants (Grade A and Manufacturing Grade):

- All pasteurization records (HTST, HHST, VAT, Aseptic, etc) CIP Records for all CIP Circuits within the plant and receiving area
- Milk storage silo records demonstrating empty and wash cycles
- Copies of letters for Boiler additives and glycol compliance
- Results for any pasteurizer testing that has been completed by plant personnel that have been certified by the State Certified Industry Resealer program (CITPRR)

Grade A Plants Only:

- Bills of Lading for IMS Listed Grade A Plants for ensuring source milk is from IMS listed BTU's and/or plants
- Packaging materials source verification records or documents for ensuring packaging materials are from an IMS listed source
- Daily Vitamin verification logs, to include the required yearly Vitamin Assay conducted by the plant
- Bills of Lading and Food Grade Certification letters for Resin being used in IMS listed single service plants

Please note, for all records requested, 3 months of records would be required for Grade A and 6 months for Manufacturing Grade plants.

Virtual Inspection

Arrangements with plant personnel will be made to conduct virtual or video-based inspections using commonly available technology such as Facetime or Zoom. Video-based inspections will strive to cover as many areas of the plant as feasible, including:

- Water Supply
- Raw Milk Receiving
- Outer Surroundings of the Plant
- Raw Milk Storage Vessels
- Processing Rooms and Equipment
- Finished Product Storage Rooms

If inspection time is limited, inspectors will focus inspections on areas necessary to verify that previous violations noted have been corrected and on food contact surfaces and equipment.

Pasteurizer Timing Inspections

Because of the importance of pasteurizer testing in ensuring pasteurizers are functioning properly, in-person work will still be expected. However, if concerns exist, the following concepts will be used to develop an acceptable alternative, to be implemented on a case-by-case basis:

- If regulatory seals are not broken, in-person testing can be delayed until a later time; however, it will not be delayed indefinitely.
- If a regulatory seal breaks, certified industry personnel can be delegated to conduct the timing and resealing procedures necessary to get equipment running. Normally, the inspector would verify the reseal within a short period after the original break, however, if an in-person inspection is not feasible, this verification can be delayed provided the plant follows the standard operating procedures.
- If the plant does not have certified industry personnel, phosphatase sampling by the plant may be used to verify equipment is running correctly, but only in situations where in-person testing and timing is not possible.

Per normal procedures, if pasteurization equipment is found to be malfunctioning, products may be subject to a recall due to improper pasteurization. If the testing has been delayed, larger amounts of product would likely be implicated and the impact of such an action is magnified.

Inspections in Response to Adverse Findings or Food Safety Issues

Virtual inspections will only be allowed for routine inspections and only during the COVID-19 emergency. The following guidance will be applied to determine inspection approach for other types of inspections:

- Any for-cause inspections or investigations will be completed in-person unless extreme extenuating circumstances exist.
- If a virtually conducted inspection shows significant issues, an in-person follow up inspection will be conducted. Significant issues may include, but are not limited to:
 - Food contact surfaces that are not clean
 - Allergen issues identified in product handling, labeling or ingredient management

- Improper product holding temperatures
- Complaints identifying significant processing or food safety issues
- Other food safety related issues

MDA staff will maintain the authority to conduct on-site and in-person inspections when deemed necessary for maintaining public health.