APPENDIX 2 – PART A

New Zealand National Programme for Monitoring and Surveillance of Residues in Non-Dairy Animal products

Sampling Plan for the year 1 July 2007 to 30 June 2008
Amended Sampling Plan for the year 1 July 2006 to 30 June 2007
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1 Submission

Enclosed is New Zealand’s sampling plan for the National Chemical Residue Monitoring Programme for non-dairy animal products for the production year 1 July 2007 to 30 June 2008.

This document outlines the 2007/2008 sampling plan, the indicative plan for 2008/2009 and clarifies changes to the 2006/2007 sampling plan.
2 Executive Summary

This document and accompanying spreadsheets detail the proposed 2007/2008, the amended 2006/2007 and the indicative 2008/2009 residue sampling & testing programmes in New Zealand. Sample numbers have increased by 27% for 2007/2008 and the majority of these additional samples will be tested for banned substances in ruminants and equines. Equine sample numbers have substantially increased and exceed the number of samples analysed by the UK (as reported in 2005) in that species.

In addition, sample numbers for banned substance testing, including thyrostatics in bovine, cervine and equine animals, will increase for the remainder of the 2006/2007 year.

Section 3 of this document explains the rationale for sampling for each animal type in the 2007/2008 programme.

Section 4 of this document provides a summary of the New Zealand approach to residue monitoring, including a comparison between France and New Zealand farming models.

Section 5 of this document is comprised of attached spreadsheets detailing the sampling plan.
3 Residue Programme by animal type

3.1 Sheep/goats

The New Zealand position for sheep is that these animals are husbanded on a whole flock or farm basis with about 12,000 sheep farms, each carrying an average number of 2500 sheep. These animals are not normally managed individually and are shepherded infrequently for shearing, vaccination, parasiticide treatment (endo and ecto) and yarding for trucking to the slaughter premises. Whole herd treatment, versus individual, is the norm in New Zealand sheep farming. Opportunities for drug intervention are limited with registered products, and even more so for EU banned substances. Opportunities and motives for off-label veterinary medicine use (i.e. registered, but no claim for use in certain species) in sheep are similarly absent due to lack of economic drivers and for the same reasons, illegal drug use on farms is considered by the NZFSA to be absent. There is no evidence from historical testing, veterinary intelligence, importation, border control or even hearsay that illegal substances are used in New Zealand sheep. Notwithstanding NZFSA proposes a plan to sample sheep and goats and test for the range of banned substances and other veterinary medicines as cited below.

New Zealand proposes to sample sheep as part of a programme aggregating meat producing ruminants for its annual programme, and will sample and test sheep for stilbenes, hormones, resorcylic acid compounds, thyrostatics, beta blocking agents, chloramphenicol, dimetridazole and nitrofurans from the categories of banned or prohibited substances (A1-A6). Additionally NZFSA will sample and test sheep for antibacterial compounds and anthelmintics as set out in the attached plan. This plan will operate from 1 July 2007-30 June 2008.

3.2 Cattle

Beef cattle are husbanded on a similar whole herd basis but, due to higher per animal value the potential for individual treatment is also higher. There is evidence of the absence of illegal use of veterinary medicines in beef cattle from testing, border control for drugs and veterinary intelligence. Beef farming in New Zealand is a low intervention process with a very low frequency owner-animal interaction making illegal intervention a difficult prospect on animals unaccustomed to humans.

Notwithstanding, NZFSA proposes a plan to sample cattle and test for the range of banned substances and other veterinary medicines as cited below.
New Zealand proposes to sample cattle as part of a programme aggregating meat producing ruminants for its annual programme, and will sample and test cattle for stilbenes, hormones, resorcylic acid compounds, thyrostatics, beta blocking agents, chloramphenicol, dimetridazole and nitrofurans from the categories of banned or prohibited substances (A1-A6) and phenylbutazone (B2). NZFSA will sample and test cattle for antibacterial compounds and anthelmintics as set out in the attached plan. New Zealand proposes to sample and test live cattle for a range of banned substances as set out in the attached plan.

The total ruminant meat samples taken at the slaughter premises are proposed to be tested for the range of banned substances listed in the plan. Each of the ruminant samples taken will be independent.

This plan will operate from 1 July 2007-30 June 2008.

New Zealand will pro-rata the slaughter premises based sampling plan for the remainder of the 2006/2007 sampling period.

NZFSA has approved a test method validated to test for 28 steroidal, hormonal, stilbene, resorcylic acid and corticosteroidal compounds in ruminant urine to sub-ppb levels in one LC-MS(3) procedure. This is a significantly greater suite of hormonal physiological compounds than is cited in the EU Annex IV or in the EU plan requirements for such substances and is indicative of the commitment NZFSA has to a comprehensive, efficient and effective residue programme. Moreover the introduction of this procedure is a significant milestone in the advancement in the science of residue testing.

3.3 Farmed Deer

Farmed deer are more valuable than sheep, but less so than cattle. They are often co-farmed with cattle and sheep. Deer as husbanded in New Zealand are not amenable to human handling except with great difficulty especially when in antlers. NZFSA is of the view that veterinary intervention in deer is uncommon for the above reason and is largely restricted to externally applied parasiticides. However prejudice NZFSA proposes to sample deer.

New Zealand proposes to sample deer at the slaughter premises as part of a programme aggregating meat producing ruminants for its annual programme, and will sample and test deer for stilbenes, hormones, resorcylic acid compounds, thyrostatics, beta blocking agents, chloramphenicol, nitrofurans, and dimetridazole from the categories of banned or prohibited substances (A1-A6). NZFSA will sample and test deer for antibacterial compounds and anthelmintics as set out in the attached plan. This plan will operate from 1 July 2007-30 June 2008.
New Zealand will pro-rata the slaughter premises based sampling plan for the remainder of the 2006/2007 sampling period.

### 3.4 Horses

In the calendar year 2005/2006, New Zealand slaughtered approximately 1200 horses. New Zealand does not have a passport or an animal identification system for horses.

New Zealand will test for stilbenes, hormones, resorcylic acid compounds, thyrostatics, beta blocking agents, chloramphenicol, nitrofurans, virginiamycin, dimetridazole and phenylbutazone as set out in the proposed plan. The plan proposes to sample horses at the slaughter premises at 35 times the rate specified for bovines (0.4%) in Directive 96/23/EC. The sample numbers in the New Zealand plan are now greater than those reported for horses in the 2005 United Kingdom sampling plan. Given the small number of horses processed, NZFSA contends that this is a disproportionate sampling rate.

### 3.5 Dairy Cattle

Dairy cattle as a meat source are included in the cattle category 3.2. The New Zealand position is that while dairy cattle are husbanded more intensively than beef cattle in New Zealand, the extra intervention risk is also managed by the milk testing programme which provides information on the use of veterinary medicines in dairy cattle as well as actual residues in the milk. New Zealand sees the milk programme as a de facto live animal programme applicable to banned substances for dairy cattle which are tested for chloramphenicol, dapsone and nitrofurans.

### 3.6 Ostrich and Emu


### 3.7 Farmed Salmon

New Zealand will sample from EU-listed farms and processors in accordance with Directive 96/23/EC. New Zealand contends that the sampling rate based on production is excessive, but accepts that farmed salmon are not a species deemed as residue equivalent within the EU-NZ veterinary agreement. Consequently, 72 samples will be taken. This will be re-evaluated after two years.
3.8 Honey

New Zealand proposes to sample honey at a rate proportional to production in accordance with Directive 97/747/EC. Consequently, 69 samples will be taken.

3.9 Wild Game

In New Zealand, wild game is mainly deer and pigs. Wild game does not generally inhabit the same land as farmed animals. As such, they are not exposed to contamination from elements or chemicals used specifically on farmland or on farmed animals. Currently only wild deer are exported to the EU. New Zealand proposes to take samples from EU-listed processors and domestic-only processors to test for sodium fluoracetate and lead. NZFSA points out that New Zealand is not highly industrialized and has few natural sources of heavy metals.
4 Summary of New Zealand approach to residue monitoring

4.1 Acceptable levels of control for EU banned substances

The New Zealand preference for demonstrating acceptable level of control for substances banned by the EU is not to undertake purely random statistical sampling, but to target risk farms and persons by way of designed and controlled surveys together with monitoring. Much as one detects breaches of road speed limits by placing police and cameras at strategic and known risk places rather than distributing these controls randomly, New Zealand proposes to identify risk farms and survey these. Criteria for selection will vary in each case but would include: previous history of a residue breach, veterinary intelligence, access to drugs or chemicals, time of year, etc. Intensive testing of a sample for wide range of substances is New Zealand preference. The vast majority of farmers in New Zealand have never had a detection or violation of any kind of residue.

New Zealand proposes that the majority of farmed animals need not be sampled and tested for these banned substances. In the recent past, surveys have included virginiamycin and beta agonists in horses. While these surveys are not part of the monitoring programme, any unfavourable outcome of a survey would result in an appropriate response.

4.2 Multi-residue testing

New Zealand prefers multi-screen tests across activity classes. With the low prevalence rate of detections in New Zealand multi-residue screens are a viable alternative. New Zealand is proposing to test one sample for many illegal substances as set out in the proposed plan.

4.3 Mycotoxins

New Zealand considers mycotoxin monitoring in product other than milk to be of little value as dairy cattle are the species most fed meal-based supplements in which mycotoxins are likely to be found and milk is the preferred matrix for testing.
4.4 Farming practice as a basis for sampling

To demonstrate the difference between farming practices in New Zealand and Europe, France was selected for comparison as a farming country with significant numbers of sheep. French data was obtained from http\epp.eurostat.ec.europa.eu/portal.

In France in 2003 there were 8,989,000 sheep and an estimated 80,000 flocks. This averaged about 110 sheep per farm.

In New Zealand in 2005 there were about 40,000,000 sheep. There are an estimated 25,000 commercial sheep farms in New Zealand. This gives a stocking rate of about 1,600 sheep per farm and is about 15 times the stock rate per farm than in France.

Because of this larger farm size and higher stocking rate, New Zealand is targeting farming practice and consequently, our sampling numbers provide equivalent information to sample numbers based on production in accordance with Directive 96/23/EC.
5 Sampling Plan

The attached spreadsheet (entitled; Appendix 2 Part B) indicates the sample/test numbers for the upcoming year 2007/2008, the indicative samples for 2008/2009 and highlights the changes from the previous 2006/2007 plan.