FOOD SAFETY AND STANDARDS AUTHORITY OF INDIA

Inspiring Trust, Assuring Safe & Nutritious Food

Ministry of Health and Family Welfare, Government of India

Study Visit to New Zealand

Tour Report

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Objective

The objective was to work out the modalities for implementation of the Food Safety cooperation Arrangement (FSCA) signed between Food Safety and Standards Authority of India (FSSAI) and Ministry of Primary Industry (MPI), New Zealand

FSSAI: has been established under Food Safety and Standards, 2006 which consolidates various acts & orders that have hitherto handled food related issues in various Ministries and Departments. FSSAI has been created for laying down science based standards for articles of food and to regulate their manufacture, storage, distribution, sale and import to ensure availability of safe and wholesome food for human consumption.

MPI: MPI helps to maximise export opportunities for our primary industries, improve sector productivity, ensure the food we produce is safe, increase sustainable resource use and protect New Zealand from biological risk.

FSSAI, India Delegation

1. Sh. Pawan Agarwal Chief Executive Officer, FSSAI, New Delhi
2. Mrs. Pallavi Pravin Darade, Commissioner of Safety, Maharashtra
3. Sh. Deba Prasad Guha, Joint Director, Eastern Region, FSSAI, Kolkata
4. Sh. Prabhat Kumar Mishra, Assistant Director, Regulatory Compliance, FSSAI, New Delhi
5. Dr. Monica Puniya, Assistant Director (Technical), Quality Assurance, FSSAI, New Delhi

MPI, New Zealand Delegation

1. Jarred Mair, Deputy Director-General Policy & Trade
2. Tim Knox Director - Market Access Policy & Trade
3. Bill Jolly- Chief Assurance Strategy Officer Market Access, Policy & Trade
4. Felicity Bloor- Counsellor Market Access, Policy & Trade
5. Neil Kennington- Regional Agricultural Attaché New Zealand High Commission, New Delhi
6. Tasha Williams- Specialist Adviser Market Access, Policy & Trade
7. Bruce Burdon Manager - Market Access Liaison and Cooperation Policy & Trade
8. Natalie Collins Manager - Dairy Products Regulation & Assurance

9. Rachel Harvie- Specialist Adviser, Export Assurance Food Assurance, Regulation & Assurance
10. Susan Morris- Principal Adviser Chemical & Microbiological Assurance, Regulation & Assurance
11. Raj Rajasekar- Manager - Senior Programme International Policy, Policy & Trade

Day 1: 2nd April, 2018, Wellington, New Zealand

- Received by Mr Raj Rajasekar, Manager, Senior Programme, International Policy, Policy & Trade followed by local sightseeing, a cable car experience and dinner

Day 2: 3rd April, 2018, Wellington, New Zealand

1. **Meeting with MPI officials** (Co-ordinated by Felicity Bloor, Counsellor, Market Access, Policy & Trade)

2. **Inaugural Address – New Zealand**

   By Tim Knox, Director and Lisa Winthrop, Manager, Market Access, Policy & Trade

   The New Zealand officials elaborated that their system consists the fundamentals Bio security, Food Safety, Sustainable economic development and trade. MPI has robust legislation and policy frame work for the whole chain of food safety system including import and export of Food items. The delegation went through their food safety system and observed reported as under: The points in MoU signed between FSSAI, New Delhi and MPI, New Zealand on 26th October, 2016 at New Delhi, India were also discussed.

3. **Introduction to Ministry for Primary Industries New Zealand Food Safety System,** Presentation by Bruce;

   New Zealand depends on imported foods up to 20-25% for their own consumption. There is no imposing on production and process control on imports. But they have quite strict biosecurity import requirements. Their Food Safety import controls are risk-based. On the other hand, NZ holds great share of World trade by exporting different produces as described below:

Product	NZ's share of World Production %	NZ's share of World trade %	Share of domestic production exported
Dairy	3%	35%	95%
Beef	1%	6%	86%
Sheep meat	3%	43%	90%
Wool	7%	18%	94%
Venison	n/a	42%	96%
Kiwifruit	15%	37%	96%
Pipfruit	1%	4%	65%
Wine	1%	4%	72%

Emphasis on Food Safety and Biosecurity protects not only NZ's reputation as a producer of safe food, but also protect NZ's economy, environment and human health from pests and diseases. Biosecurity is vital to NZ as they are more reliant on agriculture and their natural environment than any other developed country. NZ's biosecurity system helps protect economy and environment by reducing the risk of harmful organisms entering the country.

I. Principles and Guidelines for National Food Control Systems:

- Protecting consumers of NZ food, whether in domestic field or overseas
- Providing effective food regulation for food produced or consumed in NZ, including imported and exported food products
- Developing policies and influencing behaviours that promote the safety of food
- Consistent adherence to rules-based trading under the World Trade Organisation, CODEX Principles, Standards and Guidelines
- Value of reputation
- Robust regulatory and assurance systems
- Consistent delivery of safe and suitable products
- A credible trading partner
- Partnering with Industry
- Risk-based science based approach
- Food business operators take responsibility for producing safe food
- Consistent and equitable treatment across the food chain
- Including a risk-based import system
- Facilitation of trade and commerce
- Operate to aligned and consistent
- Food Safety Regulatory Model
- Risk Management Framework
- Policy and Legislative Framework

II. Food Safety Regulatory Model

- **Regulator and its responsibilities:**

  Ministry of Primary Industries (MPI) sets the regulatory requirements for NZ's domestic food safety system, and food exports. It undertakes auditing and monitoring of the system, verification to support assurances to export markets, and enforcement of food safety requirements where necessary. The system allows consumers in New Zealand and around the world to buy and consume products with confidence.

  MPI regulates NZ's primary production. MPI's roles include enforcing animal welfare standards across New Zealand, and mechanisms for sustainable limits and practices within our agriculture, fisheries and forestry industries. At the same time, MPI also works with central and local government to support increased productivity across the primary sector, and increased sustainable use of resources, such as water. MPI is also responsible for biosecurity system leadership. Secondly, MPI manages surveillance and readiness programmes to monitor for and respond to pest incursions when they do occur. MPI works closely with many stakeholders across the system, in particular, with the National Biosecurity Capability Network, AsureQuality, Customs, and local government. Thirdly, MPI supports the management of established pests. In doing so, MPI protects NZ's natural advantage and resources, and facilitates trade. The 'pest-free status' of many of NZ's products is critical to ongoing market access.

- **Government-Industry Agreements:** Under Government-Industry Agreements (GIAs), industry organisations and MPI can establish biosecurity partnerships. Partners will share decision-making, costs and responsibility to prepare for and respond to biosecurity incursions. A GIA will give industries a direct say in managing biosecurity risks. Industries can also work with MPI to develop an operational agreement pertaining to the specific readiness and response priorities of their industries. The first GIA was signed between Kiwifruit Vine Health and MPI in May 2014.

- **Food Regulatory Model:** During 1990s, their food safety system was prescriptive "inspection-based" form of government intervention in food safety. Now, they move to the current regulatory model represented a MAJOR SHIFT.

- **The current food safety model**: Industry is responsible for producing safe food and demonstrating they have operating systems and processes that will achieve this. The characteristics of this new model are as follows:

- Preventative system
- Requires persons who trade in food to take responsibility for the safety and suitability of that food
- Onus on food processors to demonstrate compliance
- Risk and science based system (HACCP and risk analysis)
- Supports a move from a heavily prescriptive production, processing, inspection system model to a balance of outcome-based, process-based with some prescriptive regulations.
- Compliance
- Audits and monitors the overall system
- Provides technical and policy input to laws and regulations
- Develops and sets (risk-based) standards
- Provides official assurances, including export certificates
- Defines competency criteria for, and approves or recognises the verifier
- Monitors and audits the performance of the verifier too.
- Approves, recognises or appoints other components e.g. labs
- Develops resources to help industry
- Approves and/or registers food control programmes
- Enforcement
- Independent audit to ensure food control programmes are in place, appropriate and being met
- Evaluates validity of risk management programmes
- Reports, and has a primary obligation to, the regulator
- Meets performance and competency standards and/or criteria set by the regulator, including accreditation to relevant NZ or international standards
- Initiates and/or takes action where non-compliance
- Provides ‘authorisation’ for government certification

- **Regulator Responsibility:** They may also be the verifier e.g. Territorial Local Authorities. Responsible for developing and implementing risk-based programmes (Food Control Plans, Risk Management Programmes, Wine Standards Management Plans or prescribe control schemes or national programmes). Should maintain and demonstrate compliance, engage and pay for verifiers.
- **Industry Responsibility:** They must produce food that is safe and suitable. Industry gains measurable benefits from behaviour change e.g. flexibility in process control, performance-based verification

III. Food Safety Risk Management

The risk management tool used for higher risk food is a document plan addressing different areas which may damage the final product quality. Food operators must operate under a programme that manages risks to their situation by thoroughly maintaining HACCP protocols for ensuring product safety. The tool demonstrates product safety and conformance and facilitates audit of the programme. MPI's Food Safety Risk Management Framework is based on CODEX principles which incorporate all aspects of internationally recognised risk analysis practice, i.e., Risk assessment, Risk management, Risk communication, Monitoring and review. It is consistent with World Trade Organisation SPS principles and uses International Standards.RMP facilitates a consistent approach to addressing risks and supports international best practice risk management. Being a reference point of bilateral trade negotiations, it supports equivalence agreements, removes unnecessary restrictions on trade, frees up resources in importing and exporting countries to allocate to more pressing areas or risk and reduces costs when partners follow agreed standards.

- **Food Standards Australia New Zealand**

  Australia and New Zealand work closely together to develop joint food standards. For more than 15 years, the New Zealand and Australian governments have worked together to align food safety requirements. This has resulted in agreements, structures and systems, including:

- Food Standards Australia New Zealand (FSANZ) and the Australia New Zealand Food Standards Code (the Code)
- Trans-Tasman Mutual Recognition Agreement (TTMRA)
- **Recall**

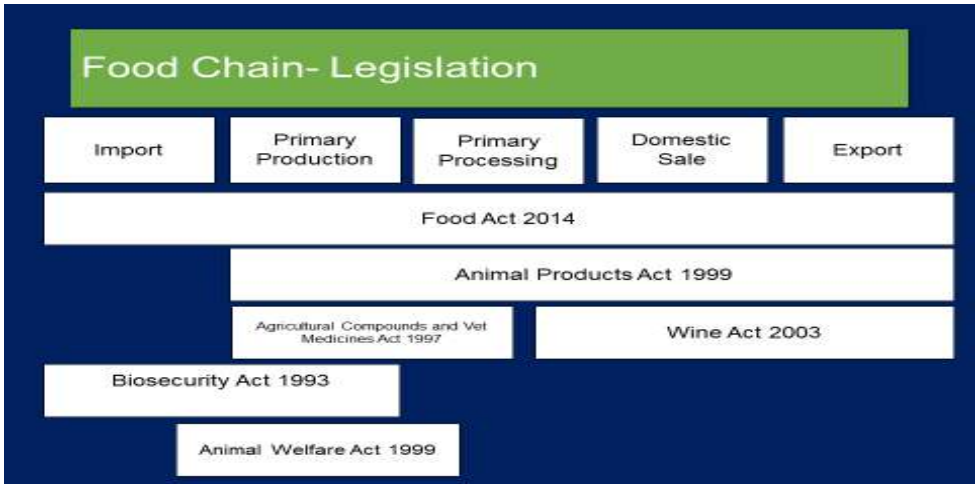
  The Food Business Operators are required to withdraw any non-conforming product from trade, report the event to their verifier and follow the procedures specified by the Director-General to ensure traceability of food inputs and product sales. MPI's monitoring programmes play a crucial role in ensuring food produced and consumed in New Zealand is safe and suitable by verifying that the food production systems are managing risks to food safety and establishing safe levels for residues, contaminants and other hazards.

- **Compliance And Enforcement**

  They have four pronged VADE approach for compliance and enforcement which is as under;

- Voluntary compliance- Achieved through education, engagement, communication.
- Assisted compliance- Interventions heavily reliant on monitoring, inspection, response.
- Directed compliance- Range of tools to direct a desired behaviour change.
- Enforced compliance- "Iron fist" / application of full extent of the law.

IV. Policy and Legislative Framework



V. Legislation

There are three main Acts that govern food safety in NZ.

- Animal Products Act 1999,
- The Food Act 2014, and
- The Wine Act 2003.

The Agricultural Compounds and Veterinary Medicines Act 1997 complement the system, indirectly impacting human food safety.

Animal Products Act 1999: The Animal Products Act applies to the production and processing of animal material and products, and has a trade facilitation role. The objectives of the Act are to ensure that traded animal products are fit for their intended purpose and to facilitate the entry of animal products into overseas markets through giving official assurances to foreign governments. The Regulations are made by Director General, subject to consultation, e.g. contaminant limits, premises hygiene, infant formula, manufacture, sampling and testing.

Food Act 2014: The Food Act focuses on ensuring that food for sale is safe and suitable. The Food Act applies to food produced for the domestic market and for export, but does not include provisions for official assurances. The Food Act 2014 has come fully into force from 1 March 2016.

Wine Act 2003: The Wine Act applies to wine produced for the purposes of trade or export. Like the Animal Products Act, the Wine Act has a trade facilitation role that extends beyond purely food safety matters. The purposes of the Wine Act include setting standards for identity and truthfulness in labelling and export eligibility requirements to safeguard NZ's reputation in overseas markets.

Agricultural Compounds and Veterinary Medicines Act 1997 (ACVM): Agricultural compounds include products such as fertilisers, animal feed and veterinary medicines. ACVM regulates these compounds to manage risks to public health, trade, animal welfare, and agricultural security. Certain substances are also prohibited to protect consumer health and meet market requirements.

VI Food Safety Policy

New Zealand's Steps to secure Food safety:

- Reforming the Food Act
- Strengthening MPI's response and operational coordination functions.

Primary production:

- increasing observer coverage in fisheries, and the number of honorary fisheries officers
- increasing the number of compliance officers and multi-warranting our compliance workforce
- under the Irrigation Acceleration Fund (IAF), supporting proposals that have the potential to add 260,000 hectares of newly irrigated land
- defining future skills requirements of the primary industries and commencing a programme of work to meet them
- establishing regional economic development studies and a range of Maori agribusiness initiatives
- Passing of the Animal Welfare Amendment Act (No 2) 2015.

New Zealand's Steps to secure Biosecurity:

- increasing border personnel
- increasing detector dog teams
- upgrading x-ray imaging in airports
- reforming the Biosecurity Act
- signing the first four Government Industry Agreements (GIA)
- beginning development work on a new bio containment laboratory
- Strengthening MPI's response and operational coordination functions.
- Trade
- doubling the size of MPI's market access function

- significantly expanding MPI's overseas footprint
- Investing in Chinese language and cultural training for staff.

4. **Inaugural Address – India**

   By Mr Pawan Agarwal, CEO, FSSAI.

   CEO, FSSAI shared vision and mission of FSSAI under 8 broad key areas:

- Food Standards
- Safe Food Practices
- Food safety Compliance
- Food Testing
- Food safety Training
- Social & Behavioural change
- Consumer Focus
- Focus on Nutrition

The presentation summarised FSSAI's continuous efforts in setting up standards harmonized with global standards like Codex (global) Standards, aligning food safety practices with global good practices, providing single window clearance for food imports etc by building two-way partnerships with internal and external stakeholders.

It was emphasised that FSSAI is committed to ensure partnership and convergence with all stakeholders across food value chain to build a healthy and happy India by transforming the food safety and nutrition landscape.

5. Felicitation of the Indian delegation by MPI officials

CEO, FSSAI being felicitated by Director, New Zealand

The Indian and New Zealand Delegation

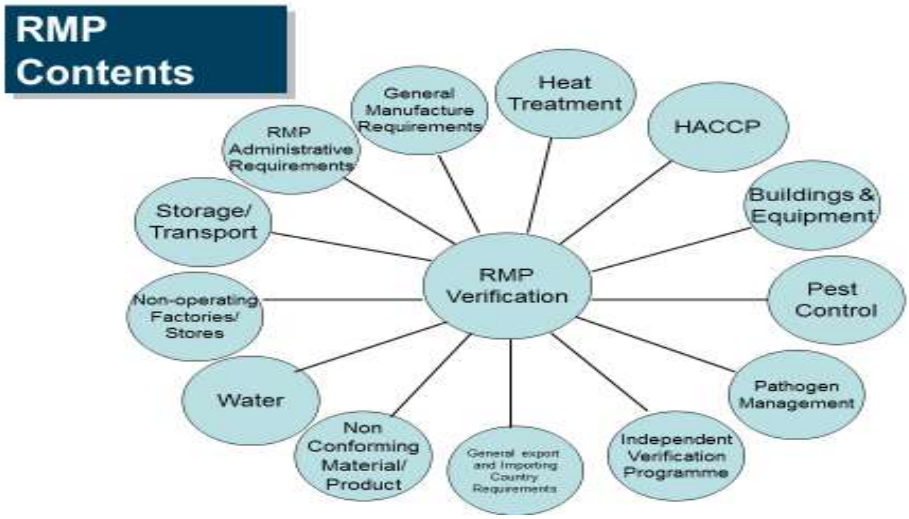
6. New Zealand Dairy Regulation Overview, Presentation by Natalie Collins

New Zealand Dairy Industry: NZ has around 1.64 million hectares in dairy with 11,800 dairy herds and 4.8 million dairy cows' in-milk. Their annual milk production is 1.8 billion kg milk solids (fat + protein) with 21.0 billion litres of liquid milk. 96% of milk used for exported dairy products going to over 140 countries which constitutes ~34% of NZ's gross agricultural revenue. NZ dairy products account for 3% of world production, but one third of international trade. There are 11800 Farm

Dairies, 184 Dairy Manufacturing Premises, and 476 Dairy Transporters & Stores in NZ. Besides, there are 531 Dairy Exporters and 351 Dairy Risk Management Programme Operators.

Risk Management Programmes: RMP is needed at both the grassroots level, i.e., in the Farm dairies and at the higher end, i.e., at Dairy processors engaged in export businesses. Dairy processors are required to operate under a risk management programme that is adapted to their situation, applies CODEX HACCP principles and identifies supporting systems/pre-requisite programmes. The RMP should set out design and processing criteria, demonstrate how product safety and conformance is achieved, and ensure non-conforming milk or product is controlled and managed appropriately.

Risk Management Programmes for Farm Dairies: Risk management programmes for farm dairies must address Location, design and construction and Equipment specifications of the farm. Milk harvesting activities, Milk cooling and monitoring of milk quality are also to be duly designed by the plan. The plan should account for Animal health management, Veterinary oversight, Farm dairy water quality, Control of chemicals and Cleaning and hygiene too. Farm Dairies must be independently assessed (audited) at least once a year by a Farm Dairy Assessor, whose competence is to be confirmed by a Recognised Verifier. Farm Dairy Verifier competence is confirmed by accreditation bodies and MPI systems audits.



Raw Milk Acceptance: Raw milk acceptance requirements (applied at collection) include Confirmation of suitability, such as milk temperature at collection, wholesomeness and presence of beta-lactams. The farm bulk milk tank sample is tested for aerobic plate count, antimicrobial agents (inhibitory substances) and mastitis (somatic cells).

Dairy Manufacturing: MPI sets the minimum outcome requirements for Microbiological parameters (pathogens and process hygiene indicators), Chemical Residues and Contaminants, Nutritional standards for specified foods (e.g. infant formula) and Country specific requirements.

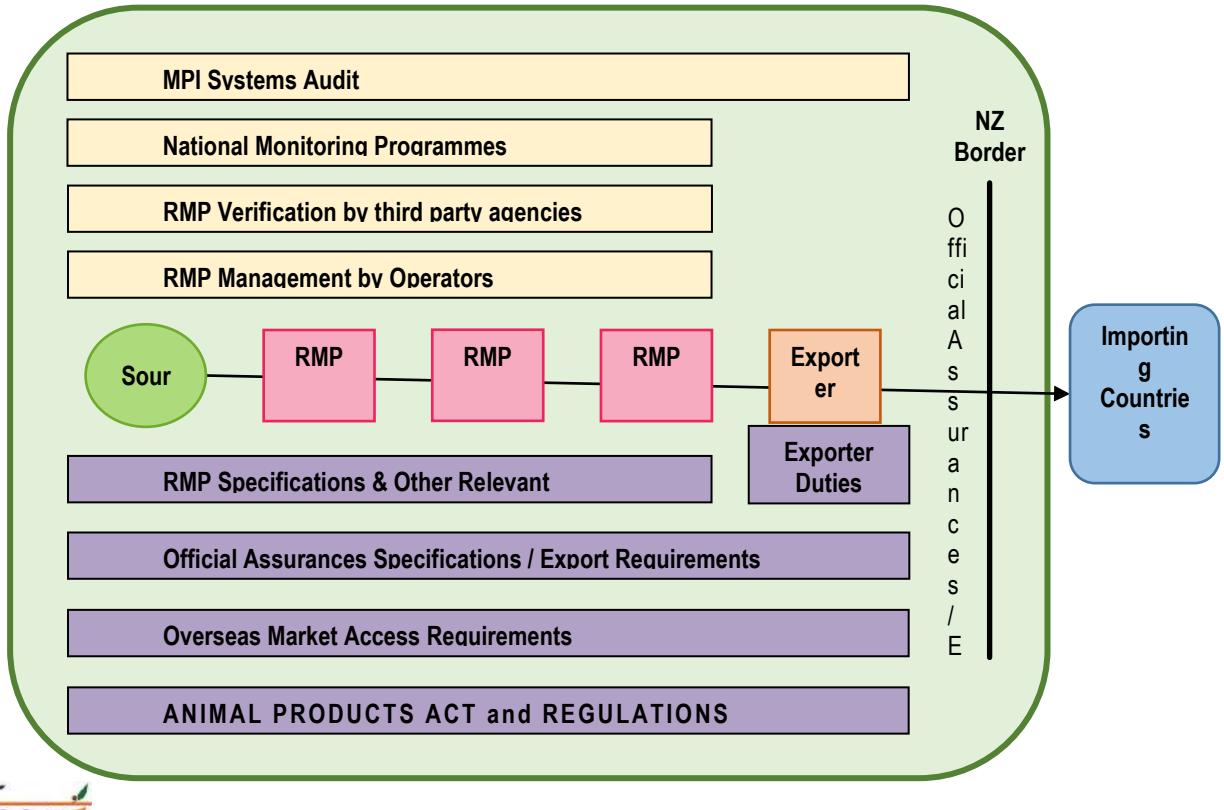
General Criteria: RMP requirements have been set by MPI at minimum level. Dairy Product Safety Limits have been specified. Residues of Agricultural Compounds & Veterinary Medicines, HACCP Plans, and personnel sanitation and hygiene requirements are generally based on Codex Programme.

Product Testing and Monitoring: Food Business Operators are bound to carry out sampling and testing programmes to confirm conformance based on HACCP & stipulated product safety limits and are managed under the RMP. Market specific requirements are additional. MPI administered monitoring programmes confirm integrity of the framework consisting of National Chemical Contaminants Programme (NCCP) and Independent Verification Programme (IVP). RMP operators must follow the procedures specified by the DG or obtain consent from the DG before disposing of any dairy material or dairy product that is non-conforming.

7. Third Party Verification Food Assurance, Systems Audit Assurance and Monitoring

Presentation by Rachel Harvie

MPI reviews have found the content of PBV reports, in particular executive summaries, is inconsistent between agencies, sometimes inaccurate, and may omit essential information. Therefore, a Guidance outlines has been published to improve the standard and consistency of PBV Reports. In particular, improved content and layout of reports enables MPI to better meet its legal obligation to ensure PBV reporting complies with requirements.



Export PBV Reporting Requirements:

- Provide a written report as soon as practicable following verification:
    - Premises with full-time verifier presence, a monthly written report must be provided to the operator.
    - Premises with less than full-time (also known as circuit) verifier presence reporting is 'as soon as practicable following verification'.
- Report the outcome of the verification visit (as "acceptable" or "unacceptable").
- Include recommendations, requirements, or follow-up actions to ensure or improve compliance.
- Centrally record verification reports and outcomes for performance monitoring and audit purposes.

All Export PBV reports are to include Risk Management Programme verification reporting.

Report should be produced by recognized Agencies that operate an animal product verification service to:

- Operate a system whereby verification reports and outcomes are centrally recorded for performance monitoring and audit purposes and make all verification information relating to animal product businesses, which is reasonably necessary to enable official assurances to be issued, available to authorized persons issuing official assurances and verifiers approving official assurance supporting documentation.

	Operator Verification Programme **Confirms whether the whole RMP is operating effectively**		
Operator Verification Activities	**Internal Audits** Scheduled document reviews Targeted investigations after: Critical NC Unacceptable audit Significant change Market rejection	**Records Review** -Routine monitoring records -CCP records Key test results Training records OMAR checklists HACCP verification records	**Reality Checks** As part of document review - check that documents reflect reality and procedures are being followed as documented Staff interviews and/or competence tests Regular "walk-throughs", random observations

Requirements from Dairy Processing Specifications

- History of complete, accurate and timely reporting to the accreditation body and MPI.
- Registration of the risk management programme.
- Evaluation status of risk management programme and its components.
- Amendments notified in accordance with sections 25 and 26 of the Act.

- Status of the risk management programme HACCP plan.
- Verification of compliance with the risk management programme.
- The agency obtains written authority from its clients to report relevant information about them to MPI.
- All reports are sent to MPI (fax & e-mail acceptable if sent by an authorised signatory).

Export Verification Programme: Guidance for all Premises

The Export Verification Programme says:

- For non-dairy Premises with fulltime verifier presence a written report must be provided to the Verification Agency and operator by the first working day of the following month. The report should cover:
- Any deficiencies and the follow up actions to be undertaken by the verifier to confirm that the operator has addressed each deficiency, and
- A summary of the monthly verification activity including:
    - Verification of the risk management programme,
    - Follow-up actions from the previous month,
    - Any regulatory market access reviews that occurred within the month,
    - Mandated frequencies,
    - Any other matters requested by the Recognised Agency Technical Manager, and the outcome of the monthly verification activity, and the performance level assigned and any consequences.
- For non-dairy premises without fulltime supervision on completion of a verification visit, the verifier must inform the operator in writing of:
    - Any deficiencies found during the verification visit, and
    - The likely outcome of the verification visit, and
    - The consequential change to the verification interval, if any, and
    - The intended date of next routine verification.

Best Practice PBV Reporting Recommendations: The Ministry for Primary Industries recommends that Export PBV Reports follow these best practice guidelines. These are not legal requirements but make Reports easier to understand for MPI and others:

- Define acronyms and important terms.
- Explain the different compliance ratings.
- Compose report so the following is present:

i) A Disclaimer,

ii) A Confidentiality statement,

iii) Plain English principles are applied for grammar, spelling, sentence construction, paragraphing, report layout,

iv) Active language used (rather than passive language),

v) Reports cannot be altered, but can still be read and copied,

vi) Total page numbers (important for hard copies).

All PBV reports for dairy premises that export are also required by legislation to comply with requirements in the following sub-sections:

- **Animal Products (Dairy Recognised Agency and Recognised Persons Specifications):** Performance Based Verification requires a history of complete, accurate and timely reporting to the accreditation body and MPI.
- **Animal Products (Dairy Processing Specifications):** Performance Measurement of Dairy Processors requires the following performance standards to be assessed:
  - Registration of the risk management programme.
  - Evaluation status of risk management programme and its components.
  - Amendments notified in accordance with sections 25 and 26 of the Act.
  - Status of the risk management programme HACCP plan.
  - Verification of compliance with the risk management programme.
  - Complete, accurate and timely reporting (within 10 days of verifier follow up for other than full-time verifiers).
  - Management of critical non-compliances.

8. MPI Residues Programmes, National Chemical Contaminants Programme (NCCP); Presentation by Susan Morris

Assessment of raw milk, colostrums and dairy products to:

- confirm that Good Agricultural Practices (GAP) are being followed

- ensure the regulatory framework is effective
- ensure market requirements are being met
- identify emerging hazards

➢ **Legislation: Dairy Industry (National Residue Monitoring Programme) Regulations 2002***

- Purpose – determine whether residues in dairy material or product are controlled effectively
- Provides for recognised persons to sample dairy material or product from farm dairies and dairy factories (whether for domestic sale or export sale or for human or animal consumption)
- All testing of dairy material or product under the programme must be carried out in a MPI recognised laboratory
- Provides for reporting of results and responses to any findings
- Compounds monitored include:

- veterinary medicines & agricultural compounds (including pesticides)
- contaminants – feeds, farm and process environment
- adulterants
- chemical elements & radionuclide's
- compounds of New Zealand or international interest

Recognised Laboratory Programme:

- MPI has a legislated recognised laboratory programme (RLP) – this specifies requirements for MPI-approved laboratories that carry out official testing in animal products
- MPI national programmes need recognised laboratories to undertake testing to maintain the credibility of the results and the integrity of the programmes

*Animal Products (Specifications for Laboratories) Notice 2015

Programme title	**Sector applied to**
National Chemical Residue Programme (NCRP)	Meat, Seafood, Honey
National Chemical Contaminant Programme (NCCP)	Dairy
Independent Verification Programme (IVP)	Dairy
National Microbiological Database Programme (NMD)	Meat and Poultry

To gain recognition, laboratories must:

- be accredited to ISO 17025 for the regulatory tests included in their scope of recognition;

- have at least one Key Technical Person (KTP) for each of the regulatory tests in their scope of ISO 17025 accreditation;
- have suitable facilities, equipment, procedures, materials and staff;
- have a quality manager appointed;
- meet all applicable requirements under the Act (specifications, OMARS); and
- Submit an application form to MPI with evidence of ISO 17025 accreditation attached.
- Recognition is for up to 3 ½ years.

Independent Verification Programme (IVP):

➢ IVP monitors conformance for microbiological parameters in dairy products

Objectives

- confirm that the New Zealand framework delivers dairy products that are safe, accurately labelled and manufactured under hygienic conditions
- confirm that RMP operators have sampling and testing programmes capable of identifying non-conformances
- identify individual premises or RMP operators that do not meet expected performance criteria
- provide information on emerging hazards

9. Regulation of Agricultural Compounds In New Zealand ,

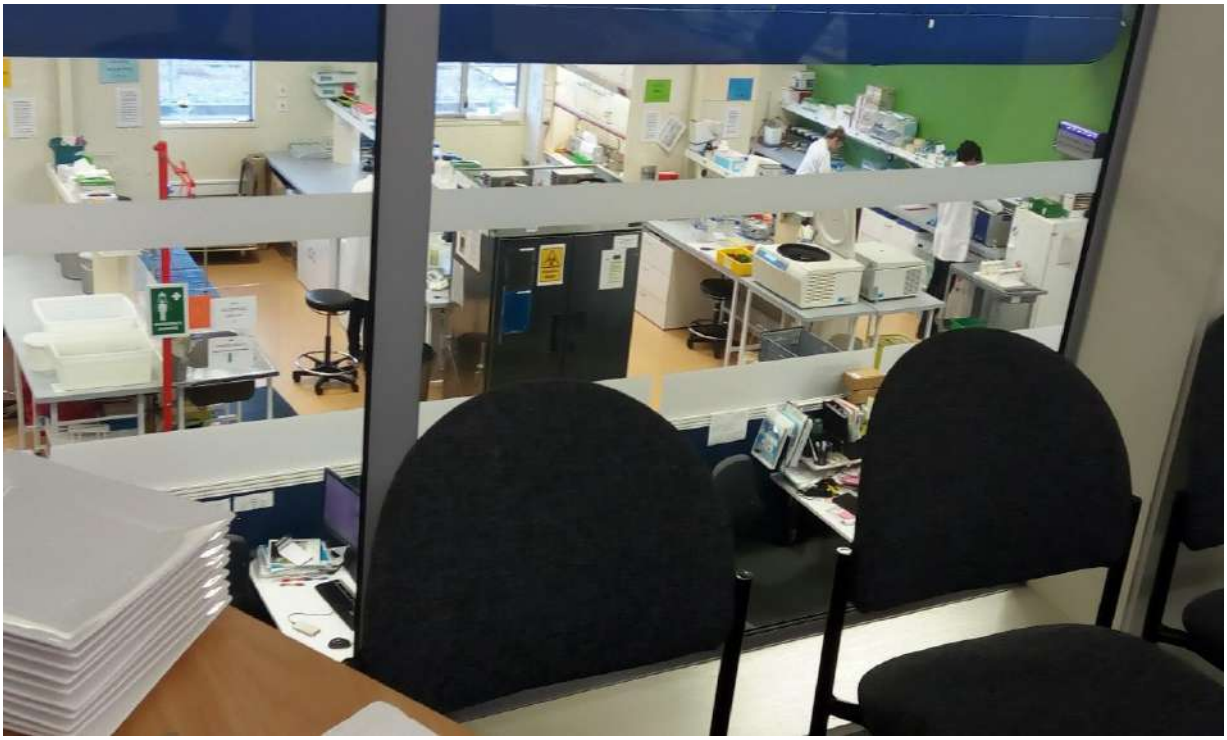
ACVM Group , Systems Audit, Assurance and Monitoring; Presentation by Neil Kennigton

- **The ACVM Act:**MPI administers the Agricultural Compounds and Veterinary Medicines (ACVM) Act 1997 and the ACVM (Exemptions and Prohibited Substances) Regulations 2011
- Regulates the importation, manufacture, sale, and use of all veterinary medicines, agricultural chemicals, vertebrate toxic agents, animal feeds, fertilisers etc.
- **Agricultural Compound Regulation:** All products used as agricultural compounds are regulated, either by registration under the ACVM Act or by compliance with the requirements and conditions of exemption under the ACVM Regulations
- Registered products undergo a robust and detailed assessment to characterise the risks and apply appropriate conditions; products with the greatest risks have the strictest controls
- Manufacture, importation, and use of exempt products are subject to regulatory control
- **Setting MRLs under the Food Act 2014:** MRLs are set at a level where residue levels are as low as reasonably achievable to support good methods of food production and minimising risks to public health

- Compliance with MRLs are monitored to enforce Good Agricultural Practice while ensuring food safety

10. Site Visit: AsureQuality, Wellington, New Zealand

AsureQuality provides food safety and biosecurity services to the food and primary production sectors worldwide. With a team of 1700 experts, based at over 100 locations in over 40 countries worldwide, AsureQuality is unique in their end to end focus on the food supply chain through a combination of auditing, inspection, farm assurance, and laboratory testing capabilities.



A view in the laboratory

Presentation by AsureQuality:

Working For Ministry for Primary Industries in;

- National Meat Database (microbiological)
- National Chemical Contaminants and Residue Programmes
- Food Residue Monitoring Programme
- Imported Foods Program
  - High risk foods
  - Surveys
  - Total diet survey
  - Special chemical or microbiological surveys
  - Crisis response

- Export Wine Certification
- Live Animal Export Certification
- Proficiency Laboratory Services for Industry

– Reference materials, reference samples, Inter-laboratory test samples and performance benchmarking, data analysis, training, sampling and sample coordination, R&D projects

- Support for International Competent Authority, trading partner and industry delegation visits
- Other Support

11. Dinner hosted by the High Commission of India at Little India, NZ

The High Commission of India,HE Mr Sanjiv Kohli hosted the Dinner

Day 3: 4th April, 2018, Hamilton, New Zealand

1. Tatua Dairy farm Visit, Hamilton, NZ

Tatua Dairy Co-operative has 114 shareholder farms, all located within a 12 kilometre radius of the processing factory. It employs 370 staff. The co-operative has maintained a strong independent history within the New Zealand dairy industry. In the 2001 mega-merger for the New Zealand dairy industry - which formed Fonterra - Tatua shareholders decided to remain independent? Tatua often records the highest payout for milk solids to the farmer shareholders in New Zealand. While the high level of payout is partly due to a small catchment area (which reduces processing costs), the excellent financial performance of Tatua is increasingly attributed to focusing on value-added milk products rather than traditional, mass-produced, commodity-based milk products such as milk powder, butter and cheese. It specialises in caseinates, WPC, anhydrous milk fat dairy flavour ingredients, specialty nutritional ingredients, bionutrients, consumer and food service dairy products.

2. Site Visit: MilkTestNZ, Hamilton, NZ

MilkTestNZ is a world leading milk testing laboratory using highly automated processes and advanced technology. Over 97% of New Zealand dairy farm supplier samples are tested at MilkTestNZ. They offer a range of microbiology, composition, analytical and specialty tests to asses a variety of milk types including cow, goat, sheep, buffalo and deer milk. They can handle more than 2000 milk samples a day to test all parameters. The milk samples were collected from the cold chain vehicle itself carrying milk to the processing unit.

Tests Available (in Milk and dairy products): Detergent Residues, QAC, NPE, NP, Antibiotics, Glyphosate, Aflatoxins

A range of other tests: Sodium thiocyanate, minerals, heavy metals, iodine, chlorhexidine, sorbicacid, nitrites/nitrates, 1080. Etc. A1/A2 beta-casein testing.

ASM Atypical Spectral Monitoring: Improving Milk Quality Assurance: Screening milk for economic adulteration as well as unintentional contamination

3. Site Visit: Fonterra Te Rapa, Hamilton, New Zealand

Fonterra Co-operative Group Limited is a New Zealand multinational dairy co-operative owned by around 10,500 New Zealand farmers and 21400 employees. The company is responsible for approximately 30% of the world's dairy exports and is New Zealand's largest company. Its subsidiaries are Anchor, Anmum, Anlene, Mainland Cheese, Tip Top, and Fonterra Brands. Its products are milk, butter, cheese, ice cream.

Fonterra's Te Rapa site was established in 1967 as a powder drying facility. The cream plant was established in 1997 for manufacturer of consumer and bulk butter and cream cheese. It employs around 500 staff.

It produces 80,000 tonnes of cream products per year. We visited this site primarily to get an overview of New Zealand's dairy processing from a company perspective and specifically focusing on milk receipt controls and testing.

4. Farm visit

Visited a farm owned by a farmer in Hamilton handling around 250-300 cattle**.**

Sanitation and temperature in cold chain was maintained & monitored

Open grazing system with testing facilities at the automatic milking units

Trained and skilled food handler with equipped testing facility and documentation system in place.

Day 4: 5th April, 2018, Hamilton, New Zealand

1. Site Visit: Fonterra Waitoa, Hamilton, New Zealand

The New Zealand Dairy Industry poured $12 billion into the economy last year alone. Dairy represents more than 25% of total NZ merchandise exports and 7% of country's GDP. Last year NZ exported $13 billion of dairy products.

A book of commitments to NZ from the farmers of Fonterra.

(Various capacity building programs and guidelines for farmers)

Fonterra's Waitoa site: produces infant formula, dietary supplements, standard skim and milk powder. It comprises two processing plants: UHT and infant formula. It processes more than 100 million litres of milk per year and up to 80,000 cartons of UHT milk and cream an hour. It is also fast tracking a $12 million expansion to produce more whipping cream (40 million cartons year).

- Safe, high quality food tailored to customer specifications
- Hazard analysis and food safety are an integral part
- Testing of final product
- Fully automated packing lines
- Robotic palletisers and automated satellite racking system
- Site layout designed to minimise noise emissions
- All environmental standards are met.

- The wastewater generated is treated with advanced recycling centre on-site

(Reduce, Reuse and Recycle wherever possible) The Improvement Idea Form displayed on board

2. Visit to Zealong Tea Estate, Hamilton, New Zealand

Widely regarded as a Waikato icon, Zealong Tea Estate is the only commercial tea estate in New Zealand, producing 100% organic award-winning tea, and a world-leading destination for tea, art and hospitality

3. Visit to Villa Maria Winery, Hamilton, New Zealand

Founded in 1961, Villa Maria has grown from a one-man band to a global brand in 50 years. Today Villa Maria employs over 250 permanent staff, has four vineyards throughout New Zealand and exports wine to over 50 countries worldwide. The Vineyard Café situated at the Ihumatao Vineyard, just north of Auckland Airport is the perfect spot for lunch overlooking the vines.

4. Site Visit: Danone Nutricia, Auckland, New Zealand

As a manufacturer of a range of Infant Formula products, Toddler Nutritional Supplements and Pregnancy and Breast Feeding Supplements, Danone Nutricia complies with strict food safety and quality laws and regulations, as well as equally important industry standards and agreements.

Day 5: 6th April, 2018, Auckland, New Zealand

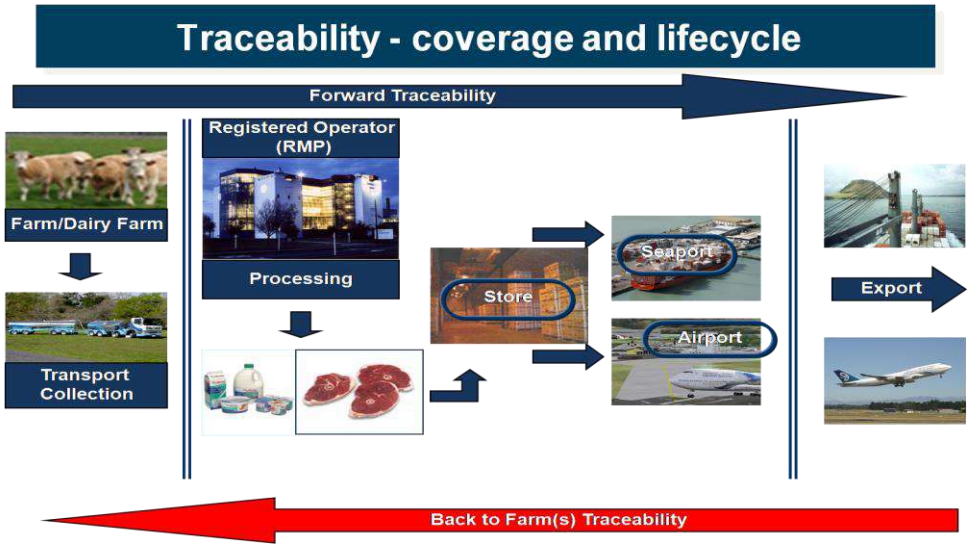
1. **MPI Centre Auckland:**

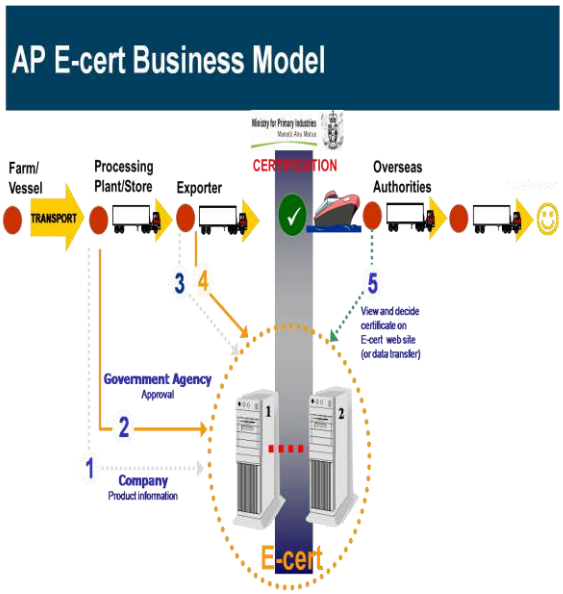
Presentation by Sandra Kon APE-cert ELECTRONIC CERTIFICATION

MPI Animal Products E-cert used for exported animal products including dairy products (i.e.: meat, dairy, seafood, game, poultry, eggs, petfood, bee products, hides, wool and skins) and organic products. Halal Certification.

Presentation by Slavisaon Animal Products Electronic Certification (AP E-cert):

- AP E-cert is the MPI internet application used for providing Government-to-Government (official) assurances about the compliance of New Zealand's animal products with importing country regulatory requirements.
- The purpose of AP E-cert is to track the market eligibility and status of animal products from the time of production until export. This enables export certificates to be approved.
- Is used to submit (Registered Exporter) and issue/approved (MPI Official) export certificates;
- Certificate templates can be customised for product type and market;
- An export certificate is supported by an extensive collection of transfer documents (EDs and EDecs) that track the product movements within New Zealand prior to it being exported





Demonstration;

E-cert can be accessed via URL https://sancrt.mpi.govt.nz/ecert/main/login

Login details for FSSAI (read only) as below:

Username; FSSAI

Password; Welcome12345!

The border inspection view is country specific and only gives you access to the final ecert information used to generate certificates. This access is intended to allow inspectors to verify certification, manage acceptance and make decisions prior to the presentation of paper copies. Of course the information can be used for a range of functions including verification, management of clearance issues and data collection.

2. Wrap up session

Document: Animal Products E-cert (New Zealand) Help Files For border inspectors

Document: Implementing provision on port of entry inspection and expedited border clearance processes

Guidance Document: Importing Food into New Zealand

- The purpose of this document is to give guidance to registered food importers on:
- the overall process for importing food into New Zealand;
- what categories of food require clearance under the Food Act 2014 before they can enter New Zealand; and
- How to obtain food safety clearance when it is required.

Export Performance Based Verification Reporting; Animal Products Act 1999

There are several reasons to improve the standard and consistency of export-related PBV Reports compiled by Animal Product business verifiers. The most obvious ones are to enable:

- The operator to clearly and easily understand the report, its outcome, and any required corrective actions.
- Easy, quick and accurate analysis of the report by MPI to ensure:
- Effective and efficient performance monitoring of RAs & operators
- Accurate and timely performance reporting to government.
- The potentially very large secondary audience to understand and effectively use PBV reports. This audience includes:

i) Interested parties within the same company as the audited premises,

ii) Other directly affected NZ stakeholders,

iii) Overseas authorities, and

iv) Overseas parties with commercial interest.

- Effective and efficient monitoring of a sample of PBV reports for compliance with MPI requirements (see list of relevant legislation).
- Auditors of MPI's Animal Products regulatory system, who may not be totally familiar with each RA's verification and reporting system, to:

i) Easily understand the content and intent of the report, and

ii) Determine if it follows MPI and/or overseas market requirements.

Way Forward

The visit and study of Food Safety Management system and Food Safety Regulatory Model at various farm and processing units at New Zealand holds the following features which may be prolific to improve the present Indian Food practices to ensure food safety in the domestic market as well as to develop the confidence for the Indian food products throughout the world.

1. Thorough and suitable control system at farm level to ensure the quality of raw products obtained from agriculture and its allied fields like dairy, pisciculture, epiculture, goatery, poultry etc.
2. Strengthening the Verifier Accreditation System, in accordance with the FSS Act, 2006 to establish proper risk assessment protocol and to ensure effective risk management procedure to be adopted by the processor/FBO.
3. Assessing the risk factors according to the kind of business and proper Validation and Evaluation of the Risk Management practices before licensing of any establishment engaged in food business operations.
4. Close cooperation between the different industry associations and the regulator farm and processing units at New Zealand to assess and establish the best practices to be adopted to ensure food safety management system throughout the food chain.
5. Regular workshop on exchange of information and training program s for the FBOs to understand the latest best practices adopted at international level to protect the safety throughout the food chain right from farm to fork.
6. Biosecurity may be given emphasis on Import control to protect environment, land, biodiversity, human life by reducing the risk of harmful organisms and pests entering in the country.
7. Fully documented electronic certification system for food consignments being exported, starting from accreditation of the assessors to the certification by both the assessors and verifiers, with end-to-end encryption may for building confidence among importing country in Indian Exporting FBO's
8. Visit of NZ delegation for laboratory audits in India and training and capacity building for FBO's can be partnered with them. Identification of laboratories in New Zealand can be done by Food Authority, India for
9. Massive Surveillance & Compliance activities for all food products at the National & International level as planned and implemented by MPI and FSSAI.
10. Organise more such study visits as FSSAI promotes co-ordination of work on food standards undertaken by international governmental and non-governmental organizations and promote consistency between international technical standards and domestic food standards, food safety and capacity building of labs.