



**Summary of Submissions on the  
Proposed MPI Consolidated List of Tests for Animal Products**

22 May 2017

MPI received 11 submissions on the proposed document. The 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 this document.

Please note a number of changes to OMAR references have been made to this document (references have been included, or removed) that were not in the version that was consulted on. These changes have been made as a result of an ongoing internal review of the sections of OMARs that relate to sampling and testing and reflect what is currently in the OMARs.

MPI would like to thank all the parties who have taken the opportunity to comment on the draft.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
2	General		As a general comment we would like the use of ISO methods included wherever possible for matrices other than meat and poultry. MIMMS is not an international recognised publication and does not keep up to date with technological advances to allow other internationally approved methods.		<p>Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.</p> <p>Some documents that are referenced in the CLT may not be recognised international publications but are critical for New Zealand assurances.</p>

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
11	General		The term "any molecular microbiological method within the laboratory scope of ISO17025 accreditation validated for the matrix concerned" is referenced throughout the CLT. The intention is to allow the use of any microbiological method that is IANZ/ISO accredited, not just MOLECULAR, therefore the word MOLECULAR should be removed. If the laboratory has demonstrated competence and suitability of a method for the matrix being examined i.e. having this method on their IANZ under a matrix class, then this test result should be accepted as appropriate for export purposes, where no method reference is specifically required by an OMAR.	If the laboratory has demonstrated competence and suitability of a method for the matrix being examined i.e. having this method on their IANZ under a matrix class, then this test result should be accepted as appropriate for export purposes, where no method reference is specifically required by an OMAR.	Some sections have been amended. This comment will be considered as part of the full 2017 review.
11	1	All	Column title "Animal Materials and Products and Associated Things" could be updated to better reflect the information it incorporates.	Applicable Matrix and Reference.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
10	1	Live Animals & Germplasm-Disease Tests	Ref No 52.1 Akabane virus VNT/Antibody detection – please remove from the list as the test is no longer offered.	Suggest to replace Akabane VNT with Akabane disease virus ELISA, antibody detection. Note: this is IANZ accredited test, performed by AHL.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
10	1	Live Animals & Germplasm-Disease Tests	Ref No 96.1 Rabies virus – FAVN is the assay primarily performed now.	Suggest to change from RFIT to rabies FAVN (fluorescent antibody virus neutralization) or to add FAVN to the list with RFIT.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
7	1	Section 1.0	Beekeepers code of practice part 2, Manufactures code of good practice, part 3.4.6.2 it states that water should have micro testing by LAS lab.	Inclusion of Honey to Section 1.0 Meat, poultry and egg industry potable water microbiology.	Amended.
11	1	1.1.1	Some other CLTs for water include information on the type of test the method is referencing but this CLT does not.	MIMM 11.A.1.1 Rapid MIMM 11.A2 with 11.A2.6 MPN MIMM 11.3/11.4 with 11.5 MF	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	1.6.1	Standardise Method reference to match other CLTs.	MIMM 11.A3 MF	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
7	1	2.1.1	Proposing addition of MPN methodology using TEMPO Automation as an alternative method (in addition to MIMM or NMD etc.)	Inclusion of TEMPO Automated MPN method as a method option.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.1.1	Under Method column it states APC. This is not a method.	MIMM 6, NMD or any other method in the laboratory scope of ISO 17025 accreditation for the matrix concerned.	Amended.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
7	1	2.1.2	<p>We are IANZ accredited in TEMPO Automated MPN for several APC tests and the <i>E. coli</i> test.</p> <p>Note: We recognises that inclusion of TEMPO is not just a matter of “adding” it to the CLT as we are aware that a process needs to be followed to have it included in the NMD or accepted in OMAR. We have noted that the Australian Government Department of Agriculture and Water Resources have approved TEMPO for meat and meat product export testing, issued March 2017 – see link.</p> <p><a href="http://www.agriculture.gov.au/SiteCollectionDocuments/biosecurity/export/meat/elmer-3/approved-methods-microbiological-testing.pdf">http://www.agriculture.gov.au/SiteCollectionDocuments/biosecurity/export/meat/elmer-3/approved-methods-microbiological-testing.pdf</a></p>	Additional Test Class to include TEMPO Automated MPN or addition of TEMPO Automated MPN to the NMD.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.1.2	Animal names listed as they appears in NMD for all except pigs.	Replace pigs with porcine.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.1.2	Standardise Method information.	As per NMD requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
7	1	2.1.3	<p>We are IANZ accredited in TEMPO Automated MPN for several APC tests and the <i>E. coli</i> test.</p> <p>Note: We recognises that inclusion of TEMPO is not just a matter of “adding” it to the CLT as we are aware that a process needs to be followed to have it included in the NMD or accepted in OMAR. We have noted that the Australian Government Department of Agriculture and Water Resources have approved TEMPO for meat and meat product export testing, issued March 2017 – see link.</p> <p><a href="http://www.agriculture.gov.au/SiteCollectionDocuments/biosecurity/export/meat/elmer-3/approved-methods-microbiological-testing.pdf">http://www.agriculture.gov.au/SiteCollectionDocuments/biosecurity/export/meat/elmer-3/approved-methods-microbiological-testing.pdf</a></p>	Additional Test Class to include TEMPO Automated MPN or addition of TEMPO Automated MPN to the NMD.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.1.3	Animal names listed as they appears in NMD for all except pigs.	Replace pigs with porcine.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.1.3	Standardise Method information.	As per NMD requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
7	1	2.1.4	<p>We are IANZ accredited in TEMPO Automated MPN for several APC tests and the <i>E. coli</i> test.</p> <p>Note: We recognises that inclusion of TEMPO is not just a matter of “adding” it to the CLT as we are aware that a process needs to be followed to have it included in the NMD or accepted in OMAR. We have noted that the Australian Government Department of Agriculture and Water Resources have approved TEMPO for meat and meat product export testing, issued March 2017 – see link.</p> <p><a href="http://www.agriculture.gov.au/SiteCollectionDocuments/biosecurity/export/meat/elmer-3/approved-methods-microbiological-testing.pdf">http://www.agriculture.gov.au/SiteCollectionDocuments/biosecurity/export/meat/elmer-3/approved-methods-microbiological-testing.pdf</a></p>	Additional Test Class to include TEMPO Automated MPN or addition of TEMPO Automated MPN to the NMD.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.1.4	Animal names listed as they appears in NMD for all except pigs.	Replace pigs with porcine.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.1.4	Standardise Method information.	As per NMD requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
7	1	2.1.5	Proposing addition of MPN methodology using TEMPO Automation as an alternative method (in addition to MIMM or NMD etc.)	Inclusion of TEMPO Automated MPN method as a method option.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
1	1	2.1.5	Reinstate the reference to the China OMAR is this is where the sampling requirements are stated.	OMAR X/XX, must follow all sampling requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
11	1	2.1.5	Standardise Method information.	As per China OMAR requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
7	1	2.1.6	Proposing addition of MPN methodology using TEMPO Automation as an alternative method (in addition to MIMM or NMD etc.)	Inclusion of TEMPO Automated MPN method as a method option.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.1.6	Standardise Method information for Fishmeal.	As per China OMAR requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.1.6	Standardise Method information for Pet food.	Any method in the laboratory scope of ISO 17025 accreditation for the matrix concerned	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
7	1	2.2.1	Proposing addition of MPN methodology using TEMPO Automation as an alternative method (in addition to MIMM or NMD etc.)	Inclusion of TEMPO Automated MPN method as a method option.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
7	1	2.2.2	<p>We are IANZ accredited in TEMPO Automated MPN for several APC tests and the <i>E. coli</i> test.</p> <p>Note: We recognises that inclusion of TEMPO is not just a matter of “adding” it to the CLT as we are aware that a process needs to be followed to have it included in the NMD or accepted in OMAR. We have noted that the Australian Government Department of Agriculture and Water Resources have approved TEMPO for meat and meat product export testing, issued March 2017 – see link.</p> <p><a href="http://www.agriculture.gov.au/SiteCollectionDocuments/biosecurity/export/meat/elmer-3/approved-methods-microbiological-testing.pdf">http://www.agriculture.gov.au/SiteCollectionDocuments/biosecurity/export/meat/elmer-3/approved-methods-microbiological-testing.pdf</a></p>	Additional Test Class to include TEMPO Automated MPN or addition of TEMPO Automated MPN to the NMD.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.2.2	Animal names listed as they appears in NMD for all except pigs.	Replace pigs with porcine.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.2.2	Standardise Method information.	As per NMD requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
7	1	2.3	Proposing addition of MPN methodology using TEMPO Automation as an alternative method (in addition to MIMM or NMD etc.)	Inclusion of TEMPO Automated MPN method as a method option.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.



Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
1	1	2.4.1	<p>Recommend that the CLT include a definition of molecular biology or correct this to state PCR technique if this is what is intended. A number of labs have some interesting ideas about what type of testing 'molecular biology' covers.</p> <p>For example, a generic molecular biology method could be "Molecular biology techniques are common methods used in molecular biology, biochemistry, genetics and biophysics which generally involve manipulation and analysis of DNA, RNA, protein, and lipid". Molecular Biology Techniques include blotting, gel electrophoresis, PCR, microarray etc., much broader than PCR alone.</p>	Include a clarification similar to that in the previous column or amend all references to molecular biology to PCR if that is the intended method.	Amended to reflect as per ISO 17025 accreditation.
2	1	2.4.1	The way the method lines are drawn it's unclear whether any method is specified for meat and bone meal; egg and egg products; egg and egg products and environmental samples, cull birds.		Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
2	1	2.4.1	<i>Salmonella</i> – terminology needs changed "Molecular microbiological" to PCR.	PCR methods in the laboratory scope of ISO 17025.	Amended to reflect as per ISO 17025 accreditation.
11	1	2.4.1	Standardise Method information.	MIMM 7.7 or molecular microbiological methods in the laboratory scope of ISO 17025 accreditation for the matrix concerned.	Amended to reflect as per ISO 17025 accreditation.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
11	1	2.4.1	No Method information for provided for 3 new rows under this CLT.	Please provide method reference or state "No method specified".	Noted. 'No method specified' is inferred by the field remaining blank.
2	1	2.4.2	ISO 6579 has been updated this month.	ISO 6579-1:2017	Noted. The CLT must reflect the method described in the OMAR.
1	1	2.4.2	<i>Salmonella</i> method ISO 6579:2002 has been updated.	<i>Salmonella</i> ISO 6579-1:2017	Noted. The CLT must reflect the method described in the OMAR.
7	1	2.4.2	<i>Salmonella</i> for Sweden/Finland Market currently references ISO 6579:2002 however this ISO method has recently been updated so should CLT be referencing ISO 6579:2017	Update method reference for Test 2.4.2 to ISO 6579:2017.	Noted. The CLT must reflect the method described in the OMAR.
11	1	2.4.2	Animal names listed as they appears in NMD for all except pigs.	Replace pigs with porcine.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.4.2	Standardise Method information.	As per EU OMAR requirements. MIMM 7.7 with additional MKTTn broth in parallel as per ISO 6579:2002 (E) as well as XLD and BGM plating media.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.4.3	Standardise Method information.	As per NMD requirements	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.4.3	Raw ground beef should also reference USA OMAR for sampling requirements.	As per USA OMAR and NMD requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.5	Standardise Method information.	Presence/absence method suitable to matrix.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
11	1	2.6	Standardise Method information.	MIMM 7.5 or molecular microbiological methods in the laboratory scope of ISO 17025 accreditation for the matrix concerned.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.8	Standardise Method information.	MIMM 7.10	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.8.1	Method information references MIMM for information regarding limits of detection. MIMM detection limit is 100cfu/g whereas ISO is 10 cfu/g and unable to confirm limit of detection for Customs Union so don't believe MIMM reference is relevant.	ISO 7937:2004	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
7	1	2.9	Proposing addition of MPN methodology using TEMPO Automation as an alternative method (in addition to MIMM or NMD etc.)	Inclusion of TEMPO Automated MPN method as a method option.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.9	Standardise Method information.	MIMM 8.2	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
8	1	2.9	<p>The South Africa OMAR requires for anatomically unrecognisable cuts that pre-shipment samples meet the microbiological criteria prescribed on the import permit.</p> <p>Example:</p> <p>7. For anatomically unrecognisable cuts (e.g. MRM or trimmings) preshipment samples tested (not less than 1 sample per 1000 kg meat) compiled with the following technological standards:</p> <p>7.1 Standard Plate Count maximum <math>1 \times 10^6/\text{g}</math></p> <p>7.2 Coliforms maximum <math>1 \times 10^4/\text{g}</math></p> <p>7.3 <i>E. coli</i> maximum <math>2 \times 10^3/\text{g}</math></p> <p>7.4 <i>Staphylococcus aureus</i> maximum <math>1 \times 10^4/\text{g}</math></p> <p>7.5 <i>Salmonella typhi</i> – zero</p> <p>7.6 <i>Salmonella</i> spp (other than <i>S. typhi</i>) <math>1 \times 10^2/\text{g}</math></p> <p>Where the import permit specifies testing for coliforms:</p> <p>Coliforms are a subset of the family Enterobacteriaceae and as such it would be expected that any culture method designed to isolate Enterobacteriaceae would also isolate coliforms and therefore potentially give a higher count. Methods for determination of Enterobacteriaceae are in section 8.2 of MIMM. Therefore include Enterobacteriaceae in Meat &amp; Meat Products in the CLT for South Africa.</p>	Include Enterobacteriaceae – Meat and Meat Products – MIMM 8.2 – South Africa	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
1	1	2.9.1	The reference method ISO 22964:20006 has been updated and although the current wording implies the latest version it could be used, with the new version appearing to be quite a change from the old one the reference should be updated.	ISO 22964:2017.	Amended.
11	1	2.9.1	Standardise Method information and update ISO 22964 reference.	FDA BAM Ch 29, ISO 22964:2017 or molecular microbiological methods in the laboratory scope of ISO 17025 accreditation for the matrix concerned.	Amended.
7	1	2.10.1	Proposing addition of MPN methodology using TEMPO Automation as an alternative method (in addition to MIMM or NMD etc.)	Inclusion of TEMPO Automated MPN method as a method option.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.10.1	Format Method information to remove space in detection limit.	MPN method compatible with limit of $\leq 300$ MPN/g.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.12	Standardise Method information.	As per EU OMAR requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.13	Standardise Method information.	As per the laboratory scope of ISO 17025 accreditation.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.13.1	Standardise Method information.	As per the laboratory scope of ISO 17025 accreditation.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.14	Standardise Method information.	As per the laboratory scope of ISO 17025 accreditation.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
11	1	2.15	Standardise Method information.	As per the laboratory scope of ISO 17025 accreditation.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	2.16	Standardise Method information.	As per the laboratory scope of ISO 17025 accreditation.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
1	1	5.0	editorial, first line under 5.0, the 'all markets' should be "All markets"	All markets	Amended
11	1	5	No reference to "all" for any test under this section so no need for information regarding scope of premises in title. Group A/B information obviously included so no need to mention in title.	5.0 POTABLE WATER – PHYSICO-CHEMICAL PARAMETERS	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	5	Standardise Method information for all tests.	APHA latest edition or as per in the laboratory scope of ISO 17025 accreditation.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	5	All tests have Markets listed as EU, US but there is no consistency with how frequently this information appears.	Include it at the beginning of each page for this section.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	5.36	Title seems redundant and doesn't fit with other document formatting.	Remove.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	5.36.1	Capitalise name of tests to align with rest of document and remove lines in between tests.	Acid herbicides: 2,4,5-T 2,4-D 2,4-DB etc.	Amended.
11	1	5.36.2	Capitalise name of first test listed to align with rest of document	Chlortoluron, diuron, thiabendazole	Amended.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
11	1	5.36.3	Remove lines in between tests. Hexachlorobenzene appears to be a smaller size font to other tests listed.	Semi Volatile Organic Compounds (SVOC): Benzo(a)pyrene Alachor Aldicarb etc.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	5.39	Remove lines in between tests. Some tests appears to be a smaller size font to other tests listed.	Volatile Organic Compounds (VOC): Benzene 1,2-dichloroethane Tetrachloroethane etc.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	6	All tests have Markets listed as EU, US but there is no consistency with how frequently this information appears.	Include it at the beginning of each page for this section.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	7	Title in capitals for all except 1 word.	7.0. ANIMAL PRODUCTS IN GENERAL – FOOD ADDITIVES AND INGREDIENTS	Amended.
2	1	Section 10	Honey 10.02 and 10.03 have Food Standards Code listed as the method. We have checked MPI websites and cannot find specific methods for moisture and reducing sugars in any Food Standards Code. Perhaps we are not looking at the correct site/s.	However if a specific method is to be used it should be listed. Some AOAC or Analytical Biochemistry methods may be appropriate.	Amended.
1	1	10.01	No method listing for HMF, should this read “No method specified” as per the remainder of the document.	Include “No method specified” in the method column.	Noted. ‘No method specified’ is inferred by the field remaining blank. Comment will be considered as part of the full 2017 CLT review.
1	1	10.04	For consistency with the remainder of the document this should be “as per ISO 17025 accreditation”.	Amend wording “as per ISO 17025 accreditation”.	Amended.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
1	1	10.04	Now includes clarification that substitution or modification of the ManKan Honey PCR kit is not permitted. Does the same restriction apply to the extraction kit which is a separate consumable as per the MPI method.	Clarification that this statement refers only to the PCR kit.	Noted. This statement only applies to the ManKan Honey real time PCR kit.
1	1	10.04	Inconsistent spelling of Manuka	Use either Manuka or Mānuka	Amended to match GREX.
1	1	10.05	Inconsistent spelling of Manuka	Use either Manuka or Mānuka	Amended to match GREX.
1	1	10.05	For consistency with the remainder of the document this should be “as per ISO 17025 accreditation”.	Amend wording “as per ISO 17025 accreditation”.	Amended.
11	1	11.1.1	Some other CLTs for water include information on the type of test the method is referencing but this CLT does not.	APHA 4th ed 1970 MPN MIMM 11.4 mFC MF MIMM 11.A2 MPN	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	11.1.2	Some other CLTs for water include information on the type of test the method is referencing but this CLT does not.	APHA 4th ed 1970 MPN MIMM 11.A.1.1 Rapid MIMM 11.A2 with 11.A2.6 MPN MIMM 11.3/11.4 with 11.5 MF	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	11.1.2	Font for <i>Escherichia coli</i> in test column bigger than other words.	Decrease font to match other words.	Amended.
11	1	11.2.1	Some other CLTs for water include information on the type of test the method is referencing but this CLT does not.	APHA 4th ed 1970 MPN MIMM 11.4 mFC MF MIMM 11.A2 MPN	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	11.2.3	Some other CLTs for water include information on the type of test the method is referencing but this CLT does not.	APHA 4th ed 1970 MPN MIMM 11.A.1.1 Rapid MIMM 11.A2 with 11.A2.6 MPN MIMM 11.3/11.4 with 11.5 MF	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.



Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
11	1	11.2.4	Standardise Method information.	AOAC and APHA latest editions	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	11.3.1	Some other CLTs for water include information on the type of test the method is referencing but this CLT does not.	APHA 4th ed 1970 MPN MIMM 11.4 mFC MF MIMM 11.A2 MPN	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	11.3.3	Some other CLTs for water include information on the type of test the method is referencing but this CLT does not.	APHA 4th ed 1970 MPN MIMM 11.A.1.1 Rapid MIMM 11.A2 with 11.A2.6 MPN MIMM 11.3/11.4 with 11.5 MF	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	11.5.6	Standardise Method information.	APHA or FDA BAM Ch 9 latest editions for 3 tube MPN	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	11.5.7	Standardise Method information.	AOAC and APHA latest editions	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
2	1	11.5.8	Histamine – method should be accredited	ISO 17025 accredited method such as HPLC or equivalent instrumentation.	Noted. The CLT must reflect the method described in the OMAR
11	1	11.5.10	Standardise Method information.	MPN method compatible with limit of $\leq 20$ MPN/g	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	11.5.12	Standardise Method information.	APHA or FDA BAM Ch 9 latest editions for 3 tube MPN.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
1	1	11.6.3	As per 2.4.2 above, <i>Salmonella</i> method ISO 6579:2002 has been updated.	<i>Salmonella</i> ISO 6579-1:2017	Noted. The CLT must reflect the method described in the OMAR.
11	1	11.6.4	Standardise Method information.	FDA BAM Ch 9 latest edition.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
11	1	11.6.5	Standardise Method information.	FDA BAM Ch 9 latest edition.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	11.6.6	Standardise Method information.	AOAC and APHA latest editions.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
1	1	11.8.2	As per 2.4.2 above, <i>Salmonella</i> method ISO 6579:2002 has been updated.	<i>Salmonella</i> ISO 6579-1:2017	Noted. The CLT must reflect the method described in the OMAR.
2	1	11.8.2	<i>Salmonella</i> ISO update	ISO 6579-1:2017	Noted. The CLT must reflect the method described in the OMAR.
2	1	11.8.2	<i>Salmonella</i> – terminology needs changed “Molecular microbiological” to PCR	...”or PCR methods in the laboratory scope of ISO 17025”.	Amended.
2	1	11.8.5	<i>Listeria</i> - terminology needs changed “Molecular microbiological” to PCR	...”or PCR methods in the laboratory scope of ISO 17025”.	Amended.
2	1	11.8.5 <i>Listeria</i>	All rapid kit methods have been removed. There are limited ones still available which have AOAC approvals. Labs should not be restricted to those in MIMMS as this is not always up to date. Labs should be able to use rapid kits if the method has been ISO accredited.		Amended.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
4	1	11.8.5	The Human Consumptions Specification (HCS) simply says under 15.5(1) that “ <i>An operator must use a laboratory with an accreditation to ISO/IEC 17025 with the required tests in the laboratory’s scope of accreditation.</i> ” It does not specify the test to be used. Therefore, under the RLP any test validated for the matrix and for which a lab has 17025 accreditation can be used. The current CLT and the proposed wording for 11.8.5 in the new CLT are therefore inconsistent with the HCS and the RLP. There should not be an entry or as is done in some test listings “Any test accredited under 17025”	Presence/absence testing FDA BAM (most current version) or MIMM 7.5 (latest version) or EN/ISO 11290-1 (1996) and subsequent amendment (2004), or any test accredited under 17025.	Amended.
11	1	11.8.5	All ELISA and rapid kits have been removed leaving only traditional or PCR testing. Suggestion to either include a generic reference to rapid kits OR allow the use of other methods that have been validated and accredited by the laboratory. Should also be a space between “ISO” and “17025.”	Presence/absence testing Latest editions of FDA BAM Ch 10, MIMM 7.5, ISO 11290-1:1996 or molecular microbiological methods in the laboratory scope of ISO 17025 accreditation for the matrix concerned. Alternatively, any other method that has been validated and accredited by the laboratory for the matrix concerned.	Amended.
11	1	11.8.5	List of enumeration methods still in list format. Standardise Method information.	Enumeration testing FDA BAM Ch 10, MIMM 7.5, ISO 11290-2:1998 latest editions	Amended.
11	1	Pg 21 - 28	Footer referring to Market column still present but this column is not present	Remove footer for these pages.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
11	1	22.1	Standardise Method information.	As per NMD requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	23.1	Standardise Method information.	As per USA OMAR requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	23.1.1	Standardise Method information.	As per USA OMAR requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	23.2	Standardise Method information.	As per USA OMAR requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	23.3	Standardise Method information.	As per USA OMAR requirements.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	23.4	Standardise Method information.	As per USA OMAR requirements	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
9	1	30.0-33.0	<p>Each product included in the List should detail its related scope and the regulatory basis of its inclusion, i.e. the country or countries that require the test due to an OMAR or 'all' where it is based on a generic New Zealand requirement.</p> <p>Tests 33.5 Reichart-Meissl Value (fat) and 33.6 Polenske Value (fat), are only applicable to Butter and Whole Milk Powder according to the Sri Lanka OMAR (Clause 4.3.1).</p>		Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
11	1	30-33	In most cases there is no information included for the Method. Standardise Method information.	In these cases state, any method that is validated and IANZ accredited.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	30	No number in the title and aligned to the left rather than centred.	30.0 DAIRY (RAW MILK)	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	31	No number in the title and aligned to the left rather than centred.	31.0 DAIRY PRODUCTS - MICROBIOLOGY	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	31.1	Test information may have an incorrect acronym.	Change to "APC / SPC / TVC" or "APC / SPC / TPC"	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	31.9	Missing "s" from test name.	Faecal coliforms.	Amended.
11	1	31.12	Not aware of any <i>Salmonella</i> counts so don't believe the classification of detection is required in test information.	<i>Salmonella</i>	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
1	1	31.17	Potential issue in that the use of the term <i>Chronobacter</i> is starting to be replaced by <i>Chronobacter</i> spp. i.e. the new ISO method is for <i>Chronobacter</i> spp. (ISO 22964:2017) and the method does not allow for confirmation to <i>Chronobacter sakazakii</i>	Ensure the organism stated and the method are aligned with the market requirement.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	31.17	Test should be corrected to <i>Cronobacter</i> species and the comment in brackets corrected to formerly known as <i>Enterobacter sakazakii</i>	Test should be corrected to <i>Cronobacter</i> species and the comment in brackets corrected to formerly known as <i>Enterobacter sakazakii</i> .	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	32	No number in the title and aligned to the left rather than centred.	32.0 DAIRY PRODUCTS – COMPOSITION (includes standards of identity, vitamins, minerals and other nutrients).	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
3	1	32 (Dairy Composition )	Protein Dry Basis is a standard of identity for casienates (Codex standard for edible casein products). Protein Dry Basis is calculated from protein and moisture, both of which are on the CLT. Does Protein Dry Basis need to be added?	Include Protein Dry Basis if appropriate.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
3	1	32 (Dairy Composition )	Casein In Milk Protein is a standard of identity for casienates (Codex standard for edible casein products). Casein in Milk Protein is calculated from Non Protein Nitrogen, Non Casein Nitrogen and Total Nitrogen. None of these tests are currently in the CLT. Do they need to be?	Include Casein in Milk Protein and/or Non Protein Nitrogen, Non Casein Nitrogen and Total Nitrogen if appropriate.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
1	1	32.22	Some clarification for the reason for 2 protein method listings. Is 32.2 for protein in infant formula there because of the melamine issue, and if so then using methods such as Kjeldahl (nitrogen equivalence) would not be suitable for this type of test.	Ensure that the reason for the 2 method listings and the associated methods are appropriate – market access people to look at this. This may require a list of permitted methods to be included based on the purpose for which the test is intended.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
5	1	32.35	I think 32.35 should be sterols rather than sterol, as there are a number of compounds which are all sterols.	sterols	Amended
1	1	32.4	Some clarification for the reason for 2 protein method listings. Is 32.2 for protein in infant formula there because of the melamine issue, and if so then using methods such as Kjeldahl (nitrogen equivalence) would not be suitable for this type of test.	Ensure that the reason for the 2 method listings and the associated methods are appropriate – market access people to look at this. This may require a list of permitted methods to be included based on the purpose for which the test is intended.	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
11	1	33	No number in the title and aligned to the left rather than centred.	33.0 DAIRY PRODUCTS – PHYSICAL AND CHEMICAL TESTS	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	1	50 - 105	Title aligned to the left rather than centred.	LIVE ANIMALS AND GERMPLASM – DISEASE TESTS	Out of scope of this amendment. Comment will be considered as part of the full 2017 CLT review.
11	2	Table 1	Test name for CLT 1.3 does not match name in Part 1.	Change to “Colony count 22°C”	Out of scope of this amendment. Comment will be considered as part of the ILCP review.
11	2	Table 1	Round information for Faecal coliforms and <i>Cl. perfringens</i> combined. Not consistent with the format used in other tables.	Split into 2 rows and denote number of rounds for each organism.	Out of scope of this amendment. Comment will be considered as part of the ILCP review.
11	2	Table 1	Table 4 incorporates information regarding participation for each recognised method within the table but Table 1 has it as a note underneath.	Standardise format by including this within the table for Faecal coliforms and Total coliforms. Remove note under table.	Out of scope of this amendment. Comment will be considered as part of the ILCP review.
2	2	Table 2	ILCP tests APC and <i>E. coli</i> in meat programme. The frequency of this programme needs to be reviewed. The need to perform 11 rounds per year seems excessive based on the very high level of correct results. The number of potable water rounds was reduced some years ago so there is past evidence of changing frequency.	Minimum rounds per year 6.	Out of scope of this amendment. Comment will be considered as part of the ILCP review.
11	2	Table 3	Is there no requirement to participation for each recognised method under the Seafood ILCP programme? If there is then this information should be captured within the table.	Standardise format by including this within the table if appropriate.	Out of scope of this amendment. Comment will be considered as part of the ILCP review.

Identifier	Part	Clause	Comment	Proposed amendment	MPI Response
11	2	Table 4	The <i>Listeria monocytogenes</i> section of the table suggests CLT 2.6 requires both presence/absence and enumeration ILCP participation. Is this accurate?	If CLT 2.6 does not requires both presence/absence and enumeration then can the <i>Listeria monocytogenes</i> be split into 2 rows and the appropriate ILCP participation be list for each CLT.	Out of scope of this amendment. Comment will be considered as part of the ILCP review.
11	2	Table 5	Alignment of title indented.	Realign to left margin.	Out of scope of this amendment. Comment will be considered as part of the ILCP review.
11	2	Table 6	Alignment of title indented.	Realign to left margin.	Out of scope of this amendment. Comment will be considered as part of the ILCP review.
11	2	Table 7	Alignment of title indented.	Realign to left margin.	Out of scope of this amendment. Comment will be considered as part of the ILCP review.
2	2	3,4,5 & 6	These sections are not easy to read. The terms, minor, major and critical are used when the ILCP provider reports to MPI not actually used in the lab reports.	<p>Use a separate section to explain which ILCP ratings lead to each defect category and a separate section with the actions to be taken. The first section could be simplified, for example:</p> <p>One 'action' or two 'warnings in subsequent rounds for the same test → minor  Minor plus an 'action' or 'warning' in the retest → major  Major plus an 'action' or 'warning' in the retest → critical</p>	Out of scope of this amendment. Comment will be considered as part of the ILCP review.