



New Zealand Food Safety

Ministry for Primary Industries

Manatū Ahu Matua

Evaluation of template or model food
control plan
OrganicFarmNZ (OFNZ)

23 April 2019



Introduction

Section 40 of the Food Act 2014 provides that the Ministry for Primary Industries' (MPI) Chief Executive can approve a template or model Food Control Plan (FCP) developed outside of MPI.

This allows food businesses or commercial operations to:

- Develop a Food Control Plan and have it approved so that each business using the plan does not need to submit their plan for individual evaluation.
- Make adjustments to the MPI templates to include multi-site or multi-business specific procedures or practices, or to reflect common language/terminology used in the business and have those changes approved.

Context for this Evaluation

OrganicFarmNZ (OFNZ) has requested approval of its Food Control Plan (FCP) under section 40 of the Food Act 2014. The OFNZ plan is modelled on the Ministry for Primary Industries' (MPI) National Programme guidance.

The OFNZ scope of operations falls under the risk-based measure for growing, harvesting, minimal processing and packing of horticultural produce (National Programme 1). This includes bottling edible oil after it has been processed by a National Programme 3 business and supplied in bulk containers.

MPI has evaluated the OFNZ plan to ensure it meets the requirements of the Food Act 2014.

Evaluation Conclusion (Summary)

The OFNZ manual, if followed as written, is sufficient to adequately control the relevant food safety hazards.

The evaluator recommends that MPI's chief executive approves the OFNZ manual as a template or model FCP under section 40 of the Food Act 2014 on condition that users of the OFNZ manual who register a multi-site business be required to have all sites verified at their first verification.



Evaluation Report for OrganicFarmNZ (OFNZ)

| Ref: FR15 Regs for custom plan evaluation | Evaluation criteria | Evaluation findings – OrganicFarmNZ (OFNZ) |
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| 10(3)(a) | Name of evaluator | <i>Chris Kasonde</i> |
| 10(3)(b) | Name of food business | OrganicFarmNZ (OFNZ) |
| 10(3)(c) | Name of operator of food business | Members affiliated to OrganicFarmNZ (OFNZ). |
| 10(3)(d) | Type of food to which the procedure applies | <p>Horticultural produce grown and/or packed in New Zealand.</p> <p>These products best fit under producers of horticultural food and includes horticultural packing operations under Food Act 2014. In this plan, products are covered in Scope of Operations (trading operations), Section 2 of template. Food businesses using this plan can grow, harvest, sort, grade, undertake minimal processing and pack horticultural produce.</p> |
| 10(3)(e) | Description of practices and activities carried out | <p>A summary of practices carried out under the plan is provided in the section on 'requirements for OFNZ Template Food Control Plan'.</p> <p>Activities include (but are not limited to):</p> <ul style="list-style-type: none">• Competency and training of staff• Sourcing, receiving and tracing of ingredients• Use of suitable water• Cleaning of premises and equipment• Applying personal hygiene. <p>The activities are managed using the following principles:</p> <ul style="list-style-type: none">• Good Agricultural Practice (GAP) /Good Operating Practice (GOP)• Hazard Analysis and Critical Control Point (HACCP)• Troubleshooting (when something goes wrong). |

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| 10(3)(f) | List of documents assessed | <p>At the time of assessment, the OFNZ Template Food Control Plan was version 1 (dated 11 January, 2019) and adapted from MPI National Programme Guidelines. The template consisted of the following sections:</p> <ul style="list-style-type: none"> • Instructions • Horticulture operation setup • Day jobs • Producing, processing and handling food • Troubleshooting • Appendices. |
| 10(3)(g) | The name and address of the place assessed on site | N/A (Evaluation did not include an on-site assessment). |
| 10(3)(h) | Places exempted from on-site assessment | N/A |
| 10(3)(i) | Technical expert/s who provided information used in the evaluation process | N/A |
| 10(3)(j) | Copies of the technical expert's reports | N/A |
| 10(3)(k) | Information about the competency of | N/A |



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| | the technical experts | |
| 10(3)(l) | <p>Evaluator’s views and reasons on Reg 9(1)(a) requirements (does the plan meet the applicable requirements of the Act)</p> | <p>(i) Identification of all hazards and other factors that are reasonably likely to occur or arise under S. 42(g): Yes – OFNZ’s Template Food Control Plan (FCP) identifies sources of significant food safety hazards that can occur on production sites as: use of land previously contaminated by chemicals and/ or metals; poor staff hygiene; improper application of water and agrichemicals; sourcing of ingredients from unrecognised suppliers; and inadequate cleaning operations.</p> <p>(ii) the validation information set out in the plan demonstrates as required by regulation 7(2) that:</p> <p>(a) the procedures and activities set out in the FCP will enable safe and suitable food to be traded: Yes – The identified areas align with requirements of Food Act 2014, Food Regulations 2015, Food Notice Requirements for Food Control Plans and National Programmes 2017 and Food Standards Code (the Code).</p> <p>(b) practices carried out will enable safe and suitable food to be traded: Yes – If followed as required.</p> <p>(c) the facilities, equipment and essential services used in relation to those procedures, practices, and activities will enable safe and suitable food to be traded: Yes – where these equate to those used for validating processes.</p> <p>Any other information provided to the evaluator for assessment under 9(1)(a)? None.</p> |

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| 10(3)(I) | Evaluators' views and reasons on Reg 9(1)(b) requirements | <p>Is the information believed to be accurate? Yes.</p> <p>Reasons: The OFNZ Template Food Control Plan is derived from MPI National Programme Guidelines.</p> <p>Common food safety issues addressed by the plan:</p> <ol style="list-style-type: none"> 1. Failure to apply a systematic approach to meet food safety. The OFNZ plan requires businesses to identify and control hazards (biological, chemical and physical) that can be managed by the business. For example, water being used for production of produce must be suitable for intended use. The business must have enough trained and competent staff (and supervisors if necessary) to achieve the safety and suitability of food. 2. Failure to disclose presence of allergens. The OFNZ plan requires businesses to meet requirements of the Australian New Zealand Food Standards Code (the Code) including being able to inform customers what is in the food so that they can make informed choices. Packaged foods must also be labelled correctly. 3. Failure to manage cross contamination. The OFNZ plan requires businesses to check land and buildings for previous use activities that could make food unsafe, and recognises that applying agrichemicals (potential poisons) needs to be managed. Food that doesn't contain allergens must be kept separate from foods that do. Similarly, poisonous/dangerous chemicals or other non-food products such as animal feeds must be kept away from food to avoid accidental contamination of food. Equipment and machinery that usually come into contact with produce must also be kept in a way that prevents contamination of produce. <i>Agree with the peer reviewer. Have added a sentence to acknowledge that the plan recognises the need to manage agrichemicals applied to crops.</i> 4. Failure to correctly identify and manage Critical Control Points (CCPs). The OFNZ plan requires businesses to meet requirements of Food Act 2014 and the Australian New Zealand Food Standards Code (the Code). In New Zealand, maximum residue limits for agricultural |



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|---|-----------------------|--|
| | | <p>compounds are set out in a Maximum Residue Limits Standard. To this end, the plan identifies the need to manage agricultural compound residues so as to not exceed maximum residue level requirements.</p> <p>5. Failure to remove foreign matter from produce. The OFNZ plan requires businesses to follow procedures that prevent foreign matter from getting into food and/or detect foreign matter in final produce.</p> <p>Further information on hazards (likely to occur from ingredients sourced within New Zealand) can be obtained from the MPI hazard database: www.foodsafety.govt.nz/registers-lists/hazards/index.htm.</p> |
| 10(2)(a) | Statement of Validity | <p>I state that the FCP is valid in terms of s.41 of the Act (is written in an acceptable form).</p> |
| 10(2)(a) | Statement of Validity | <p>I state that the FCP is valid in terms of s42 of the Act (has all FCP Contents required by that section and FR15 Reg 6).</p> <p>42(a)-(d) are covered in ‘Horticulture operation setup’ – Property details and management.</p> <p>42(e) is covered by all aspects of Template Food Control Plan from sourcing of ingredients, receipt of ingredients to distribution of produce.</p> <p>42(g) is met by identifying hazards reasonably likely to occur and putting in place control measures to help operators of the businesses make safe food.</p> <p>42(h)(i) is met by the supporting prerequisite procedures set out in the plan.</p> <p>42(h)(ii) is met when operators follow procedures in the plan such as cleaning, training, washing hands, etc.</p> <p>42(h)(iii) is met when operators perform activities related to critical control points. Example, maximum residue limits are monitored so that horticultural produce sold for human consumption do not exceed the permitted levels.</p> <p>42(h)(iv) is met by following procedures set out in the plan.</p> <p>42(h)(v) is substantially covered in the ‘When something goes wrong’ section.</p> <p>42(h)(vi) is substantially covered in the ‘Checking if the programme is working well’ section.</p> <p>42(h)(vii) is substantially covered in the ‘Taking responsibility’ section. Further guidance and tools are available at the MPI Website (www.mpi.govt.nz/dmsdocument/16717-food-business-record-blanks).</p> <p>42(i) OFNZ is fully committed to the production and distribution of safe and suitable food.</p> |

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| | | 42(j) Other requirements specified in Notices or Regulations including the Food Standards Code are covered by plan. Example, labelling and composition. |
| 10(2)(b) | What conditions does the evaluator recommend to be imposed on the registration of the plan? | 1. If the business is registered as a multi-site business, to have all sites verified at their first verification. |
| 112-113 or 115-116 | ISO requirements | N/A |
| 11(2)(a)-(c) | Endorsement | I state that the manual is assessed by me as the Evaluator. I state that this evaluation report is as prepared by me as the Evaluator. |
| 11(2)(a)-(c) | Signed and dated | <i>Chris Kasonde</i> 23. 04. 2019 |