

Imported food requirements: Soy sauce

Recent Updates:

From 17 August 2009, imports of soy sauce do not require monitoring at the border and do not require NZFSA clearance for sale.

Date	Location	Information
1 July 2009	Section 1.0	Structure revised.

1.0 Scope

1.1 The purpose of this Imported Food Requirement is to provide administrative guidance to a Food Act Officer (FAO) as to the matters they may take into consideration when determining whether they have been satisfied by a person who imports food into New Zealand that the food complies in all respects with-

- (a) All relevant provisions of the Food Act 1981; and
- (b) All relevant provisions of any regulations made pursuant to the Food Act 1981; and
- (c) All applicable food standards.

Nothing in this Imported Food Requirement limits the powers of a FAO appointed under the Food Act 1981.

1.2 Legislative requirement: [Food \(Prescribed Foods\) Standard 2007](#)

- Products covered under the scope of these requirements are Prescribed Foods for the purpose of import into New Zealand (Section 11P, Food Act 1981).
- No person may import these products into New Zealand unless that person has satisfied an officer that the food complies.

1.3 This Imported Food Requirement sets out clearance options and procedures for importers of prescribed foods that an importer may follow when aiming to satisfy a FAO that the food complies with the Food Act 1981.

1.4 These clearance options and procedures apply in addition to and after a prescribed food has gained clearance from MAF Biosecurity New Zealand. Importers should check those requirements at: [MAF Biosecurity New Zealand](#).

1.5 Products include:

- Soy sauce
- Flavoured soy sauce
- Sauce mixtures with a soy sauce base.

1.6 Products excluded:

- Sauces that do not contain soy sauce.

1.7 [Tariff codes targeted](#)

1.8 Food safety hazard: 3-chloro-1, 2-propanediol (3-MCPD) and 1, 3-dichloro-2-propanol (1, 3-DCP).

1.9 Import permitted with conditions from: All countries.

2.0 Importer Clearance Options

2.1 The clearance options and procedures in this Imported Food Requirement apply to **soy sauce** products and are in addition to clearance requirements detailed in the [Import Clearance Procedure](#).

2.2 Importers must also meet the requirements of the Food (Importer Listing) Standard 2008 and the Food (Importer General Requirements) Standard 2008. Importers should also read and understand the [Food Importer Standards Guidance](#) before sourcing products to import.

2.3 For **soy sauce** products, importers have a responsibility under the Food (Importer General Requirements) Standard 2008 to ensure imports are of minimal risk for chemical contamination. Two chemical contaminants are 3-chloro-1, 2-propanediol (3-MCPD) and 1, 3-dichloro-2-propanol (1, 3-DCP), which may cause cancer if consumed over a long period of time. Soy sauces that have been produced with added acid hydrolysed vegetable protein (acid-HVP) are at higher risk of containing these contaminants. The presence of 3-MCPD and 1,3-DCP in soy sauce is avoidable. They are usually produced by the addition of acid hydrolysed vegetable protein (acid-HVP) to the sauce to accelerate production. Use of HVP removes the need for the long fermentation process traditionally used for soy sauce production.

2.4 The following two options are available to importers when they are aiming to satisfy a FAO that the food complies with the Food Act and can therefore be cleared:

Option 1 - Clearance sampling and testing on arrival in New Zealand

In the absence of a multiple release permit (MRP), **soy sauce** products are sampled and tested in New Zealand.

Products will be tested for 3-chloro-1, 2-propanediol (3-MCPD) and 1, 3-dichloro-2-propanol (1, 3-DCP)

Sampling and testing should be in accordance with [NZFSA's sampling and testing protocol](#).

Option 2 - Multiple Release Permit (MRP)

MRPs are issued for imported prescribed foods that are:

- Inadvertently captured by the tariff codes monitored by the NZFSA, and /or
- From particular suppliers under an arrangement agreed to by the importer and NZFSA.

Importers wishing to apply for a MRP should contact the Advisor (Food Service, Sale and Import) in the NZFSA Approvals Group at (04) 894 2500 or email approvals.fssi@nzfsa.govt.nz to discuss their situation prior to completing a MRP application form.

3.0 Clearance Procedures

3.1 Documentation checks

Not applicable

3.2 Physical inspections

Not applicable

3.3 Clearance sampling and testing on arrival in New Zealand

Sampling and testing should be in accordance with [NZFSA's sampling and testing protocol](#).

Samples:

- Samples should be taken for each product type, eg, same size bottle/packet/sachet, variety, brand and is manufactured by the same company etc.
- Number of samples per lot = 1.
- Each lot sample must have a total volume of at least 175ml.

- Individual units or packets should be sampled if these are available.
- The laboratory may composite samples that represent a lot when required eg, 30 x 6ml sachets.
- All samples should be tested for 3-MCPD.
- If the result for 3-MCPD is above 0.2 mg/kg calculated on a 40% dry matter content, the lot should be rejected and no test for 1, 3-DCP is required.
- If 3-MCPD is present at a concentration between the limit of 0.2 mg/kg and 0.005 mg/kg when calculated on a 40% dry matter content, then the lot should be tested for 1, 3-DCP.
- If 3-MCPD is below 0.005 mg/kg calculated on a 40% dry matter content, then no test for 1, 3-DCP is required.

Clearance criteria: The following criteria should be used when deciding if a consignment captured by these requirements is safe to be released:

- Maximum levels as set by the Australia New Zealand Food Standards Code. Levels may not exceed the following:
 - 3-chloro-1, 2-propanediol (3-MCPD), 0.2 mg/kg calculated on a 40% dry matter content.
 - 1, 3-dichloro-2-propanol (1, 3-DCP), 0.005 mg/kg calculated on a 40% dry matter content.

Reject criteria:

- FAO may REJECT lots that:
 - Exceed 3-MCPD limit.
 - Exceed 1, 3-DCP limit.
- FAO may reject any untested lots in the consignment.
- Procedures for rejected lots and untested lots are described in [NZFSA's sampling and testing protocol](#).

3.4 Multiple Release Permit (MRP)

For holders of an MRP, the import agent will use the permit number to clear the products. Holders of an MRP should maintain an agreed imported food surveillance (sampling and testing) programme for the products covered by the MRP.

3.5 Management of non-compliant consignments

When clearance cannot be given because of non-compliance with import requirements, all determinations on disposition of non-complying consignments should be made in full consultation with NZFSA (or a representative nominated by NZFSA). This will facilitate appropriate corrective action and communication with relevant entities.

3.6 Contact details for border clearance agency

First stop for importers seeking more information.

Central Clearing House

NZFSA Verification Agency

Level 1, 96 New North Road, Eden Terrace, Auckland

PO Box 3540, Eden Terrace, Auckland

Email: imported.food@nzfsa.govt.nz

Fax: 09 909 6208

Phone: 09 909 6210 or 09 909 6211

To be notified of changes and updates to NZFSA's website, including import requirements, go to the [NZFSA website Notifications page](#).

4.0 Tariff Codes Targeted

Prescribed foods are targeted at the border using the New Zealand Customs tariff code system.

A tariff code is a number used for Customs purposes to classify goods. An import agent or customs broker may be able to assist with interpretation of the tariff code.

Importers who are importing **soy sauce** products under tariff codes not listed below should notify NZFSA Central Clearing House. CCH will notify NZFSA of the need to review the tariff codes targeted.

Inadvertent captures

As the tariff classification system is not designed specifically around the imported food regime, some food products may be inadvertently captured by the targeted tariff codes listed. If this is the case, products will not be subject to the requirements outlined in this document. Importers may apply to NZFSA for a multiple release permit (MRP) to facilitate clearance.

Products classified with the following tariff codes are captured under this requirement:

Tariff codes targeted for soy sauce	
2103 Sauces and preparations therefore; mixed condiments and mixed seasonings; mustard flour and meal and prepared mustard	
2103.10.00.00G	Soy Sauce
2103.90.00.01D	Other Sauces Not Elsewhere Specified
2103.90.00.29D	Other Sauces & Preparations (Not Mixed Condiments Or Seasonings, for Tahini & Soy Sauce Certain Suppliers Only)