Guidance Document

Collection of raw milk not intended for supply

Animal Products

11 January 2018

1 Purpose

The following is provided to clarify the nature of information required when raw milk not intended for supply is inadvertently collected. There may be other (very rare) situations that fall outside those anticipated below which would require additional information.

2 Background

Even with thoughtfully designed and well implemented risk management programmes there may still be occasions, particularly early in the season, when milk not intended for supply is inadvertently collected from farm dairies.

The concern is that this milk may contain antibiotics, colostrum, mastitic or abnormal milk, and that it may not meet New Zealand or importing country requirements.

The Animal Products Act 1999 (APA) and the standards under the APA are quite clear that such milk is non-conforming and all milk, dairy material or dairy product that it is added to is also non-conforming. Risk management programme (RMP) operators must raise an exception report, in accordance with DPC 1: Animal Products (Dairy): Approved Criteria for General Dairy Processing clauses 7(5) – (9), when such events occur, and identify any affected product in accordance with the applicable RMP(s).

RMP operators who collect the information outlined below may be able to show that the dairy products have not been adversely affected. This in turn may avoid dairy products being unnecessarily deemed non-conforming, traced and withdrawn from trade.

3 Required Information

3.1 Farm Dairy Operator to confirm:

(1) The nature of all milk in the bulk tank at the time of collection, including anything other than milk that may be been added, such as:

a) withheld colostrum;
b) abnormal milk, such as milk withheld from animals with clinical mastitis;
c) milk withheld from unhealthy animals (and if so describe the conditions);
d) milk from animals treated with veterinary medicines (including dry cow treatments, pour-ons, drenches and treatments during the dry period);

e) milk withheld for other reasons (and identify the reasons);
f) any preservative or other material added;

(2) the manner in which the milk was harvested (e.g. was it harvested under the same conditions as normal milkings);

(3) the filtering, cooling (primary and secondary) and storage conditions applied (as per normal milkings);

(4) the age of the milk;

(5) whether the dairy material has come into contact with any unapproved or unhygienic equipment;

(6) the last time the bulk tank was given a complete clean;

(7) the farm dairy operators opinion (and that of their staff) with respect to the condition of the milk; and

(8) the circumstances that led to the collection.

The farm dairy operator must be made aware that the information provided must be complete and accurate.

3.2 RMP Operator to confirm, with respect to the farm:

(1) the circumstances that led to collection of the non-conforming milk;

(2) any failure to follow instructions or procedures set out under the RMP; and

(3) corrective actions to be taken.

3.3 RMP Operator to confirm, with respect to the milk:

(1) the residue status via inhibitory substances testing of the milk collected or milk in the tanker. If no milk samples are available for the farm or the tanker, then product testing may be required;

(2) the colostrum status via IgG1 testing of the milk collected or milk in the tanker or product if the milk contained, or may have contained, colostrum;

(3) an acidity and organoleptic (senses) assessment of the milk collected (or milk in the tanker);

(4) the extent of consolidation that occurred before manufacture commenced (if in doubt, use the consolidation that occurred in the receiving silo);

(5) results from all testing of the milk collected or milk in the tanker; and

(6) all other relevant information required as per the RMP.

In situations where details of the milk condition is not known (that is, points (1) to (5) above) this should be noted.

4 Raising an exception report

An exception report must be raised when non-conforming dairy material is further processed, unless the further processing is in accordance with the Animal Products Notice: Disposal of Non-conforming Dairy Material or Dairy Product.

Through collection and analysis of the information described above, the RMP operator may determine that no product is, or will be affected. This determination will be subject to agreement by the verifier and/or MPI. The RMP operator should collect the required information as soon as possible after becoming aware of the event. This will allow determinations to be confirmed quickly, thereby minimising the impact on processing, and the obligation of all affected RMP operators to manage potentially non-conforming product.

For situations where the milk passes through the coverage of multiple RMP's, but remains under the control of the same business entity then only one exception report needs to be raised.

Contact for further information

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