



**Proposed amendments to the
Risk Management Programme (RMP) Template for Harvesting, Candling or Packing Eggs**

General

Issue	Comment
If pulping of eggs (pasteurised or raw) should be included in the RMP template.	Every egg pulping process is slightly different. Raw and pasteurised egg pulp are high risk products hence evaluation would be required. An evaluator will need to conduct an on-site visit to perform a reality check before adding egg pulping as a process to the RMP. MPI has developed a Guidance Document: Egg Pulping for RMPs and FCPs to assist operators to develop their procedures.
Shelf life of clean, uncracked table eggs updated to 35 days at room temperature.	Shelf life amended as a result of the Egg Surface survival and internalisation by New Zealand egg-associated <i>Salmonella</i> isolates as affected by storage temperature science report.
General plain English update. General update to the 'Know, Do, Show' format.	Some requirements have been summarised into a single clause and new supporting system sections (e.g. calibration, packaging, receipt of incoming materials, etc.) have been added.
'Transport' process category has been added into the RMP template to cover the transporting of eggs from one RMP to another RMP.	Operators have the option of choosing between ambient or chilled transport of eggs.
References to applicable legislation have been updated.	To ensure references to relevant legislation in the RMP template is up to date.



Part 1 General RMP Sections

Old template ref	New template ref	Proposed Amendment	Reason
RMP – Business Specific information	1. Business Identification	Added tick box for ‘Are you a multi-site RMP?’.	Some businesses have different sites operating under the same RMP.
RMP – Business Specific information	5. Scope of the RMP	Colony birds and colony eggs have been added as possible tick boxes for layer farm and packhouse options.	Allow for colony eggs operations to be included into the RMP template.
		Footnote 2: clarification on transition dates of caged birds and caged eggs.	The Animal Welfare (Care and Procedures) Regulations 2018 provide that the use of battery cages be progressively phased out by 2023 and covered by the Code of Welfare for Layer Hens .
		Footnote 3: clarification if any new processes are added to the RMP template, the process will need to be evaluated.	Further clarification on existing requirements.
		Added a section if the RMP operator receives eggs from other RMPs or send eggs to another RMP.	To be able to document traceability of where eggs are coming from and where they are going.
		Added a section on intended market if the operator is exporting.	To document if any eggs are going to be exported.
		Added section to address if the RMP covers additional products and/or processes. Includes a specific reference to egg pulping that it is not covered under the RMP template and will require evaluation.	Further clarification on the scope of the RMP template.
		8. Product Description	8. Product Description
Under Processing grade eggs, product description has been clarified.	Added in from HC Spec.		
New category of ‘Cracked and/or Broken Eggs’ introduced.	While cracked and broken eggs are also considered processing grade eggs, they have additional storage		



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			requirements which is why they are in a separate product category.
		New category of 'Eggs that are leaking' introduced.	To clarify requirements that leaking eggs cannot be further processed.
	9. Process Description	Separate processes into 4 main groups of operations: layer farm, packhouse, repacking of eggs and retail of eggs from RMP site.	Separation of layer farm and packhouse operations.
	11. RMP Document List	Added footnotes for clarification.	Added reference to the RMP Operator Resource Toolkit .

Definitions

Old template ref	New template ref	Proposed Amendment	Reason
New	Definitions	Added a list of definitions (copied from HC Spec). New definition for 'packhouse'. Definition of 'dirty egg' further explained.	Explain what those words mean when used in the template. To further clarify what 'visible foreign matter' means.

Part 2: Supporting Systems

Old template ref	New template ref	Proposed Amendment	Reason
Attachment O	A: Document Control and Record Keeping	General update to summarise similar requirements into the same clause.	General rewording for plain English language.
		New clause that documented procedures are easily accessible to personnel responsible for key tasks.	Allow personnel responsible for key tasks to have easy access to procedures they need to follow.
Attachment D	B: Personnel Competency and Training	Summarised the competency of key RMP positions to have a good working knowledge of the RMP.	Not a requirement to know the regulatory requirements that are relevant to the development and implementation of the RMP.
		Induction and on-going supervision of personnel has been moved to this section.	More appropriate location for the requirements.



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		Added new heading 'Records' that are specific to this supporting system.	Requirements separated into sections with appropriate headings.
Attachment D	C: Personnel Health and Hygiene	Health conditions and exclusion requirements to resume processing work has been summarised in Table C1.	Part of 'Know Do Show' format update.
		Allow visitors and contractors to enter a layer farm as agreed with the RMP operator.	Minimum Biosecurity agreement with EPF and MPI VS is 24 hours. Some farms may choose to have a shorter/longer period, but this will need to be documented.
Attachment N	D: Operator Verification	Operator verification activities are conducted by suitably skilled persons.	To ensure the activities are performed correctly.
		Total number of sheds and birds moved to here instead of O: Process Control. Updated site plan if required.	This may change from year to year – as long as the RMP operator maintains the number of sheds and birds and this is verified.
		Potable water supply is reassessed at least once every 3 years.	Added into this section so it can be checked as part of operator verification.
		Additional information around conducting internal audits.	Explain what is involved in an internal audit (e.g. conducting reality checks and what it involves).
		Further explanation around testing your recall plan.	Further explanation that RMP operators should be checking their recall plan is effective.
Attachment L	E: Corrective Action	Added procedure for corrective actions.	General rewording for plain English language.
Attachment C	F: Design, Construction and Maintenance of Facilities and Equipment	Added requirements for main entry areas of buildings.	Further clarification to design and construction requirements.
		Removed 'entrance' in 'minimise the entrance and harbourage of pests'.	Free-range operation is focused on managing harbourage as pests will enter in the same potholes for the birds to roam in and out of layer shed.
		Requirement to identify water and air pipelines has been reworded.	General rewording to be more outcome focussed.



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		<p>Several clauses have been merged so the achieved outcome of the outdoor area is appropriately managed. Examples of how it can be managed is explained in the bullet points below.</p> <p>Bird access to stagnant and contaminated water sources: remove 'deny access'; replace with 'management of'.</p> <p>Remove 'palatable' to 'growth of vegetation (if any)'.</p>	<p>EPF suggested replacing several clauses by reference to a 'range management plan'.</p> <p>To show the verifier this is managed is sufficient.</p> <p>EPF raised that there will often be no vegetation within a number of metres of the shed and often ranges can be lacking in vegetation but still adequate for birds.</p>
		Additional requirements on repairs and maintenance.	This was not covered in the previous template. Have been added to provide more information.
Attachment H	G: Potable water	No new requirements.	General rewording to be more outcome focussed.
Attachment E	H: Cleaning and Sanitation	<p>Schedules for:</p> <ul style="list-style-type: none"> • Routine cleaning of layer sheds and equipment; • Depopulation and cleanout of layer sheds; and • Cleaning of packhouse and equipment are moved into the RMP Operator Resource Toolkit. 	This was discussed and agreed that the Toolkit is the best place for these schedules.
		Additional procedures on cleaning of the packhouse and equipment.	Further explanation on cleaning procedures.
New section	I: Receipt of Incoming Materials	Clarification and explanation on existing requirements.	<p>Further explanation on requirements around receipt of incoming materials.</p> <p>As part of 'Know Do Show' format update.</p>
Attachment J	J: Packaging	Clarification and explanation on existing requirements.	<p>Further explanation on requirements around packaging.</p> <p>As part of 'Know Do Show' format update.</p>
Attachment K	K: Traceability, inventory and labelling	<p>Clarification on existing requirements.</p> <p>Added labelling requirements from the Food Standards Code.</p>	<p>Further explanation on requirements around traceability, inventory and labelling.</p> <p>As part of 'Know Do Show' format update.</p>



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		Add the Mass Balance Audit Calculations sheet as an example of a traceability record.	EPF is promoting the Mass Balance Audit Calculations sheet as an industry tool.
New section	L: Calibration of equipment	Clarification and explanation on existing requirements.	This was not covered in the previous template. Have been added to provide more information. As part of 'Know Do Show' format update.
Attachment B	M: Chemical Control	Clarification and explanation on existing requirements.	Further explanation on requirements around use of approved chemical compounds. As part of 'Know Do Show' format update.
Attachment A	N: Pest Control	Clarification and explanation on existing requirements.	Further explanation on requirements around pest control. As part of 'Know Do Show' format update.
		Remove 'wild bird deterrents are used'	No longer relevant.
RMP Template	O: Process Control	Removed 'Bird Management' section.	Animal welfare requirements have been removed from the RMP template. Other relevant requirements have been moved to other sections.
		Remove requirement 'eggs are collected after they have cooled to room temperature where possible'.	Requirement covered under 'Eggs are harvested as soon as practical after lay'.
		Reused trays must be cleaned and (where possible) sanitised.	Some trays cannot be sanitised properly.
		Floor eggs can be collected separately at the operator's own risk.	Allow floor eggs to be collected but it is at the operator's risk.
		Remove requirement for eggs to be taken to packhouse no more than 4 days after collection and replace with 'as soon as practical'.	Requirement covered under 'Eggs are taken to the packhouse as soon as practical after lay'.
		Added information on how eggs are dumped.	Indicate what the operator is doing with their dumped eggs.
		Additional guidance on egg cleaning and washing procedures for dry buffing, wet wiping and washing.	Further explanation on procedures to follow for egg cleaning and washing.



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		Allow the option to allow UV treatment procedures validated.	Using UV treatment for egg cleaning and washing would need to be validated.
		Minimum table egg weights moved to the RMP operator resource toolkit.	Not a RMP requirement, more of a guide.
		Egg storage procedures amended.	As part of the updated shelf life for table eggs.
		Procedures for 'Collecting eggs for further processing' amended to provide further clarity.	Allow cracked and broken eggs to be collected together to send for further processing. The pulping (mixing) (e.g. homogeneous mix of yolk and/or egg whites) would need to be added into the RMP template and evaluated.
Attachment M	P: Non-complying product and recall	Added information on dealing with non-complying product.	Further explanation on requirements around non-complying product.
		Added information on dealing with recalls.	Further explanation added.
		Added information on dealing with customer complaints.	Further explanation added.
New section with information from Attachment B	Q: Storage	Added information on storage.	As part of 'Know Do Show' format update.
New section	R: Transport	See 'Transport' issue in the 1 st table (page 1).	See 'Transport' issue in the 1 st table (page 1).
		New clause for the operator to specify if they transport at ambient or chilled temperatures.	Operators can chose if they want to use refrigerated transport or not. If they are using refrigerated transport, they will need to ensure it is appropriately managed.
Attachment F	S: Layer Feed	Moved the Feed Specifications table to the RMP Operator Resource toolkit. Amend the table so it is clear that if <i>Salmonella</i> controls are added you don't need to do testing.	This was discussed at the EPF and MPI meeting and agreement from all that it would be best suited in the Toolkit.
		New clause: 'Operator should take further action to ensure <i>Salmonella</i> infection is not established in the birds (e.g. by cloacal swab)'. '	Add further clarification if <i>Salmonella</i> test is positive, seek veterinarian advice.
Attachment G	T: Whole Flock Health Scheme	Vaccination programme is followed and documented.	Further explanation of requirements.



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		Added information on treatment of external parasites.	Further explanation of requirements.
		Show records of veterinary medicines and agricultural compounds used under the RMP.	A form has been developed in the RMP Operator Resource Toolkit.

Part 3: Hazard Identification and Control

Old template ref	New template ref	Proposed Amendment	Reason
Attachment Q	U: Hazard Analysis	New process flow diagram.	Process flow diagram required as part of HACCP analysis. Developed one from the 2002 EPF Eggs COP document.
		Table U1: added non-potable water as a potential hazard	Clarification
		Table 2 Hazard ID and identification of CCPs: Hazards from floor eggs are identified.	Floor eggs can be collected at the operator's risk.
Attachment Q	V: Identification and control of risk factors related to wholesomeness and false and misleading labelling	Add in the source or cause of risk factor.	Further explanation on hazards relating to wholesomeness and false and misleading labelling.