



## 'Clustering' by Territorial Authorities

*Trial of a regional approach  
to delivering food safety*



NZFSA thanks all businesses and Teritorial Authorities who took part in, and contributed to, this 'cluster' trial.

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# 1 Executive Summary

The New Zealand Food Safety Authority (NZFSA) Domestic Food Review (DFR) identified that the 73 local territorial authorities (TAs) play a significant role in the regulation of food safety at some 30,000 food businesses throughout New Zealand and at between 80,000 and 200,000 occasional food events that take place each year.

While TAs vary in size, they generally face the same demands and challenges, and in food safety these include the registration of food premises, enforcement of food hygiene legislation and the provision of food safety information. DFR recognised, however, that there is a need for a more consistent approach in the delivery of food safety regulation throughout New Zealand.

The DFR has identified that TAs will act as the 'front door' by which businesses will obtain information enabling them to register their operations. TAs will also be involved in verifying and regulating the food safety in many of those businesses and working closely with NZFSA to facilitate the registration process for businesses where NZFSA is the enforcement authority.

The concept of TAs working together to present a regional approach to tackling common issues and promoting consistency and best practice or value for money for their ratepayers is already established in New Zealand, and supported in legislation. The Local Government Act 2002 enables TAs to work together where benefits can be demonstrated and requires TAs to carry out their activities as effectively and efficiently as possible.

This expectation for the effective delivery of a food safety service has been carried through the DFR process to identify:

- principles governing relationships between NZFSA and all TAs to develop and maintain productive working relationships
- enhanced co-operation and the need for a coordinated and aligned approach among TAs in fulfilling their respective roles and responsibilities
- the functions, duties and powers of TAs in facilitating the administration, implementation, delivery, registration, advisory, enforcement and other activities associated with the new systems.

TAs currently work together in 'clusters' to deliver services in areas other than food, such as building regulation, and these arrangements have been the subject of two reports. In May 2004 the New Zealand Controller and Auditor-General published the report 'Local Authorities Working Together' which identified that, although the opportunities for working together are many and varied, TAs often enter into a joint arrangement in response to a specific need at a particular time.

In 2006, Local Government New Zealand (LGNZ) commissioned a report on local government structure and efficiency from McKinlay Douglas Ltd., who carried out a literary review of outcomes from amalgamations of local government functions, both in New Zealand and internationally. The report identified the degree to which this contributes to efficiency; whether diseconomies can occur over a certain size and the effects on representation and the ability to exit cluster working.

NZFSA determined to further explore the opportunities presented by TAs working in a 'cluster' to deliver a food regulatory service. Benefits to NZFSA from a trial were seen as including:

- identifying working arrangements across a region that would present a more consistent approach to food regulation;
- determining needs for creating a TA food network in NZ;
- obtaining information for input to the transition to the new food regulatory system.

Five Waikato territorial authorities, already working together to deliver a building consents process, took part in the trial. The trial consisted of a data gathering phase - in which all 1600+ food businesses in the area were approached for written information; and an implementation phase - in which Environmental Health Officers (EHOs) from the participating TAs worked with a number of food businesses to introduce a template 'Off the Peg' Food Control Plan (OTP FCP) to their operations. The OTP FCP is a documented, pre-evaluated food safety system developed by NZFSA in association with business representative groups.

The TAs identified a process to deliver both phases of the trial; developed a database for the collection and analysis of the information gathered in the first phase of the trial and set up communication links between EHOs for discussion and joint problem solving.



Trial findings identified that working as a cluster required:

- a need for clearly stated goals and expected outcomes;
- agreement between those involved as to direction, content and timelines;
- good communications;
- promotion of the activity within TAs and to businesses involved;
- a clear understanding of the activity at all levels of the TA;
- commitment throughout each TA and across TAs;
- identifying and making available resources to carry out agreed processes to expected standards;
- identifying benefits to those involved in delivery and implementation;
- creating a desire to participate, rather than coercion;
- awareness of best practices in delivering services;

The trial identified that NZFSA encouragement of a cluster approach would tend to:

- facilitate the willing cooperation between NZFSA, individual TAs and relevant regional providers;
- identify duplication of regulatory activities;
- remove conflict in the delivery of food safety systems;
- present opportunity to enhance professional roles;
- enhance credibility of regulation, systems and organisations;
- help attain the desired degree of delivery consistency at regional and national level.

Information gained from the trial has been influential in developing the NZFSA policy on clustering and in supporting TAs to work in clusters to implement the Voluntary Implementation Programme (VIP). VIP enables operators to register an OTP FCP for their business while awaiting a new Food Act. The trial has also provided feedback from stakeholders that has contributed to the development of a Food Service and Catering OTP FCP.

Further, NZFSA VIP strategy has incorporated some of the trial findings including:

- an option for TAs to take a cluster approach in delivering VIP systems;
- guidance from NZFSA to TAs working in clusters;
- enhancing the skill base of TA EHOs involved in VIP by training for appointment as auditors and Food Act (enforcement) Officers;
- involving TA management and TA support services in VIP training workshops and identifying future roles and needs;
- developing a web-based forum for feedback on experiences in delivering VIP and new systems;
- informing PHUs and identifying and clarifying roles during VIP and beyond;
- appointing NZFSA TA Programme Co-ordinators to support TAs through VIP implementation - and beyond;
- providing incentives to TAs and businesses to participate in VIP – including training workshops, support packs, state-of-the-art OTP FCPs and a funding for TA delivery initiatives to businesses;

It is anticipated that, in turn, findings from implementing the Voluntary Implementation Programme will further influence the NZFSA approach to the introduction of new systems included in the new Food Act.

## 2 Introduction

This report presents a summary of literature about TAs working together in New Zealand and the findings of a trial undertaken between NZFSA and a group of TAs working as a 'cluster' to deal with food regulation.

The Domestic Food Review identified 'consistency' of regulatory delivery as a considerable problem in New Zealand. A number of aspects of the Review sought to address this. One of these aspects was the potential consistency achievable through operating in a 'cluster' arrangement. To test this out, NZFSA worked with a group of TAs to identify the extent to which working as a 'cluster' might enhance the transition to, and delivery of, the new food safety system.

## 3 Background

Territorial Local Authorities (TAs) were identified in the Domestic Food Review as being the 'front door' by which food businesses will obtain information leading to the registration of their operations.

TAs currently have local knowledge and experience of dealing with the registration of food operations in their districts. TA Environmental Health Officers (EHOs) work with Food Act Officers from Public Health Units (PHU) towards the registration of premises operated by businesses who manufacture food that is sold at locations other than where it was made. This provides the PHU with information about food businesses that operate across TA jurisdictions and allows for input of labelling/suitability issues that may apply to products.

In the transition period to new food safety systems, a TA will have some exclusivity in the verification of off-the-peg Food Control Plans (OTP FCPs) for businesses that trade solely in that TA's district. A TA will need to identify and operate a system that recognises: these businesses; businesses applying for registration that fall outside this zone of exclusivity, and food operations that are exempt from registration of a FCP or National Programme (NP).

The Local Government Act 2002 requires TAs to carry out their activities as effectively and efficiently as possible, and enables TAs to work together where benefits can be demonstrated.

The Domestic Food Review identified principles governing relationships between NZFSA and all TAs to develop and maintain productive working relationships and enhanced co-operation and the need for a coordinated and aligned approach among themselves in fulfilling their respective roles and responsibilities. The Review also proposed the functions, duties and powers of TAs in facilitating the administration, implementation, delivery, registration, advisory, enforcement and other activities associated with the new systems.

There is now an opportunity to identify 'best means' for the consistent delivery of the new food safety regime throughout New Zealand. NZFSA believes that TAs working together in groups or 'clusters' offers a means of achieving this.

## 4 'Cluster' working among TAs in New Zealand

There are 73 local councils in New Zealand (Territorial Authorities, TAs) that locally administer a range of statutory functions and activities for their communities. TAs often face similar challenges and are increasingly being held to account for spending public monies, but can differ in terms of size, culture, resources, systems, and service standards.

Some TAs have already identified that working closer together can offer advantages including:

- delivering more consistent services across a region;
- more effective services;
- opportunities from sharing resources and purchasing.

Closer working can give rise to issues, particularly when arrangements transfer control to a joint body or another authority and where individual council priorities differ. However partnerships often work when cultures, working styles and decision-making processes differ between TAs because there is a common understanding of purpose throughout the organisations.

NZFSA identified 'cluster' working by TAs as an opportunity for a more consistent delivery of new food safety systems. It is not a new phenomenon in New Zealand, and two reports in recent years have examined joint arrangements and influences on amalgamations. Key points and common themes that are applicable to food clustering are summarised in Appendix 1.

### 4.1 The benefits of a 'cluster' trial involving food regulation

Five TAs in the Waikato - detailed in Appendix 2 - currently work together to deliver the Waikato Building Consent process. They have implemented a system across the region to achieve a consistent, best practice approach to the building consents process and achieve and maintain joint accreditation as Building Consents Authorities under the Building Act 2004.

The five TA General Managers were enthusiastic to support a food-based trial and NZFSA wished to utilise their experiences of cluster working to identify how it might assist in delivering new food safety regulation. Some years previously the General Managers had identified the potential benefits of delivering a more uniform approach to food safety across the region and submitted proposals for the regional health authority to co-ordinate the approach. However, although appearing to be best-placed to lead the initiative the idea was not followed-through at the time.

The potential benefits to parties taking part in a cluster working trial were seen as being:

#### 4.1.1 Benefits to NZFSA

- Identifying opportunities for TAs to develop working arrangements across a region to present a more consistent approach to food regulation;
- Identifying what was needed to create TA food networks in NZ ;
- Identifying the range of food operations that are being carried out by food businesses to help determine how much NZFSA work will be required to produce 'Off-the-Peg' Food Control Plans (OTP FCPs);
- Identifying the 'mix' of food businesses that operate across food sectors and the appropriate registration authority;
- Gaining a 'big picture' across a region;
- An opportunity to gain information and find solutions before the transition to the new food regulatory system.

#### 4.1.2 Benefits to TAs

- The opportunity to (further) develop group working agreements/ arrangements and apply them to the food regulatory environment; smart ways of working together that are more effective than working individually;
- Preview and work with current NZFSA OTP FCP prototypes;
- Contribute to current practical thinking around identifying local delivery process/methods for introducing OTP FCPs; enhancing relationships with local business/business groups;
- Identify the extent to which new food safety regulation will be applied throughout the region;
- Identify practical implications for registration of food businesses during transition to new food legislation;
- Direct communications with NZFSA on issues identified during trial.

#### 4.1.3 Benefits to Volunteer Business

- Opportunity to preview, and work with, prototype 'tools;'
- Chance to work with TA/ NZFSA to identify effective ways of introducing OTP FCP;
- A head-start in understanding anticipated food safety systems prior to transition.

NZFSA has defined a range of food sectors for which the OTP FCP is anticipated as being the most appropriate tool for food businesses to introduce a documented system. Food sectors are groups of businesses that do very similar things. The trial would be an opportunity to confirm this, and potentially to identify the proportion of businesses that operate across sectors.

Further information on food sectors is contained in the NZFSA consultation document: 'Domestic Food Review Transition Policy and Related Implementation.'

## 5 Trial scope

The trial scope was drawn up by NZFSA and agreed with the participating TAs who identified and committed staff and resources.

Two phases were identified to the trial.

### Phase One ('Data Gathering')

This Phase was concerned with obtaining information from local food businesses during the annual premises registration process. The Food Hygiene Regulations 1974, (FHR) identify food premises according to specified activities such as a bakehouse or cake kitchen, delicatessen, meat or fish retailer, eatinghouse etc. As part of the Domestic Food Review (DFR) process, NZFSA identified a range of food sectors from assessing, ranking and grouping associated food risks. As a result, businesses will be able to identify the scope of their activities in terms of these new descriptors.

Phase one involved the cluster TAs delivering information to all registered businesses, coordinating and analysing returns and identifying and resolving common issues arising. This was carried out as part of the renewal of food premises registrations for 2007-08 which commenced in May 2007.

### Phase Two ('OTP FCP Delivery')

This Phase involved the TAs working with local food businesses to introduce prototype food control plans. During participation in the data phase, businesses indicated interest in participating in phase two selected. It was the intention that businesses would operate across food sectors and represent types of food-selling operations that may not have been included in previous trial work. This would give NZFSA an opportunity to identify whether the OTP FCP tools currently developed could recognise these types of operation.

Both phases involved the TAs working together to take a consistent approach to delivering the trial and to collectively resolve any issues.

## 6 Trial method

NZFSA provided details of the scope of the trial to the cluster group. The group organised a co-ordinator to manage the trial work and to act as the key contact for any communications during the trial between NZFSA and EHOs in the cluster group.

From the trial scope, the group drew up a project work programme and timetable for each of the phases of the trial - a copy of this appears in Appendix 4.

The co-ordinator set up an e-mail forum between the participating EHOs to aid communications and act as a conduit for identifying and resolving any issues arising during the trial.

### 6.1 Data Gathering Phase of the Trial

The five Waikato TAs have a range of densities and types of food businesses and manage their registration according to procedures determined by each individual TA. Information was intended to be gathered from all registered food businesses using the annual registration renewal systems in operation. It was also initially intended that a single application form would be sent to businesses that would then enable the TAs to both register businesses using the existing TA systems and to provide each business with the necessary trial data. This was not found to be possible in the time available due to differing IT systems, the difficulties in changing the layout of existing forms, premises-specific information printed on each registration document and the time needed by IT support systems to effect change.

To obtain the required data, NZFSA produced a supplementary application form which was forwarded to the co-ordinator for distribution to participating TAs. The form was then sent to all food businesses in the region along with the conventional application renewal notices. It was sent under both NZFSA and individual TA logos to identify a joint approach.

The supplementary form identified the purpose of the document and requested information from business owners that might typically be requested in a new registration format, including business scope. The form contained a range of 'most likely' NZFSA food sectors and descriptors, with opportunity for businesses to further identify other activities and business locations. Information from completed forms would help the TAs determine the numbers of businesses operating across sectors and how easily they were able to interpret/recognise the sector criteria.

Businesses were also given the opportunity take part in Phase Two of the trial or to obtain further information on the transition process. A copy of the supplementary application form appears in Appendix 3.

The trial document was expected to complement and not hinder the TA premises registration process. It was anticipated that there would be a proportion of non-responses as not every businesses would be prepared to complete two registration forms – one to renew their existing registration, the other to provide information for the trial.

The TA co-ordinator created a database to capture the information as it was received and to report on this data. Sample pages of the populated database appear in Appendix 5.

Information was obtained from food operations across a range of sectors, and it was intended that data would also be gathered from sectors not currently required to register with the TAs, such as child day care, residential care homes, meals on wheels and similar providers to vulnerable populations.

The information was analysed by the TAs to determine the most appropriate food sector(s) for businesses. This identified the proportion of food businesses falling into single or multiple sectors, 'difficult cases' and an indication of the overall number in each sector in the region and who the responsible authority might be for each application.



A selection of businesses returning applications were visited by each TA to confirm whether their operations matched the written information provided. This was intended to help determine the likelihood that an OTP FCP applicant could accurately identify the scope of operations on-site assisted by the information available on the proposed OTP FCP sectors.

Any differences between the operations detailed on the application form and findings from the site visit were recorded for analysis to determine whether there would be a difference in:

- type of FCP: ie a custom-made would be required rather than OTP;
- the sector identified: ie the correct OTP FCP identified
- the regulator: ie whether TA or NZFSA.

The information would help confirm the proportion of food businesses falling into single or multiple sectors and the accuracy of information that might be expected, and assist NZFSA with developing both registration documentation and processes.

NZFSA involvement in the Phase One, data gathering, would be kept to guidance and support wherever clarity in the process was needed or issues arose that could not be determined by the cluster. It was intended that TAs involved in the trial would liaise to identify a consistent approach to sector placement and share solutions to issues arising during the trial. All issues – whether resolved, unresolved, common or individual to a TA – were to be documented and ultimately presented/discussed with NZFSA to help to identify/iron-out issues likely to arise during transition.

## 6.2 OTP FCP Delivery Phase of the trial

The second phase of the trial was concerned with delivering prototype OTP FCPs to food businesses that had identified an interest in participation in a trial. This provided an opportunity for TA Environmental Health Officers (EHOs) to comment on the OTP FCP prototype, and work with volunteer food businesses to introduce documents and systems. A proportion of the businesses selected for the trial would be working across NZFSA food sectors and part of the trial would identify approaches to assist businesses achieve registration of their OTP FCP.

NZFSA arranged a one-day workshop which was attended by the eleven EHOs who would be delivering the OTP FCP to businesses, the cluster group co-ordinator and observers from the participating TAs and the Public Health Unit.

The workshop introduced the OTP FCP concept and identified the differences between existing and proposed approaches to recognising food safety. It was the first opportunity for the EHOs to view the OTP FCP documents. The contents of the plans were systematically run through and issues discussed as they arose. The EHOs had been concerned initially that they would not have the knowledge required to support businesses in the trial, but quickly recognised the approach being taken and the content of the document. Ideas for methods to deliver the plan were discussed at the workshop, and timelines put in place.

For the purpose of the trial, NZFSA combined the work carried out on developing the Food Service and Food Retail OTP FCP templates to produce a single document intended to enable businesses operating in both food service and retail sectors to identify the scope of their operations and 'tailor' the plan to recognise food safety activities carried out. Sample pages appear in Appendix 6.

A number of businesses had indicated that they were prepared to take part on their returned supplementary application form. Criteria for selection were:

- that a business was carrying out activities that matched or fitted within the scope of the prototype OTP FCP templates developed by NZFSA - ie food service or food retail activities;
- a reasonable understanding of English. This was considered necessary in order that businesses not drop out of the trial through not understanding documentation and processes. NZFSA has identified that transition to new food systems presents challenges in this area.

Businesses taking part in the trial were volunteers and there were no incentives offered.

After the workshop, EHOs visited each business selected for the trial to confirm participation, agree a programme with each business to introduce the OTP FCP and provide support in 'tailoring' the plan so that it reflected the approach taken by the business in providing safe food.

EHOs also started a diary to record the amount of time they spent with each food business.

At various points of the trial, NZFSA visited participating food businesses:

- Before introduction of the OTP FCP - to identify the extent of documented systems, the existing approach by each business to food safety and the apparent level of implementation and management of aspects of food safety. The format appears in Appendix 7. At this visit, the OTP FCP was used as the benchmark standard for managing food safety in the business;
- Approximately one month into the trial to capture businesses' initial impressions of the OTP FCP. Each business was asked a series of questions about the documents, ease of understanding and how the introduction to the business was proceeding;

- At the end of the trial, approximately two months later, to determine the level of completed documentation and implementation of the OTP FCP, together with the overall impressions gained by the business. The format appears in Appendix 8.

At the end of the trial period, NZFSA met again with the EHOs and the cluster co-ordinator to identify issues arising during both phases of the trial and to record comment on the OTP FCP concept.

Also at this time, businesses were given the opportunity to continue using the OTP FCP for a further period of time. NZFSA intends to revisit these businesses approximately four months after the end of the trial period to gather further information.

## 7 Trial findings

### 7.1 Data Gathering Phase findings

#### 7.1.1 Size of trial

The area had 1,471 food premises registered between five TAs. All businesses were sent supplementary, co-branded registration application forms. In accordance with their obligations under Reg. 83 of the Food Hygiene Regulations 1974 (FHR), two authorities inspect premises that are currently exempt from registration and their registration figures reflected this. The TAs also estimated that a further 186 premises in the area that were exempt from registration were not being inspected. One TA did not identify whether they had any exempted premises in their area. All of the premises that were exempted from registration were sent supplementary application forms for information on DFR proposals and for capturing data. Sample pages from the database appear in Appendix 3.

The total number of food businesses in the area that in future might require registration of a FCP was identified as being in excess of 1,650.

#### 7.1.2 Information received

1,657 food businesses were contacted and 650 (39%) sent back a completed supplementary application form. This percentage of returns (approx. 39%) was reflected across four TAs; while one had 70% of forms returned. A summary of the data appears in Table 1. EHOs visited 209 of these businesses (30% of returns) to identify whether the business had correctly identified, from the descriptors given, the food sectors within which it was operating.

None of the supplementary application forms returned identified a food business or activity that was not included in a NZFSA food sector.

58% of businesses were found to have correctly identified their business sector(s).

Of the 42% that had not correctly identified sectors commonest causes were:

- 29% seemed to leave nothing to chance and identified more sector activities than they practiced;
- 19% General Food Service or Caterers did not identify other food service/catering activities that they were involved in;
- 18% did not make a selection;
- 11% were retailers that had recognised the wrong retail category;
- 9% that identified their business as food manufacture were in food service or retail;
- 8% were food service operations that did not recognise food retail activities;
- 4% were food retail operations that did not recognise food service activities.

**Table 1. Phase One Data Capture and Analysis**

	Hamilton CC	Waikato DC	Waipa DC	Matamata- Piako DC	Otorohanga DC	Total	%
Number of food premises currently registered (and sent the supplementary rego. Questions)	829 (incl. Reg4 exempted from registration)	162	269 (incl. 44 Reg4 exempted from registration)	165	46	1471	
Number of 'new' businesses (i.e. care homes, schools, childcare) sent supplementary rego. Questions	Already captured		150+	10	20 possible; 6 Maraes possible	186	
Total number of food premises in area						1657	
Number of supplementary forms returned	309	66	189	68	18	650	39
Number of follow-up visits made to businesses						<b>209</b>	<b>100</b>
Number of follow-up businesses that correctly identified food sector(s) - confirmed by EHO						121	58
Number of follow-up businesses operating in one food sector only						84	40
Number of follow-up businesses operating in two or more food sectors						125	60
Number of follow-up businesses assessed as likely to operate an OTP FCP through the TA						163	78
Number of follow-up businesses assessed as likely to be registered by NZFSA						46	22
Businesses expressing willingness to learn more or participate in trial work	213 (more info = 208; trial = 82)	55	23	45	4	339	

EHOs received comment from businesses that had been confused when selecting sectors. Reasons given for this were:

- sector activities appeared to overlap;
- sector definitions were not clear;
- business did not understand the difference between food manufacture and food retail;
- businesses did not understand the categories.

60% of businesses were identified as operating across more than one food sector. Of these, 30% were involved with activities across the food service sectors.

40% of businesses operated in one sector only; most commonly in General food Service or as a Food Retailer.

78% of businesses were identified as being likely to operate an OTP FCP registered with the TA.

The remaining 22% of businesses were identified as being likely to operate a regulatory programme registered with NZFSA as they either:

- were involved in horticulture (so likely to operate a National Programme);
- had outlets in other TA areas or were owned/franchised by national operators;
- were involved in importing food.

### 7.1.3 Implications of data gathering phase findings

- **7.1.3.1** Not all businesses that responded were able to accurately determine from the descriptors which food sector(s) they were active in. Some businesses commented that the descriptors were confusing.

When presenting a choice to businesses, NZFSA needs to give information in a clear and simple manner to ensure that businesses can understand what is required of them. In the event that a business needs to make a choice from a selection of options, descriptors for making a choice need to be clear and unambiguous to enable the business to make an accurate selection.

Accurate identification of business scope at an early stage of registration would assist the process for TAs and businesses and reduce unnecessary documentation/complexity of the process.

- **7.1.3.2** The majority of businesses that submitted returns could identify the appropriate food sectors for their operations. Those businesses that did not enter a category were found, on follow-up visits, to 'fit' one or other of the food sectors listed.

This phase of the trial did not identify that NZFSA needed to expand the number of categories but rather to better describe the ones that already been determined

- **7.1.3.3** The trial identified that 22% of businesses would be appropriate for registration by NZFSA because they manufactured food for sale, operated across districts or would otherwise require a custom FCP or NP. Based on a figure of 30,000 businesses nationally, this would extrapolate to 6600 that NZFSA would be involved in registering during transition.

### 7.1.4 Cluster implications

Data and information needed to be provided in a timely manner, and before activities in Phase 2 of the trial.

Returned information needed to be collated and analysed.

A database was created and populated.

Support services were needed to enter information on the database accurately and identify/resolve any data issues arising.

## 7.2 OTP FCP Delivery Phase findings

### 7.2.1 NZFSA initial assessment

#### 7.2.1.1 Initial assessment format

At the initial NZFSA meeting with businesses, owners were asked a series of questions to establish the business approach to food safety. The questions covered the elements of food safety that appear in the OTP FCP and responses to the questions identified the good practices recognised by businesses in addressing food safety issues.

The level of documentation that a business had, based on what would be appropriate in an OTP FCP for the business, was also assessed.

Businesses were observed in action to determine the level of application of identified food safety practices.



### 7.2.1.2 Types of businesses

The types of businesses involved with the trial reflected the broader nature of the OTP FCP used. 70% of trial businesses operated in more than one food sector which broadly reflects the data gathering phase finding of 60% of businesses operating across more than one food sector.

Businesses included: a school, a residential care home, cafes, restaurants, 'corner' dairies, on-site and off-site caterers and takeaways. The range of sectors for businesses operations appears in Table 2.

The trial businesses ranged in size, based on the number of people involved with handling food. The range of staffing levels appears in Table 3. The smallest business had one person full-time and one part-time while the largest operated with 7 full-time staff and 39 part-time. Nineteen of the businesses (82%) operated with five or fewer full-time staff. The average number of full-time staff was 3. A further 111 part-time staff were employed by the businesses taking part in the trial of which 79 (71%) worked in three of the businesses. Part-time staff were either employed seasonally, when businesses were busier, or on a daily basis to see the business through customer peaks. Part-time staff could be tasked with a range of activities, but the proportion involved in food preparation as opposed to front-of-house activities could not be determined from data provided.

The figures support previous information (Restaurant Association of NZ 2002) that showed that 7 out of 10 food service businesses employ less than 5 full time staff.

The number of staff in a business that had received formal hygiene training varied between businesses. Six businesses (25%) had no staff that had received formal training, while all the full-time staff at five of the businesses had been trained. Of a total of 67 full-time staff in the trial, 43 (64%) had formal hygiene training. In one instance this had taken place in 1992.

**Table 2. Spread of Business Operations**

Food Sectors	No. of businesses in trial
Retail only	4
General Food Service only	3
Manufacture and General Food Service	2
Manufacture, General Food Service and Retail	1
General Food Service, Off-site Catering and Retail	1
General Food Service and on-site catering	3
General Food Service, On-site catering and Off-site catering	2
General Food Service, Off-site catering and Bakery	1
General Food Service, On-site catering and Retail	1
On-site catering for vulnerable population	1
General food service and Off-site catering	1
General Food Service, Retail and Bakery	1
General Food Service, Off-site catering and Retail	1
General Food Service and Retail	1
<b>Total</b>	<b>23</b>

**Table 3. Numbers of Staff Employed by Businesses in the Trial and Formal Hygiene Training**

No. of staff at business:	No. of businesses with full-time staff	No. of businesses with part-time staff	No. of businesses with staff trained in food hygiene
nil	-	5	6
1-2	12	10	11
3-5	7	3	5
6-10	4	1	1
11+	-	4	-

### 7.2.1.3 Level of documentation identified

Businesses were asked about their food safety systems and for any available information that would support them. The format was based on the individual elements contained in the OTP FCP to identify business approaches to managing activities such as:

- training staff, health and sickness
- waste disposal
- personal hygiene
- pest control
- cleaning and sanitising
- maintenance
- food allergens
- sourcing suppliers
- purchasing, receiving and storing food
- food preparation
- potentially hazardous foods
- temperature monitoring
- food transport

Documentation was sought to support verbal responses. This identified that:

- eleven of the 23 businesses (47%) had no food safety documentation relating to any aspect of a food safety system;
- one businesses had a refuse contract only; one business a cleaning checklist only;
- five businesses (20%) provided documentary evidence of two system elements. Of these, three businesses had a waste contract, three had cleaning checklists or kitchen user instructions, one had a pest contract, one had a chiller maintenance contract;
- one catering business had a sickness policy and an allergen questionnaire for potential customers;
- two businesses (8%) recognised three elements, including waste, pest and chiller maintenance contracts; kitchen opening and closing checklists and an allergen checklist for clients;

- three businesses (13%) had written 'House Rules' or 'Code of Conduct' for staff. These typically included policies or expectations for sickness, personal hygiene, hand washing and premises cleaning. Contracts for equipment maintenance, pest control and solid waste disposal were also evident.;
- two businesses recorded monitoring activities: one recorded cooked food and chilled food storage temperatures; the other staff cleaning activities against the cleaning schedule.

Initial comments from businesses about the identified or perceived needs for documentation ranged from the more positive -

*'There's a need to have a plan so that all the staff know what is happening.'*

*'I've been trying to write a system that can be used in the kitchen by all staff.'*

*'It might help to get people to change from bad habits.'*

*'You tell me, I learn.'*

...to the less convinced -

*'I don't see the point of keeping records. If we find something wrong when we do the checks we put it right.'*

*'I attended a HACCP course once - it was too much to take in for our business.'*

*'When we're busy, noone would remember what was on a cleaning schedule anyway.'*

Perhaps the most pertinent comment was made by one restaurant/catering business:

*'You need systems in order to be consistent' (owner), 'but not to be swamped by paperwork' (Chef)*

### 7.2.1.4 Systems, monitoring and practices identified

Every business taking part in the trial verbally identified and demonstrated application of a range of pro-active aspects of food safety. These were:

- seven businesses (30%) had either a probe or infra-red thermometers in addition to any equipment-based temperature measuring equipment. A further five (20%) specified that they checked thermometers that were integral to the equipment. Others described their approach to monitoring as being able to identify the condition of walk-in chillers from regularly entering them;
- six businesses (25%) provided and laundered staff over-clothing;
- five businesses described practices for checking-in delivered food. One checked temperatures and countersigned the delivery document; one checked for quality, rather than safety, and did not check temperatures of chilled products; one said: 'I look at the colour of the meat and if it is black I send it back.' Two businesses identified issues with suppliers delivering chilled and frozen foods that were out of temperature. Both businesses were in rural areas where there were limited options for delivery and both businesses opted to collect the foods themselves, rather than continue to have them delivered-in;
- four businesses provided training or instruction for staff in aspects of personal hygiene; two kitchens were used for trainees from local food tech. courses;
- four businesses date-coded foods in chillers;

- two businesses involved with off-site catering checked venues and available equipment beforehand. They had their own cooking and chiller facilities to make up any shortfall. They both identified that they were 'prepared for the unexpected.' Two other off-site caterers operated in a different niche with emphasis on timing of ready-to-eat food deliveries to venues;
- two businesses probed all meat and fish dishes and one recorded temperatures; one used a Rationale combination oven which automatically assessed time/temperature combinations and probed core temperatures; eight businesses used the presence of blood in juices or colour to determine cooking adequacy;
- two businesses either returned unsold pies on a sale-or-return basis, or binned unsold pies at the end of the day's trading;
- two businesses identified that checks on cleaning activities were carried out by managers after each change of shift; and
- one business had short-life shelf stable stock on 'special'.

#### 7.2.1.5 Initial assessment summary

In spite of a lack of documentation, the majority of businesses taking part in the trial identified and were able to demonstrate an understanding of food safety issues and took an approach that incorporated good food safety practices.

Overall, fourteen (60%) of the businesses in the trial were identified at the outset as understanding and operating a broad range of good operating practices.

A further five operators (20%) were able to discuss aspects of good business practices but were not found to be implementing all of them. Lack of maintenance and poor cleaning of premises and equipment were the commonest areas identified.

Four businesses were more vague in their understanding and implementing of food safety that applied to their operations, or were observed carrying out practices that were contrary to those that they had identified. One business said: 'it's a bit of pot-luck in telling when deep fried food is cooked.'

Another identified business customers as having to have a 'cast-iron constitution: 'they demand half-cooked food; they prefer it juicy and moist.'

The owner of one business apologised for carrying a child around the food preparation area 'as she is off-school, sick.'

#### 7.2.2 NZFSA assessment – one month into trial

Following the initial visit by NZFSA, TA EHOs started the process of providing businesses with the OTP FCP documents and working with them to identify how plans fitted food activities. Approximately one month into this programme, NZFSA visited businesses again to gauge initial feelings for the OTP FCP document, layout, legibility, appropriateness for activities and approaches to implementation.

##### 7.2.2.1 Findings

Table 4 lists the positions that the businesses believed that they were in, relative to plan implementation, one month into the trial.

At this stage businesses were asked a series of questions.

#### Businesses were asked if they had 'tailored' the plan to their business operations and were fully implementing it.

Ten businesses indicated that they had completed the documentation and were operating their plan. Businesses commented:

*'I've gone through task by task so as not to miss anything, linking it with our existing system.'*

*'I'm learning. It is hard as my English is not good. My daughter wrote the cleaning schedule.'*

*'We're two weeks in. I have to keep remembering to go back to the plan.'*

*'Mine is a very simple operation, I don't have much to do that the plan covers.'*

*'Some days are easier than others to run due to shifts. We've involved key staff and are introducing student staff to it as needed.'*

Six businesses indicated that they had not completed tailoring the plan but were implementing the contents of the plan. Comments included:

*'I'm taking it one step at a time.'*

*'I'm using it to back-up practices. It will take time to tailor and fully-implement and we're getting towards a busy time of the year.'*

*'We're starting to compile additional schedules as we identify them.'*

**Table 4. One Month into Trial – Positions Declared by Businesses**

OTP FCP activities	No. of businesses
Fully implementing the OTP FCP	10
Implementing but more work needed on the OTP FCP documents	6
Monitoring and/or recording but not tailored OTP FCP documents	3
Read the OTP FCP but yet to implement it	2
Either not received the OTP FCP or not read documents	2
<b>Total</b>	<b>23</b>

*'I've ordered a thermometer and spoken with the EHO to make sure that I understand.'*

*'The shop has been really busy. We've both read the plan and we're doing what's in there but have not tailored it yet.'*

Seven businesses indicated that they had not completed the documentation; however three were monitoring temperatures and completing the diary records. Two businesses said that they'd been particularly busy and had 'just read the plan;' one operator said: *'I've been working on it but a change of menu has delayed the start;'* another had *'not had a chance to do more than have a look at the plan;'* another *'had not had the time to look at it.'* One business had not received a copy of the OTP FCP documents.

### **Businesses were asked what aspects of the trial to date they had found to be either easy or difficult.**

One third of the businesses commented on aspects that had been easy for them. Three commented that they were already carrying out the activities identified in their plans, and the plan made them more formal. One each commented that:

- it was not referring much to the plan processes but found the monitoring sheets and records easy to use.
- carrying out the checks made them think about things they wouldn't normally focus on.
- it was easy because it was basic common sense.
- it found monitoring checks for catered food were easy to carry out, but impossible during busy a-la-carte service.
- one business owner said:  
*'My daughter is eleven and packs sweets and things. I've got her to follow the plan. It will make a difference in the long run and I'm still new to the business.'*

Five businesses admitted that it was hard to get into the habit of carrying out checks. Four identified difficulty in making time to carry out checks. Three businesses had experienced difficulties in obtaining appropriate thermometers. Two found difficulties in setting-up the documents. One had mis-interpreted the function of the cleaning schedule and another found that training staff in business time needed careful management of the remaining staff activities.

### **Businesses were asked what they liked and disliked about the OTP FCP concept.**

Approximately half of trial businesses liked the OTP FCP because it provided, supported or enhanced food safety knowledge or application. Comments included:

*'It's all the stuff we did on the food course, now put into practice.'*

*'Information is at your fingertips.... it is good reference and refresher material and for demonstrating hygiene to staff.'*

*'I like being able to use the plan as a tool to demonstrate hygiene to staff, ie hat wearing; though the cleaning schedule is a bit of a lottery.'*

*'The guidance given in the past by the EHO on sanitising surfaces is supported by the documents, and I now implement this.'*

*'We know where we stand with the plan.'*

*'Take this to Tech. courses and teach it!'*

Four businesses were able to compare the OTP FCP with other food safety systems:

*'I was working in Melbourne when a HACCP system was introduced there but that was an expensive mess and this is much simpler.'*

*'I think the plan is great. If everyone was trying to develop their own there would be issues. I'm happier going this way than with HACCP which is more for the food manufacturer.'*

*'I used to operate a HACCP system for 34 shops. This system is easier to operate and the plan can operate in other areas of the business.'*

*'The plan exceeds my expectations of it – I thought it would be in a big book like traditional HACCP, with things we didn't need to know.'*

The majority of businesses identified that the text was clear and easy to understand:

*'It is straightforward, in your face; it's what you need to know.'*

*'The single page layout is very good.'*

*'It is good that it is written and presented like this.'*

*'It is a living document that can be used in so many areas of the kitchen.'*

Two further comments about the OTP FCP:

*'You need to have this template or how do you know where you're going?'*

*'I think the plan is good, though I often do things but don't record them. It is nice to confirm that I've been doing things right all these years.'*

The diary concept was generally liked. Specific comments included:

*'The diary is so much easier than making something up from scratch.'*

*'Normally I have to carry all that type of information around in my head.'*

*'It is good that it is separate from the main folder.'*

Seven businesses disliked having to write things. Comments included:

*'Paperwork is time-consuming and needs a lot of thought.'*

*'I dislike the paperwork – all chefs do – but I roll with it. It is something else that has to be done, as well as ordering, running the kitchen, menus, staff...it is not feasible when we're running flat-out.'*

*'If I'd wanted to write, I'd have become an author.'*



One business found the OTP FCP too prescriptive: *'It is aimed more at businesses that don't have a clue of processes or who have systems.'* Another business was aware of the difficulties faced: *'Chefs have pride and it is a balance between telling them how to suck eggs and giving them incentives and ideas.'*

### **Businesses were asked whether they had identified other issues with the OTP FCP documents, concept or implementation.**

Time, and pressure on business time, was a factor mentioned by most businesses. Time to read and analyse the documents; time to recognise what the business did and to tailor the documents accordingly; time to discuss with, or inform, or train staff; time to adjust to systems; time to monitor systems.

Approximately half of the businesses remarked about the size of the OTP FCP document. One remarked:

*'My cook looked at the folder and said "Oh my God". It looked very intimidating.'*

Another said:

*'The folder has a lot in it and there looks to be a lot of extra work to do.'*

Once the concept was understood, however, most of these businesses said that they had not found it to be as difficult as they first thought. Comments included:

*'I liked the ease of use. I first thought that it looked hard, but when reading through it I identified it as a tool.'*

*'There is a lot in it and you need to get your head around it but it looks more intimidating than it actually is.'*

*'I really had to take it home where it was quiet and sit and read it.'*

*'When I started the trial I thought it was too hard, but I'm slowly understanding, although I don't understand all of it.'*

The itinerant nature of the food industry was reflected by three businesses that, by one month into the trial, had already had staff changes. One said:

*'I went through the plan with the three kitchen staff. Two of them left the following week.'*

It was clarified that this was not necessarily due to taking part in the trial but their departure had limited or curtailed trial activities. A significant amount of business time can be spent in recruiting staff, and during the time that a business is under-strength there will be pressures on those staff that remain. Activities will be prioritised around ensuring enough food is in stock and that customers are served. At these times it is more likely that hygiene or monitoring will become ancillary to these core activities.

Four businesses found the requirements for cooking temperatures either not clear or difficult to apply to their business operations. A typical observation was:

*'The oven is in constant use with things being added or taken out, so there is no way that we can operate a time-temperature system.'*

Four businesses had thermometers that were slow to react to temperature changes which made monitoring very time-consuming.

Three businesses identified that they found monitoring and documenting difficult during a-la-carte activities due to the variety of demands on time:

*'When we're busy, everything happens at once, and not everything can be done.'*

Businesses identified checks as more appropriate to planned activities such as catering for events.

Two businesses identified issues with understanding the OTP FCP. One identified that:

*'It will be difficult for my parents who do not understand English and help me when I take time-off.'*

### **Businesses were asked for their further suggestions and comments**

There were a range of comments and suggestions from initial involvement with the OTP FCP and trial:

*'Anyone doing a food safety course should take a template home and try using it there.'*

*'It is not just about reading it, it is about putting it into action.'*

*'I found it best to sit one-to-one with staff, rather than in a group, as I can confirm understanding.'*

*'We've been experimenting with cooling things down using waterbaths – 2-hour cooling doesn't work for us but it has made us think about the process.'*

*'People in kitchens should be registered and the industry should have requirements for registering training. A food business is not a 'right' and the industry should have higher standards. That way best practice flows through the industry.'*

*'It would be easier to model schedules and diary if they were available on disc.'*

*'It is about teamwork and being able to delegate when I'm busy.'*

*'Who would be responsible for maintaining equipment provided at off-site venues and how will they be made to do this?'*

*'If you want to be good a plan is part of it, you need a system.'*

*'Only two of us work in the kitchen at peak times, the rest of the time we work alone. I would need more staff to make the plan work properly.'*

*'We've followed food segregation through from the takeaway side to the retail side of the business.'*

*'I'm not sure why I ticked the box on the form and volunteered for this.'*

### 7.2.2.2 Summary

The 'one month in' visits began to identify the feel that businesses had for the documentation and what was being expected of them, and some of the practicalities around monitoring and keeping records. The realities of an industry where there is a high turn-over of staff was also apparent by this point in the trial.

On the positive side, businesses generally liked the layout of the plan and found the guidance aspects that it contained were useful and easy to understand. People who had experienced other types of operational systems were complimentary about the straightforward approach taken by the OTP FCP.

At one month into the trial, not every business was able to confirm that the plan reflected their operations, and many were 'working on it.' The monitoring and recording side of the system appeared to be more readily identifiable by businesses.

## 7.3 NZFSA assessment – end of trial

After the 'one month in' visit businesses were left to continue either developing or operating the OTP FCP with support to be maintained by the TAs – either to a programme or 'as needed.' NZFSA made a further visit at the end of the trial period to identify the levels to which OTP FCP documents had been tailored to reflect business scope, what monitoring was taking place, how record systems were being maintained and whether longer exposure to the OTP FCP had shaped the business approach to food safety.

### 7.3.1 Documentation

Table 5 provides a breakdown of what businesses had carried out with regard to tailoring the OTP FCP to reflect the scope of the business and towards monitoring and maintaining records.

- Six businesses (25%) had identified, or identified in, the majority of elements of the OTP FCP that were appropriate to business activities; had tailored the plan, completed records and were using the diary for retaining records. These businesses had generally understood the concept and had identified that having a plan was a useful tool for the business. These businesses were assessed as being in a good position for plan verification.

This is significantly less than the number of businesses that, one month into the trial, believed that they were fully implementing their plan. This could be a perception that fully implementing related to their monitoring and recording activities rather than the completion and tailoring of the plan documents.

- A further 25% of businesses had attempted the same process, but had not completely identified their scope of operations in the OTP FCP or completed all the records. Typically training records would be incomplete, or there was no identified approach to monitoring cooking temperatures. These businesses were assessed as having to do some more work to complete plans and be in position for verification. Some of these businesses recognised this and described it as work in progress, so accepted the need for further input.

- Four businesses had made token attempts at tailoring the OTP FCP; for example by completing the registration and contact details and listing suppliers. They were carrying out monitoring and recording of food storage temperatures although recording pages in the diary were unlikely to be signed-off. Typically, these businesses would start recording reasonably diligently but information would become more scarce as time passed. Three of these businesses were supportive of the guidance they had received from the EHOs.
- Two businesses had done nothing to tailor the OTP FCP document but had monitored and recorded temperatures and day-to-day hygiene activities.
- The remaining five businesses (21% of the trial sample) had not done anything to the OTP FCP document nor kept any records of their monitoring activities.

Of these five businesses: one owner admitted to being a procrastinator and that they would need a mandate to take action; two businesses cited staffing issues impeded participation; one business was 'too busy'. One business recognised the value of the plan and was prepared to introduce aspects of it. However, the owner did not see the value of completing any documentation.

Table 5. Position of Businesses at End of Trial

Action taken	No. of businesses
Appropriate elements identified and OTP FCP tailored. Monitoring recorded	6
Majority of elements identified and OTP FCP tailored (@75%). Monitoring recorded	6
Some elements identified and some tailoring of plan attempted. Some monitoring recorded	4
No tailoring of OTP FCP. Monitoring recorded	2
No tailoring of OTP FCP. No monitoring recorded	5
<b>Total</b>	<b>23</b>

### 7.3.2 End of trial questions to businesses

All businesses were asked a range of questions about the trial including:

- their approach to implementing the plan;
- the clarity of documents;
- comprehension;
- involvement of staff,
- time input,
- support received;
- influence on food safety practices.

Businesses were asked to evaluate aspects of the OTP FCP documents such as:

- the structure and format,
- clarity of language and terminology,
- relevance to operation,
- record keeping requirements,
- likes and dislikes, and
- to identify any changes in business perceptions.

#### Businesses were asked what they liked and disliked about the OTP FCP

The majority of businesses 'liked' the plan concept and the fact that it brought food safety information into the business. Approximately half of the businesses identified that one of the benefits of having the documents was that they reinforced the management approach. The plan was a 'third party' opinion about food safety, independent of management, but supporting what management had been trying to achieve.

*'It is a good training system; it helps to provide respect for food.'*

*'It is useful for ensuring that new staff learn from the start to do things right.'*

The general consensus expressed about the OTP FCP documents was positive, particularly from those who saw the value in not having to compile them from scratch:

*'The plan made sense once I'd read through it a couple of times. It is much better than having to devise a plan on my own.'*

*'The plan is simple and straightforward. I like the diary, it is easy to use.'*

*'I like it when there are 2 or 3 different options to doing something.'*

*'All the answers are there – they match what we do in practice.'*

Others were more cautious; in particular there were comments around the amount of work that was involved in running a business and demands of other agencies, such as:

*'I've been listing all the areas that we need to identify as part of the business structure: Host responsibility policy; liquor licence; rules and penalties for the sale of liquor; Health and Safety; Fire and evacuation; Customer Care policy; Staff attendance, meals, staff pay, tea-breaks, lunch rosters, holidays, GST ....and now this.'*

*'I'm getting used to writing things but it is hard to get into the habit when there are all the other aspects of the business to think about.'*

*'Keeping up with everything is hard and I don't have a lot of time. Larger businesses will have more people; there are only 2 of us here.'*

*'The plan is very wordy and there is a lot to read. It is fairly simple but I had to re-read it to get the gist of it.'*

*'The documents are very detailed.'*

*'Is it possible to cut the plan down - especially the written parts?'*

#### Businesses were asked how they had found the keeping of records

The trial tested businesses commitment to keeping records, and most businesses commented on issues around either the actual need for keeping records, the task of record keeping, time needed or the ability to carry out monitoring and recording while busy.

*'I most dislike all the paperwork sorting; however I'm happy to do it since I've seen a change in staff attitude towards jobs, which are now getting done.'*

*'I don't like having to write things down.'*

*'Our enthusiasm for writing is waning.'*

*'I'd rather do all the record-keeping in my head!'*

*'When working flat-out – that's when the controls are needed and things checked. We check, but don't always have the time to record them.'*

The diary concept was popular as a method of keeping records of monitoring activities. Apart from two businesses that would have preferred to keep records on-line, most identified that written records were simplest. Several businesses had either modified the diary to reflect their monitoring activities or were identifying what would better work for them.

*'Diary is the best way of keeping records together.'*

*'As the diary is pre-printed it is easy; just fill in the blanks. It still takes some time out of the day; it is a pain but probably necessary.'*

Other comments were around the idea and layout of the diary:

*'The way the diary is laid out does not fit with the way we currently run our records. I'm developing our own system.'*

*'I understand the idea behind the diary, but it is not usual for Asian people to write down things that go wrong. Surely it will mean that my business will be inspected more often.'*

Two businesses already ran a kitchen diary that dealt with day-to-day work activities. Comments reflecting these approaches included:

*'It is handy having everything in one book. We can monitor our performance. I've changed our records to 4-pages per week to include a cleaning plan and duty manager duties. I'm creating special instructions for meat dishes. The head chef left, and different chefs have different ideas.'*

*'I'm planning to incorporate records in our kitchen book. On a Sunday afternoon we plan the week ahead including orders, deliveries and who does what. It is one point of reference in the kitchen; everyone is aware of where it is and what is in it.'*

One business was particularly candid about their approach to records:

*'I'll admit that I made up some figures on occasion'*

When asked why this had been done the answer was 'just to fill some spaces.'

### **Businesses were asked if/how they had involved staff with the plan**

Businesses took a range of approaches to involving staff in the trial. At one end businesses identified that staff participation was important if the systems were to work, so staff were involved in identifying aspects of food safety applicable to their work:

*'It has been exciting watching staff take a different perspective. I thought it would not fly, but emphasis has been on experimenting and fun. It was challenging to get involvement and taking responsibility. We used quizzes and open discussion. It's all about attitude and spawning this throughout the restaurant; thinking things through, not just*

*about what the food looks like on the plate but how it got there.*

*'It is a team thing; staff are part of the programme. Writing it together they know what to do. I can sit and write it myself but as staff work with the plan they may as well help. We've had a competition between kitchen staff to devise the most appropriate equipment cleaning practices.'*

*'I let staff play with the thermometer; now they pick it up and use it to check cooked temperatures. It was a fun way to get them involved.'*

*'It needs buy-in from staff. Anyone coming into the business, especially young staff, will see that it is the norm and learn good practice.'*

*'Motivation is important and getting out of the mindset that it is a daily chore, more part of the normal workload.'*

In spite of this some businesses didn't find that this inclusive approach worked, or determined to present the plan concept in a different manner:

*'Our Chef left and we've struggled to find a replacement. We've had 2 part-time chefs since and I've been shocked by their poor hygiene standards. They've been trained, so must have learned about it, but they don't practice good hygiene. They say 'no one else bothers with that.' I've had to defend hygiene and they seem to think they are above it all. It is very disappointing.'*

*'The staff looked at the plan but didn't understand a thing, so we've been converting it to a form they can work to.'*

*'All jobs now get done because there is something for staff to do on a list. We're taking each task and making it theirs.'*

### **Businesses were asked to identify issues that had arisen during the trial period that had impact on their participation in the trial**

There were a broad range of examples of real issues facing small businesses that had occurred during the trial and which had an influence on either the level of participation or records available.

Typically these involved issues around staffing such as:

*'I had a major crisis part-way through the trial – I was unable to be at the business and the chef left. Those remaining in the kitchen had no idea of the plan and it was all about getting the food out. I'm just picking up on the monitoring again. If this was mandatory I'd need to ensure a system in which records were completed when I'm not there. I had run through the plan with the staff; thought I had their buy-in and that it had become routine. It taught me a lesson – I need to identify what to do in future to combat issues arising when disaster strikes. I was doing everything and need to give others responsibilities. I've employed a student chef for the holiday period and he comes in and does the fridge temperatures before starting other work. When he goes at the end of the summer I'll roster between the other staff.'*

The viability of the plan in operation was identified by several businesses as being related to the credibility of management:

*'It is important for staff to see that owners doing the work as well and leading by example; sharing tasks.'*

*'You need to start as you mean to go on and lead by example to staff. A polite enquiry such as 'have you washed your hands' is usually enough. I've noticed now that staff will notice when others don't wash hands when coming into the kitchen and remark on it.'*



*'The person who makes the plan needs to be running it or responsibilities can be forgotten and then need chasing up.'*

*'Usually all this information is in the owners head. If the owner is not there, things fall apart.'*

*'This takes concentration. I wanted to do it thoroughly. It takes time and needs focus.'*

*'I like the concept – it is a matter of time-management. Trying to get it all done is hard. Last week we had a big reception for 120 booked, and on the day a further 50 turned up and had to be fed.'*

*'Times and temperatures have been difficult to monitor with the oven in constant use.'*

*'There are so many time and temperature combinations that it can be confusing and they don't always work when the oven is in constant use.'*

A majority of businesses raised the issue of the time involved in monitoring temperatures.

*'The thermometer is too slow to register – it makes taking temperatures too long.'*

*'I need a faster thermometer.'*

*'The thermometer is slow and makes monitoring a long process.'*

*'Having the probe and checking that what we've always been doing meets these requirements gives us peace of mind. It confirms our professional knowledge. It is especially useful at event venues.'*

*'I get the Tip Top man to help me with the freezer temperatures.'*

EHOs also identified that not all thermometers in use were appropriate for the monitoring being carried out. Their comments appear in Section 5.4.

### **Businesses were asked what improvements to food safety they had identified from the trial process**

Many businesses had to think for a time about this question. Several intimated that nothing had changed their approach because they were already doing the sorts of things identified in the plan. *'We've not changed things, just made them a bit more formal'*

*'I don't think it has made us do things any better, or some of the staff more conscientious.'*

Others were more aware of specific changes to approaches made, many of which were around key temperature requirements:

*'It's made me more conscious of what we do. We're defrosting things more thoroughly, pie warmer temperatures were not good, now better. Monitoring temperatures helped identify that one of the fridges was not working properly.'*

*'We've tried different ways of cooking to suit the food.'*

*'We found from monitoring the chiller trailers that we hired for events that not all were consistent in their temperatures. We're now looking to buy our own.'*

*'Things get put back in the refrigerator more quickly.'*

*'Keeping ice cream scoops in the chiller and controlling dirty dishcloths has been useful.'*

*'We now wash the rubbish bins more regularly.'*

Other practices identified in the plan had been introduced to procedures in the business:

*'The need to check deliveries has had to be drilled into staff.'*

*'The plan helps us to remember to do checks and become more organised.'*

*'The plan is useful for showing due diligence.'*

*'We're developing a staff handbook that will contain a set of hygiene "rules."*

*'The place runs smoothly but the plan keeps people on the ball and not blasé about things. It has taken a term and a half to get people used to the idea and by end of January it will be in place and should be a habit.'*

### **Businesses were asked if they had advice to others faced with a FCP**

The businesses were forthcoming with information from their experiences during the trial. For other businesses:

*'Businesses with small staff numbers will find that there's a lot of work to do, especially with check-lists. The best thing they can do is jump-in and get on with it; get staff involved and not forget about it.'*

*'I'd advise any business to get into the habit of checking temperatures.'*

*'Remembering to do checks is hard.'*

*'It is easy to become so tied up with getting food out that checks are not made.'*

*'The plan has focused and formalised staff training. It has meant extra work but it has probably saved more work than it has generated as we've not had to set up our own (documented) system.'*

*'Anyone doing it has to be prepared to find the time.'*

For NZFSA:

*'The plan flowed fairly well between service and retail; in some places it was repeated but generally said the same thing.'*

*'Keep the diary as simple as possible. A bigger blank area would enable us to write relevant things. It's good for reference.'*

*'There should be a helpline – EHOs are not always easy to get hold of. Perhaps a guide on the internet.'*

### Businesses were asked whether they would be prepared to register the plan as opposed to the premises

With the NZFSA proposing a voluntary scheme for the registration of a template Food Safety Programme towards the end of the trial period, businesses were canvassed for the option to become exempt from the current premises registration.

One business – that was operating across sectors and was a particularly diligent trial participant - indicated that they might be prepared to do so. Their approach to the trial indicated that they would be a prime candidate.

Comments from other pro-active businesses were not so positive and identified a reluctance to do so. Comments included:

*'The plan is a better way than just registering the premises, but not sure that I'd be happy to do it until everyone else was in the same position.'*

*'Would I voluntarily register the plan rather than the kitchen? No, there's too much extra work. I'd be at a disadvantage if the guy down the road doesn't have to do it too.'*

*'It would be better if it was compulsory, but there would still be days left out (of records) when I'd be unable to check things.'*

*'For choice I would still register the premises as this clearly identifies responsibility for maintaining them. The plan would be good to use for day-to-day operations. Sometimes we go to event sites where the owner refuses to maintain the equipment.'*

*'I feel that the only way I'd do it is if it was mandatory.'*

No mention was made of any incentive that might appeal to these businesses to change their view. The general impression gained from the responses was that the time, and the amount of work involved with the plan, was the issue for businesses that would make it less likely to voluntarily change from their current mode of registration.

### Businesses were asked about the assistance that they had received in introducing the plan

The majority of businesses were positive about the support that the TAs had given during the trial:

*'The EHO has been a great help.'*

*'I've had very good support from the EHO who has given advice and clarified things. If unsure about anything I've telephoned.'*

*'The EHO wants to use the business as an example for other businesses to follow.'*

Input from other sources was also canvassed:

*'I haven't had any help with this from RANZ.'*

*'HANZ has not provided any information around the new systems.'*

*'Suppliers aren't really interested when we raise issues – we don't have buying power and they have no competition.'*

*'I had a meeting at the polytech re. taking work experience students but there was no mention of the plan there.'*

## 7.4 EHO information on the delivering the OTP FCP

EHOs were asked to keep a diary of time and issues relating to each trial premises. Information about the time spent with thirteen of the businesses (56%) was received and appears in Table 6.

Each business received, on average, between three and four visits from the supporting EHO. The visits totalled, on average, 2 hours and 35 minutes. The shortest visits were 15 minutes, the longest 1 hour and 15 minutes.

Comments from EHOs at the end of the trial reflected a number of issues that they had been involved in while supporting businesses in introducing their FCPs. Several reflected aspects identified during NZFSA assessments:

*'Thermometer obtained by business would not register below zero, so no good for freezer;'*

*'Had purchased a meat thermometer, so it would not measure chillers;'*

*'Had recorded different cooking times for some products so could not verify consistent temperatures for cooking time;'*

*'Discussed visual checks of dishes such as rare meat cuts, fish etc.'*

*'Handwashing could be improved by staff;'*

*'Discussed operation of plan – finds it good but has some practical limitations when busy in relation to completing all temperature checks;'*

*'Having looked at his record keeping he either has not read some of the instructions correctly or does not quite understand them; shop looks good, though;'*

*'They are using their own cleaning schedule which looks good, but not dating and signing all entries;'*

*'Was under the impression that the trial was on-going and was not aware it comes to an end next month so has made implementation more urgent;'*

*'Some of the forms have been altered to suit their business better;'*

*'Manager very interested, aware of, and already practicing many food safety procedures. Initially manager could see this will increase her workload but is prepared to make the effort;'*

*'Owner commented that some of the records are like kindergarten and unnecessary ie 'checking food is cooked.' If they didn't, they wouldn't have a business!'*

## 7.5 Assessment of TA Costs in Delivering the Trial

A comparison of costs was made, based on officer time involved with delivery of the trial to the businesses and time under the existing food regime currently spent on inspecting the premises. Results appear in Table 7.

It was assessed that, currently, a typical 'corner' dairy premises in Hamilton takes an EHO about 30-mins on-site to inspect; while a licensed restaurant will take around 90-minutes. Systems requirements for data entry and filing take, on average a further 15 minutes per premises. Additional time spent will depend on the findings of the inspection, the nature of infringements found and detail/extent of infringement notice.

Follow-up visits to assess remedial actions taken would also be required. Officer involvement and compliance actions taken would determine the inspection programme for the following year of business registration. Under the current premises grading system, a well-operated licensed restaurant could expect two inspection visits per year.

Costs were calculated at an hourly on-site rate of \$72 per EHO which included all costs associated with employing an EHO at HCC. It did not include additional costs on top of this in terms of materials consumed ie transport to and from the business, time on off-site activities around the trial process.

It was recognised that the time involved in introducing and implementing the FCP in premises was variable and depended, in part, on the time required by different people to become familiar with the concept and, in part, by how much time each individual EHO was prepared/able to give to the project.

It can be seen from the table that annual on-site costs for inspection of a well-operated restaurant (currently receiving 2 x 1.5 hr visits per year with an on-site cost of \$216) is comparable with the minimum amount of EHO time spent on-site during the trial. However, this does not mean that the business would have attained a status of full and verifiable registration during this equivalent time.

The cluster trial co-ordinator felt that the time involved with trial businesses, and hence the total cost, was less than originally anticipated; but identified

that to be relevant this needed to be measured against the degree of success in the implementation of FCPs by the businesses. This would determine whether the time spent by the EHO was sufficient or whether better use could be made of it.

The trial results supported this understanding. The EHOs delivering the plan were provided with minimal introduction both to the tool and to the concept; although all were aware of what was understood by a pro-active food safety system. They were also working with businesses that had volunteered to take part in the trial and who were under no pressure to register their plans.

The lack of a driver (such as a mandatory requirement) introduced potential into the trial for reduced focus or urgency for completing the work. Both business and EHOs faced

**Table 6. Time Spent by EHOs in Delivering Trial**

Activity	Number	Time taken – min/max	Average amount of time
Deliver/introduce FCP visit	13	0.5 hr – 1 hr	57.5 mins
Follow up visit	13	0.25hr – 1.25hr	55 mins
Further visit	13	0.25hr – 1hr	40 mins
Further visit	8	0.25hr – 1 hr	25 mins
Further visit	6	0.25hr – 0.5 hr	15 mins
Max/Min/Average	Min 3 visits Max 5 visits Av. 3.5 visits	Min total time: 2hrs Max total time: 4.25hrs	2.6hrs

**Table 7. Assessment of On-site Costs**

Type of business	Average time currently spent on an inspection	Average on-site cost to TA - \$	Time spent in delivering/ supporting business introduction of OTP FCP: Min/max	On-site cost to TA: Min/ max \$	Average cost
Retail	0.5 hour	36	2/3hrs	144/216	180
Service	1.5 hours	108	2.75/4.25hrs	198/306	252

competing pressures on time to carry out their respective roles. In addition, NZFSA had not developed either the supporting guidance or training that will be made available to EHOs/Food Officers prior to transition; nor any guidance for operators to support implementation of OTP FCPs. Both will provide a deeper, and better, understanding to those involved with new systems and concepts.

NZFSA will be involved in identifying training for TA officers. Training should also help to direct the methods used to most effectively support the introduction of FCPs by businesses.

## 7.6 EHO end of trial comments on trial processes

At the end of the trial the participating EHOs were asked a range of questions about their involvement with businesses in delivering the OTP FCP and about business participation.

### 1. How did the trial work out?

Take-up of the concept was found to be slow – *‘People were not too clear at first, it needed plenty of explanation.’* A reason for this was felt to be that there were no incentives/penalties for not filling out the template.

The EHOs felt that plan benefits needed to be ‘marketed’ to push the positives of operating an OTP FCP such as:

- the plan provides security for compliance – business would know it was following right practices;
- it would provide assistance to attain better business;
- focus for training new staff;
- it could help monitor business performance;
- provide added value to business

These echoed a number of the positive comments about the OTP FCP identified by businesses themselves during the trial.

### 2. What were the methods used to introduce the business to the plan concept.

The most common approach was to initially make an appointment with the business and to discuss the trial process and content. A copy of the OTP FCP was left with the operator and time given to read at own pace. A second appointment was made a week to 10 days later when the EHO would run through and discuss the OTP FCP with the operator. In some instances the EHO identified this meeting as a long process that needed a further visit.

EHOs did identify, however, that time put in at the start of the trial was well worthwhile in the longer-term implementation of the plan by the business.

### 3. What were the issues identified by businesses as making the introduction of the OTP FCP difficult.

There was ‘too much’ information in the plan for some; while others had difficulties in interpreting cooking requirements or found temperature monitoring to be impractical under certain circumstances.

In other cases it was found that the diary led the business; it was easier to understand than the plan documents and it was about measuring things. Some businesses did not have the confidence to complete the tailoring of the plan.

In turn, EHOs felt, in some instances, that pressure from other aspects of their work did not allow them to return to businesses to provide support as much as they’d have liked.

This last comment was reflected in the NZFSA findings, when interviews with some businesses that had not fully participated in the trial identified that they might have become more focused had there been more contact with the person delivering the trial.

### 4. What specific problems had EHOs identified or needed to help resolve during the trial.

These included:

- staff turnover at businesses. Staff involved with the plan implementation left and no-one took their place;
- businesses doing checks but not recording them;
- businesses with good verbal explanations of safe practices but not tailoring the plan or providing monitoring records to back this up;
- businesses ‘too busy to do paperwork’ or generally getting businesses involved in ‘doing the plan part.’
- businesses that took to the diary but had no confidence to tailor the plan;
- repeated explanations to businesses about calibration of thermometers;
- requests for more visual information;
- difficulties in determining or applying time/temperature combinations;
- businesses that had slow-reading thermometers – owners became frustrated by monitoring times;
- issues with businesses and a-la-carte cooking temperatures;
- concerns that businesses might have falsified records in time for a progress meeting.

Many of these issues confirmed the NZFSA information gathered from businesses of key issues around implementing the plan.

A concern expressed by one EHO was:

*‘although my businesses volunteered for the trial they were not really interested....they’d not done any of the tailoring on return visits in spite of having a game plan.’*

Fortunately this was not borne out by all other participating EHOs or from the findings of the NZFSA assessor.



## 5. EHOs were asked what they felt about cluster working.

EHOs readily identified that different TAs have different priorities, and there might be conflict in working closer with other TAs.

There were concerns that the rules around cluster working could be overly bureaucratic. 'Good ideas' that started from the top of organisations had been known to lead to complicated delivery issues for those tasked with implementing them.

Staffing is a limited resource, while in predominantly rural areas EHOs have responsibilities for enforcing a range of legislative provisions and wear numerous 'hats.'

EHOs did feel that clustering offers better possibilities for support, training and development, particularly from their peers. Comments included: 'It is good to meet and talk about common issues and solutions;' 'it is good to train in cluster groups drawn from different TAs.'

It was felt that TAs might need incentives to release staff for training or attendance at cluster meetings and that there would be a need to emphasise an aspect of value for money. There were comments around opportunities of improving EHO skills and introducing Continued Professional Development in keeping up to date with commercial practices.

## 6. Suggestions about what would be needed to develop cluster working.

It was important that cluster participation was voluntary, and one that would benefit from a range of inputs and experiences. The view that a TA has a duty to deliver consistent services was also firmly held.

Organising the practical side of working in a cluster was felt to be the job of someone who:

- could identify the benefits;
- knew what the goals were;
- identified what activities had to be carried out and who was to do them;
- communicated what was to be achieved;
- arranged training;
- clarified issues;

## 7. What impact did the trial have on the EHOs.

Most of the comments revolved around the amount of work over and above other work commitments and additional discussions and e-mails between participating EHOs.

The extent of these additional communications could not be gauged. While there was a 'formal' communications route via group e-mail that was monitored, there was no capture of data on 'informal' communications between individuals about aspects and issues arising in the trial. It is likely that, as in any work situation, there will be preferred routes to obtaining information that are identified by individuals.

## 8. What could improve the OTP FCP documents.

EHOs generally found the documents to contain good information but identified that the presentation needed working on;

Having a diary that was separate from the plan documents was favoured;

Of individual elements in the plan, the options for monitoring cooking was seen as good. Comments were made generally about the benefits of businesses being able to identify options to either confirm that what they were doing was 'correct' or select what was most appropriate to them;

The EHOs identified that there needed to be more guidance around what is needed to tailor a template. They also felt that although they were 'guinea pigs' in a trial situation they wanted/ needed thorough training and support in order to deliver the FCP concept to businesses under the new system.

### 7.7 End of trial comments from 'Cluster' Group Co-ordinator

The Co-ordinator was the main force in ensuring that:

- the phases of the trial happened as intended;
- information was passed to the right people at the right time;
- information received was captured;
- issues raised were dealt with and
- the trial happened according to schedule.

The Co-ordinator identified that the participating EHOs bought-into the trial and that once the schedule and work plan directions had been e-mailed and followed-up, there were no phone calls for any further information. TAs just got on and did it, according to what they understood by it.

It was identified that the trial directions presented a different approach to working experienced by many of the EHOs; particularly those in the rural authorities. It was felt that there might have been a perception that the trial represented a 'big brother'

approach – bringing some control and direction from outside the TA and being at odds with a work approach that is often autonomous and requiring the EHO to resolve issues.

While the General Managers agreed to staff involvement it was not known how much information had been passed down the line at each TA to staff. (NZFSA had provided the trial outline to GMs). During the data gathering phase one comment had been received about 'lack of information and preparedness' in having to explain the FCP concept to businesses.

An e-mail forum had been set up by the Co-ordinator, but it had been little used other than by 2 individuals; certainly not as much as the Co-ordinator had hoped.

The Co-ordinator had not received feedback about any approaches taken to introduce the concept to businesses; only one EHO provided feedback from observations gained and information gleaned from businesses.

From the Co-ordinators perspective:

Good communications are 2-way. It can become confusing if instructions are not understood or implemented and no information is given as to why this is;

A clear understanding needs to be presented from the outset as to identifying the level of resources will be available;

As EHOs are very busy any dialogue needs organisation. This, and any feedback, may need to be identified as having to take place at a set time and factored-in to a work programme;

The trial represents a change in working style that few have experienced, so needs a proper introduction and discussion for the reasoning process to identify benefits and buy-in;

The Co-ordinator identified a need early in the trial to involve support services/admin early on for data capture. The benefits of well-informed and trained support services staff was identified as being the ability to support EHOs by handling queries and freeing them for other duties.

Cluster work would need a business plan to factor-in the objectives, the resources needed, who will do it, how it will be done, training needs, support services needed, monitoring, accountability, review;

The Co-ordinator believed that a cluster approach could need a change in mindset, so NZFSA should look at guidelines/procedures on achieving clusters; it needs positive direction after years of inaction/lack of direction towards a regional approach;

The Co-ordinator was involved taking time to:

- initially develop procedure;
- set up database;
- e-mail information;
- Discuss with team how trial was to be implemented.

The Co-ordinator found that the idea of working closer together was not always identified in the trial. For example, one TA had changed their supplementary application format to a better layout but had not made the rest of the TAs in the trial aware of this, or the potential benefit to businesses completing the form;

In spite of instructions in completing the data base, there was concern that these were not always followed and that information may have been lost from entries being overwritten.

A number of the comments made by the Co-ordinator reflect the issues identified in the reports summarised in Appendix 1 around the best methods employed by those working together towards a goal: potential issues with the dominant role of the lead authority; the need for proper planning of projects; identifying resources; identifying the benefits; best means of working; leadership; committed involvement at all levels.

## 7.8 Summary of OTP FCP delivery phase

- Twenty three businesses were selected from a larger number of volunteers to take part in a trial of a prototype OTP FCP.
- 16 businesses operated across more than one food sector.
- 80% of businesses operated with five or fewer full-time staff. The average number of full-time staff in the trial was three.
- There was a total of 67 full-time staff at the businesses taking part in the trial - 43 (64%) had received formal food hygiene training.

Before each business saw a copy of the OTP FCP the business owner was interviewed to determine the level of pro-active approach to food safety taken by the business.

- Every business owner was able to verbally identify and demonstrate a range of pro-active activities; 14 (60%) of businesses at the start of the trial were assessed as understanding and operating a broad range of good practices.
- 11 businesses (approximately 50%) of the businesses did not have any documentation relating to any aspect of a food safety system.
- 3 businesses operated a staff 'code of conduct' that typically included policy for sickness, personal hygiene, handwashing and premises cleaning;
- 1 business recorded cooked and chilled food temperatures.

TA EHOs introduced the OTP FCP and supported businesses while they tailored and implemented the plan.

At the end of the trial – approximately three months after the plan had first been introduced - businesses were again visited by NZFSA to identify any changes occasioned by the process.

- 6 businesses (approx 25%) had identified elements and tailored plans appropriate to business activities and were making records of monitoring activities.

- 6 businesses (approx 25%) had not completed identifying the scope of operations in their FCP or completed records. Typically training records would not have been completed, nor an approach made to ascertaining cooking temperatures
- 4 businesses (17%) provided information such as business details and suppliers but had not completed anything further. There was evidence of a start being made to records but this became sporadic over time;
- 2 businesses carried out daily monitoring and recording but had not completed or tailored the plan;
- 5 businesses (21%) had done nothing to complete or implement the plan.

During the trial period there were no food safety issues arising at the businesses that identified that the health of customers was compromised.

Businesses and EHOs involved with the plan were asked a range of questions about their experiences with the documentation and concept.

- Approximately half of the businesses identified a benefit of having the documents was in reinforcing the approach taken by management. It was 'a good training system' for staff. These businesses also saw the benefits of the OTP FCP as from not having to develop them themselves.
- The majority of businesses responded positively to the OTP FCP documents, but many commented to the effect that initially they were overwhelmed by the size of the file. Although for many *'the plan made sense when I'd read it through a couple of times,'* for others it was *'very wordy and there is a lot to read. Is it possible to cut it down?'*
- Time was an important issue for many businesses – in taking time to read and understand the documents, tailor them, write schedules, understand monitoring requirements and keeping records. *'I don't like having to write things down'* was a common call; *'my enthusiasm for writing is waning.'*

- Staff turnover (churn) is a recognised issue in the food service sector, and a number of businesses suffered the loss of key staff during the trial period, placing pressure on plan implementation. One business admitted to making up some of the temperature monitoring figures as a result, while another did not start the trial.
- There was some resignation to the fact that some type of food safety system would have to be introduced: *'Businesses with small staff numbers will find there is a lot of work to do, especially with check-lists. The best thing they can do is get staff involved and forget about it.'*
- Few visible improvements to practices were noted as a result of the trial; however there were comments from businesses that indicated the information contained in the documents had focused thinking: *'We tried different ways of cooking to suit the food.'* *'Things get put back in the refrigerator more quickly.'*
- Businesses that were working across food service and retail sectors were generally satisfied that the OTP FCP – which included both food service and food retail elements – provided consistent information. A food service plan, which covers the range of high risk food activities expected in this sector, would also be suitable for lower-risk food retail operations at the same business outlet. For transition, this would enable the two sides of the business to be registered under the one plan.
- At the end of the trial, businesses were asked if they would register their FCP rather than the premises. One business said that they would *'seriously think about it'* but the remainder were more reserved. One comment summarised a general feeling that: *'There's too much extra work. I'd be at a disadvantage if the guy down the road doesn't have to do it too.'*
- These comments would indicate that, as things currently stand,

there is likely to be a reluctance for businesses to volunteer to register a FCP if there is more work involved in registering and operating the plan than in registering their premises.

- The EHOs provided information of the time spent in delivering the plan concept to 56% of the businesses. This indicated that these received a minimum of 3 and a maximum of 5 visits (Av. 3.5) totalling a minimum of 2 hrs and a maximum of 4.24 hrs.
- The cluster trial co-ordinator felt that this was less time than had been anticipated; however this needs to be kept in the context of the number of businesses that were in a position at the end of the trial to register a tailored plan (approx. 25%). A mandate for businesses to register a plan, and focused EHO training would be key to enhancing this time input/outcome relationship.

## 8. Overall trial summary and outcomes

The idea of TAs working together to present a regional approach to tackling common issues and promoting consistency and best practice or value for money for their ratepayers is already established in New Zealand, and is supported in local government legislation.

TAs vary in size, but they generally face the same demands and challenges. In the field of food safety this includes the registration of food premises, enforcement of food hygiene legislation and the provision of food safety information.

In the future, TAs will be involved in registering food businesses by acting as the 'front door' by which businesses will obtain information enabling them to register their operations. They will also be involved in verifying and regulating the food safety activities identified by those businesses. TAs will also be working closely with NZFSA, and where not the registering authority, provide relevant information both to NZFSA and to the business that facilitates the registration process and provides support for food safety systems.

The benefits from TAs working together to carry out these activities have been identified as including:

- a better consistency in approach to registration and regulation – both across a region and throughout New Zealand;
- knowledge of businesses operating in the region;
- resolving local issues locally and collectively; referring only irresolvable matters/significant issues to NZFSA;
- a more focused communication route between TAs and NZFSA;
- better customer focus and improved service delivery;
- improved information systems around, eg. Mobile food operations.

Two reports commissioned in New Zealand in recent years have studied the phenomenon of local authorities working together and identified a number of findings. Key messages were:

- the potential for TAs working together has not been fully explored;
- TAs coming together voluntarily to resolve mutual issues is more successful than a forced requirement;
- TAs need to identify services and service levels that are affordable in the long term;
- Moving forward requires understanding the needs of the community and overcoming parochial interests and political hurdles;
- any approach towards working together needs to be systematic to guard against wasting scarce resources or pursuing unproductive arrangements;
- clusters that work best are timely, well-focused, soundly managed joint arrangements. They have the support of staff and have the commitment and leadership of councillors;
- negative attitude of management and elected members and perceptions of staff can be a barrier to collaborative working;

Specific measures which would enhance the development of collaboration include:

- an effective means of sharing knowledge and experience;
- benchmarking costs of local government services – a barrier to collaboration can be the inability of managements to demonstrate real cost of their own activity, and alternative means of delivering the same service;
- better promotion of the potential of collaboration

Five Waikato local authorities that were already working together to deliver a building consents process took part in a trial to identify aspects of 'cluster' delivery of a food safety system. The trial identified similar issues to those raised in the research into TAs working together including:

- a need for clearly stated goals and expected outcomes;
- agreement between those involved as to direction, content and timelines;
- good communications;
- promotion of the activity within TAs and to businesses involved;
- a clear understanding of the activity at all levels of the TA;
- commitment throughout each TA and across TAs;
- identifying and making available resources to carry out agreed processes to expected standards;
- identifying benefits to those involved in delivery and implementation;
- creating a desire to participate, rather than coercion;
- TA awareness of best practice in delivering services;

The trial also identified that NZFSA encouragement of a cluster approach would tend to:

- Help attain the desired degree of delivery consistency at regional and national level;
- facilitate cooperation between NZFSA, individual TAs and relevant regional providers;
- identify duplication of regulatory activities;
- help to remove conflict in the delivery of food safety systems;
- present opportunity to enhance professional roles;
- reinforce the credibility of organisations, systems and regulation;

In addition to testing the capacity of TAs to work in a cluster group, the trial also presented food businesses with an opportunity to introduce a prototype OTP FCP to their operations and for NZFSA to gain feed-back on the approaches taken and issues raised.

The trial findings identified that while the majority of businesses were complimentary about the format and structure of the documents, found them clear and easy to follow and liked having them on hand for staff training, there was concern over the amount of time needed to both complete the plan and operate it on a daily basis. Staffing issues in small businesses and the implications of busy a-la-carte kitchen operations on temperature monitoring and recording were common themes.

With the support of TA EHOs, approximately 25% of businesses at the end of the trial had tailored plans that reasonably reflected their business operations and 25% were estimated as being around three-quarters of the way to a tailored plan. 20% had done nothing to either tailor the plan or record monitoring, while the remaining 30% had done little to tailor plans but had recorded monitoring activities.

Businesses that were asked whether, given the opportunity, they would voluntarily register their FCP rather than the premises perceived that to do so would take more of their time and would place them at a disadvantage with their competitors. The general preference among the businesses in the trial was to wait until registration became mandatory for all.

As a result of this phase of the trial, and in the light of stakeholder comments from another trial involving the OTP FCP around New Zealand, the food service OTP FCP was reviewed; in particular around temperature monitoring and reporting expectations. The changes should help address business concerns around time expenditure and enhance uptake of the NZFSA Voluntary Implementation Programme (VIP).

EHOs provided information about both working in a cluster group and in the delivery of OTP FCPs to businesses. An indication of time spent at trial businesses gave an insight into potential costs involved with implementing new systems. One TA identified that the time spent on-site was equivalent to that currently expended annually at the premises. It was recognised, though, that there would be differences between businesses in the effective tailoring of plans and implementation of systems.

As well as leading to modifications of OTP FCP templates the trial has also been influential in developing NZFSA policy on clustering. VIP represents a further opportunity to road-test the tools and delivery of new systems prior to implementation of the Food Bill and incorporates many of the findings of this report including:

- an option for TAs to take a cluster approach in delivering VIP systems;
- guidance developed by NZFSA to TAs working in clusters;
- training and developing the TA EHO role as verifier and regulatory officer during VIP and Food Act implementation;
- involving TA management and TA support services in VIP training workshops and identifying future ;
- informing PHUs and identifying and clarifying roles during VIP and beyond;
- involving TAs in developing a forum for feedback on experiences in delivering VIP and new systems;
- additional support to TAs by the appointment of NZFSA TA programme co-ordinators through VIP implementation and beyond;
- providing incentives to TAs and businesses to participate in VIP– including training workshops, support packs, funding for TA delivery initiatives to businesses;

It is anticipated that findings from implementing the Voluntary Implementation Programme will further influence the introduction of new systems identified by the new Food Act.



## Appendix 1 New Zealand Research into Local Authorities Working Together

The reasons for districts working together in a 'cluster' to offer their services has been reviewed in New Zealand and elsewhere.

Often reviews have been occasioned by a perception that there will be benefits to be gained by amalgamating services offered by TAs, such as those accruing from economies of scale or from savings to be made by greater purchasing power or from reducing duplication of operations. In reality, any benefits of change are more dependent on the perceptions of those who will be affected by them, and their acceptance and will to change, rather than the desires of those that drive the changes.

Report findings are pertinent to any circumstance where two or more TAs determine to work closer together.

In May 2004 the New Zealand Controller and Auditor-General published the report 'Local Authorities Working Together' which identified that, although the opportunities for working together are many and varied, TAs often enter into a joint arrangement in response to a specific need at a particular time.

The report identified that:

- there is the potential for more opportunities that could benefit from a joint approach but which have yet to be acted on by TAs;
- irrespective of geographical size and characteristics, population and location, legislative requirements are the same for every local authority; while community expectations and aspirations may be quite different;
- small rural authorities had sought dispensation for a simplified approach to meeting legislative requirements due to capability issues of meeting community expectations and legal obligations;
- Councils in areas of declining population and growth had not come to terms with reassessing services that may be unaffordable in the long run;
- moving forward requires understanding of the needs

of the community and may require overcoming parochial interests and political hurdles;

- sharing the joint effort will become a developing trend;
- any approach towards cluster working needs to be systematic to identify and guard against wasting scarce resources or pursuing unproductive arrangements. Forums can enable councillors from different authorities to align priorities and perspectives to help reach decisions and resolve differences.
- those clusters that work best are timely, well-focused, soundly managed joint arrangements that have the support of council staff;
- the leadership and commitment of councillors are critical to the success of joint arrangements.

In 2006, Local Government New Zealand (LGNZ) commissioned a report on local government structure and efficiency from McKinlay Douglas Ltd., who carried out a literary review of outcomes from amalgamations of local government functions, both in New Zealand and internationally, to identify:

- the degree to which this contributes to efficiency;
- whether diseconomies occur over a certain size;
- the effects on representation and the ability to exit

The following summarises the findings of the report which identified:

- the evidence of savings as a consequence of large-scale amalgamation initiatives is, at best, equivocal. The findings by a reviewer of the structural reform of English local government between 1992-95 were more conclusive; anticipated gains from structural reform did not eventuate;
- substantial evidence from Canada that forced amalgamations may not have had public support either at the time or subsequently, suggesting a strong sense of attachment to the known and familiar;

- a tendency for those supporting restructuring to overlook or underestimate the impact of factors such as the incompatibility of systems; impact of change on system requirements; staff morale and the impact of the restructuring process itself;
- it is more likely that voluntary amalgamation initiated by one or more of the amalgamating councils where they and their ratepayers are in favour, will produce benefits that outweigh costs;
- a voluntary situation provides more opportunity for in-depth assessment of likely costs and benefits to present a picture of the way things might look after amalgamation;
- the need to gain community support almost certainly sets a higher barrier than in the case of forced amalgamations, where often the driving force is a national level political commitment, rather than an authority-by-authority assessment of needs and options;
- there is no debate over whether economies of scale exist; rather that the emphasis is on recognising that economies of scale for different local government services will arise at very different levels determined by factors such as customer base, geographic coverage and divisibility of inputs;
- the optimal size of government to achieve lowest per unit cost is likely to vary between services provided, making it extremely difficult to draw boundaries for general-purpose local governments;
- municipalities too small to achieve economies of scale on their own can nonetheless accrue advantages of scale economies by joint purchasing agreements that ensure provision of the quantity and quality of services desired by their ratepayers;
- a barrier to more collaborative working can be the negative attitude of management and elected members;
- finding new and better ways of delivering services should be seen as a way of freeing up resources to

cope with new responsibilities; how individuals regard their own skills and career opportunities is partly an issue of change management;

- elected members of small and medium-sized councils have a suspicion of the intentions of the largest councils in a region - a 'big brother' syndrome; many are more comfortable focusing on minutiae rather than major strategic issues. There may also be historical tensions between territorial's;
- larger councils can identify that having a dominant role in a region can be both a strength and a weakness when working with fellow territorial's;
- the extent to which the power of 'well-intentioned bureaucrats' – bureaucrats who genuinely believe that they are acting in the public interest but also believe that their knowledge or experience is such that they know what 'public interest' is and act accordingly - become a potentially negative influence from a local democracy perspective, as the size of a local council increases;
- the successful approach, in Australia, of voluntarily establishing Regional Organisations of Councils – partnerships of contiguous TAs (usually) with governance provided by representatives of the constituent councils. Benefits have been identified as: worthwhile savings, enhanced performance, greater influence with other tiers of government and capacity building within individual councils. Good working relationships have lead to identifying new co-operative initiatives to improve service deliver. Limits seem to be related to political preferences – how much autonomy is prepared to be sacrificed to achieve cost savings;
- the findings from an inquiry into Council Tax in England that identified that greater public expectations, national targets for public services, a growth in entitlements to public services and a strong national media contributed to ever-stronger concerns about 'post-code lotteries.' This

created an apparent desire for the same services, and level of service, to be delivered in all areas. The report argued that this goes against economic theory and common sense, since people's preferences and needs and costs in delivering services, vary between areas; so the best way of spending limited resources will be different in different places;

- case studies from New Zealand indicate a wide range of collaborative activities between TAs; often ad hoc but becoming more increasingly strategic and based on long-term relationships;
- in spite of barriers – including negative attitudes (above) – level of activity continues to grow as councils recognise a need to find best means of providing expected services;
- specific measures which would enhance the development of collaboration include:
  - an effective means of sharing knowledge and experience;
  - benchmarking costs of local government services – a barrier to collaboration can be the inability of managements to demonstrate real cost of their own activity, and alternative means of delivering the same service;
  - better promotion of the potential of collaboration
- a wider role for local government as the voice of the whole community and as an agent of place in 'place-shaping' – building and shaping local identity; representing the community; regulating harmful and disruptive behaviours; maintaining cohesiveness of communities; helping to resolve disagreements; understanding local needs; providing the right services; working with other bodies to respond to complex challenges. 'Place shaping' will mean different things in different places, but is relevant to all sizes of councils;
- distinctiveness of place is an important component in attracting skills and investments in a highly competitive world

A form of food 'place-shaping' is already widely used by TAs and regional organisations throughout New Zealand to create a picture of, and promote, an area to attract tourist dollars or to encourage local people into town to enhance the local economy. Food and wine trails, farmers markets and industry training are examples of food-related activities that can receive economic support and local/regional promotion to help distinguish the area and generate further business opportunities.

The report identified that the focus of councils should be on themselves creating or facilitating the structures of the issue they seek to address. If something which is genuinely regional or subregional in scope, then the need is for a structure which has that scope. This does not necessarily need to be formally incorporated; it may be made up purely of councils, it may included other entities. If handled best at a district or sub-district level, then the issue is one of how best to engage at that level and whether through strategic partnerships, community boards or other means appropriate.

NZFSA policy should recognise activities which:

- facilitates the willing cooperation between individual TAs and between TAs and relevant regional providers;
- avoids duplication of regulatory activities;
- removes conflict in the delivery of food safety systems;
- respects professional roles.

## Appendix 2 TAs taking part in the Waikato Cluster Trial

### Hamilton City Council

- provided co-ordinator

### Waikato District Council

### Waipa District Council

### Matamata-Piaka District Council

### Otorohanga District Council

## Appendix 3 Content of Supplementary Application Form

### New food laws and food businesses

You are probably aware that food safety laws in New Zealand are being reviewed, and currently look set to start to come into effect during 2008.

A significant change for many food businesses will be the need to identify their approach to food safety in a Food Control Plan. This will be registered through the local Territorial Authority (TA), in a similar way by which food premises are registered at present. The

Food Control Plan will contain food safety information about all the food activities that the business carries out.

Territorial authorities in the Waikato are working with New Zealand Food Safety Authority (NZFSA) during this year's registration cycle to identify processes that will make the changes as smoothly as possible for businesses. We would very much appreciate your help with this by answering the questions that follow and returning them with your application for registration 2007-2008. This information

will be treated confidentially, and we may contact you to discuss it.

NZFSA is also keen to know whether you would like to preview the current ideas that they are developing for Food Control Plans in the food service and retail sectors so that you can make comments that will help to influence their development. If you would like to do so, and would like to know more about the changes in food law that will be affecting businesses, please indicate this in Question E.

Many thanks for your assistance.

### About your food business

A. Business name and address. \_\_\_\_\_

B. What is the position of the person in overall charge of ensuring food safety in your business?

C. The type of food operations that you carry out. Please tick the boxes in the table below and on the next page that apply to what you do in your food business:

Food operation:	This means the type of food business that:	Is this what You do? (Tick)
1. On-site catering	Provides food to a large number of people at the same place and time. For example in-house catering at clubs/similar venues; college-type catering	
2. Off-site catering	Serves food at places other than where it was prepared. For example office catering; gala meals; food at functions at clubs or community halls	
3. General food service	Serves meals, snacks, drinks for immediate consumption on or off the premises. For example café; restaurant; permanent workplace canteen; pub; takeaway; cook-and-deliver operation; school dining room	

Food operation:	This means the type of food business that:	Is this what You do? (Tick)
4. Mobile food service	Vehicle-based food business providing meals, snacks and drinks for immediate consumption, eg. Ice-cream van, pie cart, coffee cart	
5. Provide food to vulnerable persons	Provides food to the elderly, very young, sick and pregnant. Includes manufactured products such as infant formula; and food services for vulnerable populations. For example hospitals; elderly day and residential care; children's day care; meals on wheels	
6. Food manufacture	Makes food that is sold at premises other than where it was manufactured. Please specify types of food manufactured:  <hr/> <hr/>	
7. Retail bakery (bread products)	Makes a range of bread-type products direct for retail sale, but not foods such as cakes, pies, pastries	
8. Retail bakery (bakery products)	Makes a range of bakery items direct for retail sale, eg. pies, cakes, slices, pastries)	
9. Retail butcher (no ready-to eat food)	Makes and sells raw meat direct for retail sale, eg. meat cuts, roasts, sausages	
10. Retail butcher (ready-to-eat foods)	Manufactures ready-to-eat small goods and may also prepare and sell raw meat direct for retail sale	
11. Food retail (make, handle, retail)	Retails all forms of food and also handles and manufactures food. For example supermarket with in-store bakery, butchery etc., a 'Corner' dairy that makes and sells sandwiches. Please specify types of food made:  <hr/> <hr/>	
12. Food retail (handle, retail)	Sells packaged/unpackaged/repackaged food and/or carries out small-scale food service, such as serving ice-creams, pick'n'mix lollies. For example some 'Corner' dairies and mini-marts; school canteens/tuck shops (do not produce meals)	
13. Food retail (retail only)	Sells only manufacturer-packaged foods. For example Liquor stores, some 'Corner' dairies and mini-marts	
14. Imports food	Please specify types of food imported:  <hr/> <hr/>	
15. Horticulture operations	grow cereals, fruit, nuts, herbs, vegetables, spices. For example apples, potatoes, maize, parsley, sunflower seeds Please specify types of produce grown:  <hr/> <hr/>	

**D.** Do you have other food businesses or carry out any other food activities:

In this TA area? Yes ☐ No ☐ In another TA area? Yes ☐ No ☐

Please specify types of food businesses or activities:

---

---

**E.** Would you like to take part in a trial run by Waikato TAs and NZFSA? This will give you a chance to see current ideas for Food Control Plans and to work with your TA to identify how you might operate with one. Yes ☐ No ☐

Would you like more information about the proposed changes to food law? Yes ☐ No ☐

If 'yes' to either or both questions, how would you like to receive further information?

By post ☐ Address for postage:

---

---

By e-mail ☐ e-mail address:

---

---

In person ☐ Such as an Environmental Health Officer from your TA?

---

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Thank you for your help. Information on a range of food issues is at: [www.nzfsa.govt.nz](http://www.nzfsa.govt.nz)



## Appendix 4 Initial Work Instructions

**Process:** Deployment of Food Control Plans

**Version:** 1.0

**Date:** July 2007

**Process Owner:** Participating Waikato Territorial Authorities

Process Step	Page
1. Select Food Business for Trial	35
2. Initial Contact with Food Businesses	35
3. Pre Trial Audit	35
4. Introduction of FCP	35
5. Implementation and Verification	36
6. Post Trial Audit	36
7. Registration of a FCP	36

### 1. Select Food Business for Trial

**By 02 August 2007**

- Selection criteria for the trial: Food businesses that can participate in the trial must:
  - a. Have volunteered for the trial (identified during the data capture project); AND
  - b. Belong to a sector(s) that is/are covered by an OTP FCP (see notes below).
- Select a number equal to the number of participating Environmental Health Officers x 2. Select one business from sector 3 and one business from sectors 11,12, or 13 (2 businesses selected in total per EHO).

Notes:

- If the number of volunteers is insufficient, or not enough sectors subject to an OTP FCP are covered, then select appropriate businesses to fulfil the requirement.
- The FCPs available are for Food Service (sector 3 on the NZFSA questionnaire) and Food Retail (sectors 11, 12 and 13). The Food Retail plan may be applied to businesses that indicate that they retail only, or handle and retail, or make, handle and retail. Further direction will be given about any further applications for the Food Service plan, other than at General Food Service outlets.
- Ensure that the selected FCP(s) are appropriate for the business activities.

### 2. Initial Contact with Food Businesses

**By 02 August 2007**

- Confirm with business that they are still willing to take part in the trial and provide guidance on the trial format. A pre-trial food safety assessment of the business will be made by NZFSA.
- Notify NZFSA of business address and contact details so that a pre-trial assessment may be organised. The pre-trial audit needs to be carried out prior to the introduction of the FCP.

### 3. Pre Trial Audit

**Week beginning 06 August 2007**

- A pre trial food safety assessment will be made of each business by NZFSA to establish a baseline prior to the trial.
- Once NZFSA has notified completion of the pre-trial audit, confirm with the business owner the operations that the food business carries out and arrange an appointment to start the FCP introduction process at the business.

### 4. Introduction of FCP

**Week beginning 13 August 2007**

Note: During the deployment the safety of customers/consumers should not be put at risk. Food Act provisions remain paramount.

- At the initial visit provide guidance and advice to the business owner on the implementation of the FCP.
- In general explain how the FCP is to be used by the business as a tool to consistently manage food safety issues and that the FCP needs to be tailored to recognise the approaches that the business takes to food safety. This might include discussing:
  - a. FCP concept/reasons – what the FCP is aiming to achieve;
  - b. FCP document – what is in it and how it is set out;
  - c. Management and common procedures – what they are and what the business owner needs to do with them;
  - d. Specific procedures – what these are; what the business owner needs to do to identify which apply to current business activities; how they need to reflect approaches taken to food safety;
  - e. Record keeping requirements associated with the common and specific procedures (where applicable – e.g. Approved Suppliers, Training);

f. The Diary - the purpose of the diary to regularly track and record on-going monitoring activities and corrective actions when taken.

- After completion of the previous bullet point take the business owner through the 'First Steps' instructions at the front of the FCP. Make sure the instructions are clearly understood and that the business owner is able to start the process once the visit is over.
  - Suggest/arrange a timetable with the business owner for implementing the FCP either in stages or all of it in the business.
  - Provide contact details should the business owner have any questions on completing and implementing the FCP document.
  - Provide appropriate support/guidance/mentoring as required throughout the introduction/implementation phase until this has been attained. This will vary according to the understanding and experience of the business owner and it is suggested that, in the absence of an agreed timetable, a call-back visit is made 2-3 weeks after the initial visit.
  - Some additional guidance material may be made available by NZFSA, but part of the trial involves identifying whether there are particular needs in this area. The trial provides an opportunity to identify, develop or enhance guidance or information processes to facilitate the process – ie a powerpoint showing it step-by-step.
  - Keep a record of the time involved with each business; in particular any visits, reasons for visits, amount of time spent, requests from business, 'phone calls, issues/queries/concerns identified by business (or TA) and how answered/resolved. This will help to build a picture of both time involvement and resources required against the findings of the final (third party) audit visit.
- ## 5. Implementation and Verification
- By 26 October 2007:**
- To ensure that the business owner has completed the FCP, understands it's purpose, has identified relevant processes and can implement the contents a 'verification' visit should be arranged. The FCP document and trial implementation process should be reviewed with the business owner to determine that:
    - a. It covers the scope of the business;
    - b. It contains all the components and information needed;
    - c. It has been tailored to reflect business operations;
    - d. The business owner has identified who is in day-to-day control of food safety;
    - e. The business owner is 'comfortable' with operating the good practices identified;
    - f. Customer safety is not being compromised.
  - A record of this visit needs to be made to capture how far the approach to introduction has been successful to tie-in with time expended and approach to putting information across. A suitable assessment form to be devised.
  - Once this has been carried out, the business enters the 'business as usual' phase of the trial. This will continue for approximately three months. During this time businesses should be offered the opportunity to request further input (ie telephone questions/visit requests).
  - In the absence of communications from business, or a timetable, it is suggested that at least one call-back visit is made to confirm that the FCP process is being followed, support the business during the trial and to ensure that the trial is not compromising customer safety.
  - Again, findings of visits are to be recorded.

## 6. Post Trial Audit

### Week beginning 29 October 2007:

- Towards the end of the 'business as usual' phase, an end of trial food safety assessment will be made of each business by NZFSA to determine how the FCP has been put into place and identify any changes in approach to food safety. The visit will also seek views from business owners on the introduction process and how they have perceived the trial.
- The trial FCP documents will be collected from the businesses for further appraisal by the auditor.

## 7. Registration of a FCP

- The information coming from the trial may be used to determine whether the amount of data provided from the business registration application form, the supplementary application form, the OTP FCP and any supporting documents and information gained from on-site visits is sufficient to complete a registration process.
  - c. Determine Audit Frequency
- It is anticipated that a business will receive one verification visit each year. This is likely to be prior to re-registration. Additional visits may be required throughout the year, depending on performance identified during verification. Criteria will be determined by NZFSA and are likely to range from 'continuous' surveillance in instances requiring action for non-compliance issues which have given rise to significant risks to customer safety; to an annual visit or extended period when consistently high standards have been identified and met.
- The pre-and post-trial audits will provide an opportunity to rate/rank a number of aspects of business activities that would determine level of compliance.

## Appendix 5 Sample pages from database

Home screen

The screenshot shows a Windows-style desktop environment with a blue background. A window titled "MAIN SWITCHBOARD : Form" is open in the center. It has two main sections: "Forms" and "Reports".

**Forms Section:**

- Food Business Details (All)
- Businesses that were Sector Verified
- Issues
- Hamilton CC
- Waipa DC
- Otorohanga DC
- Waikato DC
- Matamata-Piako DC

**Reports Section:**

- Verification of Sectors
- FCP Trial Participants
- Food Manufacture Specified
- Food Retail Specified
- General Information
- Horticulture Specified
- Import Food Specified
- CLOSE DATABASE

At the bottom of the desktop, there is a "start" button.

Data entry screen

The screenshot shows a Windows-style desktop environment with a blue background. A window titled "Food Businesses - Data Entry Form" is open. It contains several sections for data entry:

**Find Record:** A search bar with a dropdown arrow.

**A and B: Business Details**

Business name:

Address:

Town:

Position of person in overall charge:

**C. Type of Food Operations**

	Form	Visit
1. On-site catering	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Off-site catering	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Food service - general	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4. Mobile food service	<input type="checkbox"/>	<input type="checkbox"/>
5. Vulnerable persons	<input type="checkbox"/>	<input type="checkbox"/>
6. Food manufacture	<input type="checkbox"/>	<input type="checkbox"/>
7. Retail bakery (bread products)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Retail bakery (bakery products)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Retail butcher (no ready-to-eat foods)	<input type="checkbox"/>	<input type="checkbox"/>
10. Retail butcher (ready-to-eat foods)	<input type="checkbox"/>	<input type="checkbox"/>
11. Food retail (make, handle, retail)	<input type="checkbox"/>	<input type="checkbox"/>
12. Food retail (handles, retails)	<input type="checkbox"/>	<input type="checkbox"/>
13. Food retail (retail only)	<input type="checkbox"/>	<input type="checkbox"/>
14. Commercial food imports	<input type="checkbox"/>	<input type="checkbox"/>
15. Horticultural operations	<input type="checkbox"/>	<input type="checkbox"/>

Date of site visit:

**D. Other Businesses/Activities**

In this TA area? ☐

In another TA area? ☐

Specify types of food businesses/activities:

**E. NZFSA Trial**

Would like to take part in food control plan trial? ☐

Like to know more about proposed changes to food law? ☒

**Further Information**

Address for postage:

E-mail address:

In person: ☐

**Determining Regulatory Authority**

(See Step 4 of Data Capture Procedures)

TA the regulatory authority? ☒ Yes ☐ No

Record: 14 of 209 (Filtered)

## Manufacturers screen

**General Information**

*Food Manufacture Specified*

Business name	Address	Town	Specified
<i>Hamilton City Council</i>			
Bouquet Cake	26 Heriot St	Hamilton	cakes and pastries
Chinese Healthy Baking	143 Mount St	Hamilton	unspecified
Chris Foster Baking Fudge	31 Christian Church St	Hamilton	confectionery
Columbus Coffee	244 Heriot St	Hamilton	bread products, things made up
Coventry Pastries	not given	Hamilton	pastries
Dinwale Bakery	15 Whitewash Rd	Hamilton	not given
Dinwale Bakery & Deli	Turkmenia Rd	Hamilton	pastry products
Edible Oculous	54 Delamare Rd	Hamilton	cakes, confectionery
Burgess Traders 2006 Ltd	12/20 Clyde Shopping Centre	Hamilton	samosas, rolls & buns from Indian Diner
Orkney	14 Oatton Place	Hamilton	ice cream, frozen confections
Orkney	10 Oatton Pl	Hamilton	set fires (quartz) dinner
Golden Dragon Restaurant and Takeaway	234A Princes Rd	Hamilton	unspecified
Hamilton City Council Cakes	Garden Place	Hamilton	unspecified
Happy Baker	690 Bure St, Franklin	Hamilton	confectionery, cakes, scones, small pastries
Indian Diner Restaurant Ltd	PO Box 27040	Hamilton	curry, chutney, dhal
Jaguar Indian Restaurant	753 Victoria St	Hamilton	Indian food
Joan of Freedom	215 Anglesea St	Hamilton	cakes

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**MAIN SWITCHBOARD : Form**

**Forms**

- Food Business Details (All)
- Businesses that were Sector Verified
- Issues
- Hamilton CC
- Wapa DC
- Otorohanga DC
- Waikato DC
- Matamata-Piako DC

**Reports**

- Verification of Sectors
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- Food Retail Specified
- General Information
- Horticulture Specified
- Import Food Specified
- CLOSE DATABASE

## General Information screen

**General Information**

*General Information*

Business name	Position of person in charge	This TA	Another TA	FCP Trial	More Info
<i>Hamilton City Council</i>					
1000 Teachers	owner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Albion Primary School	Contractor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Accidental Club	Owner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ACR United TPA Production Op to Box	Manager	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Admiral Cafe & Restaurant	Director	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Admiral's Restaurant	Manager	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Admiral's Restaurant	Owner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Admiral's Restaurant	Manager/Owner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Admiral's Restaurant	Head Chef	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Admiral's Restaurant	Owner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ATC New Zealand	CEO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B & B Cafe	Director	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B & B Cafe	Owner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Bach's Liquor Centre	Owner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Bach's Liquor Centre	Manager	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Bach's Liquor Centre	owner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Bach's Liquor Centre	Managing Director	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Bach's Liquor Centre	Manager	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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**MAIN SWITCHBOARD : Form**

**Forms**

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**Reports**

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- Food Manufacture Specified
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Food Control Plan: |

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Milkshakes		
Cakes and Sig		
Loose sweets		
Fruit and Vegie		
Blank Template		

## The Basics:

# Hand Hygiene

### Goal

Make sure that all staff who work with food wash and dry their hands properly, especially:

- When entering any area where unwrapped ready-to-eat food is handled.
- Before touching unwrapped ready-to-eat foods
- After touching raw food (meat, veges etc)
- Before putting on gloves and after removing them.
- After using the toilet

### Why?

Hand washing and drying is one of the most effective ways of preventing harmful microbes from

Food handlers can spread harmful bacteria onto their hands onto food by either touching the food or by touching other things that the food will come in contact with (eg benches, knives,

### How to do this

#### Hand washing

**Step1:** Clean under running water, soap

**Step 2:** Wash hands soap, rubbing vigoro

between fingers/for

It can be hard to judge that you develop a habit the required washing st through the hairy bit

**Step 3:** Dry hands th between fingers), for using (towel option):

- ☐ Single use cloth (paper) Rub hands on two se seconds on each section.
- ☐ Single use paper towel Rub hands on two p seconds on each section.

Using gloves

### Write it down

## Food Service:

# Cooking Poultry

### Goal

Cook poultry and dishes containing meat and poultry thoroughly to the centre.

### How to do this

Visual inspection alone is not a reliable way to determine whether poultry, rolled meat joints, tenderloins, steaks, chops, roasts, mince, meatballs, meat products (eg sausages, burgers etc) have been safely cooked.

**Note:** when cuts of beef and whole pieces of fish served 'rare' as long as outside.

The following procedure make sure poultry is

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Pest Control		
Maintenance		
Customer Complaints		
Purchasing and Stock Control		
Checking Temperatures		
Storage		
Chilled/Frozen Storage		
Transporting Food		

  

## The Basics:

# Hand Hygiene

Goal	Why?
<p>Make sure that all staff who work with food wash and dry their hands properly, especially:</p> <ul style="list-style-type: none"> <li>When entering any area where unwrapped ready-to-eat food is handled</li> </ul>	<p>Hand washing preventing harm</p> <p>Food handlers</p>

## Hand Hygiene

Goal	Why?
<p>Make sure that all staff who work with food wash and dry their hands properly, especially:</p> <ul style="list-style-type: none"> <li>• When entering any area where unwrapped ready-to-eat food is handled.</li> <li>• Before touching unwrapped ready-to-eat foods</li> <li>• After touching raw food (meat, veges etc)</li> <li>• Before putting on gloves and after removing them.</li> <li>• After using the toilet.</li> </ul>	<p>Hand washing and drying is one of the best ways of preventing harmful microbes from getting onto food.</p> <p>Food handlers can spread harmful microbes caused on their hands into food by either touching food directly or by touching other things that the food may come into contact with (eg benches, knives, chopping boards etc).</p>

Write it down

## Cooking Poultry & Meat Products

Goal	Why?
Cook poultry and dishes containing meat and meat products thoroughly to the centre.	<ul style="list-style-type: none"> <li>To ensure that harmful food poisoning microbes are killed.</li> </ul>

**Write it down**

Service:

**Cooking** (other than poultry & meat products)

What	Why?
Serve food that is properly cooked.	<ul style="list-style-type: none"> <li>• Harmful microbes are present in many foods. Cooking (and reheating) can kill harmful microbes.</li> <li>• Microbes are invisible to the human eye and cannot be physically removed from food.</li> </ul>

## Write it down

Write down in the Checking food is cooked Cook Safe sheet what visual checks are done to make sure that food is cooked safely.

## Pie Warmer Foods

Goal	Why?
Correct re-heating and hot holding pre-cooked ready-made foods such as pies and savouries.	<ul style="list-style-type: none"> <li>• Products need to be thoroughly reheated before display in the pie warmer to destroy harmful microbes, and prevent carcasses from becoming ill.</li> <li>• Products need to be completely reheated so reach temperatures that will destroy harmful microbes during reheating.</li> <li>• Products that are not stored in fridges, freezers and pie warmers operating at the correct temperatures can allow harmful microbes to grow.</li> </ul>

Write it down

Complete daily diary temperature check.  
Write down any action taken if  
temperatures are too cool.

If food does not reheat, continue to

If the temperature of the food is not maintained at 60°C when on display in the pie warmer throw the food out.

60°C increase the

If the pie warmer is unable to hold food at 60°C have it serviced and repaired, or if necessary replace.



## Appendix 7 NZFSA - Waikato pre-trial audit form

Premises:		Date:
Interviewee:	Position:	

Scope of activities		
<input type="checkbox"/> General Food Service (café, restaurant, takeaway)  <input type="checkbox"/> On-site catering (school, college)  <input type="checkbox"/> Off-site catering (functions, clubs, halls)	<input type="checkbox"/> Makes, handles, retails <input type="checkbox"/> Handles, retails <input type="checkbox"/> Retails only <input type="checkbox"/> Manufacturer <input type="checkbox"/> Vulnerable groups	<input type="checkbox"/> Horticulture <input type="checkbox"/> Other: _____ _____ _____  How many Food Handlers? _____ Training: _____ _____

Procedure/policy	Observation/how determined	Documented Criteria	Monitoring	Records
Training and supervision	Who has received food safety training?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Health and Sickness	What do you do if staff member reports they have been vomiting	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Hand hygiene	When do staff wash hands? How do they know when to wash hands?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Personal hygiene	What do staff wear to prepare food?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Cleaning and Sanitising	What do you use to clean equipment and premises? When do you do this?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Food Allergens	What do you understand about food allergens	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Waste disposal	What do you do with rubbish in food areas? How do you get rid of rubbish?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pest Control	How often do you check for pests? What are you looking for?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Maintenance	What do you do to keep premises and equipment maintained and operating properly? Do you keep a register of equipment maintenance?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Recalls, Customer complaints	What do you do if a customer makes a complaint?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Procedure/policy	Observation/how determined	Documented Criteria	Monitoring	Records
Cooking poultry and meat products	<i>Where do you buy food for your business? Who do you buy from?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Potentially hazardous food	<i>What do you understand as being 'potentially hazardous' food?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Checking temperatures	<i>Do you know what the law requires food temperatures to be? How do you check that foods are at these temperatures?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Storage	<i>What are you looking for when you carry out a stock check? How do you rotate your stock?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Chilled/Frozen food storage	<i>What temperatures do you store chilled and frozen foods at? What does 'use-by date' mean?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Transporting food	<i>How do you transport food to the business or to a venue?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Defrosting frozen food	<i>How/where do you do this?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Preparation	<i>When preparing food, what are you wanting to prevent?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Cooking poultry and meat products	<i>How do you ensure that products are cooked? Do you use a standard time/temperature method? How often is this checked?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Cooking (other than poultry and meat products)	<i>How do you ensure thorough cooking of joints, soups, shellfish, pulses?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Hot holding prepared food	<i>What are your hot-holding temperatures? How long is food on display?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Cooling hot prepared food	<i>How do you cool foods? Where?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Reheating prepared food	<i>How do you reheat food? What temperature do you reheat the centre of food to?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Display and self-service	<i>How do you protect food on display?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pie warmer foods	<i>How do you reheat pies? What temperature are they displayed at?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Procedure/policy	Observation/how determined	Documented Criteria	Monitoring	Records
Hard scoop ice cream	<i>How do you protect ice cream, cones, scoops and toppings from contamination?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Soft serve ice cream	<i>What do you do to serve ice cream safely and keep machine operating properly?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Milkshakes, smoothies	<i>Where/how do you make sandwiches? How do you display sandwiches?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Making sandwiches	<i>Where do you buy food for your business?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Buying-in sandwiches	<i>Where do they come from? What checks do you carry out on arrival? What temperature do they arrive at? How long since they were refrigerated?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Cakes, slices	<i>How do you prevent contamination?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sweets	<i>What steps taken to pack/handle sweets safely?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Fruit and veg	<i>Cleaning of veg/equipment – what do you do?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Other activity - state		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Additional comments:				

## Appendix 8 End of trial assessment - NZFSA Waikato Cluster trial

Trading Name (of business being assessed):		Date of Assessment:
Type of business (e.g. Thai restaurant, truck stop, hotel etc)		
Address of Business:		
Interviewee name:	Position:	
Interviewer:		

Scope of activities (what processes are occurring)	Assessor comments (possible areas not covered by OTP FCP)
<input type="checkbox"/> Food Service <input type="checkbox"/> Catering <input type="checkbox"/> on site <input type="checkbox"/> off site <input type="checkbox"/> Food Retail <input type="checkbox"/> Other _____ <input type="checkbox"/> Defrosting Frozen Food <input type="checkbox"/> Preparation <input type="checkbox"/> Cooking <input type="checkbox"/> Cooking Poultry & Meat <input type="checkbox"/> Hot Holding prepared food <input type="checkbox"/> Cooling Hot Prepared Food <input type="checkbox"/> Reheating Prepared food <input type="checkbox"/> Display & Self Service <input type="checkbox"/> Transporting Food	

Procedure	Assessment of documented criteria and onsite practices in comparison with the Food Service OTP FCP	Reasoning / observation
<b>Management (Section 1)</b>		
<b>Training &amp; supervision</b>	<b>Documented Procedure</b> – has the procedure been tailored appropriately?	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Training Records</b>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> – talk to management and staff about the type of training they have completed.	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>The Basics (Section 2)</b>		
<b>Health &amp; sickness</b>	<b>Documented Procedure</b> – has the procedure been tailored appropriately?	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Staff Sickness Records</b> – has the staff sickness record been completed appropriately?	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> – have appropriate action been taken in regard to sick staff? Talk to the manager about how decisions are made about sick staff working or not.	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity

Procedure	Assessment of documented criteria and onsite practices in comparison with the Food Service OTP FCP	Resoning / observation
<b>Hand hygiene</b>	<b>Documented Procedure</b> – <i>has the procedure been tailored appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - <i>observe hand washing methods and frequency and/or talk to food handlers.</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Personal hygiene</b>	<b>Documented Procedure</b> – <i>has the procedure been tailored appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - <i>observe clothing, hands for plasters etc and food handlers conduct, talk to food handlers.</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Cleaning &amp; sanitising</b>	<b>Documented Procedure</b> – <i>has the procedure and cleaning schedule been tailored appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Moitoring Records</b> - <i>has the cleaning schedule been signed-off each day? Are the diary checks ticked?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - <i>is the food premises clean, are cleaning chemicals stored safely, use of cloths controlled, staff knowledge on cleaning methods good.</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Food allergens</b>	<b>Documented Procedure</b>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Moitoring Records</b> - <i>written details of all ingredients available.</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - <i>talk to staff on how they respond to questions about allergens from customers.</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Waste Disposal</b>	<b>Documented Procedure</b> – <i>has the procedure been tailored appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - <i>are there enough bins, are they emptied frequently, and cleaned? Is food for pigs controlled?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Pest Control</b>	<b>Documented Procedure</b> – <i>has the procedure been tailored appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Moitoring Records</b>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - <i>are there any pest issues? Ask what they do to control pests?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Maintenance</b>	<b>Documented Procedure</b> – <i>has the planned maintenance schedule been completed appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Moitoring Records</b> – <i>have the tasks in the planned maintenance schedules been signed-off? Has the unplanned maintenance schedule been completed as appropriate?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - <i>do they maintain equipment regularly, Is the premises in good repair, adequate hand washing facilities?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity



Procedure	Assessment of documented criteria and onsite practices in comparison with the Food Service OTP FCP	Resoning / observation
<b>Customer Complaints and recalls</b>	<b>Documented Procedure</b>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Customer complaint records</b> – are customer complaints recorded in the diary as required by the procedure?	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - ask what they do if they receive complaints?	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Cook Safe (Section 3)</b>		
<b>Potentially hazardous foods</b>	<i>Does the interviewee have good knowledge of what potentially hazardous foods (as defined in the procedure) are?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Checking temperatures</b>	<b>Documented Procedure</b> – has the procedure been tailored appropriately?	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Calibration records</b> - has the calibration record been completed?	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> – do they have a thermometer? How do they clean it? Do they know how to use it?	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Purchasing &amp; Receiving Goods</b>	<b>Documented Procedure</b>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Approved supplier records</b> – are the approved supplier records completed?	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Recording of rejected goods</b> – are they recorded in the diary as required in the procedure?	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> – are all their suppliers approved? Are the appropriate checks undertaken for incoming goods? Are they following the procedure for goods that are non-conforming?	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Storage</b>	<b>Documented Procedure</b>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> – how are dry goods, utensils and equipment stored? So they have a stock rotation policy.	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Chilled / Frozen Food Storage</b>	<b>Documented Procedure</b> – has the procedure been tailored appropriately?	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity <input type="checkbox"/> Not applicable <b>Go to next element</b>
	<b>Moitoring Records</b> - monitoring frequency, daily chillers, weekly freezers.	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - is potentially hazardous food being kept at safe temperatures? Are foods covered, date marked and protected from cross contamination if necessary.	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity

Procedure	Assessment of documented criteria and onsite practices in comparison with the Food Service OTP FCP	Reasoning / observation
<b>Defrosting</b>	<b>Documented Procedure</b> – <i>has the procedure been tailored appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity <input type="checkbox"/> Not applicable <b>Go to next element</b>
	<b>Practices</b> - <i>are they defrosting food in a safe manner?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Preparation</b>	<b>Documented Procedure</b> – <i>has the procedure been tailored appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - <i>do they wash fruit and vegetables? How is ready to eat food protected from contamination? How long is food in the danger zone during preparation?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Cooking Poultry &amp; Meat</b>	<b>Documented Procedures</b> – <i>has the procedure been tailored appropriately? Has the time/temperature settings record been completed as appropriate? Has the 'checking food is cooked section - Foods that are checked using a probe thermometer' section been completed appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity <input type="checkbox"/> Not applicable <b>Go to next element</b>
	<b>Monitoring Records</b> - <i>for poultry/meat product dishes where standard time/temp settings are used has a sample dish been checked and recorded weekly in the diary? Where checking of each dish or batch is specified has the 'Cooking Temperature Record' been completed?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - <i>is there any evidence that food is reasonably likely not to be cooked properly?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Cooking</b>	<b>Documented Procedures</b> – <i>has the 'Checking food is cooked' section been completed appropriately? Check it against items on the menu.</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity <input type="checkbox"/> Not applicable <b>Go to next element</b>
	<b>Practices</b> - <i>is there any evidence that food is reasonably likely not to be cooked properly? Can staff identify the visual indicators that food is adequately cooked?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Hot holding Prepared Food</b>	<b>Documented Procedures</b>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity <input type="checkbox"/> Not applicable <b>Go to next element</b>
	<b>Monitoring Records</b> – <i>have temperatures of hot-held food been recorded in the diary?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - <i>is food being held hot safely?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity

Procedure	Assessment of documented criteria and onsite practices in comparison with the Food Service OTP FCP	Resoning / observation
<b>Cooling hot Prepared food</b>	<b>Documented Procedure</b> – <i>has the procedure been tailored appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity <input type="checkbox"/> Not applicable <b>Go to next element</b>
	<b>Monitoring Records of cooling</b> – <i>has the time/temperature of one dish that has been cooled been recorded in the diary each week?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Reheating Prepared food</b>	<b>Documented Procedure</b> – <i>has the procedure been tailored appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity <input type="checkbox"/> Not applicable <b>Go to next element</b>
	<b>Monitoring Records of cooling</b> – <i>has the time/temperature of one re-heated dish been recorded in the diary each week?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> - <i>are they reheating food in a safe way?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Display &amp; Self Service</b>	<b>Documented Procedure</b> – <i>has the procedure been tailored appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity <input type="checkbox"/> Not applicable <b>Go to next element</b>
	<b>Monitoring Records of cooling</b> – <i>have temperatures of chill-display food been recorded in the diary?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Transporting Food</b>	<b>Documented Procedure</b> – <i>has the procedure been tailored appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity <input type="checkbox"/> Not applicable <b>Go to Questions</b>
	<b>Monitoring Records of cooling</b> – <i>has the 'Transporting potentially hazardous food' record been completed as appropriate?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity

Procedure	Assessment of documented criteria and onsite practices in comparison with the Food Service OTP FCP	Resoning / observation
<b>Retailing food</b>	<b>Documented Procedure</b> – <i>has the procedure been tailored appropriately?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity <input type="checkbox"/> Not applicable <b>Go to next element</b>
	<b>Monitoring Records of cooling</b> – <i>have storage temperatures, cooking/reheating temperatures been recorded in the diary each week?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Practices</b> – <i>are they reheating food in a safe way?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
<b>Diary</b>		
<b>Diary Entries</b>	<b>Diary (General)</b> – <i>have the chillers/hot holding equipment been identified on page 2? Have the tick boxes in the diary been completed, entries signed-off? Does it appear that Have problems/changes have been noted?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity
	<b>Four Week Review</b> – <i>has this been completed?</i>	<input type="checkbox"/> Acceptable <input type="checkbox"/> Non-conformity

## Discussion Guide

### Evaluation of OTP-FCP

- Q1. What is your overall opinion of the off-the-peg Food Control Plan?
- Q2. What do you think about the structure and format of the information?
- Q3. How clear is the language and terminology used in the Plan?
- Q4. What aspects of the Plan do you think need further explanation, or were confusing or contradictory?
- Q5. How relevant was the plan to your operation?
- Q6. What aspects of the plan helped to change food safety practices the most?
- Q7. What did you think about the record keeping requirements?
- Q8. What did you think about the diary?
- Q9. What did you most like/dislike about the Plan?
- Q10. How could the Plan be improved?

### Implementation

- Q11. How did you implement the new system (staff awareness, changes to procedures etc – all at once in stages etc)?
- Q12. How long did it take to tailor the documents before you could implement the system?
- Q13. How long did it take overall before the system was implemented (staff following systems etc)?
- Q14. What support did you receive to help implement the system?
- Q15. What type of support, if any, would have helped you implement the system?
- Q16. What were the main challenges? How were these challenges overcome?
- Q17. What did staff feel about the new system?
- Q18. What did you do to involve the staff in the implementation?
- Q19. What recommendations do you have for others who might have to introduce such a system?

## Appendix 9 Project Timescale

### **Mid-May 2007** – Phase 1

NZFSA produce supplementary registration application form

**Late May** – Form forward to TAs for customised logos and inclusion in mail-out with registration renewals

**Early June** – Registration mail-out (approx 1650 premises)

**Mid-June to late July** – Completed supplementary registration forms received. Data-base developed. Information entered on database.

**6 August** – Phase 2 Workshop held. OTP FCP trial participants identified and confirmed by TAs

**Mid-late August** – NZFSA carries out initial food safety assessments of trial businesses. EHOs start to introduce OTP FCP.

**Mid-late September** – NZFSA revisits businesses to capture early ideas about the OTP FCP approach and delivery.

**Mid-September-early December** – Businesses operate with OTP FCP. TAs provide support where needed

**Late November-mid December** – NZFSA carries out final assessment of businesses to identify documentation, approach, understanding, changes and issues faced and resolved. NZFSA meets with EHOs and cluster co-ordinator to identify issues arising during both phases of the trial.

**Mid January 2008** – Phase 2 data compiled. Trial data analysed. Draft report commenced.

**End January** – Draft report concluded.









**[www.nzfsa.govt.nz](http://www.nzfsa.govt.nz)**

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