Ministry for Primary Industries
Manatū Ahu Matua

Guidance Document

RMP Template for Farm Dairies – Export Eligible Milk

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Title

Guidance Document: RMP Template for Farm Dairies – Export Eligible Milk

About this document

The Risk Management Programme (RMP) Template for Farm Dairies - Export Eligible Milk assists farm dairy operators and farm dairy RMP operators to:

- meet the requirements of the Animal Products Act 1999 (Act);
- produce raw milk, including colostrum, which is safe and fit for further processing; and
- streamline the process of development, registration and implementation of a suitable Risk Management Programme (RMP) for farm dairy operations.

Related requirements

Risk Management Programme (RMP) Template for Farm Dairies – Export Eligible Milk

Document history

Previous Version Date	Current Version Date	Section Changed	Change(s) Description
August 2007	11 December 2015	All	Updated references and put document into RGP template.

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Disclaimer

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Purpose

This document provides an overview of:

- the Risk Management Programme Template for Farm Dairies - Export Eligible Milk (The RMP Template);
- the documents that comprise the template;
- any supporting documents and guidance; and
- the requirements of the legislation.

This document also provides guidance on completing the Risk Management Programme (RMP) Template. This explains the additional:

- farm dairy water requirements;
- the application of Hazard Analysis and Critical Control Point (HACCP); and
- identification and control of risk factors associated with wholesomeness, labelling, representation and eligibility.

Background

The processing of dairy material, including the harvesting of milk from milking animals, must comply with the requirements of the Animal Products Act 1999 (Act). This Act requires that the processing activities at the farm dairy are covered by a RMP registered by MPI. Section 17A of the Act allows for multiple farm dairy operators to come under the same RMP provided certain criteria are met.

The Animal Products Amendment Act 2002 allows for an RMP to be based on a code of practice, a template, or a model. It has been determined that an RMP based entirely on the template does not require evaluation provided that it is completed in full and that no significant change is made to the template.

The RMP template is a valuable tool to use in the development of the RMP. Utilising The RMP Template for Farm Dairies will:

- ensure that the operator follows acceptable industry practices and procedures;
- ensure that the operator meets the relevant regulatory requirements and obligations; and
- simplify and reduce the cost of developing, evaluating and implementing the RMP.

RMP Template for Farm Dairies

The RMP Template enables an RMP to be developed that is suitable for farm dairy operations which supply milk intended for the manufacture of dairy products for the domestic market or for export.

The RMP Template and additional information on RMP regulations are available at: http://www.foodsafety.govt.nz/industry/sectors/dairy/farms-dairies/rmps.htm.

Note that additional market specific requirements may apply over and above those covered by The RMP Template. By adopting and completing this template operators are not required to submit the RMP for independent evaluation.

This template may be used as a model for the development of an alternative RMP. An alternative RMP will require evaluation by a person recognised by MPI before applying for registration.

Farm Dairy RMPs that are likely to require evaluation are ones that:

- include novel practices;
- prefer to meet key requirements by an alternative means;
- wish to make a significant amendment to the template; or
- harvest milk intended for direct consumption as raw milk.

The RMP Template consists of the following components:

- template;
- farm dairy water quality checklist;
- hazard analysis and identification;
- identification of risk factors related to wholesomeness, labelling, representation and eligibility;
- farm dairy and milking animal information; and
- model record and return forms for use as examples.

Codes of Practice

In addition, The RMP Template incorporates the requirements of the:

- Operational Code: NZCP1: Design and Operation of Farm Dairies (NZCP1); and
- NZCP2: Code of Practice for the Assessment of Farm Dairies (NZCP2).

Farm dairy operators who adopt this template must operate in accordance with the NZCP1. It is recommended that farm diary operators have quick access and familiarise themselves with NZCP1.

A set of model forms are also provided to assist operators. These are not mandatory, but can be used directly or may serve as guidance for the level of detail generally expected to be recorded.

Operational Code: NZCP1: Design and Operation of Farm Dairies

NZCP1 provides a set of criteria and recommendations applicable to farm dairy operators and those service providers who support them. It is available to be referenced and incorporated by any RMP operator into their Farm Dairy RMP.

NZCP2: Code of Practice for the Assessment of Farm Dairies

NZCP2 provides criteria and clarifies expectations for the assessment of the operation of farm dairies. This Code is applicable for operators who have opted to reference the Code as a means of satisfying the requirement for The RMP Template to describe the farm dairy assessment system.

NZCP2 sets out the assessment protocol that Farm Dairy Assessors must follow for:

- assessing farm dairies covered by The RMP Template;
- determining appropriate actions following the identification of defects; and
- reporting to the Recognised Agency.

While directly applicable to Farm Dairy Assessors and RMP Operators, it also provides the expectations for Recognised Agencies and Persons who verify a farm dairies RMP. Note that the specific requirements for Recognised Agencies and Persons can be found in section 101and 103 of the Act.

1 Risk Management Programme

1.1 Contents of a Farm Dairies Risk Management Programme

(1) The documented RMP should to include the following:

1.1.1 Good Operating Practice

(1) Good operating practice (GOP) includes the practices and procedures designed to ensure the consistent production of milk that:

- is safe and suitable for its intended purpose; and
- meets relevant regulatory requirements.

(2) It includes several interacting components such as hygienic practices, process control and quality assurance systems.

1.1.2 Application of HACCP Principles

(1) The operator should apply HACCP principles, as appropriate to the product and process, to ensure a systematic approach to the identification and analysis of hazards and their control. This is covered in The RMP Template Appendix 2.

1.1.3 Identification of Other Risk Factors and Their Controls

(1) Other risk factors related to the wholesomeness of the product and risks from misleading labelling should be identified in the RMP. The control measures for addressing the identified risk factors should also be documented in the RMP. These are presented in The RMP Template Appendix 3.

1.1.4 Other RMP Requirements

(1) Other RMP requirements such as business identification, operator's details, and provision for verifiers' rights should also be documented in the RMP.

2 Development of an RMP Using The RMP Template

2.1 Farm Dairy Activities Fully Covered by The RMP Template

2.1.1 Development

(1) When The RMP Template (combined with applicable codes of practice) fully covers the scope of the farm dairy activities, the template provides:

- the simplest approach for developing an RMP;
- the application of HACCP principles; and
- the necessary supporting systems to ensure Good Agricultural Practice (GAP) and Good Operating Practice (GOP) are met.

(2) The operator will only need to write procedures or complete information specific to their operation. The operator's RMP will consist of:

- the completed RMP template;
- operator procedures;
- any additional supporting documents referenced such as Codes of Practice (COP); and
- a set of records.

(3) The operator is required to confirm that certain requirements have been met or agreed to, and confirm that the template is appropriate and valid for their operation.

2.1.2 Evaluation

(1) RMPs that are fully based on an MPI approved template and/or COP do not require an evaluation prior to registration. MPI has already determined that the requirements and procedures set out in the COP are valid and will deliver the relevant regulatory requirements.

(2) Verification of the accuracy of the documented RMP and operator's compliance to the RMP will be carried out at the initial verification by the contracted verifier.

2.2 Farm Dairy Activities Not Fully Covered by, or with Significant Variation to, The RMP Template

2.2.1 Development

(1) The RMP Template and supporting documents such as COP follow accepted industry practice and also specify the processes and procedures to follow. Some operators may have implemented, or wish to implement, novel or alternative means to meet requirements. Some operators may also need to, or want to develop their own specific RMP.

(2) The RMP template may still be used but the operator will need to add their own information, documents or procedures for those parts not covered by the template or COP.

(3) The operator should be able to demonstrate the effectiveness of any alternative procedures or parameters to:

- meet all relevant regulatory requirements; and
- produce safe and suitable products.

(4) Demonstration of its effectiveness may involve the collection of evidence (e.g. data from testing or trials, published scientific information, report from an expert) by the operator for assessment by the recognised evaluator or MPI.

2.2.2 Evaluation

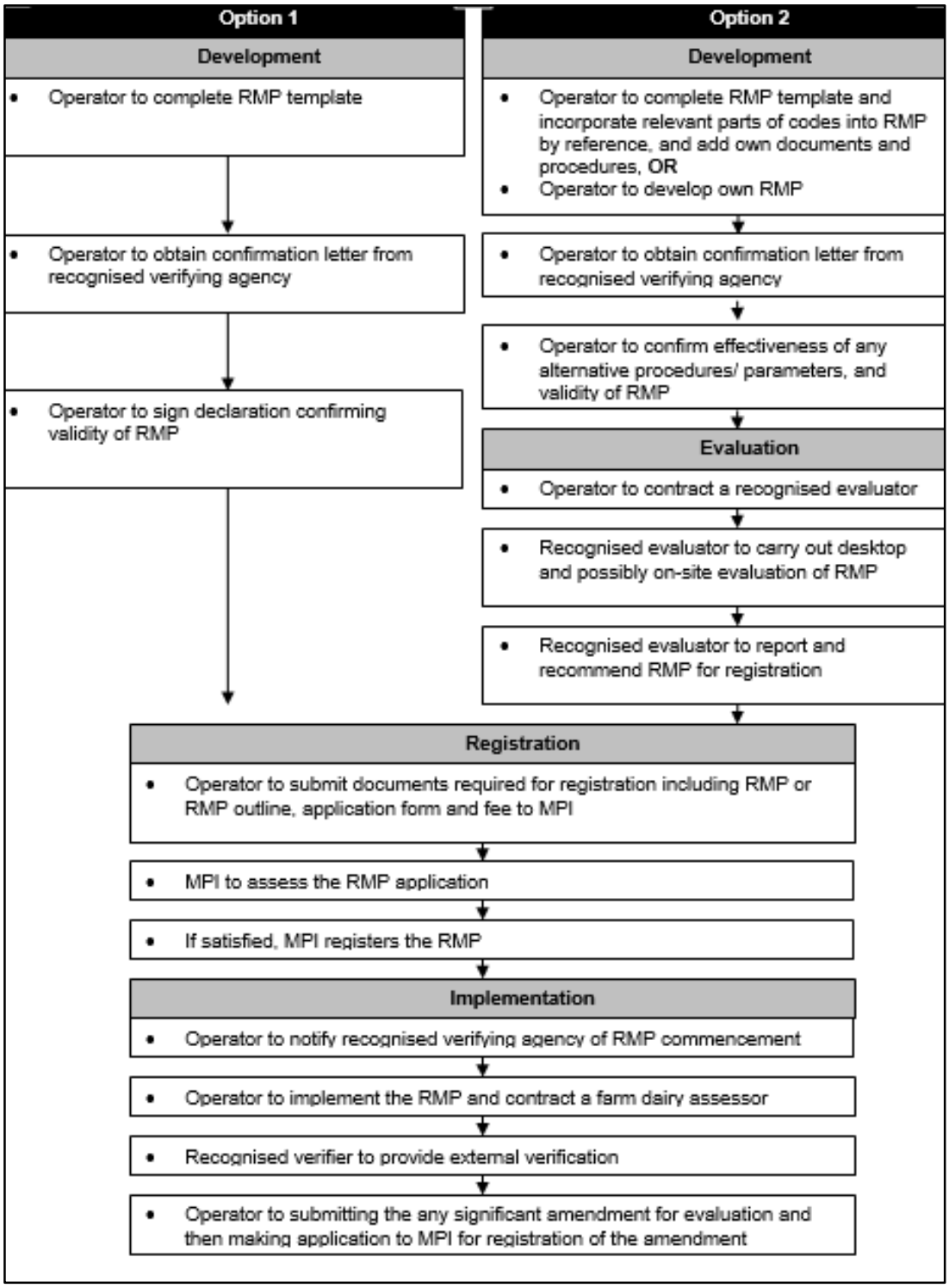
(1) RMPs that are not fully covered by an approved RMP template or COP or those with variations from the template or COP will need to be evaluated by an independent MPI recognised evaluator. Evaluation will involve a desk-top audit of the documented RMP and may require an on-site visit. The evaluators report is then submitted to MPI when making application for registration of the RMP.

2.3 Steps for the Development, Registration and Implementation of an RMP

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

- **Option 1:** For farm dairy operators whose activities are fully covered by The RMP Template; and
- **Option 2:** For farm dairy operators whose activities are not fully covered by The RMP Template, or who have decided to apply procedures or processing parameters that differ significantly.

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



3 Guideline for Completing The RMP Template

3.1 General Instructions

(1) The person completing The RMP template should:

- read this guideline while completing the template;
- provide the required information by:
  - entering information into the space provided;
  - if prompted or if insufficient space is provided, documenting separately and noting the title or location of the additional documentation; or
  - entering a tick where prompted to acknowledge acceptance of the criteria;
- ensure that all information provided is legible;
- ensure that everything written down accurately reflects or applies to all farm dairy operations intended to come under the RMP, and that they can and will comply with them at all times.

(2) It is recommended that operators resist the temptation to be tougher than is necessary when completing the RMP template.

Section 1: RMP

Identify the title and the version you have used to identify the RMP.

Section 2: RMP Operator Name, Address and Contact Details

Full legal name: If the business is a company, then the full legal name must match the details given at the Companies Office exactly. If the business is a partnership or a sole trader operation then the name(s) of the business owner(s) must be provided.

Physical address: Give the address of the operator of the RMP.

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

Phone / Fax / Email: Give the contact details for the RMP operator.

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

Section 3: Multi Operator RMP

Only complete this section when the RMP is intended to cover farm dairies that are operated by a person or business other than the RMP operator.

Section 4: Farm Location and Identification

List all farm dairies covered by the RMP including the physical location and, if more than one farm dairy, a unique identifier. Farm dairy operator details and associated contact details are only required when the farm dairy operator is not the RMP operator. If the space provided is insufficient, append the full list to the RMP template.

Section 5: Responsible Persons and Agencies

The person nominated as the day-to-day manager is the person responsible for the implementation of the RMP and for ensuring that it is kept up to date. He/she is the contact person for MPI and the Recognised Agency when dealing with matters related to the RMP.

Identify the Recognised Agency that has been contracted to verify this RMP (you should have a letter of confirmation from the agency. Provide a copy with the application for registration).

Identify the Farm Dairy Assessor/assessment organisation which will be responsible for routine assessment of the dairy under section 24 of the template. This may be the agency contracted to verify the RMP if you have made this arrangement with them.

Identify the laboratories that will undertake any testing specified under section 20 of The RMP template.

Section 6: Scope of the RMP

Complete the detail required which confirms the scope of activity. Note that the scope covers the harvesting and storage of raw milk intended for further processing with heat treatment.

Section 7 and 8: Process Description and Capabilities, and Product Description and Fitness for Purpose Outcomes

These sections have been completed and describe the products (raw milk) and processes covered by the RMP.

Section 9: Location, Design and Construction of Farm Dairies

The procedures to follow and standards to be applied are detailed in NZCP1. The RMP template requires that the operator adopts NZCP1 as part of the RMP in order to satisfy various criteria.

Sections 10-19

These sections set out various technical requirements, and require certain details and procedures to be recorded. Note that the detail recorded here is “static” and not expected to change, as opposed to information recorded elsewhere which may well change. Operators need to read the programme, describe and implement any procedures not already in place.

Section 20: Milk Supply and Monitoring

This section sets out the quality monitoring requirements that must be undertaken, the outcomes that must be met and the records that must be kept. The recipient of the milk may take responsibility for this analysis, but in such cases the RMP operator is expected to have a written contract or agreement as confirmation. Both the RMP operator and the farm dairy operator (if that is a different person) must be provided with the results of the analysis in a timely manner.

An exception applies to negative results from random Inhibitory Substance testing which may be withheld from the farm dairy operator.

Section 21: Staff

Ensuring that staff have the required competency to fulfil their duties is a fundamental requirement, and records will be required on an on-going basis. Requirements to cater for situations of milk harvester ill-health are also considered in this section.

Section 22: Export Requirements

If it is intended that the milk may be used for the manufacture of products for export then you will need to ensure you have access to, and are aware of, any additional export requirements that may apply. These are over and above the requirements set out in The RMP template.

Section 23: Non-Conforming Dairy Material

Any milk offered for supply that was not harvested under the RMP is non-conforming. Affected parties and the Recognised Agency will be notified through a formal process.

If the farm dairy operator withdraws the milk from supply then it ceases to be non-conforming and no notifications are required to be made, but a record must be kept.

Section 24: Operator Verification – Farm Dairy Assessment

This section describes the requirements for farm dairy assessment, which is an important confirmation step under The RMP Template. The operator is responsible for ensuring the Farm Dairy Assessor is competent and that sufficient detail is held to enable the verifier to confirm the competency of the Farm Dairy Assessor.

Determining Farm Dairy Assessor Competency: A person meeting the competency requirements specified in DPC2: Animal Products (Dairy) Approved Criteria for the Farm Dairies, and familiar with the assessment criteria set out in NZCP2.

RMP Verifier Undertaking Assessment: The farm dairy assessment can be undertaken by the recognised verifier as part of the verification audit, provided all assessment aspects are covered in accordance with NZCP2.

Note that the farm dairy assessment must be undertaken each season, and serious non-compliances may result in additional follow-up visits by the person undertaking the assessment.

Section 25-26: Forms, Registers and Returns

Under the RMP, operators are required to make and hold certain records. In addition, routine reporting to the Recognised Agency will be required at a frequency to be agreed with the Recognised Agency and for the reporting of exceptions.

When making records and observations, all details must be readily accessible, or able to be retrieved and made available within two working days when requested by:

- a Farm Dairy Assessor;
- a verifier;
- an Animal Products Officer;
- a person authorised by the Director-General; or
- the Director-General.

Operators may choose to develop forms or may use any other system that satisfies section 26 of the RMP, such as:

- MPI example forms;
- electronic recording;
- collection company docket; and
- LIC Minda, farm diary and veterinary scripts.

To assist a set of example forms are provided which set out the level of detail generally expected.

Temporary records are acceptable (e.g. using whiteboard in the dairy for cows under treatment) provided a permanent record is subsequently made, and the procedure in place is documented under section 17.

Section 27: Programme Amendments and Documentation Control

This section sets out requirements for control of the programme and the obligations to be met when making amendments. A significant amendment will require evaluation and registration, and may include:

- change of RMP operator;
- change of purpose (e.g. an intention to sell raw milk for consumption);
- the RMP operator permanently ceasing operations, in which case the Director-General should be advised and requested to remove registration of the RMP; or
- any other significant departure from the requirements set out in this programme.

For further details on what constitutes a significant change, please refer to the MPI Manuals & guidelines – Dairy webpage, or at:
http://www.foodsafety.govt.nz/industry/sectors/dairy/documents/manuals.htm

The following changes to the dairy require the Farm Dairy Assessor to confirm compliance to the programme:

- modifications to the farm dairy, milking plant or constructing a new dairy;
- change to the farm dairy water quality status, as required from the water checklist; and
- confirming a new or modified grazing management plan.

If there is any change to the contact details provided in sections 2 and 5 of the template, you must inform MPI in writing.

Section 28: References and Supporting Documentation

This section identifies additional documents which make up the programme and also those that may provide guidance material. The procedures, standards or requirements they contain form part of the RMP and must be met. The advantage to the operator is that they provide the industry GOPs upon which the RMP is based. Provided the operator accepts these, the operator is not required to develop their own set of practices, procedures and controls.

Section 29: External Verification

This section states that you authorize the contracted verifier to have the freedom of access to carry out verification activities. Do not change or add anything to this section. Confirm, by ticking the box at the bottom of the section, that a letter has been received from the verification agency confirming that they will verify the RMP.

The verifier must have access to any and all information that may be desired to support audit findings (e.g. laboratory test results failing action limits and the corrective actions taken, monitoring if on water management plan). Verification does not require an on-farm audit if the verifier is satisfied that:

- the Farm Dairy Assessor is competent to assess activities at the farm dairy against The RMP Template and NZCP2;
- the Farm Dairy Assessor is able to provide any additional observations or information required by the verifier; and

- all farm dairy operations comply satisfactorily with requirements.

Section 30: RMP Operator Declarations

This section contains a set of declarations confirming that, in the view of the proposed RMP operator, the RMP is valid and appropriate for the activities it is intended to cover.

Once completed, the RMP operator who signs the RMP declaration also dates and initials each page of the programme.

Section 31: MPI Fees for Application to Register an RMP

Once completed, the RMP must be registered by MPI before processing operations (milking for supply) can commence. To register your RMP, submit the following to MPI at approvals@mpi.govt.nz:

- the completed RMP including all application details;
- a copy of the letter from the Recognised Agency agreeing to be the RMP verifier; and
- the application fee.

For an RMP that contains a significant amendment or is not based on this template, the RMP will require evaluation by a person recognised by MPI prior to making application to register the RMP. This evaluation report should be attached to the application.

Applicants should also note the requirements of the Privacy Act in Part 4 of this document.

Appendix 1: DPF201a – Assessment of Farm Dairy Water Status

This checklist assessment must be completed under section 13, and again every three years or when a significant change occurs to the farm dairy water supply. The Farm Dairy Assessor and/or the RMP verifier will review this to ensure it is accurate and current.

Appendix 2 and 3: HACCP and Wholesomeness and Labelling

Refer to sections 9 and 10 of this document for explanation.

Appendix 4: RMP Amendment Record

A record must be made of amendments made to this RMP. All amendments will also be advised to the Recognised Agency as part of the routine reporting.

For significant amendments, the amendment will need to be submitted for evaluation by a person recognised by MPI and then application made to MPI to have the amendment registered. This would not apply to the initial registration of the RMP.

Appendix 5: Farm Dairy & Milking Animal Information

A record is to be made of certain details relevant to the farm dairy, cleaning of the dairy plant and animal health.

Forms, Registers and Returns

A set of sample forms, registers and returns are provided to assist operators. These are not required to be used, but they set out the level of detail generally expected under this template.

4 Collection of Personal Information on Individuals

(1) Completing the application for an RMP under the Act requires the collection of personal information on individuals. Pursuant to Principle 3 of the Privacy Act 1993, we advise to the individuals that:

- this information is being collected for purposes relating registration of a risk management program and administration of The Act;
- the recipient of this information, which is the Agency that will collect and hold the information, is the Ministry for Primary Industries, PO Box 2526, Wellington 6140;
- some details of the registered RMP will be displayed on the public register of RMPs;
- the collection of information is authorised under section 20 of the Act. The provision of this information is necessary in order to process this application;
- the supply of this information is voluntary;
- failure to provide the requested information is likely to result in a return of the application form to the applicant, and may ultimately result in a refusal to register in accordance with section 23 of The Act; and
- under Principles 6 and 7 of the Privacy Act 1993, you have the right of access to, and correction of, any personal information, which has been provided.

(2) For further information refer to the MPI website or contact the MPI Approvals Team: approvals@mpi.govt.nz.

5 Hazard Analysis and Critical Control Point (HACCP)

5.1 Purpose of RMP Template Appendix 2: HACCP

(1) Hazard Analysis and Critical Control Point (HACCP) is a systematic and science-based control system for assuring food safety. Food safety is achieved by assessing hazards developing controls, and focusing on preventative measures.

(2) Operators must apply the HACCP principles when developing their RMP. To assist operators meet this requirement, MPI has completed Appendix 2 to The RMP Template. This shows how the HACCP principles are applied to generic milk harvesting activities at a farm dairy.

(3) The operator may need to make some changes in the HACCP application to ensure that it accurately reflects the products and processes covered by their RMP.

5.2 Good Operating Practice (GOP)

(1) The HACCP approach used in The RMP Template is based on the expectation that these systems are/will be effectively implemented. Supporting systems covering GOP must be developed and documented prior to HACCP application.

5.3 HACCP principles

(1) The HACCP principles are set out in DPC1: Animal Products (Dairy) Approved Criteria for General Dairy Processing. The operator is required to apply HACCP principles to the process, including all inputs.

(2) The operator is not required to carry out hazard identification and analysis for “other sources” (e.g. personnel and environmental sources), which are expected to be controlled by Good Manufacturing Practice (GMP) supporting systems.

6 Wholesomeness

6.1 Purpose of RMP Template Appendix 3: Summary of Identified Risk Factors and Controls Related to Wholesomeness or False Labelling of Raw Milk

(1) The operator must identify in their RMP any risk to:

- the wholesomeness of the product; and
- false or misleading labelling, representation or eligibility that is reasonably likely to occur.

(2) The operator must also document the control measures for effectively addressing any identified risk factor.

(3) To assist operators meet this requirement, MPI has completed Appendix 3 of The RMP Template. It shows the identification of risk factors related to wholesomeness and labelling for a generic process covering the dairy processing operations at a farm dairy.

(4) The operator will need to carry out their own risk factor identification when the risk factor identification in Appendix 3 of The RMP Template does not adequately cover the operator's product or process. The approach and format shown should be used by the operator as a guide or pattern for their own application.

6.2 Wholesomeness

(1) Wholesomeness, means that the raw milk does not have in/on it anything that is offensive, or whose presence would be unexpected or unusual in product of that description. Foreign objects that are considered physical hazards are dealt with under The RMP Template Appendix 2: HACCP.

6.3 False or misleading labelling, representation or eligibility

(1) Raw milk intended ultimately for New Zealand or Australia must meet all relevant legislative requirements related to labelling, representation or eligibility, including:

- Animal Product (Dairy) Regulations 2005; and
- Animal Products (Dairy Processing Specifications) Notice 2011; and
- The Australia New Zealand Food Standards Code.

(2) Raw milk intended ultimately for export beyond Australia must also meet the relevant legislative requirements related to labelling, representation or eligibility contained in:

- Animal Product (Export Requirements – Dairy Products) Notice 2005; and
- Animal Products Notice: Official Assurance Specifications – Dairy Material and Dairy Products; and
- Export requirements.

(3) When identifying risk factors, consideration should be given to the type and intended use of the material, the intended market, the consumer, and requirements for authenticating certain claims (e.g. colostrum).

7 Sources of Other Information

(1) Information specific to farm dairy operators and farm dairy RMP operators is available on the MPI dairy website at: http://www.foodsafety.govt.nz/industry/sectors/dairy/farms-dairies/

(2) For further information on use of The RMP Template, it is recommended that operators consult their Recognised Agency for RMP verification.