

Dairy and Milk Products — HMTc Program Manual

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Scope and method

Every limit on every subcategory is the strictest maximum level set by any credible government worldwide, converted to the product's native basis, with a disclosed read-across from the nearest government value where no government regulates the exact product. Nothing is invented; every number traces to a named sovereign limit in the [regulation references](#).

Method: [government-limit default \(Method v2.0\)](#). Dairy limits are taken at face value in each product's native basis; there is no reconstitution conversion (dairy has no legislated reconstitution ratio, unlike infant formula). Product forms — liquid milk, cheese, powder, condensed, butterfat — are kept distinct: non-concentrated liquid forms share the general fluid-milk sovereign pool, while concentrated forms carry their own higher form-specific government maximums. Every claim analyte is equal at the gate: a product is certified only at or below 100% of each published government floor or disclosed read-across. An exceedance on any metal enters Remediation unmarked; there is no transitional overage. [Inorganic arsenic](#) and [hexavalent chromium](#) are reflex speciation screens; [methylmercury](#) has no pathway in dairy; [tin](#) is material only for canned product.

Master limit matrix

All values ppb (µg/kg) in each row's native basis. Click any subcategory for its full government-by-government derivation. n/m = not material in the matrix; controlled by screen or reflex speciation, not a number.

Subcategory	Pb	Cd	tAs	iAs	Hg	MeHg	Ni	Sn	Al	Cr	Cr-VI	Basis
Liquid milk — cow	20	50	50	—	10	—	100	250000	500	300	—	as consumed
Liquid milk — goat, sheep, and other ruminant	20	50	50	—	10	—	100	250000	500	300	—	as consumed
Camel milk	20	50	50	—	10	—	100	250000	500	300	—	as consumed
Cheese	20	500	500	—	50	—	100	250000	500	300	—	as sold
Yogurt and cultured dairy	20	50	50	—	10	—	100	250000	500	300	—	as consumed
Cream	20	50	50	—	10	—	100	250000	500	300	—	as consumed
Milk powders — whole, skim, and specialty	20	1000	500	—	50	—	250	250000	500	2000	—	as sold
Condensed and evaporated milks	200	100	100	—	100	—	100	200000	500	300	—	as sold

Every claim analyte is equal at the gate. A product is certified only when every published limit is met at or below 100% of its government floor or disclosed read-across. An exceedance on any metal enters Remediation and carries no mark.

Risk Flag

These subcategories carry a natural or process background that runs above the limit — the limit being the strictest government maximum for the product, never a percentile of market data (Method v2.0). A product is not disqualified by this: only its own tested result decides certification, and a well-sourced lot can sit well below the market. What the pooled occurrence literature shows is where the work is — which ingredients demand exceptional sourcing.

▼ Aluminium

Grains and cereals, [aluminium](#)-based leavening agents (baking powder made with sodium aluminium sulfate or phosphate), and some tablet and capsule excipients carry high aluminium. No government sets an aluminium limit for solid infant food, so the standard holds these products to the strictest sovereign infant aluminium ceiling — the AU-NZ infant-formula limit — as a protective read-across, rather than to the only limit that names solid foods (an adult additive-residue allowance many times looser). Much of the excess comes from aluminium-based leavening, which a brand can reformulate away with aluminium-free baking powder.

~4.2× Cheese (the 500 ppb limit)

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Multipliers are the ratio of the pooled occurrence median to the published limit; occurrence characterises the market only and carries no compliance weight. See [the cross-category summary](#).

About this edition

Standards are living, versioned documents; each subcategory page carries its own version history and dated change log. This is the current web edition. A consolidated, version-pinned PDF of the full manual is in preparation and will be linked here on release; until then each subcategory page is individually citable.

The literature baseline underlying these certification limits is maintained independently at the [Heavy Metal Index](#)^[7]. This certification standard applies those findings; the two are kept editorially separate by design.