



Summary of submissions

Simply Safe and Suitable Food Control Plan template update

This document provides a summary of submissions for the consultation of the Simply Safe and Suitable food control plan template update.

Submissions were made by email and by an online survey. This summary document includes:

- The number of submissions, how submissions were made and who the submitters were,
- Graph conveying the results from questions asked,
- Submissions and outcomes for the template pages and
- General comments about the template

Proposal for Cheese template

Consultation period: 21st June – 12th July 2018	64 Submissions: <ul style="list-style-type: none">• 5 from email• 59 from online survey	Submissions: <ul style="list-style-type: none">• Food businesses• Verifiers• Councils• Unknown
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Overview of online survey submissions

Note: not all submitters answered every question. These graphs show the total number of responses to each question.

SELLING YOUR FOOD TO OTHER BUSINESSES

Referring to the 'Simply Safe & Suitable update pack' Does the 'Selling your food to other businesses' card tell you everything you need to do if you want to sell your food to other businesses?



39 - Yes
12 - No
8 - I'm not sure

Labelling



8 out of 59 submitters had concerns about not having to change the packaging and labelling for wholesale.

“What does ‘you don’t have to do anything different to your food [mean]’? ... If I deliver a product it will need to be protected and be accompanied with the required information...”

“We do not agree with the Know that states ‘you don’t have to do anything different to your food ... For example a bakery making sandwiches to sell from their premises and also selling to a service station who wants their sandwiches packaged and labelled – can the bakery package and label? if the bakery packages and labels the sandwiches for the service station to

Key



Change made



Change not made



Working on it

retail then does the above statement prohibit the bakery from doing this?”

“How can the verifier prove intent behind any changes to labelling?”
“The description on not changing the label or packaging is not clear. If you are trying to restrict the sale of products for catering purposes only i.e. pies by a baker being sold to a cafe you are not explaining this well enough.”

“Many NZ businesses as part of their operation do small amounts of wholesale and I do not believe there is evidence of risk or non compliance when it is a small part of their operation.”

“Don’t have to do anything different to your food is unclear. for example If my shop sell pies without a package and I now supply the next door shop the same pie in a paper package, did I not change the way I normally sell ?. Is this now right or wrong.”

“mention labelling rules or a link to it would be good”

“This policy provides clear information and straight forward detail on the ‘boundaries’ around selling food to other business.
“Well written and just what is needed.”

“The example that you must not “change the way that you package or label it” could be better clarified to advise that no food must be sealed in a package for further retail sale, it must only be sold as open food, if this is what this means.”

Summary: The submissions reflect that the requirement to supply the products without changing how it is usually packaged and labelled is not clearly understood.

Outcome: We have edited the language to make this clear in the template.

Proportion of product sold to other businesses



4 out of 59 submitters had concerns about what percentage of sales can be made to other businesses while they are on the templated plan.

“Is there an actual percentage that can be sold to other businesses and how can you actually regulate that?”

“At what point does the ‘main purpose’ change? Can the operator know that the business they are selling to is going to only sell direct to the consumer?”

“There are few businesses who does direct retail sale from the premises and at the same time may supply to not only one but to at least 10 different shops (diary shops/ restaurants) within the same region. The percentage supplied maybe around 45% wholesale and 55% direct retail sale from the premises made. Hence, would like to see some clarity for verifiers to assess when the business should be considered mostly wholesale, is it the number of retail shops supplied (what if this increases to 20+ but it is still less than 50%) or whether it is percentage sold as wholesale in a financial year or the registration period.”

“There also needs to be clarity what is considered a ready to eat meal which requires registration of business as customise food control plan.”

“It is really useful for businesses to know that they are able to formally sell food to other businesses under the SSS plan. It appears that there is deliberately no guide to the limitations of the amount of business where food is sold to other businesses in the card. This has been discussed at MPI workshops and various options to quantify the limit have been proposed. The draft advises that if you are mostly selling food to other businesses then you might be on the wrong plan. This suggests that the limit could be considered to be no greater than 50% of the business although this can be defined in various ways eg it could relate to a percentage of gross annual sales. The extent that this card applies is also limited in the card to not changing the main purpose of what you do. This could also be defined as just less than 50% of the business but it is very arguable how this might be defined better.”

Summary: The submissions reflect that there is some concern with regards to how much wholesale a business can undertake while they are on Simply Safe and Suitable.

Outcome: The main activity of the business has to be sales direct to consumer. Defining a quantitative amount arbitrarily creates artificial **boundaries**. **MPI will continue to work with verifiers to calibrate approaches nationally and decisions will be at the discretion of the Registration Authority.**

CHECKING YOUR PLAN IS WORKING WELL

Referring to the 'Simply Safe & Suitable update pack' is the 'Checking the plan is working well' card clear and easy to understand?



49 - Yes
5 - No
4 - I'm not sure

Testing and Calibration



5 out of 59 submitters felt that the description of the testing and what needs to be done is not adequate

“The description of testing should be shorter and to the point - remove the apples example Remove verifier for asking questions - this is not the role of the verifier. MPI should produce a basic fact sheet to be included in the tool box”

“I'm not sure that who have not done any testing before will know where to start, i.e. what to test for and how to sample. The ones that do will not find the apples bit of any interest.”

“There are certain tests that need to be done under then SSS Plan such as checking calibration of instruments such as thermometers and pH meters. However there is

Key



Change made



Change not made



Working on it

no advice about how this should be done in the Plan ie hot and cold checks in ice and boiling water, with a tolerance range of 1 deg C for probes and in ice for IR guns according the manufacturer's instructions and pH meters using test calibration solutions.”

“Private water supplies need annual bacteriological tests and possibly chemical testing to comply with the Drinking Water Quality Standards. However the advice about testing of foods is not something that would be anticipated for an operator to need to carry out under the SSS Plan. If there is a requirement to test foods in this way, it is highly likely that the operator should be operating under a custom plan. For

example butchers making salamis under the UCFM plan. The whole point of the Template plan is to provide a way of carrying out the food production safely without the need for additional tests to verify that this is being done. I do not therefore see any reason for this type of food testing to be included in the SSS plan.”

“In regards to an update to the Simply Safe and Suitable version of the food control plan, I was wondering if you have introduced a part which specifically states the requirement to calibrate thermometers every 3 months?”

“In the current Simply Safe and Suitable FCP it states ‘Service your equipment regularly and, if necessary, calibrate according to your calibration schedule’ (pp76) but does not provide specifics.”

“There was a provision made in the March 2017 version (specifically it said probe thermometers should be calibrated with boiling and/or ice points every 3 months and this should be recorded; and for infrared thermometers this should be done in accordance with manufacturer’s instructions but the frequency was unspecified; calibration records needed to be kept).”

“The first section of ‘know’, Why is

self-auditing important is generally very good and pitched well. The bit, ‘some notes about testing’ however detracts from the useful information set out in the in the first half of the policy. Will all operators know what the generic term ‘testing’ means and if this is relevant to their business. This part is a bit ambiguous and wordy.”

Summary: The submissions were focussed on the testing aspect of the self-verification of the plan and concerns that some businesses may not know what to do.

Outcome: We have removed the apple example. Businesses can use the show card to test the components of the plan and verify that the plan is working for them. The calibration frequency was not reviewed and the update made in March 2017 to calibrate probe thermometers every 3 months is still valid. Guidance on calibrating thermometers is in the ‘Buddy’.

LUPIN: SEPARATING FOOD AND KNOWING WHAT'S IN YOUR FOOD

Referring to the 'Simply Safe & Suitable update pack' Are you clear about what lupin is, and where you can find the rules about lupin in your plan?



38 - Yes
11 - No
8 - I'm not sure

Allergen guidance

Key

- Change made
- Change not made
- Working on it



8 out of 59 submitters wanted more guidance and information about allergens in general and Lupin specifically.

“Knowing what is in your food. The food standards code requires that you are aware of all the ingredients in the food and not just limited to mandatory allergen information. Allergens are not limited to the 11 common ones. Clarification is needed on subjective terms of ‘away’ and ‘separated’. There is no guidance to provide acceptable context to very broad rules”

“It would be good to have a comprehensive list of what Lupin is in. Not just cereals etc. which grain? I couldn't really see much about Lupin in the plan itself and while the Lupin guidelines were really good I

felt they needed a little extra info e.g specifically what items would have Lupin.”

“Can do some advertisement through the media, such as video, to tell and explain what lupin is. Always let the businesses know if you are allergic to lupin.”

“In regards to allergens, FP understand Gluten, tree nuts, Dairy. They are not good at all with Sulphites. This one I explain and customers ask a different way. I know three people allergic and sensitive to Sulphites, so people with Lupin allergies are really going to have issues training operators. So maybe supporting documentation in the templates area (ie record

templates maybe helpful) as putting directly in Plan will make it bulky”

Summary: The submissions reflect a lack of awareness and understanding of Lupin as an allergen.

Outcome: MPI will develop guidance to help improve business understanding of Lupin as a food allergen

Other comments about the template

Consistency in Templates



“It would be useful to know why the draft Wine Standards Management Plan which has been drafted to include these proposed updates has also included many other updates to the SSS Plan that don't have any specific reference to wine production. It appears that the team working on the draft Wine Standards Management Plan did have a brief to look at updating other parts of the plan but have looked at it in isolation. For example the Sickness Policy is different (getting watered down with every new version) but there are a lot of other good updates including a Places and equipment card and Maintenance which talks about calibration of thermometers amongst other things. It is disappointing that both these reviews have not taken the opportunity to address a number of fundamental inconsistencies, errors and clarification issues that have been highlighted to MPI from the start. These relate to matters throughout the SSS plan such as poultry temperature checks and sickness amongst many other things. My main point is we have the SSS Plan, NP guidance and now draft Wine Plan that are all designed with the same SSS-type format but all are different. So depending on who you are and the point in time that you joined in with all the fun, your plan might be different to someone else

doing exactly the same thing. This is a NOT a consistent approach and all the plans should be aligned with each other where they are dealing with the same topics and food production and there should be a review process to deal with feedback about how the plan is working in practice that results in other updates to existing cards. It is therefore disappointing that this mini review did not go much further.”

Outcome: Templates are designed and developed for a particular group of businesses to use. As all businesses are not the same the plans are not the same. Businesses can choose to use the template if suitable or develop a custom plan.

Contamination



“In the first of the proposed additions to the Food Control plan - I would ask if it included the outlining of onus of responsibility should the food become contaminated after it has left the supplier, could the carrier be involved? Also how does the supplier prove that any contamination that should occur did not come from them before the food left their premises?”

Outcome: The Simply Safe and Suitable template allows the business to control and manage risk from the time supplies arrive into the premises till the time food leaves the premises. If the businesses follow the plan they should be able to avoid any contamination of the food and if contamination was to occur, pinpoint where it could have occurred.

General comments about the template

“Thank you for the update re. the Food Control Plan template. I think this is an excellent addition to the template and will be of particular value to small home businesses that wish to sell part of their product to other businesses while still selling mainly direct to the customer. The template is very well written and designed and this draft addition continues the great work! I hope that it is available when I draw up my first food control plan in the next couple of months.”

“The idea of testing is excellent and I have been recommending to all my clients who are on a simply safe and suitable template.”

“The format of the SS&S makes the requirements quite easy to understand. Pleased to see MPI are committed to keeping this going. I was sceptical to begin with but now I am a fan of the KiDS format because operators and staff can see what it is that they need to do for food safety and what needs to be demonstrated during a verification.”

“Nicely presented in a clear manner”

“Thanks for such a great initiative on wholesale as this will surely assist the small businesses.”

“The way the simply safe and suitable cards/templates are done is great. It is easy to read and divided nicely into it relevant groups making it even easier to find what applies to oneself.”

“I am hoping new updates or iterations of this plan make it easy for people to create and edit online. When I made my plan in 2014, it was very hard and frustrating to use an online version, so mine is all hand written and highlighted in a hard copy manual given to me by the CCC (Chch Council).”

“Thank you for Simply Safe & Suitable update pack, it helps new businesses owners like us”

“I like it makes it clear that someone within the business needs to take responsibility for internal audits. This is often not considered by operators.”

“FCP is a good plan and simple enough, the problem is that a lot of people after reading it still do not know what to do with it. It will be so much better if MPI can arrange a class about it. I think that will make it so much easier.”