OFNZ TEMPLATE FOOD CONTROL PLAN

Revision : 5

Date : 1 July 2022

Next review date : 1 May 2024

This is a pre-evaluated document. If you add any procedures to this plan or make any changes to the procedures provided they must be evaluated.

Table of Contents

Change log

Revision 3: June 2022 -

Table 1: Common hazards in organic horticulture adjusted to specifically mention allergens that must be declared

Section 4.4: Links to MPI website updated

Section 4.5: Specific refernece to allergens and link to NPI website

Section 4.7: Links updated

Revision 4: June 2022

Section 5.3 Link to MPI website updated

Revision 5: July 2022

Footer: revision number, date of issue, and page index added

Section 4.4: Tree nuts specified

1 INSTRUCTIONS

1.1 OFNZ Template Food Control Plan

In this document OFNZ refers to OrganicFarmNZ.

OFNZ Template Food Control Plan is a pre-evaluated food safety document and is based on the National Programme Guidelines.

The OFNZ Food Control Plan needs to be used in conjunction with OFNZ Food Control Plan Form.

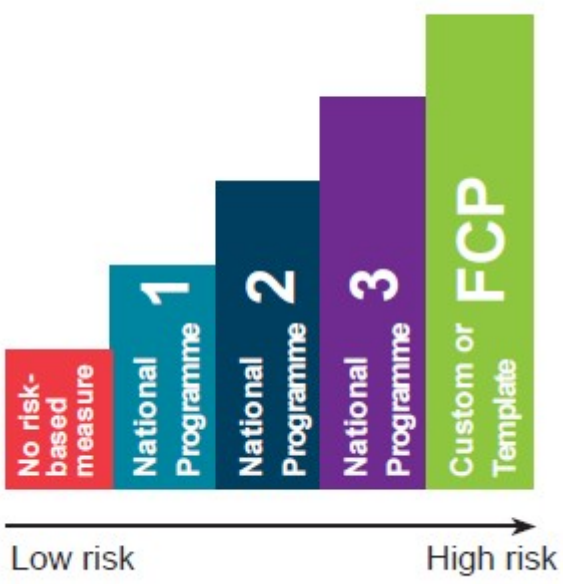
If you add any procedures to the OFNZ Template Food Control Plan or make any changes to the procedures provided they must be evaluated.

A National Programme (NP) is a set of rules that medium and lower risk food businesses need to follow to comply with the Food Act 2014. These rules are there to help you manage food safety risks and stop people getting sick.
There are three levels of NPs based on the food safety risk involved in particular types of food business. Level 3 is medium to high risk.

Under a NP, you don't need written procedures or a documented food control plan (these are only required for high risk food businesses), but you do need to keep records for some of the things you do.

For the OFNZ Template Food Control Plan you need to register with your OFNZ Regional Group or National office. You must also be a full member of OFNZ and get checked (verified) by an OFNZ Auditor.

The OFNZ Template Food Control Plan covers a wide range of horticulture activities. You use the information that is relevant to your business.



Where can I find more information?
You can check the Food Regulations 2015 here:
www.legislation.govt.nz
If you have any questions contact OFNZ or MPI.
Visit www.mpi.govt.nz/foodact
MPI: info@mpi.govt.nz 0800 00 83 33

1.2 How to use this template

This guide tells you what things your verifier will check, and outlines where you need to keep records. To help you make sure that you are keeping the right records for the right things we have placed icons throughout this document:

Record keeping needed

Think: Some key things to notice or remember

Each topic has three sections: Know, Do and Show.

Know has general information about why this topic is important to food safety and gives ideas for how you can comply with food law.

Do outlines what you must do to comply with the food safety laws.

Show outlines what your verifier will ask you to demonstrate or the records they will expect to see.

Sometimes things go wrong, and your food might become unsafe or unsuitable. You need to be able to identify when something has gone wrong, and be able to fix it. You need a procedure in place and you need to keep records. These records are listed throughout the document. Follow the 'When something goes wrong' card.

The green pages outline information about setting up your business and staff training.

The blue pages outline information about cleaning and sanitising, maintaining equipment and facilities, and personal hygiene.

The orange pages outline information about control steps commonly used in National Programme (NP) businesses. These procedures have already been proven to reduce or eliminate hazards so food is safe and suitable. You only need to use the orange pages which apply to your business.

The red pages outline what to do when something goes wrong.

Overview of getting started

Set up

- Read this guide.
- Plan how you will implement food safety.
- Contact and get a letter from a verifier saying they will verify you.

Register

- Complete the registration form and any supplementary forms required by your council or MPI.
- Submit application, including fee.

Operate

- Follow the procedures.
- Put your records in place.
- Keep records up to date.
- Contact your verifier and arrange a time to be verified.
- Focus on top 5 requirements.

Verification

- Ensure you can demonstrate how you make safe and suitable food.
- Provide necessary records.

1.3 Requirements for OFNZ Template Food Control Plan

OFNZ Template Food Control Plan Records	Required	When

		something goes wrong
Competency and training	✓	
Sickness	✓	
Water test results (self-supply only)	✓	
Pests	✓	
Maintenance	✓	
Sourcing, receiving and tracing	✓	
Storage and display		✓
Knowing what's in your food - Horticulture spray diary		✓
Separating food	✓	
Foreign matter	✓	
Packaging and labelling	✓	
Transporting food (temperature) Only if food requiring temperature control for safety	✓	
Cleaning	✓	
Checking the programme is working well	✓	
Dealing with customer complaints	✓	
Recalling food	✓	

1.4 Overview of the Top 5 requirements

The Top 5 requirements of OFNZ Template Food Control Plan are:

1. Competency & Training
2. Personal hygiene
3. Water & Spray application
4. Sourcing, receiving & tracing
5. Cleaning

[Add pictogrammes => MPI the order of the pictogrammes is different in OFNZ Template Food Control Plan than Guidance NP3].

The following requirements are only applicable if part of the business activity of the horticulture business.

6. Honey: Tutin status of honey
7. Process controls

1.4 References

Legislation
Food Act 2014
Australia New Zealand Food Standards Code

Regulation
Food Regulations 2015
Food (Fees and Charges) Amendment Regulations 2015

Notices
Refer to overview Notices on MPI website.

Resources
Food Standards Australia New Zealand - FSANZ

1.5 Definitions

Control	(verb) To manage the conditions of an operation to maintain compliance with established criteria. (noun) The state in which correct procedures are being followed and criteria are being met.
Control Measures	Actions and/or activities that are taken to prevent, eliminate or reduce the occurrence of a food hazard that has been identified.
Corrective action	Remedial procedures to be followed when a deviation occurs. Action to be taken when the results of monitoring indicates a loss of control.
Critical Control Points (CCP)	A process or step at which control can be applied to prevent, eliminate or reduce a food safety hazard to an acceptable level.
Critical Limit	Is a maximum and/or minimum value to which a biological, chemical or physical parameter must be controlled at a critical control point (CCP) to prevent, eliminate or reduce to an acceptable level of occurrence of a food safety hazard.
Cross contamination	The transfer of micro-organisms (or other contaminant) from one food product to another. For example the transfer of bacteria from raw to cooked meat.
Food Hazard	A biological, chemical, physical, allergenic, nutritional and/or biotechnology-related agent in, or condition of, food that has the potential to cause and adverse

	health consequence for humans.
HACCP	Hazard Analysis and Critical Control Points An internationally recognised system used to identify and manage significant food safety hazards, and to ensure that food prepared, made & cooked and served is safe and suitable to eat.
Hazard Analysis	A process of identifying hazards with as goal to determine which hazards are of such a nature that their prevention, elimination or reduction to acceptable levels is essential to the production and handling of safe and suitable food.
Monitor	To conduct a planned sequence of observations or measurements to assess whether a CCP is under control and to produce an accurate record for future verification.
Potentially hazardous foods (Refer to 18283 Food Notice: Requirements for Food Control Plans and National Programmes.)	a) food that meets one of the following criteria: i) the food may contain and will support the growth of harmful microbes; or ii) food that must be kept under temperature control to prevent toxins forming due to microbial growth; or b) food that meets one of the criteria in (a) as a result of it being modified or altered or exposed to air (for example, dry custard powder is not potentially hazardous, but becomes potentially hazardous when mixed with milk or water. Or, a can of beef stew is not potentially hazardous, but becomes potentially hazardous after opening)
Process	The actual method of producing food as carried out in practice. A process should follow the defined procedure.
Process Approach	A process is a set of activities that uses resources (people, machines, etc.) to transform inputs into outputs. The process approach considers the interaction between these processes, and the inputs and outputs that tie these processes together.
Records	Information such as checklists, log sheets, instrument charts and records, log books, work diaries. May be formal or informal but all records must be auditable.
SOP	Standard Operating Procedure Is a set of step-by-step instructions compiled by an organisation to enable staff to conduct regularly recurring work processes with as aim to achieve efficiency, quality output and uniformity of performance, while reducing miscommunications and failure to comply with industry regulations.
Validation	Evidence that a control, if appropriate for the type of food, and properly carried out, will be effective against a hazard. Validation may be by test or by

	reference to established knowledge.
Verification	The use of methods, procedures, or tests in addition to those used in monitoring to determine if the process is in compliance with the food safety programme.

2. HORTICULTURE OPERATION SETUP

2.1 Property details and management

Fill out the business details below:

Business details	
Legal name	
Trading name	
Activity	☐ Horticulture production and packaging operations – SEC-33 ☐ Manufacturers of oils or fats for human consumption – SEC-15 ☐ Extractors and packers of Honey – SEC-32 ☐ Retailers that handle food (but do not prepare or manufacture food) – SEC-18
NZBN	
Verification Agency	
Postal address	Address is private? Yes / No
Telephone **Fax**	Day: Evening:
Email	

Trading Operations – How you source and supply your products/services			
Indicate YES or NO for the relevant Trading operations	**YES**	**NO**	**CODE**
Market			MAR
Catering			CAT
Eat-in premises			EAT
On-licence			OLC
Home delivery			HOM
Mobile			MOB
Takeaway			TAK
Retail			RET
Wholesale			WHO
Transport provider			TRP

Import			IMP
Export			EXP

Section 5 – Grow and/or pack fresh fruit and vegetables What types of food does the business grow and pack?			
Indicate YES or NO for the relevant type of food	**YES**	**NO**	**CODE**
Minimally processed fruits & vegetables			SEC-33_010
Equivalent activities of a traditional greengrocer. E.g. cutting fruit and vegetables			SEC-18_050
Herbs & spices			SEC-33_020
Nuts & seeds			SEC-33_030
Mushrooms			SEC-33_040
Sprouts & Microgreens			SEC-33_050
Edible oils - Bottling edible oil after been processed by a NP3 business and supplied in bulk containers.			SEC-15_010
Honey – Extractors and packers of honey			SEC-32_010
Exemption less than 100 hens apply. The exemption is for 100 or less hens where the eggs are sold directly to the end consumer - not through a third party.			No code
Describe non-food activities of the business (if applicable)			

Processes			
Indicate YES or NO for the relevant processes	**YES**	**NO**	**CODE**
Acidification – Using acid (low pH) to preserve food products. Examples pickles and shelf stable condiments.			ACD
Drying – Remove moisture from food to make products such as vegetable powder.			DRY
Fermentation – Using micro-organisms to make or preserve food products. Examples: Kimchee.			FER
Pasteurisation (with heat) – Apply heat treatment to preserve food and drink products. Example juice.			PAS
Aseptic processing/packaging – Apply heat treatment to preserve food products for an extended period of time. Examples: Ultra-High-Temperature (UHT) milk, UHT beverages, UHT stocks and soups.			ASE
Canning / retorting – Apply high temperature and pressure to make canned food products that have an extended shelf life. Examples: canned baked beans, spaghetti, canned fish and fruit.			CAN
Concentration – Increase the thickness of food products by removing water for example malt extract or condensed milk.			CON
Handling chilled RTE products – Handling chilled Ready-To-Eat (RTE) products with a shelf life of more than 5 days. Example: sliced cooked ham.			HCL
High-pressure processing – Using high pressure to extend shelf-life of food. Examples: salad dressings, juice, salads, guacamole, smoothies and meat.			HPP
Holding at serving temperature – Holding at serving temperature in a pie warmer or bain-marie.			HOL
Irradiation – Apply radiation to preserve food products, or destroy pathogens. Examples: Irradiated herbs and spices.			IRR
Novel or unique process – Apply any of the following processes to food products: Ohmic, cold plasma, ultrasonication, hydrodynamic, electromagnetic processes (pulsed electric field, radio frequency, ultra violet (UV) etc.), microwave pasteurization, experimental cuisine and/or molecular gastronomy.			NOV
Processing chilled TRE (Ready-To-Eat) products – Processes to produce chilled ready-to-eat products with a shelf life of more than 5 days. Examples: cooked ham, cooked small goods (requiring time/temperature combinations to control pathogens such as Listeria.			PCL
Reheating – Reheating a food that has been previously cooked for immediate consumption. Examples: reheating a frozen cooked ready-to-eat meal.			REH
Slow or low temperature cooking – Examples: Sous vide, hangi, umi and smoking.			SLL
None of the above – None of the above processes are used.			

Location(s)

Street address (1) (premises where food business operates)	Address is private? Yes / No
Postal address (if different from above)	
Local authority	
Site identifier	
Water supply	Town water supply / self-supply water

Additional site(s)	
Street address (2) (premises where food business operates)	Address is private? Yes / No
Local authority	
Site identifier	
Water supply	Town water supply / self-supply water
Street address (3) (premises where food business operates)	Address is private? Yes / No
Local authority	
Site identifier	
Water supply	Town water supply / self-supply water

Operator: The operator is the owner or other person in control of the food business **Note: The Operator must be present at the verification.**	
Name	
Day-to-Day Manager Position	
Physical address	
Telephone	
Mobile	
Email	
Website	

2.2 Business layout

You need to make sure that the setup of your horticulture business allows you to make safe and suitable food.

You need to draw a map of your horticulture operation that includes:

- Your growing areas,
- The buildings (e.g. house, sorting & packing sheds),
- What happens in the different areas on your map, including sorting & packaging areas.
- What happens in your buildings, including non-food activities,

Some non-food activities being conducted in the same or neighbouring building / property that might affect food safety may need to be included in your map of your horticulture operation.

Note below any non-food activities being conducted on your horticulture site(s), in your building, or at neighbouring properties/buildings that might affect food safety or suitability in your business, and anything you do to manage risk.

Risk to food safety	How we manage the risk?

The map and floor plan do not need to be to scale.

If you have multiple sites you need to draw the business layout for each individual site.

2.3 Land management & equipment

What do you need to know?

- When choosing places and equipment for your food business there are some things you should consider, such as:
  - what the place has been previously used for,
  - that rooms and equipment can be easily cleaned and maintained,
  - that there is adequate lighting and ventilation,
  - that equipment is designed for food use and for the process you are intending to use it for.

Why is choosing good places and equipment important?

- Places and equipment are the foundation of a food business, and the choices you make determine how hard you and your staff will have to work to know food is always safe and suitable.
- It's often things which are easily overlooked that can result in food being contaminated and people getting sick. For example:
    - a light breaking and spreading glass into food,
    - food crops absorbing heavy metals or chemicals in soil from a previous land use (e.g. shooting range, battery factory etc.) into their root systems and leaves,
    - dust and dirt carrying bugs getting into food from the neighbouring supply yard loading compost, fertiliser etc. into trucks,
    - buildings constructed from materials that could be a source of bugs, chemicals or foreign matter getting into your food.
- It's best to source equipment especially designed for food use and for the process you are intending to use it for.
- It's best to choose places and equipment that prevent as many food safety risks as possible.

What do you need to do?

- Manage any food safety/suitability risks associated with places and equipment.
- Check previous use of land and buildings, and don't use areas that are likely to make food unsafe.
- If your neighbours do things that could cause food to be unsafe or unsuitable, work out how to minimise the chance that this could happen. Make sure any buildings used for your food business are big enough to accommodate the number of staff you plan to have working there and allow for design of a good workflow.
- Design your workflow so you can safely move around your area (e.g. so you don't carry unsafe foods or ingredients through areas where safe food is being handled).
- Make sure buildings, fittings, fixtures or equipment are not made of materials that could be a source of bugs, chemicals or foreign matter getting into your food, or work out how to minimise or eliminate the chance that food could become contaminated from these sources.
- Ensure all areas where food will be handled or stored can be easily cleaned.
- Limit the amount of dust dirt, fumes or pests that can get into buildings used for handling, processing or storing food.
- Provide places for storage of cleaning chemicals and maintenance compounds away from food.
- Make sure there are toilets and places to wash hands close to food handling areas (including where horticulture crops are being harvested).
- Provide for rubbish areas away from food processing / preparation areas.

- Make sure you have equipment for measuring control points (e.g. thermometers for checking fridge/chiller temperatures) and that it is accurate and working properly.
- Food in vending machines must be kept safe.

What do you need to show?

- Your verifier might ask:
    - how you know the location hasn't previously been used for something that will make food.
    - what you do to manage risks from activities of your neighbours.
    - why you chose the equipment you are using,
    - how you know the building, fixtures, fittings and equipment aren't a risk to the safety or suitability of your food.
- Your verifier will observe workflow and whether staff can easily work and maintain good personal hygiene.

2.4 Taking responsibility

What do you need to know?

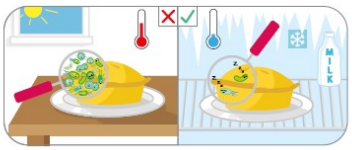
- It is your responsibility to make sure the food your business produces, handles and/or sells is safe and suitable.
- You don't need to be a food safety expert but you do need to know enough to make good food safety and suitability decisions for your business. This guide is intended to help you to do that.
- Overall, you as the owner are responsible, even if you employ people to help manage food safety and suitability.

Not all the sections in this guide may be applicable to your business – you don't have to follow rules that don't apply to you (for example if you don't package food you don't have to follow the rules about packaging). If you are unsure about whether a section applies to your business seek advice from OFNZ, your verifier or your registration authority (local council or MPI).

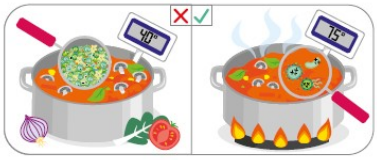
<u>Food safety versus food suitability:</u>

- **Food safety** is about preventing food from causing illness or harm. Food can be unsafe if it contains certain 'hazards'. Hazards fall into 3 categories:
    1. **Biological (bugs):** Certain bugs can make people sick. Food can be unsafe if it has high enough levels of these bugs.
    2. **Chemical:** Many chemicals can make people sick if in or on food.
    3. **Physical (foreign):** Glass, metal or other sharp objects can sometimes get into food and cause harm.
- Food suitability is about making sure food meets customer expectations and doesn't contain anything unexpected or offensive.
- Taking responsibility for food safety means understanding the possible hazards that could make food unsafe and taking steps to:
    1. Keep bugs out.

    2. Reduce bugs to safe levels.



3. Eliminate or remove bugs.



- Taking responsibility for food suitability means:
    1. Only using foods or ingredients that are fit for purpose,
    2. Labelling food correctly, and
    3. Making sure any claims about your food are true.
- You need to ensure that donated food is safe and suitable. See the MPI website or OFNZ for help with donating food.

Keeping customers safe:

It's possible that you can make people sick with your food. It's important to know, understand and follow the rules.

Following the rules will help your business as:

- About 86% of people get that get sick from food don't report it – but they still look for someone to blame.
- About 75% of people don't think that they got sick from food they made themselves, and blame someone that sold food to them.
- Most people believe it was one of the foods they last ate that made them sick – when it actually could have been something they ate days or weeks ago.
- About 40% of people that get sick will not buy the food they blame for making them sick again (and might tell their friends not to buy it).
- If someone reports illness, a food safety officer investigates their complaint – this means your business might be visited even when you didn't have anything to do with making someone sick.

Keeping records:

- Keeping good records will help you prove you didn't make people sick.
- There are some records you need to keep, others you might like to keep for good practice. Where you aren't required to keep records it is your choice whether you wish to keep records or other evidence to keep track of how well you are managing food safety and suitability.
- Without records it will be harder to prove your food is safe and suitable which could lead to:
    - recalling food,
    - stopping sale of food,
    - having to make certain improvements to your processes or practices,
    - fines or prosecution.

  All of the above can cost your business in time, money or reputation.
- There is more helpful guidance and tools available in the 'Record Blanks' on http://www.mpi.govt.nz/dmsdocument/16717-food-business-record-blanks.

Advice and guidance:

- You can get advice and guidance from OFNZ or from others, for example consultants or verifiers.
    - Consultants can design systems, processes and procedures for you – but can't take away your responsibilities. It is part of their job to help you understand how to make good decisions about food safety and suitability – especially when things don't go to plan.
    - Verifiers can provide advice and coaching (options and examples) about how you can make sure your business is making safe and suitable food but they cannot make your decisions for you.

What do you need to do?

- Always follow the food safety and suitability rules.
- Make sure you have enough trained and competent staff (and supervisors if necessary) to achieve the safety and suitability of food.
- Get verified.
- Keep a copy of all documents or records required for at least 4 years.
    - All records must to be accurate, easy to read, and identify what was done, when it was done, and who did it.
- Make sure records are easily accessible.
- Give written notice to your registration authority (OFNZ) of any significant change in your business – if possible before making the change, or at **least within 10 working days after the change occurs.**

What do you need to show?

- Your verifier might ask:
    - whether you have given certain food safety responsibilities to other people and, if so, how you know they are doing a good job of keeping food safe and suitable,
    - whether there have been any changes to what you do, make or sell since the last time they were there,
    - whether there are stresses or pressure on the business that have meant staff cuts or changes to save costs - and how you have taken food safety and suitability into account when making these decisions.

2.5 Checking if the programme is working well

What do you need to know?

- It is your responsibility to regularly check that food safety and suitability is being well managed in your business.
- What to check and how often, depends on the effect of something going wrong in your business (e.g. if something really important to food safety has gone wrong you might have to recall food back to the point where you last had evidence everything was under control – so it's important to check these things more often).
- An internal check can also be done if a business you supply audits your business, however this should not be the only one.
- You should check:
    - that people are doing what they need to do,
    - the procedures that have been put in place are being followed and are effective,
    - your facilities and equipment remain suitable for the food activities carried out at your business.
- You or one of your staff must be your own internal verifier (auditor).

Checking should be done regularly. You don't need to check everything all at once, or at every check. e.g.: you might check that temperatures of fridges are being taken (and recorded) every day or every shift, but checking that the training has been undertaken, is effective and records are up-to-date might be done only every few months.

<u>Why is self-auditing important?</u>

- You are responsible for your business and the food you produce, not your verifier or the government. If you wait for someone else to tell you what is going wrong in your business it may become costly, and you may make people sick.
- Check the programme is working well by (for example):
    - checking whether staff are carrying out key food safety behaviours (e.g. washing hands etc.),
    - checking records are being completed and kept,
    - looking through records to check that things are working as expected (e.g. fridges are keeping foods under 5°C),
    - reviewing 'When something goes wrong' information and checking that steps have been taken to prevent problems from happening again,
    - running food safety quizzes with staff,

- using the ‘Show’ sections in this guidance to ask the same questions or check the same things that your verifier would ask or look at,
- testing the environment or foods for certain bugs or chemicals to show procedures (e.g. cleaning) are effective.

Some notes about testing:

- There are specific requirements for testing in some situations (e.g. self-supply water). There are also rules about certain limits for bugs or chemicals. A limit doesn’t mean you always have to test the food for that bug or chemical. If you are thinking about using sampling and testing to show your programme is working well, this shouldn’t be the only check that you do. It is not possible to test your way to food safety.
- Testing can be a useful tool, but it has limitations. If, for example, testing results find harmful bugs that might mean some part of the process is not working well.
- A negative result may not prove that your plan is working perfectly (or that the food is safe). Bugs, in particular, are not usually evenly distributed in food. It’s possible to test some food and get a negative result, when another part of the food is in the same batch has high levels of harmful bugs.

Imagine you have a batch of 200 apples packed into 10 sacks and you think it’s possible there might be 1 or 2 bad apples in the batch. You open 1 sack and pull out 1 apple – if it’s a good apple does it prove all the other apples are good?

How many sacks do you have to open, and how many apples do you have to pull out (sample) to be sure that you either find the bad apples or prove that the batch contains no bad apples? What if, once an apple has been taken out of the sack, you aren’t allowed to sell it?

Would you ‘test’ to find the bad apples in the sacks – or put processes in place to make sure you found and removed any bad apples before you packed them in the sacks in the first place?

- If you want to include testing as one of the checks, it is more often more effective to test the environment rather than final goods.
- If you use sampling and testing as part of your procedure of checking, it is highly recommended that the testing plan is developed by an expert. If you don’t have an expert in your business, a consultant, a verifier or MPI can provide information about putting together a sampling and testing plan.

What do you need to do?

- Set up procedures for regularly checking that you and your staff are making safe and suitable food and meeting your requirements and responsibilities under the Food Act 2014.
- Follow the procedure on ‘When something goes wrong’ if your self-checks identify mistakes or actions that could have made food unsafe or unsuitable.

What do you need to show?

- Show your verifier:
    - how you check that your procedures are working well,
    - results of the checks you have made,
    - results of the tests you have carried out.

2.6 Suitable water

What do you need to know?

- Suitable water must be:
    - safe to drink if it is used for food preparation, washing food contact surfaces/equipment, and for staff to wash their hands,
    - clean and fit for purpose when used for any other activities in growing or making food.

Horticulture: Water used for irrigation should be of drinkable quality where possible – especially where applied directly to crops that are not expected to be cooked or treated to reduce or eliminate bugs or chemicals, before being eaten.

Why is it important to ensure water is suitable?

- Water can carry harmful bugs and chemicals that can make people sick. These might be because the water is contaminated at the source, or because water pipes and storage containers become contaminated.
- It's important to consider how you use water in your business, and make sure that the water is not going to be a source of food contamination. If you use a council or registered water supply most of this is done for you.

If you use self-supply water

- You will need to prove it is suitable for use by having it tested at an accredited lab (there is information on the MPI website about these).
- You will need to know where near-by activities and naturally occurring chemicals could make your water supply unsafe.
- Keep water tanks:
    - clean and in good condition to stop the build-up of sediment, and
    - covered to stop animals, birds and dirt from contaminating water.
- You may need to install operate and maintain and maintain (e.g. replacing filters) a water treatment system, following the manufactures instructions, to ensure water is suitable for use with food.
- You might need to treat roof, surface or ground water using filtration, chlorination or UV disinfection to make it suitable for use.
- Self-supply water sources may be subject to other legislation as well.

For ground water supply only

- Bores should be designed and maintained so they are protected from surface contamination.

For roof water supply only

- Additional risks to contamination of your water can be reduced by:
    - collecting water only from clean roofs and gutters made from safe materials (e.g. no lead based paints, bitumen, exposed timber or copper gutters),
    - putting screening gutters up, removing overhanging branches and vegetation, and mounting aerials and satellite dishes away from water collection areas,
    - installing a first flush device (a device which diverts the first flush of water when it rains).

Water is a top 5 requirement for the horticulture sector.

What do you need to do?

- For water for food processing, hand washing and cleaning, either:
    - use a potable (council/registered) water supply, or,
    - check that your roof, surface or ground water supply is tested at least once every year in an accredited lab and meets the following limits:

Measurement	Criteria
Escherichia coli	Less than 1 in any 100 ml sample*
Turbidity	Must not exceed 5 Nephelometric Turbidity Units
Chlorine (when chlorinated)	Not less than 0.2mg/l (ppm) free available chlorine with a minimum of 20 minute contact time
pH (when chlorinated)	6.5 – 8.0

**Escherichia coli* testing must be performed by an accredited lab.

    - Test any new supply of water before using it in food areas.
- Test roof, surface or ground water supplies within 1 week of knowing about a change to the environment or of activities that may affect the safety and suitability of the water.
- For surface and (insecure) ground water intakes must be:
    - at least 10m away from livestock,

- at least 50m away from potential sources of contamination including silage stacks, offal pits, human and animal waste, potential chemical stores and tanks.

All water supplies

- Only use water tanks, containers, pipes, outlet taps and treatment systems for any water supplies on site that are suitable for drinking water (or are "food-grade"). Regularly check and maintain these.
- Clearly mark outlet taps, tanks, and pipes that do not contain clean water. These must not be used for food processing, hand washing and cleaning.
- If your water supply becomes unsafe (or you're advised by your supplier it is unsafe):
  - don't use it, or
  - boil it for at least 1 minute before use, or
  - disinfect it with chlorine before use, or
  - use another supply of water which you are sure is
  - safe (e.g. bottled water).
- Always throw out any food which has been contaminated by unclean/unsuitable water.

It is recommended you record the water source for each of the locations you operate in.

What do you need to show?

- Your verifier will:
  - ask how you know your water is fit for purpose,
  - ask you about how you check and maintain water equipment and facilities.

For self-supply water

- Your verifier will:
  - ask to see test results for any roof, surface or ground water supplies that are used for food preparation, washing food contact surfaces / equipment or for hand washing,
  - ask what near-by activities could affect the safety of your water,
  - ask you to show them how you know any water treatment system is working properly.

Will you keep records for this?

You need to keep records of self-supply water tests.

2.7 Competency and training

What do you need to know?

- Not all staff and visitors need training in all things – but they must know how to keep food safe when doing their particular job.
- You need to train your team before you:
  - start making and selling food,
  - introduce or change a procedure,
  - whenever you think you/your staff need it.
- Training should include good food safety practices like:
  - hand washing and wearing clean clothing,
  - keeping away from food when sick,
  - keeping foods separate in the food preparation area,
  - cleaning and sanitising,
  - sourcing, receiving and tracing food,
  - checking that process steps are managing risks,
  - what to do if something goes wrong.
- You can train staff any way that works for your business. You could consider:
  - working under supervision,
  - buddy training,
  - courses (in-house or external),
  - using videos, games and quizzes as training methods.
- If you are a one person business you can try using online training tools, food safety courses or seek help from a consultant.

Why is training important?

- Everyone has a role to play in keeping food safe and suitable. Staff need to know that what they do can affect food safety – especially if something doesn't happen as it normally would.

Not all of the things that affect food safety are 'common knowledge' so it pays to be trained properly so you or your staff don't accidentally get it wrong.

What do you need to do?

- Ensure all staff and visitors know what they need to do to keep food safe and suitable.
- Nominate the person or people that must make sure all staff and visitors are trained so they know how to meet the rules.
- Write down what people need to be trained to do for the tasks that affect food safety in your food business. Include the training needed for:
  - the day-to-day manager(s),
  - staff,
  - visitors (e.g. contractors, delivery people etc.).

- Keep a record of the training you or your staff or visitors have completed, and when they completed it.

What do you need to show?

- A verifier will watch staff working, they will ask questions about:
  - what they do,
  - how they do it,
  - why they do it,
  - what happens when things go wrong (or changes).

Will you keep records for this?

- You need to keep records. You can find some optional templates and examples of ways to keep training records in the ‘Record Blanks’ on http://www.mpi.govt.nz/dmsdocument/16717-food-business-record-blanks.

3. DAY JOBS

3.1 Cleaning and sanitising

What do you need to know?

- Cleaning and sanitising are 2 different things:
  - cleaning removes dirt, grease and most bugs from surfaces,
  - sanitising kills harmful bugs left on clean surfaces.

Cleaning

- Food contact surfaces and equipment should be cleaned at least every day that food touches them (it's best to clean as you go). If food contact areas are not used for a few days they should be cleaned before they are used again (to remove dust and dirt that has settled there in between use).
- It's important to clean staffrooms, bathrooms and toilets to minimise the chance of staff bringing bugs from these areas into places where food is handled or processed on hands and clothes.
- It is a good idea to keep storage rooms clean and tidy.

It's OK to use basic cleaning methods like you would use at home – but only use clean water and cleaning chemicals designed for use in food areas and follow the instructions on the label (some chemicals need to be left for a while before wiping off, some chemicals need to be rinsed off with clean water (not just wiped off).

- Your cleaning equipment (brooms, mops, cleaning cloths), can become a source of contamination if they aren't cleaned or replaced regularly too.
- It's recommended to use disposable cleaning cloths or wash cleaning cloths after each days use.

Why is cleaning and sanitizing important?

- Bugs love to hitch a ride on dust and dirt so an unclean area is also a food contamination area.
- Cleaning doesn't remove all bugs, so if you're processing horticulture products for sale (e.g. cutting a pumpkin or cauliflower) you also need to sanitise food surfaces to kill any bugs that are left behind after cleaning (sanitisers don't work properly on unclean surfaces, so always clean before sanitising).
- Dirty premises can attract pests like mice, rats and cockroaches which can spread disease.

- Even if food is fully packaged at all times it's a good idea to keep things clean. If the outside packaging gets dirty that will contaminate the hands of people who open the package and this may, in turn, contaminate the food.
- Rubbish (including liquid waste) can be a source of food contamination. Bugs will grow in it.

What do you need to do?

- Sweep, vacuum or mop floors, wipe benches and clean food contact surfaces, equipment, staff facilities and storage areas regularly and when needed.
- Use hot (food grade) soapy water or food safe cleaning chemicals according to the label instructions.
- Clean brooms, mops and other cleaning equipment regularly.
- Store cleaning equipment and chemicals away from food.
- Store rubbish away from food and remove it from the premises regularly.
- Make sure people can't mistake rubbish for food / ingredients.
- Clean bins and rubbish areas regularly.

What do you need to show?

- Your verifier will:
    - look around your business and check that everything looks clean and tidy. They will also ask you and/or your staff when and how you clean.

- Your verifier might:
    - ask how you clean equipment or food contact areas that are hard to get to,
    - ask how you remember to clean equipment or areas that only need occasional cleaning (e.g. ceilings, light fixtures),
    - ask how often rubbish is removed.

You do not need to keep records, but some businesses like to use a cleaning schedule and/or a cleaning record. Examples of these are in the '**Record Blanks**' on the MPI website. http://www.mpi.govt.nz/dmsdocument/16717-food-business-record-blanks

3.2 Checking for pests

What do you need to know?

- Pest such as mice, birds and insects can spread disease. They do this by picking up bugs from dirty items such as waste and transferring them to food and food equipment.
- You need to take steps to control pests and prevent them from contaminating food.

What do you need to do?

- Check for and remove any signs of pests regularly (e.g. droppings, empty full traps, dead insects).
- Clean any affected equipment and areas that come into contact with food.
- Dispose of any affected/contaminated food.

What do you need to show?

- Show your verifier how you check for pests.

Will you keep records for this?

- You need to keep records about types and numbers of pests found and the treatment used - you can keep separate records for this or use the same record system you use for ‘When something goes wrong’.

3.3 Maintaining property and equipment

What do you need to know?

- A common way bugs or other harmful things (e.g. chemicals, bits of glass or metal etc.) get into food is from things breaking, breaking down or getting damaged. Bugs especially like to hide and grow in pitting, cracks, crevices or holes, and if they find a hiding space where food is stored, prepared, processed or handled they often get into food and make it unsafe.
- Equipment such as chillers, freezers might become inefficient or break down allowing temperatures to rise and allow bugs to grow in food stored there.
- Sometimes it's the things you can't see (e.g. water pipes) or don't see all the time (e.g. the inside of some equipment) that break down or become dirty / contaminated resulting in unsafe or unsuitable food. It's important to remember to sometimes check the things not in plain view.
- Measuring equipment (e.g. thermometers) can become a lot less accurate over time (and you need to know that the temperature is accurate to know that bugs aren't able to grow).
- If you expand your business to make more food, different kinds of food, or have more people working at once, your workflow can be affected and ready-to-eat food can be contaminated by getting too close to raw, unsafe food, or allergens can end up in foods they shouldn't be in.
- Not all chemicals and compounds (like grease, oil, etc.) are designed to be used with food, and some chemicals can make people sick if they get into food.

Some overseas studies have shown that businesses that keep up with regular, preventative maintenance can save around 50% in maintenance and repair costs compared to those that wait for something to break down before doing any maintenance or repairs. Also, if you wait until something breaks down you might also incur costs associated with managing unsafe or unsuitable food.

What do you need to do?

- Regularly review that you haven't outgrown your location, or negatively impacted workflow through any growth or changes to the amounts and types of foods you are growing, making or selling.
- Regularly check your premises for signs of deterioration (e.g. holes in floors and walls).
- Only use equipment and facilities that are in good condition and working properly.
- Service your equipment regularly.
- Calibrate any measuring equipment you use (e.g. thermometers, scales regularly).

- Ensure maintenance compounds and chemicals (including natural sprays) are:
    - fully labelled, stored, sealed and only used following the manufacturer's instructions,
    - stored and transported in containers that can't be mistaken for food containers.

What do you need to show?

- Show your verifier:
    - what you do to check your premises and equipment are designed for food use and are in good working order,
    - how you store maintenance compounds and chemicals.

- Your verifier might ask:
    - how often you do maintenance checks,
    - what you check for during maintenance checks,
    - how you remember to service equipment, especially if this only needs to be done infrequently (e.g. once a year),
    - how you are calibrating measuring equipment, and how often.
    -

You do not need to keep records, but some businesses like to use a maintenance schedule and/ or a maintenance record. Examples of these are in the '**Record Blanks**' on the MPI website. http://www.mpi.govt.nz/dmsdocument/16717-food-business-record-blanks

Will you keep records for this?

- You must keep to records of when something goes wrong with maintenance. You can use the same record system you use for **'When something goes wrong'**.

Some businesses like to use a separate maintenance schedule and/or a maintenance record instead. Examples of these are in the '**Record Blanks**' on http://www.mpi.govt.nz/dmsdocument/16717-food-business-record-blanks.

3.4 Personal hygiene

What do you need to know?

- Ways to protect food from contamination from people include:
  - o washing hands,
  - o not working with food when sick with anything that causes vomiting or diarrhoea.

Why is personal hygiene important?

- One of the most common ways bugs get into food is from people – mostly from their hands.

About 30% of people are natural carriers of a bug (Staphylococcus aureus) that can cause food poisoning – and good personal hygiene is the only way to prevent it becoming a problem in your food.

- Regularly washing hands in soapy water for 20 seconds, rinsing and drying them properly (using paper towels, single use cloths, or an air dryer) is one of the best and easiest ways to help prevent bugs getting into your food.
- Wash your hands:
  - o before handling food,
  - o after coughing or sneezing,
  - o after using the toilet,
  - o after using phone,
  - o after taking out rubbish,
  - o after touching something you think is dirty.
- Uncovered cuts and sores can spread bugs and make food unsafe and unsuitable, especially if they are weeping or infected.

If people are wearing gloves (whether to cover sores or for any other reason) they should wash their gloved hands or replace the gloves in all the same situations when ungloved hands should be washed.

- Personal hygiene is important even if your workplace is on the road or in the middle of a field.
- Staff should seek medical advice if they:
  - o have jaundice, or
  - o have vomited or had diarrhoea 2 or more times in a day, or
  - o have been sick with a tummy bug for more than 24 hours.
- Harmful bugs can be transferred to food through a sick person's faeces, vomit and other body fluids (e.g. blood, snot).
- Staff who have had a tummy bug should not work with food until 48 hours after they feel better.

Think about ways to balance peoples' need to earn an income even when sick (and so might be tempted to try to hide their illness) and the business need to prevent contamination of food by sick people.

- Dirty clothing can contaminate food, surfaces and equipment.
- Wearing clean clothes (aprons etc.) helps to keep bugs out of food.
- If staff contaminate food, you might have to recall it. See 'Recalling your food'.

What do you need to do?

Wash hands

- Always have water, soap, paper towels, single-use cloths or an air dryer available for use.
- Wash hands in soapy water for 20 seconds, rinse and dry thoroughly.
- Cuts and sores on food handlers must be completely covered e.g. with band aids and (or gloves) or they must not handle food.

Manage sick staff

- Implement a sickness policy to ensure you or your staff don't work with food when sick with an illness that can be passed on through food.
- Any staff or visitors (including contractors) who have vomited or had diarrhoea in the 48 hours before entering the food premises, or who develop these symptoms when on the premises, must tell the day-today manager (or the person in charge) immediately.
- Sick staff may be able to complete tasks that do not come into direct contact with food or food handling and preparation areas.

What do you need to show?

- Your verifier will:
    - check everything they need is there by washing their hands when they enter your business.

- Your verifier might:
    - ask you to tell them who is responsible for making sure your handwashing area is fully stocked and cleaned,
    - ask how you know people are washing their hands when they should,
    - ask staff about when they wash their hands, and may ask them to show how they wash their hands,
    - ask what happens if someone has a tummy bug or gets sick.

Will you keep records for this?

Good Management Practice (GMP) is to keep records about staff reporting sick and what you have done to ensure they aren't a source of food contamination (you can find some optional templates and examples of ways to keep sickness records in the 'Record Blanks' on http://www.mpi.govt.nz/dmsdocument/16717-food-business-record-blanks).

4. PRODUCING, PROCESSING OR HANDLING FOOD

4.1 Identifying and controlling hazards

What do you need to know?

- Identifying and controlling hazards will help to keep your food safe when preparing, processing or handling food.
- It's your job to identify and control hazards to keep your food safe when it's being prepared, processed or handled.
- The hazards you need to know are:
    - bugs (e.g.listeria, E.coli, salmonella, campylobacter etc.),
    - chemicals (e.g. cleaning products, pest control products),
    - foreign matter (e.g. glass, stones, metal).
- Not all control steps may not all be applicable to your business – you don't have to follow the ones that don't apply to you (for example if you don't package food you don't have to follow the rules about packaging).
- Not all hazards cannot be controlled in all food businesses (for example it's not possible for a manufacturer of frozen vegetables to directly control the application of agricultural compounds onto horticultural produce) – your responsibility is to control hazards that can be controlled in your business.
- If you are unsure about whether a section applies to your business seek advice from OFNZ, your verifier, a consultant or MPI.
- In addition to the specific procedures in this guide, you should also:
    - follow any directions for use and storage on labels or advised by suppliers,
    - keep non-shelf stable foods out of the temperature danger zone (5°C - 60°C),
    - follow the 2 hour/4 hour rule, (see 'Safe storage and display'),
    - keep cold foods below 5°C,
    - defrost foods in the fridge/chiller when possible,
    - keep hot foods above 60°C,
    - reheat food to above 60°C (75°C is best) before placing in a bain-marie or food warmer,
    - wash fruit and vegetables before preparing, cooking and/or eating, unless labelled 'Prewashed' or 'Ready-to-eat'.
- Bruising can make some produce unsafe or unsuitable (e.g. bruised apples can contain patulin which is a toxin that can make people sick).

What do you need to do?

- Identify the food related processes your business uses.
- Hazards common in horticulture are listed in the table on the following page. For more information go to the MPI hazard database - https://www.mpi.govt.nz/food-safety/food-safety-codes-and-standards/hazard-analysis-and-critical-control-point/hazard-database/.

The searchable MPI hazard database provides information on food safety hazards that can occur in New Zealand foods.

- Identify the types of hazards (bugs, chemicals and foreign matter) that you need to control in your business.
- Select the control steps you will apply in your business.

What do you need to show?

- Your verifier will:
    - ask you to take them on a tour of your business and point out the different processes you have,
    - ask how you decided which process control steps to include in your business,
    - ask you about the types of hazards you are controlling in your business.

Table 1: Common hazards in organic horticulture

Food type	Hazard	Control measure
Apples	Chemical – Mycotoxin - Patulin	Exclusion of rotten, bruised and damaged fruit will minimise the contamination of apples for human consumption
Almonds	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Bee products - royal jelly, pollen, propolis)	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Brazil nuts	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Cashews	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Comb honey	Chemical – Tutin	Hobbyist, beekeepers and packers: see advice on MPI website. Note: only extracting and packing honey (including comb honey) is covered under NP1, other bee products are NP3 and not covered in this plan.
Corn or maize	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Crustacea	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Eggs	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Fish	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Gluten	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Hazelnuts	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Honey	Chemical – Tutin	Hobbyist, beekeepers and packers: see advice on MPI website.
Kiwifruit	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Legumes – chickpeas, beans,	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on

peas, lentils		MPI website, booklet and requirements in FSC.
Lupin - lupin flour	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Macadamias	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Mango	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Milk	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Molluscs	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Nuts (raw)	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Peanuts - includes groundnuts, peanut oil and peanut flour	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Pecans	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Pistachios	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Pine nuts	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Seeds – sesame, sunflower, poppy	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Sesame and Sesame seed oil – oil extracted from sesame seeds	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Spices	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Soy and Soy beans	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Sulphites	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.
Walnuts	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.

Wheat – wheat flour	Chemical – Allergens	Susceptible people should avoid food containing allergen. See advice on MPI website, booklet and requirements in FSC.

Source: MPI Hazard Database (https://www.foodsafety.govt.nz/registers-lists/hazards/index.htm)

4.2 Sourcing, receiving and tracing food

What do you need to know?

- You should use trusted suppliers (e.g. registered food business) for your food, ingredients and processing aids to give you a good start to making safe and suitable food.
- You need to check the food you receive:
    - is not damaged,
    - is at the right temperature,
    - is not past its use-by date.
- You need a system to keep track of the food / ingredients/inputs you receive.
- You need to be able to trace and recall your product immediately if you need to.

Why is sourcing, receiving and tracing important?

- Using trusted suppliers gives you confidence that the foods/ingredients/inputs are safe to use. This can save you time and money, and prevent people getting sick from your food.
- Some foods must be kept cold (chilled or frozen) to stop bugs growing and they can become unsafe quite quickly if not kept at the right temperature.

It's best to be there to receive deliveries - if chilled or frozen food is delivered out of hours how will you know whether it was at the right temperature – and that it will still be safe by the time you get there?

Horticulture: You need to consider agricultural compounds (inputs), like herbicides, pesticides, fungicides and fertilisers in the same way other food businesses have to consider ingredients, additives and preservatives etc. You need to know what chemicals (including natural sprays) you got from where, the crops you used them on, and where the crops have gone to. A spray diary is a good way to do this.

Businesses sprouting seed for human consumption need to consider the seed as an ingredient and source it from a trusted supplier. You need to make sure that it has been produced specifically for human consumption, and the risks of the seed becoming contaminated with Salmonella has been managed.
This is a top 5 requirement for growing
horticultural produce.

Honey: You need to confirm that the honey you receive for extracting and/or packing is not at risk of containing tutin. This is a top 5 requirement for growing horticultural produce.

What do you need to do?

Source

- Keep a list of your suppliers and their contact details.
- If you are an importer of food the requirements you need to meet are outlined here: http://www.mpi.govt.nz/document-vault/10823

Receive

- You must always check:
    - the temperature of chilled food and, if it is above 5°C, apply the 2 hour/4 hour rule (see 'Safe storage and display'),
    - frozen food is frozen,
    - packaging is not damaged or dirty,
    - food is not past its use-by date.
- Always put chilled food away first and then frozen food, then food that can be stored at room temperature.

  Honey: You must get a certificate of analysis or tutin declaration from your honey supplier for each batch received by you for processing.

- When receiving food, start your tracing system by:
    - keeping your receipts, or
    - writing down the type(s) and quantity of food(s) you got from each supplier, or
    - using an electronic (e.g. bar-coding) system to track what you received, when and who from.

Trace

- Create a tracing system by keeping a list of your suppliers and their contact details.
- Use your tracing system to:
    - identify any food you still have in your business that is unsafe or unsuitable and make sure it is moved away from other food and won't be distributed or sold
    - either:
        - recall everything, or
        - recall the specific batch(es) that contain the unsafe/unsuitable ingredients (only if you have kept detailed records).

      To be able to recall specific batches you will need to have kept records that include supplier details, brand and batch IDs and best before/use-by dates etc.
- Test your tracing systems regularly to prove you can quickly identify and prevent sale or distribution of, or recall, unsafe/unsuitable food if you need to.

What do you need to show?

- Your verifier will:
    - ask you who your suppliers are and how you check that they are trusted suppliers.

- Your verifier might:
    - observe receipt of a delivery of food to your business,
    - check your records relating to receiving food,
    - ask how you have tested your tracing system. They might also conduct a tracing test using an ingredient you have received or a batch of food you have produced.

Will you keep records for this?

- You must keep records of:
    - your suppliers,
    - the type and quantity of food/ingredients you have received (including the date of receipt),
    - the temperature of chilled food when it was received,
    - what foods ingredients or inputs have gone into (or onto),
    - who you sell/deliver your food to (unless it is direct to the final consumer).

Honey: It is recommended you keep certificates of analysis or supplier declarations for tutin, for each batch of honey supplied to you.
Note: only extracting and packing honey (including comb honey) is covered under NP1; other bee products are NP3 and not covered in this plan.

4.3 Safe storage and display

What do you need to know?

- Food that is not covered, clearly labelled or stored away from food can become contaminated.
- You need to know how to keep food (including food in vending machines) at the right temperature to stop bugs from growing.
- Foods and ingredients (including food in vending machines) should not be used or sold past their use-by date.
- Food needs to be stored away from non-foods (e.g. perfumes used in cosmetic or household cleaning products) as they can be absorbed by food and make it unsafe or unsuitable.
- Storage conditions to keep food safe will either be on the food label or provided by the supplier.

'Display' means the storage of food in a retail/public area.

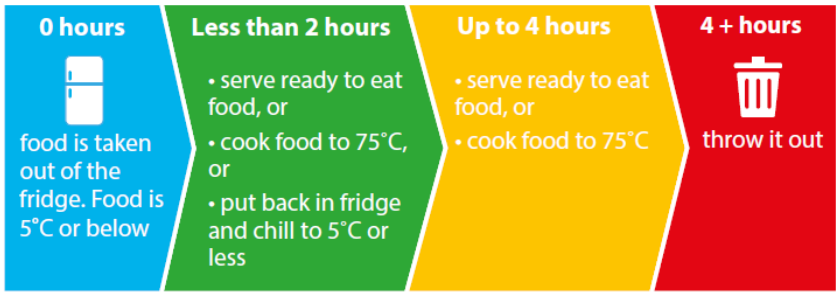
Why is safe storage and display important?

- It is possible for food to become unsafe while not being used, and being stored.
- Foods that are stored in rooms/stack systems (i.e. not on the floor) that can be easily cleaned (don't absorb or draw moisture) and kept free of pests, are less likely to be contaminated.
- Floors can be a source of contamination as pooling water and dirt which can be brought into areas on shoes or tyres, can make food unsafe.
- Some foods must be kept cold (chilled or frozen) to stop bugs growing (e.g. milk, meat), some foods we keep cold so the final customer enjoys them (e.g beer). You need to know the difference so you can keep food safe.
- Any storage conditions required to keep food safe can be found on the food labels or from the supplier. It's important to follow the directions.
- Some foods (e.g. powdered foods) need to be stored in a place where humidity is controlled to prevent the food from absorbing moisture. If dried foods absorb too much moisture this allows bugs to grow and the food to become unsafe.
- Many foods have a use-by date because bugs can grow slowly in them even when they're stored safely. Foods with a use-by date can make people sick if they eat them after this date. It's important to have a stock checking/rotation system to check that food is not used or sold after the use-by date.
- A best before date is different from a use-by date. A best before date indicates the quality of the food might not be as good after this date, but it is unlikely to make people sick if they eat it.

- Packaging comes into contact with food, so it's important to keep it stored as safely as you would keep food, so it doesn't become a source of contamination.

What do you need to do?

- Store food and packaging safely.
- Create a system for making sure that food is regularly checked for use-by dates and can't be used or sold after the use-by date.
- Check daily that chilled food is being kept at 5^{0}C or lower by:
    - using a calibrated probe thermometer to check the temperature of food or other substance (e.g. a container of water), or
    - using a calibrated infrared thermometer to measure the surface temperature of the food, or
    - using a calibrated automated system to monitor the internal temperature or surface temperature of your food, or
    - using another method that accurately measures the temperature of food.
- Check that food in the freezer is still frozen. You don't have to measure the temperature of the frozen food.
- Follow the 2-hour/4-hour rule, as shown in the diagram below:



- If you are storing foods that need to be under controlled humidity to keep them safe, install and monitor a humidity control system.
- Follow the procedure on what to do 'When something goes wrong' if you find that food is not being kept at the correct temperature and/or humidity.

What do you need to show?

- Show your verifier:
    - how you check the temperature of chilled food,
    - how you control and check humidity (if required),
    - that food is stored appropriately, labelled and covered.

4.4 Knowing what's in your food

What do you need to know?

- Knowing or being able to tell customers what's in your food will allow them to make informed choices. This is especially important for people with food allergies. Food allergies can result in life-threatening reactions that can occur within minutes of eating the food.
- Know the common food allergens: peanuts, almonds, Brazil nuts, cashews, hazelnuts, macadamias, pecans, pine nuts, pistachios, walnuts, crustacea, molluscs, fish, milk, egg, gluten (that is found in wheat, rye, barley, oats, spelt, and triticale), wheat, soy, sesame, lupin, sulphites (must be listed if added at 10 (or more) milligrams per kilogram of food)
- You must know what's in the ingredients you use.
- The Australian New Zealand Food Standards Code (the Code) contains rules you may need to meet.
- The Code is found here: http://www.foodstandards.govt.nz/code/Pages/default.aspx
- The Code includes rules about:
    - Which foods or ingredients are allergens.
    - Which additives, preservatives and processing aids can be (or must be) used with particular foods.
    - Ingredients that can't be used in food – or need to be approved before they are used.
    - Composition rules that only apply to some foods (e.g. meat pies, fruit juice, edible oils etc.)
- You can check the Code or ask your food safety consultant, verifier or registration authority for more information.

Why is knowing what's in your food is important?

- Horticulture (growing): Agricultural compounds like herbicides, pesticides, fungicides and fertilisers can leave residues on food that can cause illness.
- You should always check and follow label instructions when using these products. Only use them on the plants they are approved for and harvest plants after any withholding periods specified.
- There are rules about the maximum residue limits that are permitted on horticultural produce sold for human consumption here: https://www.mpi.govt.nz/dmsdocument/19550-maximum-residue-levels-for-agricultural-compounds
- You don't have to test your crops to prove the limits are met – but random sampling and testing of produce is carried out by MPI, and sometimes your customers will also do testing.
- If your product doesn't meet the limits, you have to be able to show that you took all steps necessary to ensure your product would meet the rules.
- Even if you are only selling food made and packaged by others, it's your responsibility to check that the food is labelled correctly. This guide will help know what you should check for: https://www.mpi.govt.nz/dmsdocument/2965-A-guide-to-food-labelling.

- You must be able to tell customers whether a food contains each individual allergen if they ask. For packaged foods this information must be on packaging.
- You need to know what's in your food if you are growing produce, making foods with more than one ingredient or selling manufacturer packaged foods, so you know what ingredients and allergens they contain.
- If you think a food isn't labelled correctly, especially if it probably has an allergen that isn't listed (e.g. a muffin doesn't list wheat flour or gluten) – check with your supplier before selling it.

What do you need to do?
Horticulture: Ensure agricultural compound residues in crops do not exceed maximum residue levels requirements.

What do you need to show?
Horticulture: Show your verifier how you know which agricultural compounds have been applied to crops, and how you know the maximum residue levels are not exceeded.

4.5 Separating food

What do you need to know?

- Separation means using time or distance (or both) to:
  - keep food that doesn't contain allergens separate from foods that do,
  - keep non-food goods, like poisonous/dangerous chemicals or animal feeds, away from food.

Why is separation is important?

- Accidental contamination of food is one of the most common reasons food becomes unsafe.
- Some simple steps can reduce the chance of accidental contamination:
  - use different spaces and equipment for foods that contain allergens than foods that don't, or
  - process foods containing allergens at different times from foods that don't and thoroughly cleaning and sanitising surfaces, equipment, and utensils between use.
- Processing all foods that don't contain allergens before you process allergen-containing foods, can add some extra protection.
- For a list of allergens you need to know about see https://www.mpi.govt.nz/dmsdocument/50725-Allergen-labelling-Knowing-whats-in-your-food-and-how-to-label-it
- Dangerous/poisonous chemicals can make people sick if they get into food. Other sections of this guidance are intended to prevent this from happening so this is just a reminder to keep these away from food.

What do you need to do?

- Keep foods that contain the allergens listed in the Know section of 'Knowing what's in your food' from contaminating foods that don't /shouldn't contain those allergens.
- Keep all products not intended for human consumption (e.g. chemicals and pet food) away from food.

What do you need to show?

- Show your verifier how you separate:
  - foods that contain the allergens listed in the 'Know' section of 'Knowing what's in your food', and foods that don't contain those allergens,
  - dangerous chemicals or poisons and food.
- Your verifier may ask you or your staff to explain how they know which foods you make or serve contain allergens.

4.6 Keeping foreign matter out of food

What do you need to know?

- Many food complaints are made to authorities are related to finding foreign matter in foods.
- Foreign matter includes dead pests (e.g. flies, mice, etc.), hair, fingernails, band aids, coins of jewellery, bits of cleaning cloth, razor blades, nuts, bolts, plastic, cardboard, stones, twigs, glass, metal shards, etc..

Why is managing the risk of foreign matter in foods important?

- Some foreign matter is unsafe, including hard or sharp objects like glass, hard plastic or stones etc.. These can cause damage to the mouth, tongue, throat, stomach, intestine, teeth and gums.
- Keeping foreign matter out of food is important and can be done in variety of ways. This depend on the types of foods and chance of foreign matter occurring.
- Food is unsafe if you think it contains:
    - Glass,
    - Hard or sharp foreign matter that measures 7mm to 25mm in length, or
    - Hard or sharp foreign objects less than 7mm or between 25mm and 77mm and the primary intended consumers of the product are:
        - Children under 6 years old,
        - Elderly people,
        - People with dentures.
- Foreign matter from people or pests that gets into food that won't be treated (e.g. heated) to kill bugs (or after treatment to kill bugs) can cause people to get sick.
- Much of the foreign matter found would not cause illness or harm or make your customers sick, they will often link it to unsafe food practices.
- Many of the procedures in this guide will help, but you could also consider filtration or sieving, visual inspection, colour sorting, implementing jewellery policies for workers, metal detection, x-ray inspection, etc.

What do you need to do?

- Implement procedures to prevent foreign matter getting into food and/or to detect foreign matter in final products.
- Always make sure nothing in your process contaminates your food with foreign matter.
- Calibrate and check the performance of foreign matter detection equipment such as metal detectors, x-ray or colour sorting units.

What do you need to show?

- Show your verifier:
    - how you keep foreign matter out of food, or check that it is not present in final foods,
    - how you know any foreign matter detection equipment is regularly calibrated.

4.7 Packaging and labelling food

What do you need to know?

- Unsafe and/or unsuitable packaging can make food unsafe. Food grade packaging (e.g. crates) must be used to keep food safe.
- Anything that touches your packaging (e.g. bugs, chemicals, or foreign matter) can make your food unsafe and/or unsuitable.
- Not all foods have to be labelled, but for those that are, the labels must meet the rules in the Australia New Zealand food Standards Code (the Code).
- Foods can become unsafe over time, even though they still might look, smell and taste ok. It's important to let your customers know when to eat your food by, by calculating the shelf-life providing a Best-Before or Use-By Date. You need to make sure you calculate this date correctly.

Packaging

- Only use packaging that doesn't cause, or contribute to, food becoming unsafe or unsuitable.
- Check that packaging is food grade when you buy it. Either:
    - purchase packaging labelled as being suitable for food or
    - get an assurance from your supplier that it is food grade.
- Check that packaging is intended for your type of foods or use (e.g. honey drums have a liner suitable for use with acidic foods, that won't flake, peel or degrade).
- Handle and store packaging with the same care as a food or ingredient.

Why is packaging important?

- Packaging protects your food from becoming unsafe or unsuitable.
- Anything that touches your packaging (i.e. bugs, chemicals or foreign matter) can make your food unsafe or unsuitable.
- Check for pests on produce while packing. Refer to SOP 3.1.2 Checking for pests.

Labelling

- If you are supplying bulk foods these will generally need to be accompanied with a packing or specification sheet. You must supply the same information that would go on the food label.
- Labels or specification sheets will generally need to include:
    - name of the food,
    - lot/batch identification,
    - name and address of your New Zealand or Australian business,
    - any applicable advisory statements, warning statements and declarations,
    - any conditions for storage and use,
    - ingredients list,
    - date marking (e.g. use-by, best before etc.),
    - nutrition information panel,

- information about nutrition, health and related claims (only if you've made a claim),
- information about characterising ingredients and components,
- if the product is or has been made with genetically modified foods or irradiated foods.

- If you receive or supply any bulk food, you must check that any label information that is needed is also supplied.

Not all foods need this, e.g. fresh fruit and vegetables

- If your food doesn't have to be labelled, you must still be able to tell your customers:
  - what's in the food,
  - any warning statements,
  - if the food is made from or contains genetically modified ingredients or irradiated foods.

Why is labelling important?

- Labels allow your customers to make good and safe food choices.
- Some of your customers may have medical conditions (e.g. allergies) which require them to include or avoid certain foods in their diet.
- Consistency in the layout of label (e.g. having a nutrition information panel and using minimum font sizes) can help your customers make good food choices.
- MPI has developed a guide to help you create your food label. Follow 'A guide to food labelling' https://www.mpi.govt.nz/food-business/labelling-composition-food-drinks/documents/ to write your label.

Why calculate the shelf-life of a food

- You may need to work out the shelf-life of a food so that you can apply either a use-by or best before date.
- There is a guide to help you work out shelf-life. Follow 'How to determine the shelf-life of food' http://mpi.govt.nz/document-vault/12540

What do you need to do?

Package

- If you are packaging food:
  - implement procedures for ensuring packaging will not cause, or contribute to, food becoming unsafe or unsuitable,
  - calculate the food's shelf-life,
  - identify whether you need to either:
    - label your food, or
    - provide a packing or specification sheet with bulk foods.

Label

- You must meet the rules about labelling in the Code for any foods you label.

What do you need to show?

- Show your verifier:
    - your packaging and how you know it is safe and suitable for the foods you are packaging,
    - your food labels and how you know what to put on your labels.

- Your verifier might:
    - how you worked out the shelf-life of a food product,
    - ask for the results of shelf-life testing if you carried out testing.

4.8 Transporting food

What do you need to know?

- Food can become unsafe at any point in the supply chain.
- If a food needs to be kept under temperature or humidity control to stop bugs from growing to levels that will make people sick, it is important to make sure temperature/humidity is kept constant through the whole chain – including while being transported.
- While food is being transported, the vehicle it's being transported in should be considered a food premises or food room – keep it clean and separate food as you would in a kitchen or store room.
- If you transport and distribute food, the supplier and person receiving it are depending on you to keep it safe. Records will show that you have kept it safe.
- Food and non-food goods need to be kept separate.
- Only use vehicles suitable for the type and amount of food being transported.
- If you are contracting someone else to transport food, check that they are a registered food business.

What do you need to do?

- All parts of the vehicle that you use to transport food or food equipment must be clean (and sanitised if going to be in direct contact with ready-to-eat food).
- Always transport and deliver food at the correct temperature:
    - keep frozen food frozen,
    - transport chilled food cold (at or below 5°C) and monitor this regularly (using a thermometer or equivalent),
    - transport hot food hot (above 60°C),
    - only deliver food in the temperature danger zone (5°C-60°C) if it's going to be eaten within 4 hours of entering the temperature danger zone.
- Control and check humidity or atmosphere conditions where this is required to keep food safe.

What do you need to show?

- Show your verifier:
    - how you check food is kept at the correct temperature and/or humidity when being transported,
    - how you control temperatures and keep foods separate while transporting food,
    - your vehicle(s) used for transporting food.

Will you keep records for this?

You must keep temperature and/or humidity records for each transport vehicle and transport run, where these are required to be controlled.

5. Troubleshooting

5.1 When something goes wrong

What do you need to know?

- When things go wrong (and they will sometimes), you need to take immediate action to keep food safe and suitable. This could include:
    - Isolating affected product and preventing it being used, distributed or sold (in some cases you might be able to reprocess the food to make it safe and suitable). It may need to be recalled if it's already been sold or distributed.
    - Contacting your verifier. The verifier can help you identify options for what you can do to fix it, if you need them to. (They will not fix the problem or make decisions for you).

Why is having a process in place for when something goes wrong important?

- People will sometimes make mistakes that can affect food safety or suitability. It is important these mistakes are dealt with and any food that is not, or might not be safe and suitable, is not sold. See 'Recalling food'.
- If a customer complains about your food or something they have seen in your business related to food safety or suitability, you need to investigate it.
- If it turns out something has gone wrong, the same steps outlined in the Do section below apply.

What do you need to do?

- Set-up procedures that allow you to react quickly when something goes wrong.
- As soon as a problem affecting food safety and/or suitability is identified:
    - identify all food that is, or could be unsafe or unsuitable,
    - prevent it from being sold or, determine if a recall is necessary,
    - notify your verifier that there is (or has been) a problem as soon as possible,
    - fix the problem,
    - take action (or make changes) to prevent th problem from happening again,
    - keep clear, accurate records of all the actions you took once the problem was identified. You must keep these records for at least 4 years.

What do you need to show?

- Show your verifier:
    - how you investigate customer complaints,
    - what you do when something goes wrong.

- Your verifier might ask:
    - about things that have gone wrong, and what has happened since, to see records for things that have gone wrong,
    - staff what they do if they make a mistake which affects food safety or suitability.

5.2 Dealing with customer complaints

What do you need to know?

- You must be able to identify if the complaint is about food safety, suitability or quality.
- Customer complaints about food safety and/or suitability must be dealt with immediately.
- You must have someone responsible for dealing with customer complaints.

What do you need to do?

- Identify who is responsible for dealing with complaints:
  day-to-day manager or delegated person (tick as appropriate)
  Name: _____
- Identify if the complaint is about food safety, suitability or quality.
- If the complaint affects the food safety and/or suitability of a batch or individual item/dish, you must separate until proven to be safe or throw out affected food and associated ingredients,
  - check food that has been in the same area or has been prepared at the same time,
  - identify where the problem started,
  - fix the problem,
  - take action to prevent the problem from happening again.
- Notify your verifier:
  - if someone who eats your food ends up sick, or
  - could end up sick if they eat your food.

What do you need to show?

- Show your verifier a record of all of the following if the complaint is about food safety or suitability:
  - the contact details of the person who made the complaint,
  - the date and time of the purchase,
  - your food that was affected including the batch/lot ID if available,
  - what the complaint was about,
  - the cause of the problem,
  - the action you took immediately and the action you took to prevent it from happening again.

5.3 Recalling food

What do you need to know?

- There are 2 kinds of recall:
  - **o** Trade level – where food that has been distributed to stores is being recalled;
  - **o** Consumer level – where there is public notification of the recall.
- There are 2 main reasons for a recall:
  - o Something has gone wrong in your business.
  - o Something has gone wrong in a supplier's business and you have already used the ingredient, input, equipment, packaging or food they are recalling.
- The records you must keep can help in your procedure for recalling food. Traceability is extremely important in a recall situation.
- A recall is needed if you have doubts your food is safe and suitable and you have already sold or distributed some or all of it.
- A recall procedure is not needed if you only sell food directly to the final customer and is for immediate consumption.

Why is having a recall procedure important?

- If you think food may be unsafe or unsuitable and it has already been sold, it is your responsibility to do everything you can to prevent that food from making people sick.
- It's important to consider if:
  - o you can quickly identify which trade customers have the food and how you will contact them,
  - o you have to notify the public not to eat the food you are likely to need to take out media advertisements, and will need to arrange this.
- It's important to give useful advice to the customer e.g. anything they need to do (e.g. certain symptoms) if they have already eaten the food?
- There are a number organisations that provide guidance to help develop a recall procedure, including MPI. See https://www.mpi.govt.nz/food-business/food-recalls/food-recall-guidance-for-businesses/
- It is useful to test your recall procedure once in place.
- Work out how you will know if the recall is successful e.g. how much product was distributed compared to how much you got back, and/or how quickly you were able to recall the product.
- You should test your recall procedure occasionally by having mock recalls.

What do you need to do?

- Recall food that you know is or might be unsafe or unsuitable (that is likely to be in the food chain or customers' homes (hasn't been eaten yet)).
- If you decide to recall, you must:
  - o notify MPI as soon as possible and at least within 24 hours,

- call 0800 00 83 33 and ask for the Food Compliance team (if during work hours) or ask for the on-call MPI Food Safety Officer (if calling after hours).

What do you need to show?

- Show your verifier:
  - the procedure or plan you have in place to recall food if you have to,
  - records for any mock recalls you have carried out,
  - records for any food recalls you have carried out.

APPENDIX A: STAFF TRAINING RECORD

Name:	Telephone:
Position:	Start date:
Address: Email:	

Topic	Relevant	Employee signed *	Supervisor signed **	Date
Essential training				
Health & Sickness				
Hand hygiene				
Personal hygiene				
Cleaning & sanitising				
Food allergens				
Potentially hazardous food				
Maintaining organic integrity of the property – BioGro Organic Standards				
Training as needed				
Fruit and vegetables				
Purchasing and receiving food				
Perishable and shelf-stable food storage				
Chilled and frozen food storage				
Equipment, packaging and other items in contact with food				
Preventing cross-contamination				
Waste management				
Pest, diseases, weed and animal control				

Transporting food				
Food labelling				
Customer complaints				
Supplying and tracing food				
Recalling food				

* I acknowledge that I have received training in the procedure and agree to follow it.
** The employee has been trained and has demonstrated a good understanding of the procedure and has been observed consistently following it.

Other training

Date	Details

Corrective Actions:

Date	Details

APPENDIX B: SICKNESS RECORD

Name	Symptoms	Date	Action taken

APPENDIX C: OFNZ PEST RECORD

Date	Pest?	What control method is used (E.g. bait/trap)?	Control method conform Organic Standards?	Where Used?	Result / Date
			YES /NO		
			YES /NO		
			YES /NO		
			YES /NO		
			YES /NO		
			YES /NO		
			YES /NO		
			YES /NO		
			YES /NO		
			YES /NO		
			YES /NO		
			YES /NO		

APPENDIX D: OFNZ MAINTENANCE SCHEDULE AND RECORD

Premises / Equipment item	Frequency	Next scheduled check	Who does the maintenance	Description of the maintenance

APPENDIX E: TRANSPORTED FOOD TEMPERATURE RECORD

Instruction: Only use this record when food is out of temperature control for more than 4 hours.

Date	Type of food	Temperature (taken + 4 hours of temperature control)	Checked by

APPENDIX F: OFNZ CLEANING SCHEDULE

Items and areas to be cleaned	Frequency of cleaning	Method of cleaning (including manufacturer's instructions for diluting of chemicals)	Cleaning product	Disinfectant	Person responsible

APPENDIX G: OFNZ CLEANING RECORD

Items and areas to be cleaned	Frequency of cleaning	Method of cleaning (including manufacturer's instructions for diluting of chemicals)	Initial (no tick off)							
			Mo	Tu	We	Th	Fr	Sa	Su	Weekly
		-								

APPENDIX H: FRIDGE TEMPERATURE CHECKLIST

- Only when required -

Date week starts							
Fridge	Mon	Tue	Wed	Thur	Fri	Sat	Sun
1	°C	°C	°C	°C	°C	°C	°C
2	°C	°C	°C	°C	°C	°C	°C
3	°C	°C	°C	°C	°C	°C	°C

Date week starts							
Fridge	Mon	Tue	Wed	Thur	Fri	Sat	Sun
1	°C	°C	°C	°C	°C	°C	°C
2	°C	°C	°C	°C	°C	°C	°C
3	°C	°C	°C	°C	°C	°C	°C

Date week starts							
Fridge	Mon	Tue	Wed	Thur	Fri	Sat	Sun
1	°C	°C	°C	°C	°C	°C	°C
2	°C	°C	°C	°C	°C	°C	°C
3	°C	°C	°C	°C	°C	°C	°C

Date week starts							
Fridge	Mon	Tue	Wed	Thur	Fri	Sat	Sun
1	°C	°C	°C	°C	°C	°C	°C
2	°C	°C	°C	°C	°C	°C	°C
3	°C	°C	°C	°C	°C	°C	°C

Date week starts							
Fridge	Mon	Tue	Wed	Thur	Fri	Sat	Sun
1	°C	°C	°C	°C	°C	°C	°C
2	°C	°C	°C	°C	°C	°C	°C
3	°C	°C	°C	°C	°C	°C	°C

Date week starts							
Fridge	Mon	Tue	Wed	Thur	Fri	Sat	Sun
1	°C	°C	°C	°C	°C	°C	°C
2	°C	°C	°C	°C	°C	°C	°C
3	°C	°C	°C	°C	°C	°C	°C

Date week starts							
Fridge	Mon	Tue	Wed	Thur	Fri	Sat	Sun
1	°C	°C	°C	°C	°C	°C	°C
2	°C	°C	°C	°C	°C	°C	°C
3	°C	°C	°C	°C	°C	°C	°C

Date week starts							
Fridge	Mon	Tue	Wed	Thur	Fri	Sat	Sun
1	°C	°C	°C	°C	°C	°C	°C
2	°C	°C	°C	°C	°C	°C	°C
3	°C	°C	°C	°C	°C	°C	°C

APPENDIX I: RECALL HAZARD/RISK ANALYSIS FORM

Recall Hazard/Risk Analysis Form

Using this Form:

The decision to recall can be somewhat subjective at times. There are some situations where the hazard is known to be potentially life threatening, and the decision to recall is clear. In other situations it may be necessary to separate public perception of risk from scientific analysis of risk, and the decision to recall can be more difficult. This form is designed to clarify the thought process when making a decision to recall, and to provide a record of recall decisions for future reference.

DATE NOTIFIED	
BRAND/PRODUCT NAME	
COMPANY CONTACT DETAILS Address, email and phone details	
CONTACT PERSON Name, position, email and phone details	
PRODUCT INFORMATION	
What batch or batches is suspected?	
Are batches before and after suspected / affected?	Please tick one below: ☐ Yes ☐ No If YES what batches?
Quantity of product per batch including quantity of individual consumer packs per batch	
Product weight/volume	
Batch identification details i.e. date mark/batch code or ID as is stated on product label	
DETAILS OF HAZARD/NON COMPLIANCE (PLEASE TICK ONE BELOW) ☐ Microbiological Contamination ☐ Chemical contamination ☐ Foreign Matter ☐ Undeclared Allergen ☐ Labelling Incorrect ☐ Other	**DESCRIBE HAZARD/NON COMPLIANCE**
Has any testing been done?	Please tick one below: ☐ Yes ☐ No If YES please attach a copy of the test results
Does the product contravene a regulatory limit or standard?	Please tick one below: ☐ Yes ☐ No If YES which regulatory limit or standard?
Does the hazard/non-compliance have the potential to cause risk to health? Please tick one below: ☐ Yes - recall possible, proceed with risk analysis ☐ No - recall not required, unless other factors indicate otherwise (see ANY OTHER RELEVANT FACTORS). Company's own commercial risk to recall or not.Corrective action to prevent reoccurrence to be undertaken and documented.	

Issued 22 September 2014

DISTRIBUTION DATA (see Note 2)	
Where is the affected product (batch/batches)?	
Is ALL product still in company/distribution control (not yet with consumers)? Please tick one below: ☐ Yes - Product Hold or Withdrawal (see Note 1) ☐ No - Recall possible, proceed with risk analysis	
Where is product sold? (Please list all customers/retailers and include their location)	
Approximately how much product has been sold?	
Has product been exported? This includes all product sold outside of NZ including exports to Australia & the Pacific Islands	Please tick one below: ☐ Yes ☐ No If YES which countries?
CONSUMPTION INFORMATION How is this product commonly used (e.g. eaten immediately, stored for a few days, stored for a long period of time in freezer/pantry)? How much of this product is usually eaten in one sitting and how often? Is it Ready-To-Eat?	
CONSUMER/MEDICAL REPORTING (Note 3)	
Have there been consumer complaints about this product?	Please tick one below: ☐ Yes ☐ No If YES give details
Any reports of illness or injury?	Please tick one below: ☐ Yes ☐ No If YES give details
EXPERT OPINION (Note 4) Note experts consulted, and results of consultation.	
ANY OTHER RELEVANT FACTORS This section should be used to record anything else that influences the recall decision.	
Hazard/Risk Assessment indicates Recall Required? Please tick one below: ☐ Yes ☐ No ☐ Maybe - insufficient information to make accurate scientific assessment. Precautionary principle to be used.	
Precautionary Principle: Where assessment of available information indicates the possibility of harmful effects on health but scientific uncertainty exists, assume the product presents a risk to human health and take appropriate control action.	

Final recall decision *(including the extent of the finalised scope of the recall (batches, distribution etc))* **and key reasons:**
Please attach photo(s) of product including an image of batch identification details and its location on the label when returning this form

Notes:

1. Risk analysis may be required to determine whether product is suitable for reconditioning and release for sale or must be disposed of (destroyed). Disposal actions must be discussed with MPI.
2. Distribution contributes to the risk analysis, as it assists in identifying the potential exposure of consumers to the hazard. Third party distributors and their customers must be considered also.
3. Consumer/Medical reporting: Where two or more consumer complaints or reports of illness or injury implicate the same product or manufacturer the likelihood of a hazard being associated with the product is high and therefore likelihood of recall is high, particularly if the reports have originated from different households or otherwise unrelated sources. Recall is not automatic on suggestion of illness, unless there is additional evidence that confirms a causal link with a particular food product, however reports of illness must be taken seriously. Product may need to be put on hold, or withdrawn pending further investigation.
4. Expert Opinion becomes very important when differentiating between 'real' risk based on scientific evidence versus perceived risk. Expert opinion may also be a source of recent, unpublished, advances in scientific understanding of risks associated with particular hazards that may impact on the decision to recall.

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