Appendix One: Proposals for minor and technical changes to current RMP notice

Animal Products (Risk Management Programme Specifications) Notice 2008		
Clause and background information	Proposed changes	Reason for change
7 Limits Limits set the point where the level of risk moves from acceptable to unacceptable, in relation to the critical control point, which is the point where controls can be applied to prevent, eliminate or reduce hazard. Some limits are set through regulation. When there is no limit set through regulation, operators are required to set their own.	Proposal: Include a requirement that operators set out a reason for each operator-defined limit in relation to food safety.	Purpose: To confirm that the operator: • thought about why they are setting a particular limit, and the level it has been set at; • has good justification for the limits selected; and • has reviewed available information and is aligned with best practice.
9 Description of the process or operation A RMP must describe every process or operation carried out under the programme. While carrying out these processes, rework might be required. Rework occurs in situations where: • something goes wrong during processing; or • there are leftovers. It is an important part of processing as it prevents product wastage, but it can be a risky step if not well controlled.	Proposal: Include a requirement that "rework" be included as part of the description of the process or operation, if applicable. Rework generally refers to interim materials or products that have been partially or fully processed and are being reintroduced to the process at an earlier step.	Purpose: Rework often occurs during processing, and should be planned. By adding rework as a requirement into the process description it becomes clear when an operator intends to do this and that any hazards or other risk factors that may be introduced as a result of rework have been systematically assessed.

12 Document list This requires the operator to keep a list of all documents that comprise the programme with the date and version at the time of registration.	Proposal: Include a requirement that the RMP must have a list of all documents that comprise the programme with the **current** date or version.	Purpose: This change is to ensure that if an amendment is made to a document, a record of the amendment is made, and the date and/or version in the document list is updated. Having the latest version clearly identified in the document list will ensure there is no confusion about which is the current version of the document.
17 Allowing verifiers to carry out verification functions and activities This clause provides recognised verifiers with the rights to go into the business and carry out the tasks of a verifier.	Proposal: include a requirement that an operator's RMP must include a provision allowing the verifier to see operations in action.	Purpose: In order to satisfactorily complete the verification task, it is important that verifiers are able to see operations in action. While this could be considered as implicit in the existing requirements, MPI considers that it would be helpful to clarify the requirement in this respect in the proposed regulations. The extra clarification ensures that verifiers are clearly able to request seeing an operation in action.
19 Document control Systems to ensure that RMP documents are current, authorised, and readily available, and that obsolete documents are removed and archived.	Proposal: Clarify that validation evidence forms part of the RMP documentation, and must be readily accessible. Obsolete validation documentation must be retained in accordance with the current retention periods.	Purpose: To avoid doubt that validation evidence, like other documentation that makes up the RMP, needs to be retained. The need to retain validation evidence would be particularly important if there were a food safety incident and the validation evidence needed to be reviewed. It also provides evidence of due diligence.
21 Documentation to be submitted for registration of a significant amendment of a risk management programme To register a significant amendment to a RMP, the following documents must be submitted: • pages affected by the amendment; and • the protocol when a significant amendment is made (where appropriate).	Proposal: The following documents must be submitted for registration of a significant amendment of a risk management programme: • Full outline with amendments identified; or • Full RMP with amendments identified.	Purpose: The current requirements can make the registration process more onerous for the MPI, as assessors often need to go back through the files to see how the amendment fits with the existing RMP. By requiring the complete RMP or outline to be submitted when registering a significant amendment this will simplify the registration process, and also ensures that the most recently registered version can be more readily accessed by MPI.