

HACCP Management in New Zealand Dairy Establishments

The New Zealand dairy legislation map is provided for in the Dairy Roadmap <http://www.foodsafety.govt.nz/elibrary/industry/dairy-legislation-roadmap.htm>

	MPI response	MPI regulation
1. Food safety plan	<p>Risk Management Programmes:</p> <p>A Risk Management Programme (RMP) [combination of Hazard Analysis Critical Control Points (HACCP) and Good Manufacturing Practice (GMP)] must be approved, evaluated, and registered under the Animal Products Act (APA 1999). RMPs are based on the Animal Products (Risk Management Programme Specifications) Notice 2008 (RMP spec) and cover all Costa Rica HACCP requirements.</p> <p>Each RMP must be individually designed by food business operators to ensure that it is able to eliminate or manage the specific risks associated with each operator’s situation and must be based on the HACCP principles.</p> <p>The RMP is an official and legally binding document between the food business operator and MPI that must be registered with MPI. To become registered, the RMP must be evaluated according to MPI’s approval procedures that involves a desk top review and an on-site assessment. Approved RMP’s are issued a notice of registration that is provided to the operator. Given that the RMP is a legally binding document, once approved, MPI and recognised agencies use the RMP as the guide to measure compliance. MPI maintains a list of approved RMPs on the MPI website.</p>	<p>Animal Products Act (APA 1999)ⁱ</p> <p>Animal Products (Dairy) Regulations 2005 (Dairy regs 2005)ⁱⁱ</p> <p>Animal Products (Risk Management Programme Specifications) Notice 2008 (RMP spec)</p> <p>DPC 1: Animal Products (Dairy): Approved Criteria for General Dairy Processing</p> <p>DPC 2: Animal Products (Dairy) Approved Criteria for Farm Dairies</p> <p>DPC 3: Animal Products (Dairy): Approved Criteria for the Manufacturing of Dairy Material and Product</p> <p>DPC 4: Animal Products (Dairy): Approved Criteria for Storage and Transportation of Dairy Material and Products</p> <p>Dairy processing spec</p> <p>Food Standards Australia New Zealand - Food Standards Code</p> <p>Food Act 2014</p>

		ACVM Act 1997 Operational Guideline: Design and Construction of Dairy Premises and Equipment 2006
2. Hazard analysis	<p>A RMP is a programme designed to identify, control, manage, eliminate or minimise hazards and other risks during processing of animal material and products (all known or reasonably foreseeable hazards including biological, chemical, physical, allergens, and intentional adulteration for economic gain).</p> <p>A risk management programme (RMP)¹ is a written programme that must identify, control, manage and eliminate or minimise hazards and other risk factors in relation to the production and processing of animal products to ensure that the resulting product is fit for its intended purpose.</p> <p>Although food business operators are able to formulate the RMP document to suit their specific situation, there are mandatory components. These components are stated in the APA² and further described in the Animal Products (Risk Management Programme Specifications) Notice 2008.</p> <p>The mandatory components of a RMP are:</p> <ul style="list-style-type: none"> • Identification and description of animal material and animal product covered by the RMP, including the intended use • Identification of the premises or location to which the programme applies • Identification of any regulatory limits and operator-defined limits in relation to any risks that may affect the following: <ul style="list-style-type: none"> - human or animal health - false or misleading labelling - wholeness of the final product • Required actions when regulatory or operator-defined limits are not met • Description of the process or operation • Identification of risk factors and analysis of hazards • Procedure to control hazards and other risk factors, including corrective actions and disposal of product, and the identification of critical control points • A list of the documents that comprise the RMP and any amendments • Procedure for notifications to MPI of any issues or required amendments to the details of the RMP • Procedure for the recall of animal material or animal product and a notification system • Identification and competency of responsible persons under the RMP 	Animal Products Act (APA 1999) Animal Products (Dairy) Regulations 2005 (Dairy regs 2005) Animal Products (Risk Management Programme Specifications) Notice 2008 (RMP spec) Operational Guideline Dairy HACCP Plans

¹ APA Part 2, Section 12 – What is a risk management programme

² APA Part 2, Section 17 – Contents of and requirements for risk management programmes

	<ul style="list-style-type: none"> Operator verification system to specify the activities and the frequency of the activities performed under the RMP Provision to allow recognised RMP verifiers the freedom of access to perform verification functions and activities A protocol to demonstrate the effectiveness of the RMP 	
<p>3. Preventative controls</p> <ul style="list-style-type: none"> Process controls Food allergen controls Sanitation controls Supply chain controls <p>Prerequisite controls:</p> <ul style="list-style-type: none"> Premises facilities and equipment Utilities Pest control Cleaning & sanitation Training Allergen & cross contamination management Temperature controls 	<p>CCP's, controls other than CCP's and Process controls.</p> <p>These are the typical preventative controls:</p> <ul style="list-style-type: none"> Pasteurisation [Critical Control Point (CCP)] Farm RMP requirements, National Chemical Contaminants Programme (NCCP) & antibiotic testing at point of receipt, ingredient supplier management Pathogen management of environment and product Pest management Staff management, training, personal hygiene Foreign matter/physical hazards/dairy product safety (DPC 2) Water quality controls, incl. water exclusion Access control 	<p>Animal Products Act (APA 1999)</p> <p>Animal Products (Dairy) Regulations 2005 (Dairy regs 2005)</p> <p>Animal Products (Risk Management Programme Specifications) Notice 2008 (RMP spec)</p>
<p>4. Monitoring preventative controls</p>	<p>Written procedures and records are required for control points.</p> <p>Companies are required to monitor all preventative controls identified in their RMP.</p> <p>MPI administers a number of monitoring programmes that are designed to assess that the food safety system is achieving its objective. These programmes cover all animal material and animal product used for the production of food.</p> <p>The Dairy Industry (National Residue Monitoring Programme) Regulations 2002 provides MPI with the authority to conduct national level monitoring programmes for dairy products. All testing that is conducted under a national monitoring programme must be conducted in an officially recognised and accredited laboratory.ⁱⁱⁱ</p>	<p>APA 1999</p> <p>Dairy regs 2005 (Reg 5)</p> <p>Heat treatment COP</p> <p>Dairy processing spec (Clause 5)</p> <p>RMP spec</p>
<p>5. Corrective actions</p> <p>Corrective actions:</p> <ul style="list-style-type: none"> Procedure 	<p>The procedure to control hazards and other risk factors, including corrective actions and disposal of product, and the identification of critical control points is a mandatory requirement of an RMP.</p>	<p>APA 1999</p> <p>Dairy regs 2005 (Reg 5)</p>

<ul style="list-style-type: none"> • In event of unanticipated food safety problem • Records 	<p>Written corrective action plans/procedures include isolation and disposition of non-conforming product and processes. Requirement to report to the regulator. Provision for notification and review by regulator.</p>	<p>RMP spec (covers product & process)</p> <p>Animal Products (Disposal of Non-conforming Dairy Material or Dairy Product) Notice 2013 (Disposal notice)</p>
<p>6. Verification</p> <ul style="list-style-type: none"> • Verification activities • Documentation 	<p>Internal verification of preventative controls, monitoring, and record keeping are required under government regulations and this is subsequently verified by a government recognised independent agency.</p> <p>Supported by National Chemical Contaminants Programme (NCCP) and Independent Verification Programme (IVP).</p> <p>Verification of Dairies and Dairy Product</p>	<p>APA 1999</p> <p>Dairy regs 2005</p> <p>Animal Products (Recognised Agencies and Persons Specifications) Notice 2015</p> <p>Export verification notice</p> <p>Dairy Industry (National Residue Monitoring Programme) Regulations 2002</p> <p>IVP</p>
<p>7. Validation</p>	<p>NZ regulations require operators to develop and scientifically validate their RMP and have them evaluated by Government recognised qualified evaluators prior to the RMP being submitted for further assessment and approval by MPI. The validation is required to show the preventative controls will effectively control the hazards in the specific food processing system and as relevant to the food being produced.</p>	<p>RMP spec</p> <p>Heat treatment COP</p> <p>Animal Products (Recognised Agencies and Persons Specifications) Notice 2015 i.e. duties & recognitions</p>
<p>8. Food safety plan reanalysis</p>	<p>NZ regulations require RMPs to be current and reflect the necessary process controls to achieve the regulatory outcomes.</p> <p>In the event of unanticipated food safety problems or where preventative control is not deemed effective this also triggers a reanalysis requirement.</p> <p>HACCP requirements- RMPs are required to be regularly reviewed. Review periods for HACCP plans are defined in the RMP (generally within every 2 years period).</p>	<p>APA 1999</p> <p>[Food safety law reform (FSLRB)]</p> <p>RMP spec</p> <p>Dairy processing spec?</p>

	<p>New product development/processes and/or product rework are required to be included and controlled within the RMP scope or dealt with as a significant change.</p> <p>Significant change to the RMP has to be revalidated, re-evaluated and registered with the regulator.</p>	
9. Document control and records	<p>Document control and record keeping is covered specifically under the Animal Products Notice (Risk Management Programme Specifications) 2008 and DPC 2: Animal Products (Dairy) Approved Criteria for Farm Dairies.</p>	<p>Animal Products Act (APA 1999)</p> <p>Animal Products (Dairy) Regulations 2005 (Dairy regs 2005)</p> <p>Animal Products (Risk Management Programme Specifications) Notice 2008 (RMP spec)</p> <p>DPC 2: Animal Products (Dairy) Approved Criteria for Farm Dairies</p>

ⁱ Animal Products Act 1999

For an [An Overview of the Animal Products Act 1999 - MPI](#) see <http://www.mpi.govt.nz/document-vault/15991>.

The Animal Products Act 1999 (APA) regulates the production and processing of animal material and animal product in New Zealand. Its purposes are to:

- Govern the slaughter and processing of animals intended for consumption, including farmed meat and wild game, seafood, honey and bee products, eggs and dairy products
- Manage physical, biological and chemical hazards that might present a risk, irrespective of where in the production or processing chain they occur
- Ensure that products produced under the Act are wholesome and truthfully labelled

The key regulatory components of the APA that provide the overarching framework for the food safety system of animal product include:

- Risk management programmes
- Regulated control schemes
- Animal product standards and specifications
- Export controls, requirements and official assurances
- Recognised agencies
- Powers and controls of officers

ⁱⁱ Dairy Regulation and Specifications under the APA

The APA provides for different types of legislation to ensure the objectives of the Act are met. In New Zealand, regulations set the outcomes or high level requirements whereas notices or specifications provide the more technical or operational requirements.