Code of Practice for Cold and Dry Stores

Part 4: RMP Template

Prelims

Amendment 0

December 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:

Assistant Director (Production and Processing)

New Zealand Standards Group

New Zealand Food Safety Authority

P O Box 2835

Wellington

Telephone: 04 894 2500

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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To update this publication when you receive an amendment, remove the appropriate outdated pages, destroy them, and replace them with the pages from the new issue.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

Amendment 0

December 2006

Section 12 (3A) of the Animal Products Act 1999 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 template provided in this COP has been developed by the New Zealand Food Safety Authority (NZFSA), in consultation with an industry working group; to assist store operators develop their RMPs. They have been designed for use by store operators involved in the:

- further chilling of animal products, including dairy, (i.e. products are received already chilled and they are further cooled in the store to a lower temperature);
- freezing of chilled animal products;
- refrigerated or ambient storage of animal products; and
- transport of dairy products.

Section 2 of this document explains the use and application of the RMP template. Guidelines for completing the template are provided in section 3, and the template form is provided in section 5. 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 template is also published as a separate Word document so that the form can easily be used by operators.

The use of the template is one way of meeting the RMP requirements. Store operators 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.

Note: Some store operators are also involved in the transport of animal products. This COP includes the transport of dairy products because this operation falls within the APA definition of dairy processor, which in turn is included in the definition of primary processor and all primary processors are required to have an RMP. The transport of non-dairy products (e.g. meat, seafood, poultry, bee products) does not need to be covered by an RMP, but the operator must comply with the transportation requirements specified in Part 15 of the Human Consumption Specifications. The NZFSA intends to review these requirements and will consider harmonising them so that a consistent approach can be applied to the transport of all animal products.

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 RMP template provided in section 5 of this document. The RMP template is completed by the operator by filling in the required information in the appropriate boxes.

The requirements for the documentation of Good Operating Practice (GOP) 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, and adding written 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 are referenced in the template, 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 meet 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 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, GOP 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

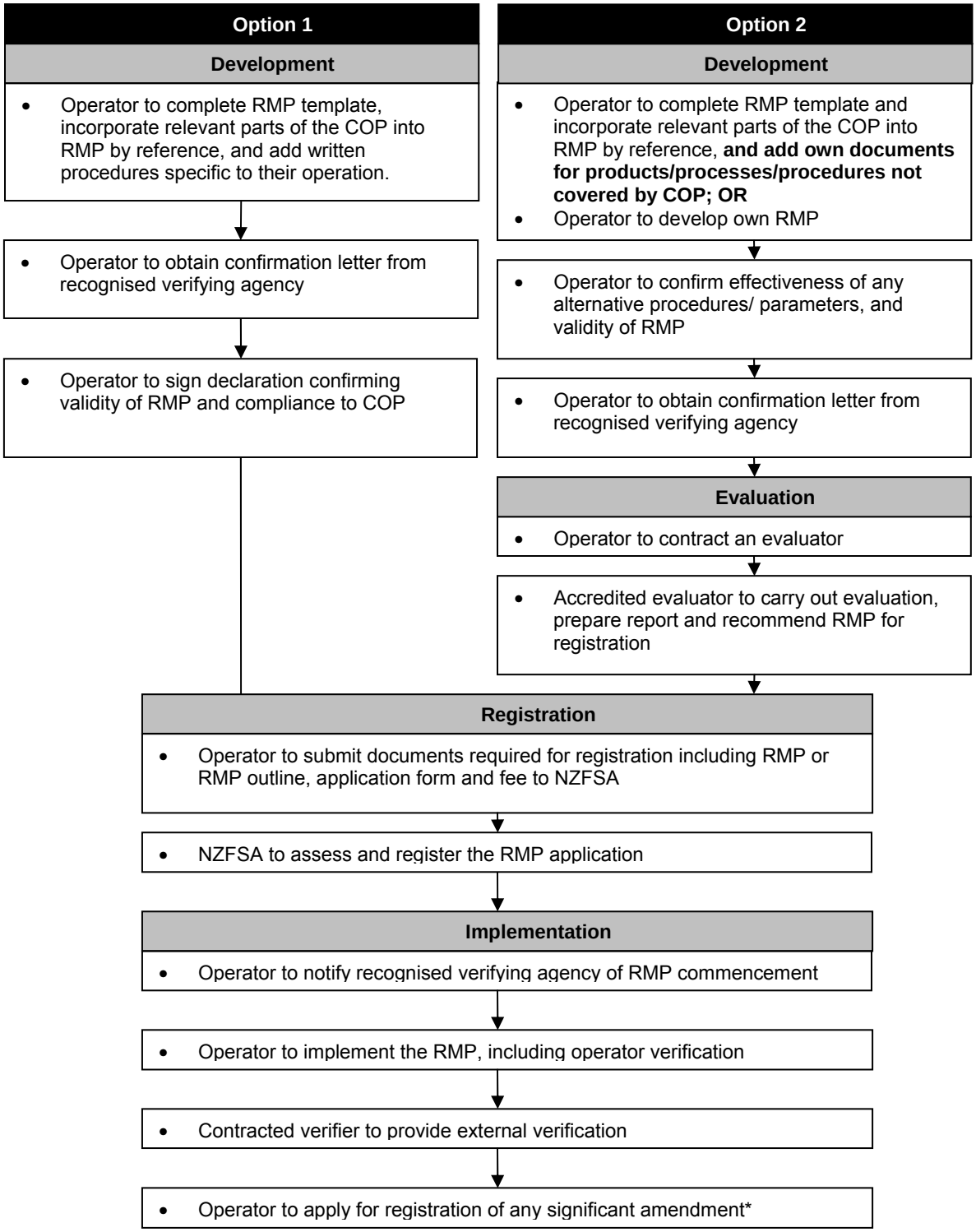
An RMP that is not fully covered by an approved COP or has procedures that vary from the COP will need to be evaluated by a recognised evaluator to confirm the adequacy of the RMP. The scope of the evaluation will be limited to those parts of the RMP that are not covered by the COP, and/or procedures that vary from the COP. 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 the two options discussed in section 2.2:

- 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

Disclaimer

Considerable effort has been made to ensure that the information provided in the RMP Template for the Processing and Storage of Animal Products in Cold or Dry Stores is accurate, up to date, and otherwise adequate in all respects. Nevertheless, this Template is 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 this Template:

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 and Storage of Animal Products in Cold and Dry Stores; 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 and Storage of Animal Products in Cold and Dry Stores.

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 each section of this guideline before completing the corresponding section of the template;

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

Section 1: Business identification

1.1 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 must not be the same as any exporter's registration number.

For those premises that are currently listed as eligible to export products to the EU, the same set of numbers must be used for the RMP identifier and for EU listing of the premises.

1.2 RMP No: Assign a consecutive two digit number (01-99) to each new RMP you have. Enter 01 if this is your first RMP.

1.3 Unique Location Identifier for Dairy Business Operator: A unique identification is allocated by the NZFSA to each dairy business premises. You must obtain this identifier from the NZFSA before submitting your RMP application by contacting Erin O'Brien from the Approvals and ACVM Group at erin.obrien@nzfsa.govt.nz. You may request a particular identifier which the NZFSA will consider.

This identifier must be an "S" followed by not more than 4 numbers. When the RMP covers only one premises, and includes dairy and non-dairy products, this identifier may be the same as the Business ID given in 1.1.

Section 2: Operator name, business address and contact details

2.1 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 full name(s) of the business owner(s) must be provided.

2.2 Trading Name: This is the name that you trade under, (i.e. the name that usually used in company letterheads) which may be different to the legal name given in 2.1.

2.3 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 should also be given.

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

2.5 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.

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 or position or designation, and contact details (phone no., fax no., email address) of the day-to-day manager. It is recommended that the position or designation be given instead of the name of the day-to-day manager to avoid the need for amending the RMP and notifying the NZFSA when the person is replaced. You may also wish to identify a deputy to the day-to-day manager.

Section 4: Scope of the RMP

4.1 Physical boundaries: Attach a site plan of your RMP to the completed template. The site plan must show 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 should be included as part of the physical boundaries of your RMP. Areas and facilities within the boundary that are excluded in the RMP (e.g. those you wish to keep under the Food Act regime) should also be clearly indicated in the site plan.

The physical boundary of the RMP must be clearly marked on the site plan with a dark marking pen. As a minimum, the different rooms within buildings should be shown and drawn in the correct scale. Inclusion of landmarks (e.g. fences, roads, important infrastructures) in the site plan will help in establishing the location and physical boundaries of your RMP.

Tick the box in 4.1 to confirm that you have attached a basic site plan.

4.2-4.4 RMP coverage: Indicate the types of operation that are covered under your RMP by ticking the relevant boxes. If there are other operations that you want to include in your RMP (e.g. thawing), specify them under “other”. If these “other” operations are not adequately covered by this template and the COP, you must add more details as required for these operations throughout the RMP.

Cross out and/or write “NA” for those activities that are not applicable to your operation.

Note: This template has been designed for use by store operators involved in:

- further chilling of animal products, including dairy, (i.e. products are received already chilled and they are further cooled in the store to a lower temperature);
- freezing of chilled animal products;
- refrigerated or ambient storage of animal products; and
- transport of dairy products.

All other operations must be identified under "other".

4.5-4.6 Activities excluded from the RMP: Tick the appropriate box to indicate that you store non-animal food products (e.g. vegetable and fruit products) or non-food products (e.g. materials for industrial use, dead birds for taxidermy) within the physical boundaries of the RMP. Non-animal food products and non-food products may be stored within the boundaries of the RMP but they must be excluded from the documented RMP because they are outside the coverage of the Animal Products Act 1999.

The operator must have procedures that will ensure that they are not a source of contamination to any animal product processed or stored within the physical boundaries of the RMP.

Put N/A in the appropriate box if you do not store non-animal food products or non-food products within the physical boundaries of the RMP.

Section 5: Product description

Products: Consider the different types of products that are covered by your RMP. Delete or cross out the column for the product type that you do not handle.

Intended use of product: Indicate whether the product is for human or animal consumption.

Requirements for chilling, freezing, storage: The regulatory requirements for each product type are given in this section. Do not change this information.

In the absence of specified chilling and freezing parameters for dairy and for animal products for animal consumption, you should establish your own parameters provided you can justify that they meet the required regulatory outcomes. You can base this on parameters agreed with product suppliers, or on the critical preservation temperatures specified for animal products for human consumption. Write any parameters which you have established in the appropriate column.

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

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.

Section 7: External verification

Tick all the boxes in this section to indicate that you have a contracted a verifier, and you authorise this verifier to have the freedom and access to carry out verification activities.

Attach a copy of the letter from the verifying agency confirming that they will verify your RMP.

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

Column 1: Document

This gives the list of all the documents, including the GOP 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:

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

a) Read each GOP supporting system or programme thoroughly.

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

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

d) 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

Many of the GOP programmes in Part 2 of the COP require that you write certain procedures that are specific to your operation and premises. Examples of this type of documents are: cleaning schedules, pest control schedule, inventory control procedures and operating procedures. Existing premises are likely to have these documented procedures already. Write the title and version number (e.g. date) of any of your own written procedures that comply with the COP.

Columns 6 and 7: Operator's own documents for additional products, processes and procedures

Write the title and version (e.g. date) of any of your own written procedures for products, processes, and GOP procedures that are **not** covered in the COP (e.g. thawing, packing of chilled or frozen products).

Column 8: Person responsible for implementation

For each GOP 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.

Section 9: Confirmation

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

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 the appropriate application form available on the NZFSA website. For businesses that only handle non-dairy animal products, use AP4: 'Registration of Risk Management Programme'. For businesses that handle both dairy and non-dairy animal products, use DPF 4: Registration of Dairy Risk Management Programme.

You must submit the following to the NZFSA:

- completed DPC4 or AP4;
- completed RMP template including a site plan and letter from the verifying agency; and
- application fee prescribed in the application form.

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 a recognised 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 the appropriate application form, as discussed in 4.1 above.

You must submit the following to the NZFSA:

- completed DPC4 or 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 prescribed in the application form.

4.3 For all RMPs

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.

5 RMP Template for Cold or Dry Stores

- This RMP template applies to cold stores or dry stores whose primary operation involves the storage of animal products, including dairy.
- The Guidelines for Completing the RMP Template, given in section 3, should be referred to when completing this template.
- This RMP template is available in Word which is published separately from Part 4.
- The RMP template starts on the next page. This page is not part of the RMP.

1. Business Identification	
1.1 Business ID:	1.2 RMP No.: ___ ___
1.3 Unique Location Identifier for Dairy Business Operators:	

2. Operator Name, Business Address and Contact Details	
2.1 Full legal name (Company, sole trader, partnership): 2.2 Trading name (if different):	
2.3 Physical address(es) of premises:	2.5 Contact details: Phone No: Fax No: E-mail: [ ] I give consent to being provided electronic information.
2.4 Postal address (for communication):	

3. Responsible Person		
Role	**Name or position or designation**	**Contact details (if different from above)**
Day-to-day Manager of the RMP		

4. Scope of the RMP

4.1 Physical boundaries

[ ] The physical boundaries of the RMP are shown on the attached site plan.

4.2 The RMP covers the following processes or activities for **Non-Dairy Animal Products for Human Consumption** (e.g. meat, seafood, poultry, bee products):

[ ] Freezing of packed, chilled animal products
[ ] Freezing of chilled meat carcasses
[ ] Freezing of chilled whole fish
[ ] Storage of frozen animal products
[ ] Storage of chilled animal products
[ ] Dry storage (ambient temp.) of animal products
[ ] Further chilling of packed animal products
[ ] Other (specify) _____

4.3 The RMP covers the following processes or activities for **Non-Dairy Animal Products for Animal Consumption** (e.g. petfood) :

[ ] Freezing of packed, chilled animal products
[ ] Freezing of chilled meat carcasses
[ ] Storage of chilled animal products
[ ] Storage of frozen animal products
[ ] Dry storage (ambient temp.) of animal products
[ ] Further chilling of packed animal products
[ ] Other (specify) _____

4.4 The RMP covers the following processes or activities for **Dairy Products**:

[ ] Freezing of packed, chilled dairy products
[ ] Storage of chilled dairy products
[ ] Storage of frozen dairy products
[ ] Dry storage (ambient temp.) of dairy products
[ ] Further chilling of packed dairy products
[ ] Transport of dairy products
[ ] Other (specify) _____

4.5 **Non-animal food products**

[ ] Non-animal food products (e.g. vegetable and fruit products) are stored within the physical boundaries of the RMP, but they are excluded from the RMP and are covered under the Food Act (i.e. Food Hygiene Regulations or Food Safety Programme).

[ ] Procedures are in place for ensuring that non-animal food products are not a source of contamination to any animal product processed or stored within the physical boundaries of the RMP.

4.6 **Non- food products**

[ ] Non- food products are stored within the physical boundaries of the RMP, but they are excluded from the RMP.

[ ] Procedures are in place for ensuring that non-food products are not a source of contamination to any food product processed or stored within the physical boundaries of the RMP.

5. Product Description

Products	**Non-dairy animal products for human consumption**	**Dairy products for human consumption**	**Animal products for animal consumption**
Intended use of product	Human consumption	Human consumption	Animal consumption
Requirements for the chilling, freezing and storage of animal products	HC Spec 76(2) and 104(2) specifies the following critical preservation temperatures: • Chilled mammals, ostriches, emus and poultry: ≤ 7°C • Frozen mammals, ostriches, emus and poultry: ≤ -12 °C • Chilled whole fish: -1°C to 1°C • Chilled fish product: - 1°C to 4°C • Frozen fish or fish products (including shellfish): ≤ -18°C • Brine frozen fish: ≤ -15°C • Shucked paua intended for canning in NZ: ≤ 6°C	Dairy Approved Criteria for Storage and Transportation of Dairy Material and Products 6(13) requires that stores have adequate faciliities for storing refrigerated or frozen foods; monitoring food temperatures; and when necessary, controlling ambient temperatures to ensure the safety and suitability of food.	AC Spec 66 requires that chilling or freezing are conducted without any unnecessary delay and in a manner that minimises any potential microbial proliferation and contamination of animal material or product.
Labelling	Labelling of transportation outers as specified in HC Spec 32.	The Approved Criteria for Storage and Transportation of Dairy Material and Products 9(1) (c) requires that products are labelled in a manner that enables traceability to be maintained.	Labelling of transportation outers as specified in AC Spec 31

6. Process Description				
Further chilling, or freezing of non-dairy animal products (e.g. meat, seafood, poultry, bee products)	**Further chilling, or freezing of dairy products**	**Storage of chilled or frozen animal products (including dairy)**	**Dry storage of animal products (including dairy)**	**Others**
[ ] Receiving [ ] Blast chilling [ ] Blast freezing [ ] Storage [ ] Dispatch	[ ] Receiving [ ] Blast chilling [ ] Blast freezing [ ] Storage [ ] Dispatch [ ] Transport*	[ ] Receiving of chilled or frozen products [ ] Storage in chiller [ ] Storage in freezer [ ] Dispatch [ ] Transport *	[ ] Receiving of packaged products [ ] Transfer to dry store [ ] Storage [ ] Dispatch [ ] Transport *	

* Store operators involved in the transport of **dairy** products must comply with the requirements given in Part 2, Section 14.2.4 of the COP, and they must include the transport of dairy products in the RMP.

Store operators who are involved in the transport of **non-dairy** products must comply with the transportation requirements specified in Part 15 of the Human Consumption Specifications, but the inclusion of transport of non-dairy animal products in the RMP is optional.

7. External Verification

[ ] I have contracted a recognised verifying agency to perform external verification activities.

Name and contact details of verifier: _____

_____

_____

_____

[ ] A letter from the verifying agency confirming they will verify the RMP at all sites covered by this RMP is attached.

[ ] I authorise my contracted verifier to have the freedom and access necessary to allow him/her to carry out verification functions and activities as specified in AP RMP Specifications clause 15 and AP Dairy RMP Specifications clause 14.

8. RMP Document List, Responsibilities For and Authorisation of RMP

Document	**Documents from the COP**		**Operator's own documents based on the COP**		**Operator's own documents for additional products/processes/ procedures**		**Person responsible for Implementation**
	Reference	**Date**	**Reference**	**Date**	**Reference**	**Date**	
Main part of RMP (this document)	N/A		Completed RMP template				
GOP Supporting Systems:							
Design & construction of facilities, equipment	Part 2, Section 2						
Potable water	Part 2, Section 3						
Cleaning and sanitation	Part 2, Section 4						
Personnel competency, health and hygiene	Part 2, Section 5						
Control of chemicals	Part 2, Section 6						
Pest control	Part 2, Section 7						
Calibration	Part 2, Section 8						
Process control	Part 2, Section 9						
Document control and record keeping	Part 2, Section 10						
Traceability and inventory control	Part 2, Section 11						

Document	**Documents from the COP**		**Operator's own documents based on the COP**		**Operator's own documents for additional products/processes/ procedures**		**Person responsible for Implementation**
	Reference	**Date**	**Reference**	**Date**	**Reference**	**Date**	
Recall of products	Part 2, Section 12						
Operator verification and other operational requirements	Part 2, Section 13						
Other requirements specific to dairy	Part 2, Section 14						
HACCP Application and Identification of other risk factors	Part 3						
Other documents:							
Site plan of physical boundaries							
Letter from Verification Agency							
Assessment of Water Supply Status (only necessary for own supply)							
Record forms							

9. Confirmation

[ ] I confirm that all of the documents listed in Section 8 are appropriate for my operation.

[ ] I confirm that all facilities and equipment necessary to implement the RMP are available and ready to operate.

[ ] I confirm that the RMP, including all supporting systems, has been authorised by me.

[ ] I confirm that the RMP will be implemented as written, including all relevant parts of the code of practice.

Signature of Operator or Day-to-day Manager of RMP: _____ **Date: ...../...../.....**