

2025 PMO Changes

Below are all of the proposals that were accepted and a brief description of what changed.

Proposal	What Changed	Impact
101	Editorial/PMO update	Minor wording and clarification changes.
102	Updated requirements for dairy farm milkhouses, direct loading, milk tank truck cooling/storage, sampling procedures, inspection forms (2359a & 2359k), and related administrative procedures.	Modernizes requirements for farms using direct-loading systems and milk tank trucks while maintaining sanitary protections. Clarifies inspection expectations.
105	Farm bulk tank washing requirements updated. (Originally FDA non-concurred but later accepted.)	Clarifies acceptable cleaning procedures for farm bulk tanks.
106	PMO revision.	Administrative/technical clarification.
107	PMO revision.	Administrative/technical clarification.
108	PMO revision.	Administrative/technical clarification.
109	Allows cream to be added after pasteurization during yogurt manufacture.	Gives yogurt manufacturers more production flexibility while maintaining product safety.
112	PMO revision.	Clarifies existing requirements.
113	PMO revision.	Clarifies existing requirements.
114	PMO revision.	Clarifies existing requirements.
115	Updates magnetic flow meter timing systems for processes operating above pasteurization temperatures.	Modernizes equipment requirements for higher-heat processing systems.

Proposal What Changed		Impact
117	Updated milk plant equipment test report and PMO language.	Revises inspection documentation and equipment testing procedures.
118	PMO revision.	Administrative clarification.
119	PMO revision.	Administrative clarification.
120	PMO revision.	Administrative clarification.
122	PMO revision.	Administrative clarification.
124	PMO revision.	Administrative clarification.
125	PMO revision.	Administrative clarification.
128	PMO revision.	Administrative clarification.
203	Added a formal definition for Dairy Plant Sampler and added Direct Loading as a defined term.	Establishes standardized terminology for regulatory programs.
206	Revised certified industry inspector reciprocity and recertification procedures.	Allows greater flexibility in recognizing certifications from other states and simplifies recertification.
208	Clarifies reporting of presumptive-positive and confirmed-positive drug residue results and sheep milk testing procedures.	Improves consistency in residue reporting and sheep milk testing.
210	Removes references to "target testing levels" throughout Appendix N and updates drug residue language. Originally non-concurred but later accepted.	Aligns the PMO with FDA's current approach to drug residue enforcement and terminology.
213	Updated Milk Tank Truck Inspection Report (2399b).	Revises inspection documentation.
215	PMO revision.	Administrative clarification.

Proposal What Changed		Impact
217	PMO revision.	Administrative clarification.
219	PMO revision.	Administrative clarification.
220	PMO revision.	Administrative clarification.
228	Revised definition of an Officially Designated Laboratory to include certain commercial laboratories authorized by regulatory agencies.	Expands who may perform official laboratory work under PMO requirements.

Overall, the 2025 PMO revisions focus on four major themes:

Updating requirements for direct loading of milk and allowing greater flexibility in the use of milk tank trucks for on-farm cooling and storage. These changes establish clear sanitary design, sampling, and inspection requirements that accommodate modern dairy operations without compromising milk safety.

Another significant area of change involved the drug residue testing program. The PMO was updated to remove outdated terminology related to "target testing levels" and better align Appendix N with current FDA policies and enforcement practices, providing greater consistency in how drug residue testing is conducted and interpreted across the industry.

The Conference also approved changes that expand the definition of Officially Designated Laboratories to include authorized commercial laboratories, increasing laboratory capacity while maintaining regulatory oversight.

Additional revisions updated requirements for farm bulk tank cleaning, modernized standards for magnetic flow meter systems used in higher-temperature processing, and permitted the post-pasteurization addition of cream during yogurt production. New definitions, updated inspection forms, and revised certification procedures further improve clarity and consistency for both regulators and industry.

2025 Evaluation of Milk Laboratories (EML)

Key Differences

Proposal	Area Changed	2025 Change
227	Definitions and Drug-Residue Laboratory Roles	Adds/updates definitions and clarifies the roles of CISs, IAs, and ISs in screening raw milk

		supplies for drug residues. Updates the definition of an officially designated laboratory and clarifies which industry personnel may perform drug-residue testing.
228	Officially Designated Laboratories	Expands and clarifies the definition of officially designated laboratories and adds restrictions concerning official regulatory samples from facilities under common ownership or management.
229	Conditional Analyst Certification	Creates a conditional certification pathway based on training, on-site evaluation, split-sample performance evaluation, and eventual full certification.
230	Proficiency Testing	Reduces the minimum proficiency-testing sample number to 6 samples for specified automated methods.
231	LEO Equipment	Adds a list of equipment and apparatus to assist Laboratory Evaluation Officers during on-site laboratory evaluations.

Overall difference: The 2025 EML clarifies drug-residue testing roles, expands officially designated laboratory requirements, creates a conditional certification pathway for analysts using similar methods, reduces certain automated-method proficiency testing from 14 samples to 6, and provides a defined equipment reference list for Laboratory Evaluation Officers.

2025 MMSR: Key Differences

Methods of Making Sanitation Ratings of Milk Shippers and the Certifications/Listings of Single-Service Containers and/or Closures for Milk and/or Milk Products Manufacturers

Proposal	Area	2025 Change
JC-2	Animal Health / Disease Testing	Updates references to current federal animal-disease regulations and shifts specific regulatory disease-testing requirements toward the appropriate State Animal Health Officials and USDA APHIS Veterinary Services.
222	Single-Service Container & Closure Manufacturer Ratings	Adds an option for a 24-month rating frequency with biannual regulatory inspections, reducing the frequency of ratings and inspections for qualifying facilities.
223	IMS Product Codes	Places IMS-listed retort products within the same product-code category as aseptic products, providing a product code for retort products.

Overall difference: The 2025 MMSR generally modernizes and streamlines the program by updating animal-health provisions, providing a less burdensome rating option for qualifying single-service container and closure manufacturers, and formally classifying retort products within the IMS product-code system.

Source: 2025 NCIMS Conference actions and MMSR changes.

2025 NCIMS Procedures: Key Differences

Procedures Governing the Cooperative State-Public Health Service/FDA Program

Proposal	Area Changed	2025 Change / Difference
302	Editorial Updates	Clarifies and formalizes PHS/FDA authority to update the Constitution, Bylaws, PMO, MMSR, Procedures, EML, and NCIMS Forms under jointly developed guidelines.
303	PHS/FDA Check Ratings	Adds requirements for specialized training, random selection of IMS-listed shippers, representative coverage, and limits on check-rating frequency and timing.
306	SRO Certification	Creates a new detailed certification procedure covering application requirements, certification categories, side-by-side evaluations, an 80% agreement standard, minimum facility evaluations, and three-year recertification.
307	Sampling Surveillance	Clarifies eligible sampler categories and requires three-year recertification and submission of joint-evaluation reports to PHS/FDA.
308	Terminology / International Certification Program	Updates terminology to “U.S. Territories” and makes corresponding updates to related NCIMS governance provisions.
310	NCIMS Governance	Primarily updates Executive Secretary responsibilities in the Constitution and Bylaws; no major substantive change to the Procedures themselves.

Overall: The largest substantive change is Proposal 306, which establishes a much more detailed and standardized process for certifying and recertifying State Rating Officials.