

New Zealand Dairy Products

27 November 2008

Advice to Importers

1 Summary

New Zealand is a major exporter of dairy products to over 140 countries and its dairy industry operates in accordance with best international practice as defined by Codex. New Zealand products have not been affected by the occurrences of melamine in China. NZFSA operates integrated regulatory controls from the farm through to export which provide a high level of assurance to both New Zealand domestic consumers and those of our export markets. All exporters of dairy products are required to be registered and operate in compliance with New Zealand sanitary laws as well as meet the market access requirements of any market they export to. NZFSA controls food imports and ensures the identity and integrity of all dairy product exports. You can be assured of the safety and quality of NZFSA certified export consignments.

2 Further Information

New Zealand has strong regulatory and industry controls which meet or exceed best international practice. Importing country competent authorities can be assured of the safety and identity of dairy products certified by the New Zealand Food Safety Authority (NZFSA).

A general overview is provided in this letter of; the regulatory requirements from farm through to export; the nature of feeding practices; the control and monitoring of veterinary drugs and contaminants (including melamine); regulatory oversight and verification of the dairy industry; and test results and test methodology for melamine.

In relation to melamine;

- There have been no regulatory recalls/returns of New Zealand milk powders or infant formula from China to New Zealand.
- Milk of New Zealand origin has not been implicated in Chinese product found to contain melamine.

New Zealand dairy export products do not contain Chinese dairy ingredients.

2.1 Dairy Farm and Processing Risk Management Programmes (RMPs)

The New Zealand Animal Products Act 1999 requires that every person who produces, manufactures, stores or transports milk or dairy products must do so in accordance with a risk management programme registered by NZFSA. The Animal Products (Risk Management Programme Specifications) Notice 2008 contains minimum standards for risk management programmes for farm dairies, product manufacture, transport and storage. The identification, analysis and control of hazards is based on Codex HACCP principles. Other technical requirements are contained in the Animal Products (Dairy Processing Specifications) Notice 2006.

Dairy operators are legally obliged to comply with the requirements of their approved risk management programme and this programme is the basis of verification and monitoring to confirm that the regulatory procedures in the programme are being followed.

In relation to farm dairy risk management programmes these must contain the following measures for the control of residues from veterinary medicines.

Where milking animals are treated with veterinary medicines:

- the use is appropriate, and recognised for the condition being treated in milking animals;
- the product is NZFSA registered for use on lactating dairy animals;
- the farm dairy operators accurately follows the instructions on the label, provided by a veterinarian, or provided under an NZFSA recognised code of practice;
- the farm dairy operator uses the medicine as instructed, to avoid residues;
- the treated animals are clearly identifiable; and
- milking practices ensure no inadvertent contamination of the milk intended for supply.

Each farm dairy risk management programme contains the following measures for the control of pesticide residues and other contaminants:

- Locating and designing farm dairies to minimise the risk of contamination during milking.
- Excluding from sale milk that may be contaminated with extraneous substances, toxic substances, or pesticides, capable of rendering raw milk unsafe.
- Ensuring that the milking plant used is designed and maintained so that materials and substances coming into contact with milk do not contaminate the milk or cause it to deteriorate.
- Ensuring that milk receiving areas and milk storage areas protect milk against manure, dust and other contamination, objectionable smells, birds, rodents, insects, and other vermin.

- Ensuring that milking plant in farm dairies is:
 - cleaned to minimise the risk that milk may deteriorate or be contaminated;
 - cleaned only with approved detergents and sanitisers; and
 - cleaned to minimise the risk of contaminating milk with the detergents and sanitisers.
- Minimising the risk of the contamination of milk by pesticides by:
 - preventing the storage of pesticides and similar substances in farm dairies; and
 - controlling the use of pesticides and similar substances in or near farm dairies.

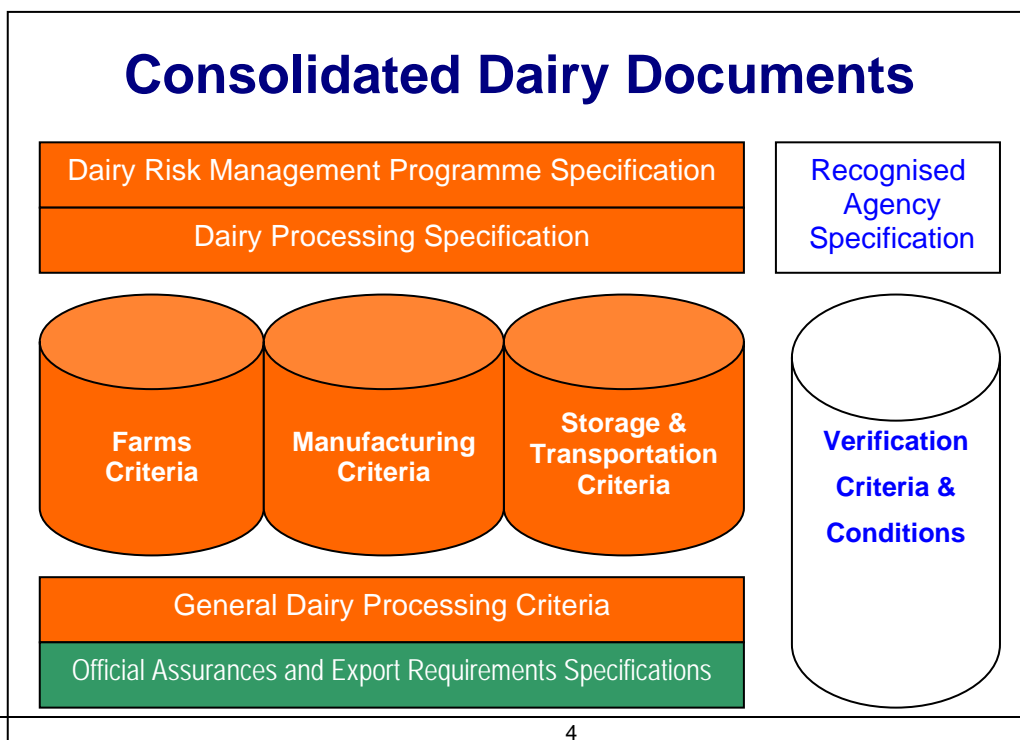
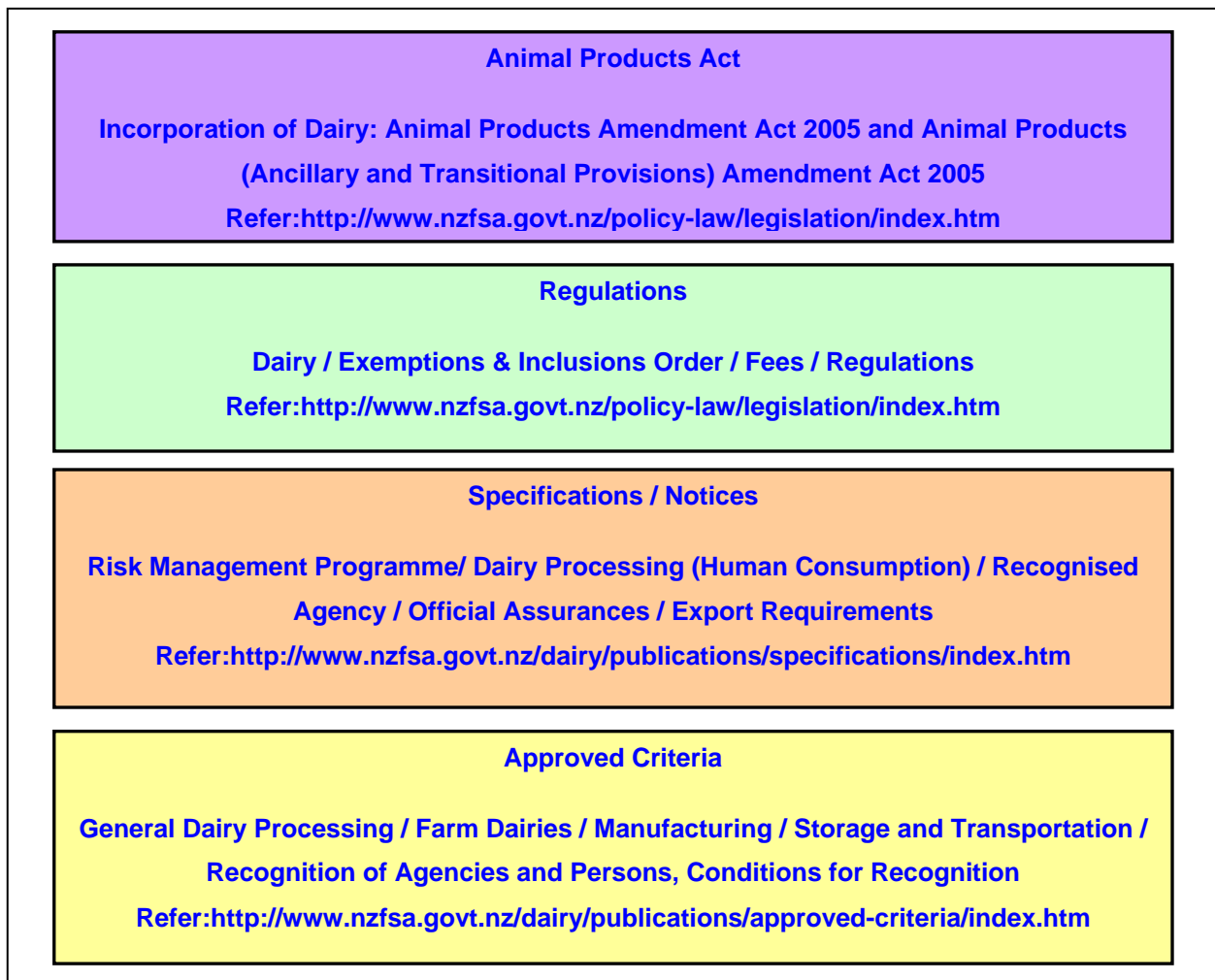
All farm dairy risk management programmes must specify the steps to be taken if any dairy material or product is found or suspected not to be safe.

A farm dairy assessor must regularly assess each farm dairy to confirm that they comply with the requirements of the risk management programme. Farm dairy assessors are required to meet the minimum competency requirements specified by NZFSA.

2.2 Export Controls

The Animal Products Act provides for the issuing of official assurances (export certificates) and the publishing of overseas market access requirements. Exporters (as well as primary producers) of animal material and products are required to be registered with NZFSA. The [National Programme for Monitoring Chemical Contaminants and Residues in Raw Milk and Dairy Products \(NCCP\)](#) has further details concerning registration of exporters, exporter duties and offence and penalty provisions. It should be noted that the penalties for endangering public health are severe with a maximum penalty of 5 years in prison.

2.3 Legal Framework for Milk and Milk Products



2.4 Feeding Practices

New Zealand dairy production is substantially based on cows grazing grass with very limited use of any other feedstuffs. This coupled with New Zealand's temperate climate and geographical isolation results in New Zealand having a very high animal health status and a relatively low use of veterinary drugs and agricultural chemicals.

2.5 Residues and the National dairy Residue (and Contaminant) monitoring programme (NCCP)

In New Zealand, the relevant controls and practices, which ensure chemical residues in food do not pose a risk to human health, are considered to be the result of the following:

- Geographical isolation and effective border controls.
- Farming and manufacturing systems which require minimal chemical input.
- Regulatory (including registration) systems based on international market standards and requirements, but which also strive to meet the needs of producers, thereby eliminating motivation to source products that are not registered for the intended use.
- Restricted distribution through the veterinary profession of products where appropriate.
- On-farm and in-factory quality systems and export focussed farmers and industry.
- Regulated control of milk acceptance
- A robust national residue (and contaminant) monitoring programme

In relation to the national residue (and contaminant) monitoring programme (NCCP) the key points of note are;

- i. The NCCP is statistically based following Codex guidelines
- ii. The NCCP monitors 245 substances.
- iii. The NCCP yields 93,000 individual annual results
- iv. Since 2000 the NCCP has increased the average number of substances monitored almost 4 fold.
- v. The NCCP has captures all banned substances as specified for milk by European Council Directive 96/23/EC, as set out in Annex IV to Council Regulation 2377/90/EC.
- vi. The NCCP programme tests for Melamine using the LC MS/MS

2.6 Melamine Analysis

NZFSA recognised laboratories have methods approved for the analysis of melamine in milk and dairy products. NZFSA has developed specifications to ensure that; sample preparation and analyses are appropriate for all dairy sample matrices, minimum laboratory analytical performance requirements are met, and the accuracy of reported results. LC-MS/MS is the required confirmation procedure.

2.7 Melamine test results

The following summarises the raw milk and infant formula testing for melamine under the NZFSA National Chemical Contaminant Programme (NCCP) to date:

Raw milk at farm	50 samples	No melamine detected
Raw milk at factory	19 samples	No melamine detected
Infant formulas	14 samples	No melamine detected
Other bulk dairy products	378 samples tested	No melamine detected

(Included samples of cheese, butter, milk powders, whey protein powders, Na caseinate, casein, lactose, AMF)

2.8 NCCP laboratories accreditation and approval

Laboratories testing samples from the NCCP are accredited to ISO 17025 – General Requirements for the Competence of Calibration and Testing Laboratories, by International Accreditation New Zealand (IANZ).