



**Summary of Submissions on the
Attachment U – Listeria management procedures “add on” to the existing DOB RMP Template**

18 April 2017

MPI received 3 submissions on the proposed documents. The submissions have been analysed in the following table. As a result of the consultation process, and where appropriate based on the analysis below, amendments have been made to the documents; Attachment U – Listeria management procedures “add on” to the existing - DOB RMP Template and Guidance Document: How to use attachment U.

MPI would like to thank all the parties who have taken the opportunity to comment on the drafts.

Document	Part	Comment	Proposed amendment	MPI Response
General		I hope that MPI will start to consider the real effects of the constant amending and additions to the RMP. This addition, in my mind, will do nothing to reduce the existing risks of food borne illness in our industry except limit our time and money to build successful businesses subsequently, reducing the amount of time and money we can spend on improvements to our workplace.		The current consultation is the first on an amendment to the dual operator butcher template risk management programme (template RMP) since it was published in 2005. To support the changes to the RMP template, MPI undertook case studies in a number of butcheries (including DOB's) over the course of 2016/17. The case studies investigated levels of knowledge of Listeria; types of management systems in place; and confirmed whether or not these were effective through laboratory testing. The case studies

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				helped to establish the most convenient and cost effective ways that butchers can comply with Listeria management procedures.
General		The paperwork involved with running a dual operator butchery is already at a pretty ridiculous level and these continual updates are making it very difficult to find productive time amongst the mountains of data entry for our staff.		The current consultation is the first on an amendment to the dual operator butcher template risk management programme (template RMP) since it was published in 2005. It is good practice to evaluate the contents of the template RMP and ensure that it enables dual operator butchers to meet the current legislative requirements, reflect up-to-date industry practices and that it continues to remain fit for purpose.
General		While the time available for feedback (two weeks) is reasonable, the fact that feedback closes on 30 March and the implementation date is 1 April reflects badly on MPI.		Noted.
General		Wherever RMP attachments are referenced, it needs to be made clear that the reference is to an existing RMP document and not part of Attachment U.		Agreed.
General		The Attachment and the Guidance Document are intended to be used as a set but, in total, they are overly complex, too wordy and require considerable attention to detail and time to complete. The Attachment appears to be designed with MPI verification services (rather than the DOB customer) in mind which is not helpful.		Noted. MPI will continue to work with dual operator butchers and other stakeholders to help to ensure that the documents and guidance are user friendly. It is often necessary to have detailed guidance documents to enable operators to better understand requirements.

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Attachment U	Title	Needs to be more clearly stated with the document title statement "Attachment U - Listeria Management Procedures" changed to read "Attachment U - Listeria Management Procedures for Wholesale Operators".		Agreed. Part 15 applies to retail butchers who process and sell ready-to-eat animal products by wholesale.
Guidance	General	Would be significantly enhanced by clearly separating the process i.e. exactly what needs to be done (a flow diagram is a tool that is very useful to summarise processes) from the supporting information that guides decision-making.		Noted. MPI will continue to work with dual operator butchers and other stakeholders to help to ensure that the documents and guidance are user friendly.
Guidance	Page 5	Duplication of material in both documents (e.g. the page 1 of the Attachment and page 5 of the Guide both contain the same information " <i>The person listed has knowledge of ...</i> ") This should be removed.		Noted. All dual operator butchers who process ready-to-eat animal products are encouraged to use the guidance documents to help them review their good operating practices and ensure that the operator and their workers have a knowledge of <i>Listeria</i> , the illness it can cause, and sources of <i>Listeria</i> . Any repetition between the documents is intended to ensure that the guidance document can stand alone.
Guidance	Page 6	The inclusion of "cooked sausages" in the list of product types that the requirement applies to needs to be amended to exclude pre-cooked sausages that are prepared for e.g. fish and chips shops but which are cooked again before being sold to the public		Agreed. The example of cooked sausages has been removed from documents.