Analysis of Submissions:
Proposed Laboratory Specifications Guidance

Date: 31 August 2015

MPI received 12 submissions on the proposed Laboratory Specifications Guidance Document. These submissions have been analysed in the following table. As a result of the consultation process, and where appropriate based on the analysis below, amendments have been made to the guidance document. MPI would like to thank those parties who have taken the opportunity to comment on the document.

The Guidance Document Recognised Laboratory Programme (RLP) has been published on the Food Safety website at: http://www.foodsafety.govt.nz/industry/general/labs-recognised-persons-agencies/documents/other.htm.

Submission Analysis:

Defined Questions

Points MPI would like feedback on	MPI Response
1. Is it clear how a laboratory changes from the current requirements to the new?	No response required.
Yes	
Yes, and the workshops held by MPI with industry were very useful in proving additional clarification.	
Reasonably, although attending the "roadshow" definitely helped with understanding the requirements especially the comments from IANZ.	
Yes	
Yes	
2. Is the application process and form clear? Eg should the application form include classes of tests?	
The application form is not user friendly. The new form for the vetting, especially the piece that the Lab has to fill out, covers topics that have no significance for a signatory. (Contact with vulnerable groups) Why is this process required when the labs are responsible for the appointment of their KTPs and ensuring that they are competent to perform the task. What is an FA1 form that you have to complete for amendment to Recognition. I anticipate that at times we would want to add a KTP and we would advise IANZ as we normally do and then are we applying for an amendment. There would not necessarily be any IANZ report to send.	The vetting form is standard form supplied by NZ Police, and cannot be changed. The Police check is required as part of recognised agency provisions as per s101(2)(b) of the APA. The FA1 reference has been corrected. Agreed, some amendments may not require IANZ report, which is why the form refers to "as applicable". MPI will request additional information needed for amendments if required.

Points MPI would like feedback on	MPI Response
Yes	Noted.
Not sure what is meant by classes of test. Unsure what 3. "Business Identification" is for. Is this the Recognised Agency Notice Unique Identifier? 6. "Names of Directors of the Applicant or those Responsible for its Management or Control" – do we list the person responsible for the RMP? Is this is the Technical Services Manager for us.	Classes of test means Consolidated Test List, which will be required as attachment to form AP18. Yes, this is the unique ID allocated to a lab. MPI will retain existing identifiers as much as possible after transition to maintain continuity of recognition. The form has been amended to clarify. This needs to be person responsible for lab, as part of recognised agency provisions as per s101(2)(b) of the APA.
Not required. Consolidated List Clear.	Noted.
Section 8 - Probably need more space to list KTPs. Should be able to list test classes next to the KTP	Agreed – will amend the form.
3. Are the text boxes quoting the Notice clauses useful? Or are just some of them useful (please nominate)?	Retain text boxes and amended.
Yes but all the numbering on the draft is wrong from Page 12 so every section thereafter is mixed matched.	
Yes	
Would be helpful if the section numbers in the Guidance document lined up with the section numbers in the Notice. Don't think it is necessary to include the text boxes as both documents should be read together but have no concern with them being included.	
Yes	
Yes, might as well keep them all.	

General Comments

General	MPI Response
We support the intent of the guidance material; however, we do not support the Test List being a requirement via incorporation into the Animal Products Specifications for Laboratories (Notice). We do not support the Test List forming the basis of accreditation scope under the Recognised Laboratory Programme (RLP). Refer to our comments 6, 10 and 11 later in this document.	Noted. Submissions on the CLT have been forwarded for consideration with the August targeted consultation.
Notice General requirements for recognition 2.3(1)(b) a research laboratory or reference laboratory……and that is not accredited to ISO 17025 for all tests conducted (which implies accreditation for some of their testing but not the test in question)	Agreed and amended.

General	MPI Response
Requirements for limited recognition 2.4(1) DG may grant recognition to the laboratory for a specified……..if 2.41(1)(a) the laboratory is currently accredited to ISO 17025 for at least one other test of a similar discipline **Guidelines** General requirements for recognition 2.3(1)(a)(i) a recognised laboratory needs to be accredited to ISO 17025 for each regulatory test(s) unless it is a research or reference laboratory not accredited to ISO 17025 (which means not accredited - not quite the same as the Notice Limited recognition 2.4(1)(a) circumstances for limited recognition include a new test not already covered by a laboratory scope of recognition The wording in both the Notice and Guidelines in these areas needs to be more clear for correct interpretation of this. I have also highlighted some phrases that may be open to interpretation.	
Notice	**MPI Response**
2.6 (7) and 2.6 (8). Realise that the Notice is difficult to update. Fine for the recognised laboratories own employees but difficult for contractors. When subcontracting to another laboratory, the requirements set out would be difficult for the original laboratory to "ensure" besides the basics e.g. recognised by MPI and accredited by IANZ for ISO17025. Most competing laboratories would not allow each other to audit them to confirm that the requirements are met. Update Notice if possible at a later stage. Part 2.7 seems to be clear.	Noted.
AP18	**MPI Response**
Not clear who should complete Police Vetting. Only for new KTPs and Director? Not clear whether Police Vetting has to be completed for current KTPs during transition to new MPI RLP programme.	Police check needs to be completed by Director or those responsible for management or control of lab. This is required as part of recognised agency provisions as per s101(2)(b) of the APA. KTPs do not require police checks unless they are also a Director or one of those responsible for management or control of lab.

Guidance Document

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
	Purpose	Repetition in first paragraph and last sentence in this section.	Delete last sentence in this section. "Compliance…in the Notice."	Agreed and amended.
	2.1	a. Sub clause (1) states that *"regulatory testing"* has been summarised into the Test List. We note that the term *"Regulatory*		Noted. Submissions on the CLT have been forwarded for consideration with the August targeted consultation.

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
		testing" which is used in the Guidance and in the Test List is not defined. If this is the basis that a test is included in the Test List the term needs to be defined. b. Sub clause (2) c) requires applicants to identify the test parameters requiring recognition with reference to the Test List. We disagree that the Test List should form part of the RLP. Accreditation scope should be based on; all test parameters and sample matrices requested by a laboratory that meet the accreditation criteria. At a minimum the Test List should include all test parameters previously recognised under the dairy programme (Appendix A). If this is not the case then dairy laboratories will need to have multiple accreditation scopes. For example a laboratory completing Vitamin A testing on Fortified Milk powders for specified populations and general population will need to have Vitamin A accredited under two programmes i. RLP scope will be for Infant Formula (0-6m) ii. General Chemical scope will be for Follow-On Formula (6-12m), Growing up Milk Powders and general commodity fortified milk powder If laboratories are unable to have test parameters recognised under the RLP accreditation scope and must have recognition under multiple accreditation scopes it is vital that these are recognised under the Animal Products Act (Act). We consider that product conformance, product safety, and regulatory test parameters will need recognition under the Act, which will be virtually all of the tests carried out at our laboratories for example: iii. Whey Protein Nitrogen Index testing of milk powders to verify heat treatment iv. Vitamin and mineral testing on any fortified product (not just infant formula) to verify nutritional information panels are correct v. Compositional testing for certificates of analysis required MPI to support official assurances. c. It is unclear that there is a process or criteria for amendment to the Test List, the only reference to amendments is a note on the Test List that persons with new regulatory tests "*contact the MPI Recognised Laboratory Programme email*". We ask that MPI formally notify the		

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
		process and criteria used, if this is to be a requirement document.		
2.3	1 (b)	Clarify when the reports are required? After annual IANZ assessment and during renewal (triennial)? See 2.10 (3) as well. Which requires IANZ report for application/renewal process only. This paragraph also requires closed out corrective actions (audit clearance from IANZ). Usually an IANZ clearance letter received. Is this required? Also compare with AP18 form which requires the IANZ audit report during the 3 yearly renewal process.	Specify when reports required e.g. during renewal process triennially (3 yearly). Align part/clauses and AP18 form to specify when IANZ reports are required.	IANZ reports are required to be supplied for recognition applications ie new, limited and renewal recognitions. However there may be times when MPI would need to review such reports eg as part of an investigation hence the "..there may be times where this report is requested by MPI.." 2.10(3). IANZ clearance letter may be necessary if the report includes open corrective actions that have subsequently been closed out by the clearance letter. It would pay to include clearance letter for completeness.
2.5	1	Regarding the "as soon as practical" and then referring to clause 2.14 It is not always possible to notify MPI "prior" to incidences.	Could we revert back to the timeframes in the "Export Laboratory Programme 2010 under reporting 2.15, where there are recommended timeframes?	As soon as practical means as soon as you can and MPI does not set a timeframe for this. However MPI has specified within one working day for critical non compliances.
2.5	1d	Facilities e.g. renovations. Only required for significant renovations which may impact testing.	Please update to "facilities e.g. renovations that may impact the integrity of the analytical testing" as per the Notice statement.	Agreed and amended.
2.5	2	a. Sub clause (2) clarifies the scenarios where a laboratory must report issues/events leading to critical non-compliances. It is noted that this clarification references the Specification for Laboratories notice (Notice) clause *2.5 Changes to Laboratory Recognition*. This reference should be to Notice clause *2.13 Disclosure of information and confidentiality* (3), specifically point d). This point of the Notice requires reporting within a specific timeframe to the Director General where "*The laboratory knows of any critical non-compliance that relates to testing*". Guidance 2.5 (2) talks about the laboratory reporting "*any issues/events related to or leading to critical noncompliances*". Unless there has been a non-compliance there should be no requirement for any reporting to MPI.	The guidance text should be revised to something similar to: "*A laboratory needs to report to MPI any critical non-compliances, and the events/issues that led to that critical noncompliance:"*	Agreed and amended.
2.5	2c	Internal management review findings will include confidential business information. Second Note in this section does not cover 2c. Management review findings are reviewed during the IANZ annual audits (ISO17025 requirement). Please remove 2c. Not required by the Notice and	Please remove 2.5 2 (c) internal management review findings.	Amended for clarification. MPI have developed critical non-compliance form.

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
		covered by IANZ. Any critical non-compliances reporting requirements are covered in parts 2.12 and 2.14.		
2.6	3	Recommend a traceable record kept. Phone calls or txt is good customer service but does not provide a record for the laboratory of customer communication.	Add email or written correspondence to provide the laboratory with a record of the customer notification.	Agreed and amended.
2.6	(3)	Assume client refers to contract labs (eg Eurofins) contracting to NZ business (eg Dairy Company). In the case of the Dairy Company's own laboratory, results will not be made available to the final customer until product has been released for sale. In this case the customer is the manufacturing plant.	Clarify the intention.	MPI have amended wording to reflect customer/client and external to clarify the intention of the subclause.
2.6	4	Would be helpful to link to a list of notifiable diseases for MPI.	Insert link to a list provided by MPI.	Exotic pathogens could have a legal status of notifiable, unwanted under different government departments/organisations or both notifiable and unwanted. Lists can be found at this link: http://www.biosecurity.govt.nz/pests/search/ It is recommended that you contact the pests/diseases hotline even if you are unsure of the status of a pathogen.
2.7	(1)	Assume this refers to contract laboratories (eg Eurofins) notifying their customers (eg Dairy Company) and not a Dairy Company notifying their end customers.	Clarify the intention.	MPI have amended wording to reflect customer/client and external to clarify the intention of the subclause.
2.7	(2), (3)	Assume this is only relating to IANZ endorsed reports. This Company does not currently issue any IANZ endorsed reports. Assume there is still no requirement for reports to be IANZ endorsed.	Clarify the intention.	MPI have amended wording to reflect customer/client and external to clarify the intention of the subclause.
2.7	(4)	Assume this needs to be significant ie not where there is an ILCP bias but most results are still within limits.	Inclusion of examples would be helpful.	MPI have specified an example of a significant issue.
2.7	4	The original laboratory would not be aware of any issues that may affect the tests results from the subcontracted laboratory. Only the subcontracted laboratory would know.	Change to "The subcontracted laboratory needs to report to the original laboratory and MPI any issues it becomes aware of that may affect their test results"	Amended and clarified.
2.7	5	Compare to Notice 2.7 b (approved by Director general) and 2.2.1 (c) of	Update paragraph to reflect wording in the Notice	Amended for clarification.

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
		the guidance document.	and exceptional circumstances in the guidance document. Which is that a test can only be subcontracted to a non recognised laboratory when nominated/approved by the Director General.	
2.11	7	Providing Regular reports on time will be a standard condition of recognition. *There is no mention of regular reporting other than notifying MPI with changes or critical non-conformances and they appear to have different timeframes. Meat & seafood have not required as such to report critical non-conformances*	Need clear instructions on all reporting requirements.	Amended for clarification. .
2.12	(3)	Assume this is exception reporting only, not routine reporting.	Clarify that this section relates to exception reporting, routine reporting is not required.	Amended for clarification.
2.12	3c	ILCP reports reviewed annually by IANZ. Please remove this requirement or clarify when required or state "may be requested by MPI". Covered by 2.14 2 (b) to report poor performance of ILCP.	Please remove ILCP reporting requirement or clarify when required.	As above.
2.12	(3) d)	Unsure of intent of the comment "significant biosecurity, trade or public health risk". Does this mean if a contract lab (eg Eurofins) obtains a result that exceeds the limits in DPC1, OMAR etc that they must notify MPI? No requirement to contact the customer (eg Dairy Company) first? The contract lab may not know the final use of the product, or even if it is for human consumption eg result may be for a R&D abuse trial. Assume for in- house laboratories (eg a Dairy Company's own laboratory) that this requirement is covered by the current MPI Exception Reporting requirements of the Company usually handled by a Technical Services/Compliance department or similar. Assume this would only apply to IANZ accredited tests included in the Consolidated List of Tests.	Clarify the intention. Inclusion of examples may be helpful.	Exception reporting relates to notifying MPI of unusual circumstances or results that affect the laboratories performance or impact NZ biosecurity or or public health implications. Results from trials would not be expected to be regulatory tests. Disposition of product from such trials would be expected to come under other regulatory instruments. Clarification should always be sought from MPI. Amended for clarification.
2.11	(7)	Unsure that "regular reports" are required. Section 2.11 of the Lab Spec Notice only includes "information requested". Unsure what regular reporting is required unless requested in section 2.1 (2) c).	Clarify what regular reporting is required.	Clarified above.
2.13	1b	Please clarify what statements are relevant to laboratory. Opinions and	Please clarify what statements are relevant to the	Amended for clarification.

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
		comments are outside the Laboratories Scope of IANZ accreditation.	laboratories.	
2.14	(2) b)	The statement "Poor performance in ILCP's" is open to interpretation.	Clarify further what constitutes poor performance, possibly with the use of examples.	All ILCP providers will have specific notifiers for poor performance. MPI would expect laboratories to know what these notifiers are, and respond to these as per ILCP requirements. Amended and clarified.
2.14	(2) d	a. Sub clause (2) d) clarifies that a customer exerting influence on the laboratory to alter or retest without good reason is a critical non-compliance. Alteration of a test result or retesting without a good justification would be a critical non-conformance, not the customer applying pressure to do so. This example reflects on the customer not the laboratory and should be removed from the list.		Amended and clarified.
2.14	2e	Clarify to who the non-disclosure of unfavourable test results are relevant too.	Update to "Non-disclosure of unfavourable test results to customers"?	Agreed and amended.
3.1	2	How would a laboratory go about to request a test to be added to the consolidated list of tests?	Record procedure.	Addition of new tests (e.g. from an OMAR requirement) will be added to the Consolidated Test List as quickly as possible by MPI. MPI will notify laboratories of any delays. Should a laboratory see that a test is required and is not on the list they should contact MPI as soon as possible. Agreed and amended.
4.1	(2)	Currently this laboratory does not issue any IANZ endorsed reports. Currently the PAC's that are prepared by this laboratory (on behalf of the Company) do not list the testing lab for any tests. We do not want this requirement to change. Have assumed this clause related to contract labs (eg Eurofins) reporting a result to a NZ business (eg Dairy Company) or IANZ endorsed reports.	Clarify the intention.	A laboratory does not have to use and IANZ or MPI endorsement on test reports. The laboratory can choose to just use their own laboratory logo. The notice clarifies responsibilities if a laboratory uses an IANZ or MPI logo. MPI recommends that all laboratories that undertook testing is included on test reports. If not, there must be a means to trace back to the testing laboratory. This will be assessed by IANZ. MPI have amended wording to reflect customer/client and external to clarify the intention of the subclause.
5		Laboratories will apply for transfer from their existing programme to the RLP but as the RLP does not cover all test parameter from their existing programme there may be lapses in recognition of testing. We ask that		IANZ has stated that they will be covered by a biological or chemical programme for testing that is non regulatory, such that all testing parameters will be captured under the

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
		when any currently accredited test parameter (appendix A) not initially available in the RLP is subsequently made available that for 18 months after the transition period ends that there be an additional 3 month transition from when its added, wherby the parameter may be transfered from their previous programme without a full application.		ISO17025 accreditation. IANZ manage this process well in advance of scheduled assessments so that there are no gaps in recognition. Further clarification can be sought from IANZ.

Consolidated Test List

Consolidated Test List			4. Proposed amendment	MPI Response
Front Page		Composite sampling does not clearly state it is for Micro	Renamed as: "Microbiological Composite Sampling"	Noted. Submissions on the CLT have been forwarded for consideration with the August targeted consultation.
Front Page		Concerns raised regarding composite testing clause. Presently laboratory tests composite samples for enumeration bacteria. Without the ability to continue, this would cause a substantial amount of extra testing.		Noted. Submissions on the CLT have been forwarded for consideration with the August targeted consultation.
		In relation to the section on the front page about Composite Sampling 1. The scope of the clause is unclear. It does not indicate whether it applies solely to microbiological testing, or whether it also includes compositional, sensory and other tests. While we have subsequently been advised that it does not include chemical testing, the text needs to be updated to reflect that. The Consolidated List does not indicate which pathogens are defined as 'particular pathogens'. We have received advice that this refers to Salmonella and Listeria but this is not clear in the text, or whether it is specific to Salmonella and Listeria, or to pathogens which can be tested using a detect test (e.g. Cr. sakazakii). It also does not indicate whether it applies to composite samples taken within the manufacturing area or composite samples made up within the laboratory. If the former it will have significant impact on dairy industry practices, as it will potentially mean that multiple composite samples will need to be taken e.g. one to do Listeria	Clarification is required as noted in comments. If the composite requirements have been developed because certain markets require them, they the requirements should only apply to those markets.	The compositing requirements have been amended accordingly.

Consolidated Test List			4. Proposed amendment	MPI Response
		detection, one to do Salmonella detection. 2. It is unclear what the clause 'not to be used for subsampling' means. If we understand correctly, the composite sample must be used in its entirety, not split to do different tests. If this is the case we would need to take separate composite samples at time of manufacture to do Listeria and Salmonella testing. If the process to make up the composite can be shown to give a homogeneous sample then there should be no problem. 3. In some cases composite testing may be more representative of the batch than single 'targeted' samples throughout the batch as individual samples may miss an intermittent problem. Rather than prohibit composite testing we believe the efficacy of the compositing procedure should be reviewed, as well as implementation of appropriate limits to ensure that any results that are higher than normal (but still compliant) be investigated. 4. It needs to be clear that the requirements are limited to regulatory requirements i.e. those specified in notices, standards and OMARs or required as standard of identity testing. (*Or is that what is meant by the clause 'Note: for dairy tests please refer to the dairy tests as determined by the Risk management Programme (RMP) and Overseas Market Access Requirements (OMARs)'? If so it is not clear)*. Customer required-testing that is not a regulatory requirement should be able to be tested on a composite sample. 5. Removal of the ability to test composite samples will increase test costs, as it will not be able to be replaced with a single sample as it will be even less representative of the batch. If the scope of the statement is not limited to microbiological tests this will be significant for dairy companies.		
		Status of document a. The Test List is incorporated by reference within the Laboratory Specification Notice. The below statement is now absent from the Test List making this document a requirement to all Laboratories in scope of the Laboratory Specifications Notice.		Noted. Submissions on the CLT have been forwarded for consideration with the August targeted consultation.

Consolidated Test List			4. Proposed amendment	MPI Response
		"*This list of tests provides guidance on what regulatory test(s) a laboratory may need to perform to be recognized by* *MPI for undertaking specific tests for live animals, on animal material or animal products, or on materials associated with the processing of animal material or animal products.* *This list of tests would be useful for the general public, and for premises, certifiers, verifiers, and laboratories associated with the processing of animal material or animal products*." In the public consultation of the Laboratory Specifications Notice the Test List was guidance and comments from MPI in the analysis of submissions (Page 2, *"This list is guidance and is not part of the notice"*) confirmed this. We request that either the status of the Test List is returned to guidance (by reinstatement of the deleted wording) or any reference to dairy be removed from the document. Disclaimer on the Test Lists states *"this list of tests is not an exhaustive list of all tests for animal material or animal products"*. Due to this statement the tests parameters and methods accredited under the RLP should not be restricted to those on the Test List.		
		Composite Sampling *a.* The following statement has been added to the Test List since last consultation: *Composite Sampling: Composite sampling for tests must:* *i. Only be used to determine presence or absence of particular pathogens (not enumeration); and* *ii. Not be used for subsampling.* This appears to be an insertion of Laboratory Approval Scheme (LAS) requirement 8.8.5 and is although this may be appropriate for the microbiological testing of meat products is not appropriate for all testing of dairy material and dairy products. Composite testing has a statistically valid and accepted place for analysis purposes; please refer to the following standards; • Codex CAC/GL 33-1999, *Recommended methods of sampling for the determination of pesticide residues for compliance with MRLs*. *2.2 A Codex MRL for a plant, egg or dairy product takes into account the maximum level expected to occur in a composite sample, which has been derived from multiple unit of the treated product and which is*	We ask that the statement restricting composite samples to only be used for presence or absence of pathogens is removed or clarified to only apply to testing previously under the LAS programme.	The compositing requirements have been amended accordingly.

Consolidated Test List			4. Proposed amendment	MPI Response
		intended to represent the average residue level in a lot. • ISO 17025 :2000, *Acceptance sampling plans and procedures for the inspection of bulk materials* *5.3.1 General* *This International Standard contains the following procedures for inspection of an individual lot;* *a) Increment sampling;* *b) Constitution of composite samples;* *c) Preparation of test samples; and* *d) measurements* In addition to these standards, we attach a paper (Appendix B) based on research carried out by the Primary Growth Partnership programme that has been submitted to the Food Control Journal. The paper deals with issues due to imperfect mixing of composite samples in the context of food safety assurance and serves as an example of the use of composite sampling in food safety and other applications.		
11.85		Having read through the document and also discussed this with a colleague who sat in on a teleconference. The Lab Notice seems to be clear and simple to understand. Tests consolidated were all simple to find with one exception the Listeria: 11.8.5 REF to Ready to Eat Foods – not exceed 100 cfu/g – this method can only be listed under enumeration as this is what it is. Methods numbered one and two both have cfu methods but currently I think you need to check but MIMM method is only doing a MPN method. It would also be good practise to have a MPN method in the scope which is in the FDA BAM as there are a lot of customers from overseas asking for it on their shelf life products, and we are not getting asked for cfu/g. I would like to have that in under 11.8.5 MPN/g for Listeria foods not just ready to eat.		Noted. Submissions on the CLT have been forwarded for consideration with the August targeted consultation.
32.7	Vit A	Is this a duplicate of 32.24? all dairy products vs infant formula?		Noted. Submissions on the CLT have been forwarded for consideration with the August targeted consultation.
33.10	1080	I would like to recommend that a test code for 1080 in milk be incorporated in Dairy Products Chemical & Physical (33.XX), similar to 33.10 Aflatoxin, rather than under 8.23.		Noted. Submissions on the CLT have been forwarded for consideration with the August targeted consultation.

Consolidated Test List			4. Proposed amendment	MPI Response
		Also the codes used for the MPI RLP have some overlap with the IANZ test numbers which add to confusion. I suggest a different sent of codes that don't overlap with the IANZ codes.		
		Missing Lactose test and Casein in Milk Protein test (both SOI for Caseinate) Pesticides is not included but is listed in DPC1 (section 9 (1) (a))	Add Lactose and Casein in Milk Protein tests Add Pesticide tests Review list against all other regulatory requirements	Noted. Submissions on the CLT have been forwarded for consideration with the August targeted consultation.
		The dairy microbilogical test "Commercial Sterility" is not included in the test list. Commercial Sterility is the only microbioligical test requirement for UHT Milk going into China (ie there is no specific pathogenic testing)	Include Commercial Sterility as an accreditable test method	Noted. Submissions on the CLT have been forwarded for consideration with the August targeted consultation.
		WPNI (Whey Protein Nitrogen Index) used to prove heat treatment for codex purposes we believe should be on the list. Vitamin C – we test this on base powders that are then used for infant formula but not made as an infant only formula, we think vit C should be on all powders not just infant? Enterobacter sakazakii – should this be included?		Noted. Submissions on the CLT have been forwarded for consideration with the August targeted consultation.