Ministry for Primary Industries
Manatū Ahu Matua

Guidance Document

Guidance for Farm Dairies RMP Template - Domestic Supply

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Title

Guidance Document: Guidance for Farm Dairies RMP Template - Domestic Supply

About this document

This document provides an overview of the RMP Template, the documents that comprise the template, any supporting documents and guidance, and outlines the requirements of the legislation.

This document also provides guidance on completing the Farm Dairies RMP Template for Domestic Supply. This explains the additional farm dairy water requirements, the application of Hazard Analysis and Critical Control Point (HACCP), identification and control of risk factors associated with wholesomeness, labelling, representation and eligibility

Related Requirements

Risk Management Programme (RMP) Template for Farm Dairies – Domestic Supply

Change history

Previous Version Date	Current Version Date	Section Changed	Change(s) Description
November 2008		All	Updated references to MPI and migrated into new template Removed section 6 relating to HACCP and renumbered subsequent sections

Contact Details

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For further information on the use of this document contact your recognised agency for RMP verification or contact the MPI Approvals group

Approvals@mpi.govt.nz

Disclaimer

This guidance does not constitute, and should not be regarded as, legal advice. While every effort has been made to ensure the information in this guidance is accurate, the Ministry for Primary Industries does not accept any responsibility or liability whatsoever for any error of fact, omission, interpretation or opinion that may be present, however it may have occurred.

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1 Purpose of the Farm Dairies Risk Management Programme Template

The Farm Dairies Risk Management Programme Template for Domestic Supply has been developed by the Ministry for Primary Industries (MPI) to assist farm dairy operators and farm dairy RMP operators to meet the requirements of the Animal Products Act 1999 and produce raw milk, including colostrum, which is safe and fit for further processing. In particular, it is intended to streamline the process of development, registration and implementation of a suitable risk management programme (RMP) for farm dairy operations.

Introduction

The processing of dairy material, including the harvesting milk from milking animals, must comply with the requirements of the Animal Products Act 1999. This Act requires that the processing activities at the farm dairy are covered by a RMP registered by MPI. Section 17A of the Act allows for multiple farm dairy operators to come under the same RMP provided certain criteria are met.

Farm Dairies RMP Template

The Farm Dairies RMP template for Domestic Supply enables a RMP to be developed that is suitable for farm dairy operations which supply milk intended for the manufacture of product for the domestic market (New Zealand and Australia). By adopting and completing this template, operators are not required to submit the RMP for independent evaluation.

For farm dairies that:

- include novel practices
- prefer to meet key requirements by an alternative means
- wish to make a significant amendment to the template; or
- harvest milk intended for direct consumption as raw milk.

This template may be used as a model for the development of an alternative RMP, however such a RMP will require evaluation by a person recognised by MPI to evaluate a RMP for farm dairies prior to applying for registration.

The Farm Dairies RMP Template for Domestic Supply consists of the following components:

- Template.
- Farm Dairy Water Quality Checklist.
- Hazard Analysis and Identification.
- Identification of risk factors related to wholesomeness, labelling, representation and eligibility.

NZCP1: Code of Practice for Design and Operation of Farm Dairies

NZCP1 provides a set of criteria and recommendations applicable to farm dairy operators and those service providers who support them. It is available to be referenced and incorporated by any RMP operator into their farm dairies RMP.

If NZCP1 is referenced in the RMP or the template then the farm dairy operator must be familiar with, have access to and operate in accordance with the code. If an operator does not wish to reference NZCP1 in their RMP or template then an acceptable alternative must be developed.

2 Risk Management Programme

2.1 Contents of a Farm Dairies Risk Management Programme

The documented RMP must include the following:

Good operating practice

- Good operating practice (GOP) includes the practices and procedures designed to ensure the consistent production of milk that is safe and suitable for its intended purpose, and that meets relevant regulatory requirements. It includes several interacting components such as hygienic practices, process control and quality assurance systems.

Application of HACCP principles

- The operator must apply HACCP principles, as appropriate to the product and process, to ensure a systematic approach to the identification and analysis of hazards and their control. This is covered in Appendix 2.

Identification of other risk factors and their controls

- Other risk factors related to the wholesomeness of the product and risks from misleading labelling must be identified in the RMP. The control measures for addressing the identified risk factors must also be documented in the RMP. These are presented in Appendix 3.

Other RMP requirements

- Other RMP requirements such as business identification, operator's details, and provision for verifiers rights must also be documented in the RMP.

3 Development of an RMP using the Farm Dairies RMP Template – Domestic Supply

The Animal Products Amendment Act 2002 allows for a RMP to be based on a code of practice, a template, or a model. The Farm Dairies RMP Template for Domestic Supply has been formally recognised as valid and appropriate for the dairy processing activities at farm dairies wishing to supply only to the domestic market. It has been determined that a RMP based entirely on the template does not require evaluation provided that it is completed in full and that no significant change is made to the template.

The template is a valuable tool to use in the development of the RMP. Using the farm dairies RMP template will:

- ensure that the operator follows acceptable industry practices and procedures
- ensure that the operator meets the relevant regulatory requirements and obligations; and
- simplify and reduce the cost of developing, evaluating and implementing the RMP.

3.1 Farm Dairy Activities Fully Covered by the RMP Template

3.1.1 Development

When the farm dairies RMP template (combined with referencing a code of practice or an acceptable alternative) fully covers the scope of the farm dairy activities, the simplest approach for developing an RMP is to use the RMP template provided. The RMP template allows the operator to complete the RMP by filling in the required information in the appropriate boxes and confirming that the supporting systems described by the template will be adhered to.

The template provides the necessary supporting systems to ensure Good Agricultural Practice (GAP) and Good Operating Practice (GOP) will be met as well as the application of HACCP principles.

In doing so, the operator will only need to write procedures that are specific to their operation. The operator's RMP will, therefore, consist of the completed RMP template, operator procedures, any additional supporting documents referenced such as codes of practice, and a set of records.

The operator is required to confirm that certain requirements have been met and that the template is appropriate and valid for their operation.

3.1.2 Evaluation

RMPs that are fully based on an MPI approved template and/or COP do not require an evaluation prior to registration since MPI has already determined that the requirements and procedures set out in the COP are valid and will deliver the relevant regulatory requirements. Verification of the accuracy of the documented RMP and operator's compliance to the RMP will be carried out at the initial verification by the contracted verifier.

3.2 Dairy Activities not Fully Covered by, or with Significant Variation to, the RMP Template and NZCP1

3.2.1 Development

Since the farm dairies RMP template and supporting documents such as codes of practice follow accepted industry practice and also specify the processes and procedures to be followed, some operators may have

implemented, or wish to implement, novel or alternative means to meet requirements. Some operators may also need to, or want to develop their own specific RMP.

The RMP template may still be used but the operator will need to add their own information, documents or procedures for those parts not covered by the template or codes of practice.

The operator must be able to demonstrate the effectiveness of any alternative procedures or parameters to consistently meet all relevant regulatory requirements and produce products that are safe and suitable for their purpose. Demonstration of its effectiveness may involve the collection of evidence (e.g. data from testing or trials, published scientific information, report from an expert) by the operator for assessment by the recognised evaluator or MPI.

3.2.2 Evaluation

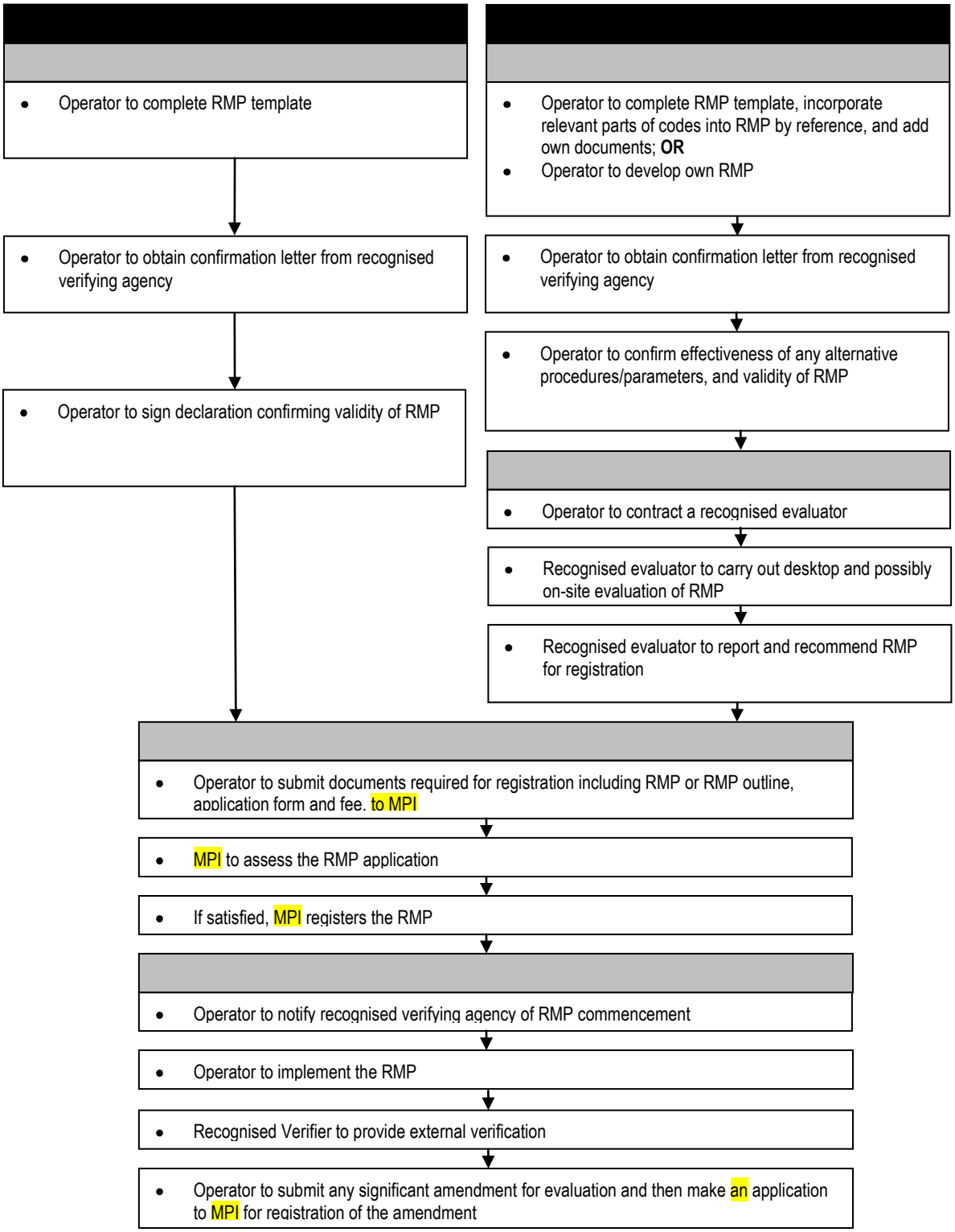
RMPs that are not fully covered by an approved RMP template or COP or those with variations from the template or COP will need to be evaluated by an independent evaluator recognised by MPI to confirm the adequacy of the RMP. Evaluation will involve a desk-top audit of the documented RMP and may require an on-site visit. The evaluators report is then submitted to MPI when making application for registration of the RMP.

3.3 Steps for the Development, Registration and Implementation of an RMP

The steps for the development, registration and implementation are summarised in Figure 1. The diagram shows the steps for two options:

- Option 1: For farm dairy operators whose activities are fully covered by the Farm Dairies RMP Template – Domestic Supply.
- Option 2: For farm dairy operators whose activities are not fully covered by the Farm Dairies RMP Template – Domestic Supply, or who have decided to apply procedures or processing parameters that differ significantly.

Figure 1: Steps for the development, registration and implementation of an RMP



4 Guideline for Completing the RMP Template

4.1 General Instructions

The person completing the template should:

a) Read this guideline while completing the template.
b) Provide the required information by:

   i) entering information into the space provided
   ii) if prompted or if insufficient space is provided, documenting separately and noting the title or location of the additional documentation; or
   iii) entering a tick where prompted to acknowledge acceptance of the criteria.

c) Ensure that all information provided is legible.
d) Ensure that everything written down accurately reflects or applies to all farm dairy operations intended to come under the RMP, and that they can and will comply with them at all times.

It is recommended that operators resist the temptation to be tougher than is necessary when completing the RMP.

Operators can choose their RMP Identifier. The Identifier must be a number or a number-letter combination of at least 3 characters and no more than 10 with at least one character as a number and no leading zeros. The operator must input their agreed Identifier on page 1 of the template, in the RMP Identifier section.

Template reference number.	Subject and description
1	**RMP**
	Identify the title you have used to identify the RMP, and the version
2	**Operator Name, Address and Contact Details**
	Full Legal Name: If the business is a company, then the full legal name must match the details given at the Companies Office exactly. If the business is a partnership or a sole trader operation then the names(s) of the business owner(s) must be provided.
	Physical address: Give the address of the operator of the RMP.
	Postal address: Give the address where you want any correspondence sent to.
	Phone / Fax / Email: Give the contact details of the RMP operator. Tick the box to indicate that you give consent to being provided with electronic information (e.g. emails).
	Owner of the Farm Dairy: Where the RMP covers one farm dairy only and the owner of the farm dairy is not the RMP operator then provide the details for the farm dairy owner.
3	**Multi Operator RMP**
	Only complete this section when the RMP is intended to cover farm dairies operated by more than one person or business.
4	**Responsible Persons and Agencies**
	The day-to-day manager is the person responsible for the implementation of the RMP and for ensuring that it is kept up to date. He/she is the contact person for MPI and the recognised agency when dealing with matters related to the RMP. Identify the recognised agency that has been contracted to verify this RMP (you should also have a

	letter of confirmation from the agency and provide a copy with the application for registration). Identify the laboratories that will undertake any testing.
5	**Scope of the RMP**
	Note that the scope covers the harvesting and storage of raw milk intended for further processing with heat treatment.
6-7	**Process Description and Capabilities, and Product Description and Fitness for Purpose Outcomes**
	These sections are already completed and describe the products (raw milk) and processes covered by the RMP.
8	**Location, Design and Construction of Farm Dairies**
	The procedures to follow and standards to be applied are detailed in NZCP1: Code of Practice for Farm Dairies. The template requires that the operator adopts NZCP1 as part of the RMP in order to satisfy various criteria.
9-18	
	These sections set out various technical requirements, and require certain details and procedures to be recorded. It should be noted that the detail recorded here is “static” and not expected to change, as opposed to the information on other sections which may well change. Operators need to read the programme and describe and implement any procedures not already in place.
19	**Milk Supply and Monitoring**
	This section sets out the quality monitoring requirements that must be undertaken and the records that must be kept. The recipient of the milk may take responsibility for this analysis, but in such cases the Farm Dairies RMP operator is expected to have a written contract or agreement as confirmation and both the RMP operator and the farm dairy operator (if that is a different person) must be provided with the results of the analysis.

Bovine - Raw Milk			
Parameter	**Frequency**	**Maximum Limit**	**Action if Exceeded** [1]
APC (measured by APC or Bactoscan)	Monthly	100,000 cfu/ml	Plant inspection, review of wash procedures, milk cooling, NZCP1
Inhibitory Substances	Monthly	0.003 iu/ml 0.006 iu/ml	Investigate to determine cause, review of procedures according to NZCP1 Above plus notify RA, farm dairy assessor and recipients of the milk
Coliforms	Monthly	100 cfu/ml	Review plant hygiene, milking procedure, clinical mastitis
Sensory evaluation	Per collection or dispatch	No spoilage, objectionable matter, discolouration, odours and/or taints	Milk that is tainted, contains objectionable matter, or is otherwise unfit for the intended purpose will be withheld. Review milking practices, plant hygiene, NZCP1 and animal feed
Sediment/foreign matter		Not present	Presence of spoilage, foreign matter, discolouration, odours and/or taints
Temperature	Per collection or dispatch	From end of milking 14°C after 1 hour 10.5°C after 2 hours 7°C after 3 hours	Check primary and secondary cooling, coolant water quantity and temperature

[1] In addition, the first three consignments following any dry period are to be monitored.

Bovine – Colostrum			
Parameter	**Frequency**	**Maximum Limit**	**Action if Exceeded** [2]
APC	Monthly	100,000 cfu/ml	Plant inspection and review of wash procedures.
Inhibitory Substances	Monthly	0.003 iu/ml 0.006 iu/ml	Investigate to determine cause, review of procedures according to NZCP1 Above plus notify RA, farm dairy assessor and recipients of the milk
Coliforms	Monthly	100 cfu/ml	Review plant hygiene, milking procedure, clinical mastitis
Sensory	The frequency of monitoring is determined by the likelihood of a supply being non-conforming, and a record is kept that explains how the frequency was determined[3]	No spoilage, objectionable matter, unusual discolouration, odours and/or taints	Review milking practices, plant hygiene, NZCP1 and animal feed
Sediment/Foreign matter		Not present	Presence of spoilage, foreign matter, discolouration, odours and/or taints
Temperature	Per collection or dispatch	From end of milking 14°C after 1 hour 10.5°C after 2 hours 7°C after 3 hours	Check primary and secondary cooling, coolant water quantity and temperature

[2] In addition, the first 3 consignments following any dry period are to be monitored.
[3] In addition, the first 3 consignments following any dry period are to be monitored. In case of failure, follow-up until 3 consecutive consignments conform.

Species other than bovine			
Parameter	**Frequency**	**Maximum Limit**	**Action if Exceeded** [4]
APC	Monthly	100,000 cfu/ml	Plant inspection and review of wash procedures
Inhibitory Substances	Monthly	0.003iu/ml 0.006iu/ml	Investigate to determine cause, review of procedures according to NZCP1 Above plus notify RA, farm dairy assessor and recipients of the milk
Coliforms	Monthly	100 cfu/ml	Review plant hygiene, milking procedure, clinical mastitis
Sensory	Per collection or dispatch	No spoilage, objectionable matter, discolouration, odours and/or taints	Review milking practices, plant hygiene, NZCP1 and animal feed
Wholesomeness		Not present	Presence of spoilage, foreign matter, discolouration, odours and/or taints
Temperature	Per collection or dispatch	From end of milking 14°C after 1 hour 10.5°C after 2 hours 7°C after 3 hours	Check primary and secondary cooling, coolant water quantity and temperature

[4] In addition, the first 3 consignments following any dry period are to be monitored.

Template reference number.	Subject and description
20	**Staff**
	Ensuring that staff have the required competency to fulfil their duties is a fundamental requirement, and records will be required on an on-going basis. Requirements to cater for situations of milk harvester ill-health are also considered in this section.
21	**Non-conforming Dairy material**
	Any milk offered for supply that was not harvested in accordance with the RMP is non-conforming and there is a formal process to ensure affected parties and the recognised verification agency are notified. If the farm dairy operator withdraws the milk from supply then it ceases to be non-conforming and no notifications are required to be made, but a record must be kept.
24	**Programme amendments and Documentation Control**
	This section sets out requirements for control of the programme and the obligations to be met when making amendments. Significant amendments includes: • A departure from the requirements set out in this programme. • Moving farms. • Change of owner. • Change of purpose (e.g. an intention to sell raw milk for consumption). • Permanently ceasing operations, in which case the DG should be advised and requested to remove registration of the RMP. For further details on RMPs and appropriate forms, please refer to the following website http://www.foodsafety.govt.nz/industry/general/rmp/documents/forms-templates.htm The following changes to the RMP require the farm dairy assessor to confirm compliance to the programme: • Modifications to the farm dairy, milking plant or constructing a new dairy. • Change to the farm dairy water quality status, as required from the water checklist. If there is any change to the contract details provided in sections 2 and 5 of the template, you must inform the Ministry for Primary Industries (MPI) in writing.
25	**References and Supporting Documentation**
	This section identifies additional documents which make up the programme and also those that may provide guidance material. The procedures, standards or requirements they contain form part of the RMP and must be met. The advantage to the operator is that they provide the industry Good Operating Practices upon which the RMP is based. Provided the operator accepts these, the operator is not required to develop their own set of practices, procedures and controls.
26	**External Verification**
	This section states that you authorise the contracted verifier to have freedom and access to carry out verification activities. Do not change or add anything to this section. Confirm, by ticking the box at the bottom of the section, that a letter has been received from the verification agency confirming that they will verify the RMP. The verifier must have access to any and all information that may be desired to support the audit findings (e.g. lab test results, failing actions and the corrective actions taken, monitoring if on water management plan).
27	**RMP Operator Declarations**
	This section contains a set of declarations confirming that, in the view of the proposed RMP operator, the RMP is valid and appropriate for the activities it is intended to cover. Once completed, the RMP operator who signs the RMP declaration also dates and initials each

	page of the programme.
28	**MPI Fees for Application to Register this RMP**
	Once completed, the RMP must be registered by MPI before processing operations (milking) can commence. When completed, the RMP includes all application details and can be submitted along with a copy of the letter from the recognised agency agreeing to be the RMP verifier. The application fee should be submitted to MPI at the address shown. For an RMP that contains a significant amendment or is not based on this template, the RMP will require evaluation by a person recognised by MPI prior to making an application to register the RMP. Applicants should also note the Privacy Act Notice in section 7 of this document.

Template Appendix number.	**Subject and description**
Appendix 1	DPF201a – Assessment of Farm, Dairy Water Status This checklist assessment must be completed under section 12, and again every 3 years or when a significant change occurs to the farm dairy water supply. The RMP verifier will review this at the RMP verification to ensure it is accurate and current.
Appendix 2	HACCP
Appendix 3	Wholesomeness & Labelling Refer to section 7 of this document for explanation.
Appendix 4	RMP Amendment Record A record must be made of amendments made to this RMP. All amendments will also be advised to the recognised agency as part of the routine reporting. For significant amendments, the amendment will need to be submitted for evaluation by a person recognised by MPI and then application made to MPI to have the amendment registered.

5 Collection of Personal Information on Individuals

In regard to any personal information being collected on this application for registration of a risk management programme under the Animal Products Act 1999 (that is personal information about an identifiable individual), notification is hereby provided in accordance with Principle 3 of the Privacy Act 1993, to individuals of the following matters:

(1) This information is being collected for purposes relating to registration of a risk management programme and administration of the Animal Products Act 1999.

(2) The recipient of this information, which is also the agency that will collect and hold the information, is the Ministry for Primary Industries, PO Box 2835, Wellington. Details of the registered RMP will be displayed on the public register of RMPs.

(3) The collection of information is authorised under section 20 of the Animal Products Act 1999. The provision of this information is necessary in order to process this application. Failure to provide information is likely to result in the return of this application form to the applicant and ultimately may result in a refusal by the Director-General, in accordance with section 23 of the Animal Products Act 1999, to register the RMP that is the subject of the application.

(4) You are reminded that under Principles 6 and 7 of the Privacy Act 1993, you have the right of access to, and correction of, any personal information, which has been provided.

6 Wholesomeness

6.1 Purpose of RMP Template Appendix 3: Summary of Identified Risk Factors and Controls Related to Wholesomeness or False Labelling of Raw Milk

The operator must identify in their risk management programme (RMP) any risk to the wholesomeness of the product, and any risk from false or misleading labelling, representation or eligibility, that is reasonably likely to occur. The operator must also document the control measures for effectively addressing any identified risk factor.

To assist operators to meet this requirement, MPI has completed Appendix 3 to the Farm Dairies RMP Template. It shows the identification of risk factors related to wholesomeness and labelling for a generic process covering the dairy processing operations at a farm dairy.

When the risk factor identification in Appendix 3 of this document does not adequately cover an operator's product or process, the operator will need to carry out their own risk factor identification. The approach and format shown should be used by the operator as a guide or pattern for their own application.

6.2 Wholesomeness

Wholesomeness means that the raw milk does not have in it or on it anything that is offensive, or whose presence would be unexpected or unusual in product of that description. Foreign objects that are considered physical hazards are dealt with under the Appendix 2: HACCP.

6.3 False or Misleading Labelling, Representation or Eligibility

Raw milk intended ultimately for New Zealand or Australia must meet all relevant legislative requirements related to labelling, representation or eligibility, including:

- Animal Product (Dairy) Regulations 2005; and
- Animal Products (Dairy Processing Specifications) Notice 2011

Raw milk intended ultimately for export beyond Australia must also meet the relevant legislative requirements related to labelling, representation or eligibility contained in:

- Animal Product (Export Requirements – Dairy Products) Notice 2005
- Animal Products (Official Assurance Specifications- Dairy Products) Notice 2011
- Export requirements

When identifying risk factors, consideration should be given to the type and intended use of the material, the intended market, the consumer, and requirements for authenticating certain claims (e.g. colostrum).

7 Sources of Other Information

Information specific to Farm Dairy Operators and Farm Dairy RMP Operators is available on the MPI dairy website at: http://www.foodsafety.govt.nz/industry/sectors/dairy/