



# Code of Practice: Processing of Bee Products

Part 5: RMP Templates

## Prelims

Amendment 1

June 2006

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## Disclaimer

### ***IMPORTANT DISCLAIMER***

Every effort has been made to ensure the information in this report is accurate.

NZFSA 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.

### ***Website***

A copy of this document can be found at: <http://www.nzfsa.govt.nz/animalproducts/index.htm>

## **Review of Code of Practice**

This code of practice will be reviewed, as necessary, by the New Zealand Food Safety Authority. Suggestions for alterations, deletions or additions to this code of practice, should be sent, together with reasons for the change, any relevant data and contact details of the person making the suggestion, to:

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New Zealand Standards Group

New Zealand Food Safety Authority

P O Box 2835

Wellington

Telephone: 04 463 2500

Facsimile: 04 463 2643

## Amendment Record

It is important that this publication is kept up-to-date by the prompt incorporation of amendments.

To update this publication when you receive an amendment, remove the appropriate outdated pages, destroy them, and replace them with the pages from the new issue. Complete instructions will be given on the covering letter accompanying the amendment. File the covering letter at the back of the publication and sign off and date this page.

If you have any queries, please ask your local verifier.

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# 1 Introduction

The Animal Products Amendment Act 2002 allows for a risk management programme (RMP) to be based on a code of practice (COP), a template, or a model if in the view of the Director-General it is valid and appropriate for businesses of that kind.

The RMP templates provided have been developed by the New Zealand Food Safety Authority (NZFSA), in consultation with an industry working group, to assist bee product processors develop their RMPs. They have been designed for use by operators involved in the extraction, processing, packing and storage of honey; and the processing of dried pollen.

Section 2 of this document explains the use and application of the RMP templates. Guidelines for completing the template are provided in section 3, and the template forms are provided in sections 5 and 6 of this document. The guidelines explain and give instructions on how to complete the template. These guidelines must be read while completing the template to ensure that the information required is fully understood. It is very important that operators provide complete and accurate information as the registered RMP will be a legally binding document that must be complied with, and will be verified by an external verifier.

The RMP templates are published as separate documents and are available as Word files so they can easily be used by operators.

Using the templates provided is one way of meeting the RMP requirements. Bee product processors may use alternative approaches, provided all relevant regulatory requirements are met. Those who wish to use an alternative approach should refer to the [Risk Management Programme Manual](#) for guidance.

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## 2 Development of an RMP based on an RMP Template

### 2.1 Businesses whose products and processes are fully covered by the approved COP

#### 2.1.1 Development

When the COP fully covers the scope of the operation of a business, the simplest approach for developing an RMP is to use the relevant RMP template provided in sections 4 and 5 of this document. The RMP template is a simple form that the operator completes by filling in the required information in the appropriate boxes.

The requirements for the documentation of GMP supporting systems and the application of HACCP principles in the RMP can be met by incorporating the relevant sections of the COP into the RMP by reference. This means that the operator will only need to write very few procedures that are specific to their operation. The operator's RMP will, therefore, consist of the completed RMP template, the relevant sections of the COP that apply to their operation, and any of their own written procedures.

Confirmation by the operator that the RMP meets all the legal requirements for a valid RMP will simply involve signing a declaration in the RMP template.

#### 2.1.2 Evaluation

An RMP that is fully based on an approved COP does **not** require an evaluation prior to registration since the NZFSA 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 COP will be carried out at the initial verification by the contracted verifier.

## **2.2 Businesses whose products or processes are not fully covered by the approved COP, or those with significant variation from the COP**

### **2.2.1 Development**

Since the COP is limited in its scope in terms of the bee products, processes and procedures it covers, some businesses will need to tailor parts of the RMP template to meet their particular process variations. Some may also need to, or want to develop their own specific RMP.

Businesses whose products and processes are not fully covered by the COP, or who have decided to apply procedures or processing parameters that significantly differ from those given in the COP will need to write their own documentation for those parts of the RMP that are not covered or vary from the COP (e.g. HACCP application, GMP procedures). The RMP template may still be used but the operator will need to add their own information or documents for those parts not covered by the template or COP.

The operator must be able to demonstrate the effectiveness of any alternative process, procedures or parameter to consistently meet all relevant regulatory requirements and produce products that are fit for their intended purpose. Confirmation of the effectiveness of any alternative process, procedure or parameter may involve the collection and analysis of evidence by the operator (e.g. data from testing or trials, published scientific information, report from an expert). A protocol for the collection of data should be prepared by the operator as discussed in Chapter 4 of the [Risk Management Programme Manual](#).

### **2.2.2 Evaluation**

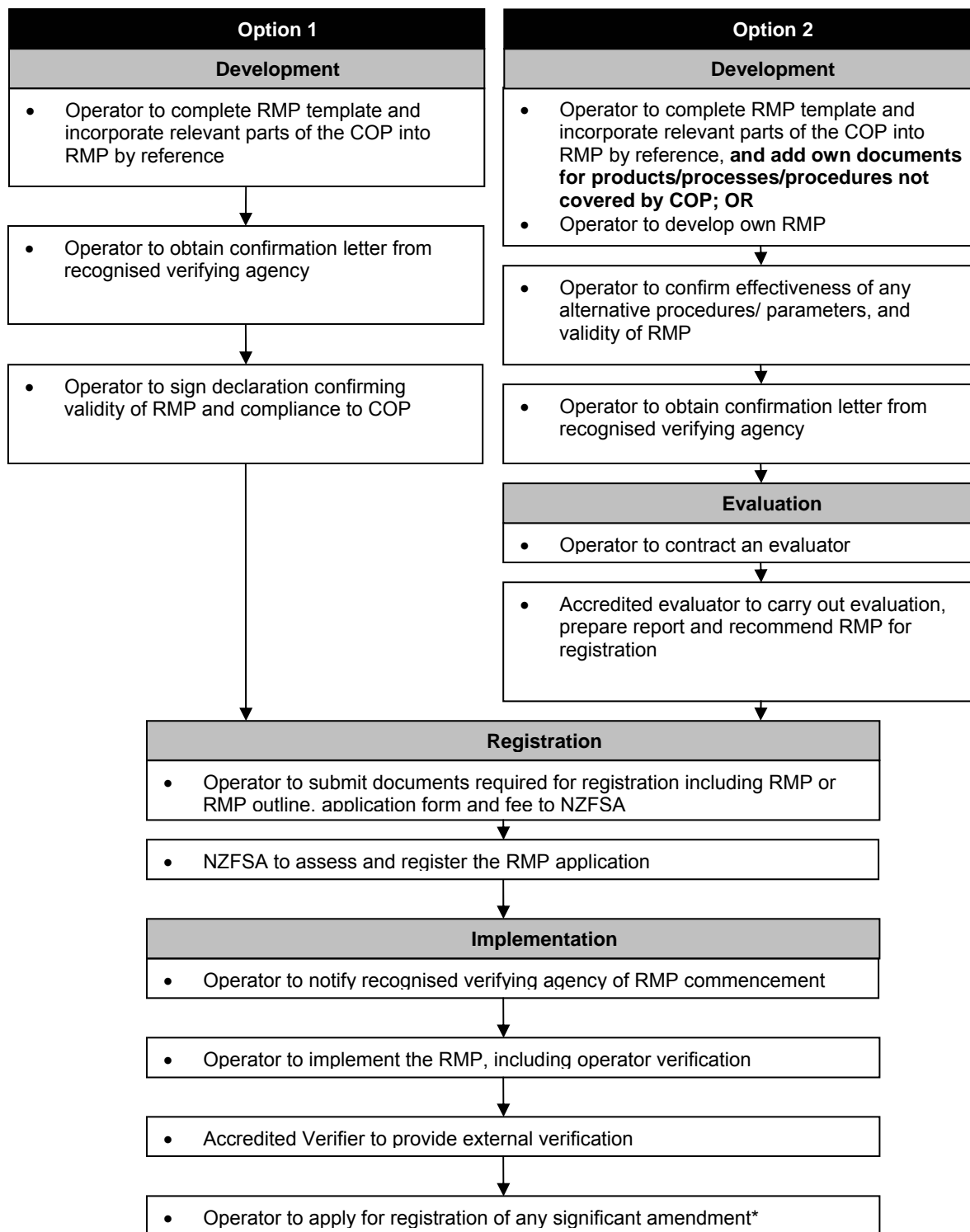
An RMP that is not fully covered by an approved COP or has procedures that vary from the COP will need to be evaluated by an independent evaluator to confirm the adequacy of the RMP. Evaluation will involve a desk-top audit of the documented RMP and may require an on-site visit of the premises before registration of the RMP.

## **2.3 Steps for the development, registration and implementation of an RMP based on the RMP template**

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

- Option 1: For businesses whose products and processes are fully covered by the COP.
- Option 2: For businesses whose products and processes are not fully covered by the COP, or who have decided to apply procedures or processing parameters that significantly differ from those given in the COP.

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



\* Significant amendments will require evaluation prior to registration



## 3 Guidelines for Completing the RMP Template

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### Disclaimer

Considerable effort has been made to ensure that the information provided in the RMP Template for the Processing of Honey and Dried Pollen, and the RMP Template for the Storage of Bulk Honey is accurate, up to date, and otherwise adequate in all respects. Nevertheless, these Templates are approved STRICTLY on the basis that the Crown, the New Zealand Food Safety Authority, its statutory officers, employees, agents, and all other persons involved with the writing, editing, approval or publication of, or any other kind of work in connection with these Templates:

- a. disclaim any and all responsibility for any inaccuracy, error, omission, or any other kind of inadequacy, deficiency, or flaw in, or in relation to, the RMP Template for the Processing of Honey and Dried Pollen, and the RMP Template for the Storage of Bulk Honey; and
- b. without limiting a) above, fully exclude any and all liability of any kind, on the part of any and all of them, to any person or entity that applies the RMP Template for the Processing of Honey and Dried Pollen, and the RMP Template for the Storage of Bulk Honey.

### 3.1 General instructions

The RMP template must be completed by a person or people who have full knowledge of the whole operation covered by the RMP. The person completing the template should:

- a. read this guideline for each section of the template before completing it;
- b. provide the required information by:
  - entering information into the empty boxes or blank lines, or
  - ticking the appropriate answer or information, e.g. [✓]
- c. ensure that all information provided is legible; and

- d. ensure that everything written down accurately reflects or applies to their operation and that they will be able to comply with them.

### 3.2 Components of the RMP template

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#### Section 1: Business/RMP identification

**Business ID:** Choose a unique business identifier. It must be a number or number/letter combination of at least 3 and not more than 10 characters with at least one character as a number and no leading zeros. The business identifier cannot be the same as an exporter registration identifier. It must also be different to any existing NZFSA Bee Products Premises listing identifier. This is because of technical constraints within the database.

Operators who have previously completed an AP35 form and are currently listed as a bee product premises with NZFSA will need to choose a new business identifier when making an application for registration of an RMP.

For those premises that are currently EU listed, the same business identifier must be used for the RMP registration and for EU listing of the premises.

When an existing EU listed premises registers their RMP, NZFSA will automatically change the EU listing identifier for that premises to the new RMP business identifier.

Operators that are not currently listed for the EU but who wish to be listed for EU market access need to complete an AP32 form per the instructions on that form.

**RMP No:** Please assign a sequential two digit number (01-99) to each new RMP you have. Enter 01 if this is your first RMP.

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#### Section 2: Operator name, business 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 name(s) of the business owner(s) must be provided.

**Trading Name:** This is the name that you trade under, i.e. the name that you use on your shop sign or letterhead, which may be different to the legal name given above.

**Physical address:** Give the street address of the premises covered by the RMP. The address of any off-site building where an activity covered by your RMP occurs and is under your control (e.g. storage shed) should also be given.

**Postal address:** Give the address where you want any correspondence sent to.

**Phone / Fax / Email:** Give the contact details for the business.

Tick the box to indicate that you agree to correspondence about your RMP being sent to you by email. This is recommended, whenever possible, as it speeds up communication from the NZFSA significantly.

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### **Section 3: Responsible person**

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 the NZFSA and the verification agency when dealing with matters related to the RMP.

Give the name, position or designation, and contact details (phone no., fax no., email address) of the day-to-day manager.

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### **Section 4: Scope of the RMP**

**Physical boundaries:** Tick the box to confirm that you have attached a basic site plan showing the buildings, facilities and external surroundings included under your RMP. Any off-site building where an activity covered by your RMP occurs and is under your control (e.g. storage shed) should be included as part of the physical boundaries of your RMP. The physical boundary of the RMP must be clearly marked on the site plan with a dark marking pen.

Areas and facilities within the boundary that are excluded in the RMP (e.g. retail shop that you wish to keep under the Food Act regime) should also be clearly indicated in the site plan.

Attach the site plan to the completed RMP template.

**RMP coverage:** Indicate the types of operation that are covered under your RMP by ticking the relevant boxes. If you have other operations that should be covered by the RMP, specify this under "other". If this "other" operation is not adequately covered by this template and the code of practice, you must add more details as required for these operations throughout the RMP.

**Activities excluded from the RMP:** Specify any activity that occurs within the physical boundaries of your RMP that you want to exclude because it is covered under a different RMP or under the Food Act regime.

Examples of activities that you may wish to keep under the Food Act regime are: retail shop, packing of honey only for the domestic market.

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### **Section 5: Product description**

**Products:** Consider all of the bee products that leave your RMP. If necessary, change the products listed to agree with what you produce. Delete or cross out the column of any product that you do not produce. If you produce other products that are not included in the table, add the required information into a new column or another page.

**Intended consumer:** Indicate whether the product is for human and/or animal consumption.

**Intended uses:** Indicate the uses for each product.

**Regulatory limits:** The NZFSA has not set any regulatory limits for honey or other bee products. Do not change or add anything to this row.

**Other legal requirements:** Specific legal requirements for each product are given. Do not change or add anything to these rows.

**Labelling:** Legal requirements for labelling are given. Do not change this information.

Indicate any label claims made for any product (e.g. organic).

(Note: All label claims must be truthful and evidence must be available to justify them).

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## Section 6: Process description

**Process steps:** Indicate all the key process steps included in your RMP by ticking the relevant boxes. Delete or cross out those steps that are not applicable to your process. If your process has other steps aside from those listed, specify them under the relevant product column.

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## Section 7: External verification

This section states that you authorize the contracted verifier to have the 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.

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## Section 8: RMP document list, responsibilities for and authorisation of RMP

### Column 1: Document

This gives the list of all the documents, including the GMP supporting systems, that form part of your RMP. Ensure that all the documents are applicable to your RMP.

### Columns 2 and 3: Documents from the COP

Instead of writing your own documents, the following RMP components can be incorporated into your RMP by reference in this document list:

- GMP supporting systems from Part 2 of the COP
- HACCP application from Part 3 of the COP
- Identification of other risk factors from Part 4 of the COP

Write the particular section of the COP that applies to your RMP under the “reference” column, and the date on the document referred to. The date indicates the version of the document. Ensure that all documents are applicable to your product, process, and premises (follow the instructions in the box given below).

The GMP supporting systems in Part 2 of the COP describe the hygienic practices and procedures that you will comply with. The external verifier will confirm the effectiveness of the RMP against these procedures and requirements.

Read each GMP supporting system or programme thoroughly.

Ensure that all the written procedures apply to your operation and that you will be able to comply with them.

Some GMP supporting systems require that you provide information specific to your operation (e.g. Schedule 1 for water).

Ensure that any additional documents are listed in the RMP Document List. Initial the bottom of every page of any additional document and put a date to indicate the version.

#### **Columns 4 and 5: Operator’s own documents based on the COP**

Write the title and date of any of your own written procedures for products, processes, and GMP programmes that are covered in the COP. Examples of this type of documents are: cleaning schedules, pest control schedule, and operating procedures that are specific to your premises and personnel but still comply with the COP. Ensure that they are clearly identified, with a version number (e.g. date), as part of the RMP.

#### **Columns 6 and 7: Operator’s own documents for additional products, processes and procedures**

Write the title and date of any of your own written procedures for products, processes, and GMP procedures that are **not** covered in the COP. Examples of this type of documents are: operating procedures for products other than honey and dried pollen, HACCP application and identification of other risk factors (wholesomeness and labelling) for other products. Ensure that they are clearly identified, with a version number (e.g. date), as part of the RMP.

Note: The RMP Template for the Storage of Bulk Honey does not have these columns since it is expected that all the products and activities under the RMP will be fully covered by the code of practice and the template.

#### **Column 8: Person responsible for implementation**

For each GMP supporting system, give the name or position of the person responsible for its implementation. For small operations, the same person may be responsible for all or most of the systems.

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#### **Section 9: Confirmation**

Tick the 4 boxes to confirm that you agree to these statements.

**Signature:** The operator or the day-to-day manager of the RMP must sign and date the completed template.

## 4 RMP Evaluation and Registration

### 4.1 For RMPs completely based on the COP

After you have completed the RMP, you must apply to the NZFSA for registration using application form [AP4: 'Registration of Risk Management Programme'](#) which is available on the NZFSA website. You must submit the following to the NZFSA:

- completed AP4;
- completed RMP template including a site plan and letter from the verifying agency; and
- application fee of \$100 (incl. GST).

### 4.2 For businesses whose products and processes are not fully covered by the COP, or who have decided to apply procedures or processing parameters that significantly differ from those given in the COP

After you have completed the RMP, you must arrange and pay for an accredited RMP evaluator to evaluate it. A list of these people is given on the [NZFSA website](#).

Once the evaluator is satisfied with the RMP and has provided a report saying that the RMP is valid, you must apply to the NZFSA for registration using application form [AP4: 'Registration of Risk Management Programme'](#) which is available on the NZFSA website. You must submit the following to the NZFSA:

- completed AP4;
- completed RMP template, including a site plan and letter from the verifying agency; OR endorsed RMP or RMP outline, including a document list, site plan and letter from the verifying agency;
- evaluation report; and
- application fee of \$100 (incl. GST).

For both RMP options, the NZFSA may ask for clarification or further information on any part of the RMP. There may be an additional assessment fee charged for the time of the NZFSA assessor. Once the NZFSA is satisfied with the RMP and all fees are paid, the RMP will be registered.

More detailed information about the registration, implementation, verification, amendment and cessation of RMPs are given in the [Risk Management Programme Manual](#).