



# Evaluation of Template or Model Food Control Plan

## **New Zealand Aged Care Association**

**March 2018**





## Introduction

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

This allows food businesses or commercial operations to:

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

## Context for this Evaluation

The New Zealand Aged Care Association (NZACA) has requested approval of their Food Services Manual under Section 40 of the Food Act 2014.

The manual amends the MPI Simply Safe and Suitable food control plan template. New Zealand Aged Care Association operators fall into the food service sector, so the MPI template is appropriate for them to use.

## Evaluation Conclusion (Summary)

The New Zealand Aged Care Association manual, if followed as written, is sufficient to adequately control the relevant food safety hazards associated with making food for immediate consumption. The manual does not, for example, address hazards associated with freezing food for later consumption.

Some recommendations have been made for consideration by the NZACA:

1. To include 'Training and Competency' in the 'Policy' section to reflect their importance in producing safe and suitable food.
2. Including in the pest control policy a procedure for dealing with a pest infestation.
3. To qualify in the temperature control guide that chilled food delivery temperatures received at 8°C must be within accepted good practice of the 2-hour, 4-hour rule.
4. To check the feasibility of operators being able to meet cooling requirements for potentially hazardous foods.
5. Considering increasing the temperature to which potentially hazardous food is reheated to allow for a greater margin for error.
6. Considering adding sulphites and lupin to the list of allergens.

*As at 5 April 2018, it is understood recommendations have been addressed and relevant steps taken.*

The evaluator recommends that MPI's chief executive approves the New Zealand Aged Care Association manual as a template or model FCP under section 40 of the Food Act 2014.

The verifier of a registered food control plan based on the NZACA manual is recognised under S.139 to verify template-based food control plans.





## New Zealand Aged Care Association Evaluation Report

<b>Ref: FR15 regs for custom plan evaluation</b>	<b>Evaluation criteria</b>	<b>Evaluation findings – New Zealand Aged Care Association</b>
<b>10(3)(a)</b>	<b>Name of evaluator</b>	Christopher Kasonde
<b>10(3)(b)</b>	<b>Name of food business</b>	New Zealand Aged Care Association
<b>10(3)(c)</b>	<b>Name of operator of food business</b>	Members affiliated to NZACA
<b>10(3)(d)</b>	<b>Type of food to which the procedure applies</b>	Variety of foods prepared for elderly residents living in care facilities. These foods are covered under Schedule 1 Part 3 "Food service sector". Food businesses under this sector can prepare or manufacture and serve meals, snacks, or beverages for consumers' immediate consumption.
<b>10(3)(e)</b>	<b>Description of practices and activities carried out</b>	<p>A summary of practices carried out under the Food Control Plan (FCP) is provided in the Food Services Manual Index.</p> <p>Activities include: sourcing of ingredients, receiving, cold storage, handling or preparing different types of food according to prescribed menu - washing, cutting to acceptable size and thickness, mixing, marinating, cooking, searing, grilling, chilling, thawing, packaging, hot holding, reheating, displaying, holding, serving, and transporting.</p> <p>The manual requires people preparing food products to follow good operating practices relevant to each production process. For example:</p> <ul style="list-style-type: none"> <li>• Ingredients must be obtained from approved sources.</li> <li>• All potentially hazardous ingredients must be delivered at or below 4°C or solid frozen.</li> <li>• A calibrated food thermometer must be used to measure the temperature of food.</li> <li>• Food must be stored in a manner that ensures reduction or prevention of bacterial growth and measures taken to prevent cross-contamination during preparation and service.</li> </ul> <p>Operators are required to follow established procedures and maintain records where applicable.</p>

Ref: FR15 regs for custom plan evaluation	Evaluation criteria	Evaluation findings – New Zealand Aged Care Association
10(3)(f)	List of documents assessed	<p>Food Services Manual – March 2018 Version 1. (Submitter advised that contents were designed to meet both MPI Food Act requirements as well as Ministry of Health Certification requirements).</p> <p>Consisting of the following sections:</p> <ul style="list-style-type: none"> <li>• Manual Index</li> <li>• Introduction</li> <li>• Set Up (adapted from MPI simply safe and suitable)</li> <li>• Layout of building (Provision for Plan to be inserted in the manual)</li> <li>• Food Safety Policy</li> <li>• Food Services Staff Responsibilities</li> <li>• Orientation - Catering and Food Services Personnel</li> <li>• Staff Performance Appraisal Form - Kitchen Personnel</li> <li>• Staff Performance Appraisal Form - Kitchen Manager</li> <li>• Individual Training Record</li> <li>• Starting (adapted from MPI simply safe and suitable)</li> <li>• Food Control Plan Daily Diary</li> <li>• Hand Hygiene Competency Assessment</li> <li>• Breakfast Order Forms</li> <li>• Dietary Profile and Nutritional Assessment</li> <li>• Food and Fluid Intake Chart</li> <li>• Resident Food Preferences at a glance</li> <li>• Resident Fluid Preferences at a glance</li> <li>• Pest Control Policy</li> <li>• Preparing (adapted from MPI simply safe and suitable)</li> <li>• Food Services for the Older Person</li> <li>• Food Services Ordering and Monitoring</li> <li>• Food Services Preferred Suppliers</li> </ul>



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		<ul style="list-style-type: none"> <li>• Pantry Stock Rotation Register</li> <li>• Making and Cooking (adapted from MPI simply safe and suitable)</li> <li>• Food Brought into Facility</li> <li>• Kitchen Chopping Board Specified Use</li> <li>• Cooling Time - Temperature Record</li> <li>• Temperature monitoring and cooling of food</li> <li>• Cleaning of Temperature Probe</li> <li>• Food Defrosting Policy</li> <li>• Kitchen Temperature Calibration Record</li> <li>• Consumable Item Temperature Control Guide</li> <li>• Food Storage - Reheat Control Reporting Form</li> <li>• Serving (adapted from MPI simply safe and suitable)</li> <li>• Meal Service Policy</li> <li>• Resident Meal Receipt Verification Form</li> <li>• Food Allergens Top 10 List</li> <li>• Closing (adapted from MPI simply safe and suitable)</li> <li>• Kitchen Cleaning Schedule Sample</li> <li>• Maintenance Record</li> <li>• Food Services Satisfaction Questionnaire</li> <li>• Kitchen - Food Services Internal Audit</li> <li>• Food Services Safety Checklists</li> <li>• Troubleshooting (adapted from MPI simply safe and suitable)</li> <li>• Complaints / Concern Management</li> <li>• Specialist (adapted from MPI simply safe and suitable - Making sushi with acidified rice)</li> </ul>

<b>Ref: FR15 regs for custom plan evaluation</b>	<b>Evaluation criteria</b>	<b>Evaluation findings – New Zealand Aged Care Association</b>
<b>10(3)(g)</b>	<b>The name and address of the place assessed on site</b>	N/A (Evaluation did not include an on-site assessment)
<b>10(3)(h)</b>	<b>Places exempted from on-site assessment</b>	N/A
<b>10(3)(i)</b>	<b>Technical experts who provided information used in the evaluation process</b>	Chris Hewins, MPI
<b>10(3)(j)</b>	<b>Copies of the technical expert's reports</b>	N/A
<b>10(3)(k)</b>	<b>Information about the competency of the technical experts</b>	N/A
<b>10(3)(l)</b>	<b>Evaluator's views and reasons on Reg 9(1)(a) requirements</b>	<p><b>(i) Identification of all hazards and other factors that are reasonably likely to occur or arise under S. 42(g):</b></p> <p>The Manual meets the applicable requirements of the Act as procedures address food processes and provide requirements for the safe preparation of food: policy and procedures in the manual are intended to comply with the requirements of Food Act 2014.</p> <p>Although the template does not mention specific hazards, the bulk of the procedures used in the manual are adapted from the MPI 'Simply Safe and Suitable' (SSS) template. MPI has evaluated the SSS template which, when followed, manages hazards and other factors that are reasonably likely to occur in the food service and retail sectors.</p> <p>In addition, the model template includes additional useful guidance for operators to check when needing information such as procedures on how to avoid food-medication interactions.</p>





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		<p>Observations from the Evaluator.</p> <ol style="list-style-type: none"> <li>1. Relevant practices – Training and Competency – is omitted from the key factors necessary for food safety in the Policy document.  <i>It is recommended that Training and Competency of food handlers is included in the Policy. This reflects the importance of people understanding what they need to do; why, and when they need to do them to keep customers safe.</i></li> <li>2. The pest control policy does not include a process for managing an infestation of pests.  <i>It is recommended that information for dealing with an infestation of pests is included.</i></li> <li>3. The food allergens list has identified the top 10 allergens.  <i>It is recommended that sulphites and lupin be added to the list.</i></li> <li>4. The Temperature Control Guide:             <ol style="list-style-type: none"> <li>(i) Identifies temperature parameters for a 2-hour cooling process.  <i>It is recommended that the feasibility of the temperature parameters are checked to ensure that they can be easily met by operators.</i></li> <li>(ii) Identifies a reheating temperature for potentially hazardous food that is less than the reheating temperature provided by Simply, Safe and Suitable (SSS).  <i>It is recommended that the temperature for reheating potentially hazardous food is checked and either validated or modified to reflect good practices in SSS.</i></li> </ol> </li> </ol>

<b>Ref: FR15 regs for custom plan evaluation</b>	<b>Evaluation criteria</b>	<b>Evaluation findings – New Zealand Aged Care Association</b>
		<p>(iii) Identifies an unqualified receiving temperature for chilled foods.</p> <p><i>It is recommended that the receiving temperature provided in the temperature control guide be clarified to work within the 2-hour, 4-hour good practice ruling for chilled foods.</i></p> <p><b>(ii) the validation information set out in the plan demonstrates as required by regulation 7(2) that:</b></p> <p><b>(a) the procedures and activities of the food business set out in the FCP will enable safe and suitable food to be traded:</b> N/A</p> <p><b>(b) practices carried out will enable safe and suitable food to be traded:</b> Yes – but also see above.</p> <p><b>(c) the facilities, equipment and essential services used in relation to those procedures, practices, and activities will enable safe and suitable food to be traded:</b> Yes – where they equate to those used for validating the process.</p>
<b>10(3)(l)</b>	<b>Evaluator's views and reasons on Reg 9(1)(b) requirements</b>	<p><b>Is the information believed to be accurate?</b> Information is believed to be accurate.</p> <p><b>Any other information provided to the evaluator for assessment under 9(1)(a)?</b></p>
<b>10(2)(a)</b>	<b>Statement of Validity</b>	<p><b>I state that the plan is valid in terms of s41 of the Act (it is in writing and acceptable form).</b></p> <p><b>I state that the FCP is valid in terms of s42 of the Act (has all FCP Contents required by that section and FR15 reg 6).</b></p>
<b>10(2)(a)</b>	<b>Statement of Validity</b>	The NZACA manual is valid.



Ref: FR15 regs for custom plan evaluation	Evaluation criteria	Evaluation findings – New Zealand Aged Care Association
10(2)(b)	What conditions does the evaluator recommend to be imposed on the registration of the plan?	No registration conditions are recommended.
112-113 or 115-116	ISO requirements	N/A
11(2)(a)-(c)	Endorsement	I state that the procedures are assessed by me as the Evaluator. I state that this evaluation report is as prepared by me as the Evaluator.
11(2)(a)-(c)	Signed and dated	<i>Chris Kasonde 19/03/2018</i>