



Critical issues in food safety-for export of Milk and Milk Products

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EXPORT QUALITY CERTIFICATION – A BACKGROUND

- Export (QC&I) Act, 1963 – umbrella Act governing quality of exports
- EIC set up to advise Government on measures for sound development of exports through QC & I to include notification of standards & certification systems
- Powers of Central Government under the Act
 - Notify commodities for compulsory PSI
 - Specify standards for export and type of QC & I
 - Establish or recognise Agencies for QC & I
- Nearly 1000 commodities notified

EIC STRUCTURE

- Apex Body – Council, Chairman, 18 members, Member Secretary- Director, EIC
- Specialist Committees
- EIC – The Organization
 - CEO Director, office at Delhi
 - Powers of ‘Head of Department’
 - Administering export certification
 - Administrative & technical control of EIC & EIAs
 - Machinery for Export Certification – 5 EIAs at Mumbai, Kochi, Kolkata, Delhi and Chennai, under administrative & technical control of EIC
 - 41 Sub-offices & labs

PRODUCTS COVERED UNDER EXPORT CERTIFICATION

- Nearly 1000 commodities notified in all sectors (Food, footwear, chemicals, engineering, leather, jute etc.)
- Under Mandatory Certification (food commodities)
 - Fish & Fishery Products
 - Dairy Products
 - Egg Products
 - Poultry Meat & Poultry Meat Products
 - Honey
 - Raw Meat (Frozen/chilled), Processed Meat

Present Status of Milk & Milk Products Exports

- India – largest producer of Milk
- Exports relatively insignificant
- Major reason – Quality and safety
- WTO regime – free market, increase in volume of trade.
- Requirements of Pesticides, Contaminants, Microbiological parameters etc.

Export Certification System for Dairy Products

- GOI Notification SO: 2719 & 2720 dated 16/12/2000 on Milk & Milk Products
- Competent Authorities
 - Export Inspection Agencies

Conditions to be fulfilled in-order to export

- Meet statutory restrictions of state/central Govt. w.r.t. environmental conservation, commercial etc.
- Milk from healthy animals, not treated with antibiotics and drugs etc.
- Contain only permissible food additives fit for human consumption
- Processed in a approved plants
- Plant to meet hygienic conditions.
- Packed in separate rooms hygienically, automatic filling bottling, no reuse, wrapping on packaging.

Conditions to be fulfilled in-order to export Cont..

- Stored at established temperature to ensure durability
- Indicate period- fit for human consumption
- Maintain records, present it to C A
- Test for residues of Antibiotics, Pesticides, Heavy Metals at prescribed intervals.
- If contaminated should not be permitted for human consumption.
- Test for residues in accordance with national/ international recognised methods.

Procedure for Application and Approval

- In prescribed application form with relevant documents.
- Constitution of IDP
- Recommendation of IDP for approval
- Grant of approval by In-charge of EIA and allotment of approval no.
- Issuance of Certificate of Approval by EIC.

Monitoring and Control by Exporter

- Primary responsibility lies with exporter
 - Broad areas of control and records
 - i. Premises
 - ii. Structure and layouts
 - iii. Pest control
 - iv. Maintenance
 - v. Cleaning and Sanitation
 - vi. Personal hygiene
 - vii. Rest Rooms
 - viii. Water management
 - ix. Chemicals
 - x. Lighting and ventilation
 - xi. Waste disposal & effluent treatment
 - xii. Good manufacturing practices (GMP)
- Continued..

3-TIER SURVEILLANCE SYSTEM

- MONITORING BY EIA OFFICIALS TO VERIFY
 - Sanitation & Hygiene
 - Process controls
 - Implementation of HACCP plan
 - Records
 - Observe testing by laboratories
 - Draw samples of raw materials, water , ice, finished products, swabs of workers hands and work places
- SUPERVISORY VISITS TO CHECK
 - Compliance to norms by processors
 - Quality and correctness of monitoring by EIA officers.
- CORPORATE AUDITS
 - Independent audit by EIC to verify operation of scheme by EIAs as per documented systems.

Issuance of Certificates

- **Inspection Certificate**

- i. Every consignment needs to be issued
- ii. Issue by the exporter or by EIA
- iii. Validity – 45 days

- **Health Certificate**

- i. As per the requirement of the importing country
- ii. Based on – copy of certificate of inspection
 - testing data of residues
 - lab report for additional parameters, if any

Some Important Food Safety requirements for Milk & Milk Products

- Residue Monitoring Plan (RMP) – Raw Milk
 - i. Pesticide residues- once in two months
 - ii. Drugs- once in a week
 - iii. Heavy metals – once in a month
 - iv. Aflatoxin – once in a month
- Microbiological criteria for milk and milk products
 - i. Pathogenic micro-organisms – should be absent
 - ii. Organism indicating poor hygiene – within prescribed limits
 - iii. Indicator organisms – within prescribed limits

INTERNATIONAL RECOGNITIONS

- **EC** - Designated CA for marine products and issuance of authenticity certificate for basmati rice; dialogue on for dairy products, egg products, poultry meat & honey
- **USA (USFDA)** - recognized for Black Pepper – no detention if accompanied by EIC certificate; initiated dialogue for other foods
- **Australia (AQIS)** - recognized in December 2002 for marine products – maximum 5% consignments to be subjected to random verification- seeking for dairy products, spices etc.
- **Sri Lanka (SLSI)** - recognized for 85 products regulated by Sri Lanka (food, cement, engineering items, electrical appliances etc. – Agreement signed in Dec' 2002 – Assessment by SLSI team in April 2003 – level of inspection reduced to 25% in 1st year
- **Mauritius-** MRA in process for food and other products including dairy products

INTERNATIONAL RECOGNITIONS

Contd...

- **Italy** – An MoU has been signed in the area of fish and fishery products. Efforts are on to cover food products such as sesame seeds, snack food etc.
- **Korea**- Four of our EIAs, namely, Mumbai, Kochi, Chennai and Kolkata have been recognized by Korea Food & Drug Administration (KFDA) for certifying various food products for export into Korea.
- **Turkey** – EIC has been designated as the authorised agency to issue health certificate to export food products and food packaging materials
- **Singapore**- 4 sectors- food & agriculture, electric and electronic products, telecommunication equipments and drugs & pharmaceuticals. Food sector includes dairy products, egg products and packaged drinking water.

Thank you

