



# Summary of submissions

## Template Food Control Plans: *Simply Safe & Suitable* and *Official template December 2015*

This document provides a summary of submissions for two consultations about template Food Control Plans (FCP). A new template FCP (*Simply Safe & Suitable*) was developed by MPI and was consulted on in February 2017. The existing template FCP (*Official template December 2015*) was consulted on in November–December 2016, as part of a wider consultation that included proposals for notices for national programmes. Submissions for both were made by email and by an online survey. The summary document includes:

- the number of submissions, how submissions were made and who submitters were,
- graphs conveying the results from questions asked about the *Simply Safe & Suitable* template,
- quotes about the *Simply Safe & Suitable* template,
- submissions and outcomes for both templates,
- future work.

The main changes suggested for the *Simply Safe & Suitable* template FCP were the **addition of templates for records and the addition of guidance to various cards**. We are providing templates for records as part of a separate *Toolkit*. We have not added guidance to cards as this template only includes the requirements. Guidance will be made available separately to this template.

The main changes suggested for the *Official template December 2015* were **corrections to errors and updates to the sushi and sous vide sections**. A number of submitters urged caution about the sous vide cooking method and the potential hazards of the process when practiced by inexperienced operators.

### Template Food Control Plan – Simply Safe & Suitable

Formal consultation period: 6–23 February 2017.	145 submissions: • 60 from email, • 85 from the survey.	The submitters: • business operators, • environmental health officers (EHOs), • education providers.	Feedback from food businesses and EHOs during 2016 was taken into account for both templates.
<b>Food Control Plan Food Service and Food Retail   Official template December 2015</b>			
Formal consultation period: 25 October–5 December 2016.	198 submissions: • 39 email, • 159 from the survey.	The submitters: • business operators, • environmental health officers (EHOs), • education providers.	

# What people thought about the *Simply Safe & Suitable* Template

What do you think of the 'Know, Do, Show' concept?



**41 - I like it**  
**14 - I love it**  
**14 - It's ok**  
**10 - I hate it**  
**5 - I'm not sure**

Does the order make sense?



**68 - Yes**  
**7 - No**  
**6 - I'm not sure**

Does the plan give you all the information you need to produce safe and suitable food?



**60 - Yes**  
**14 - No**  
**3 - I'm not sure**

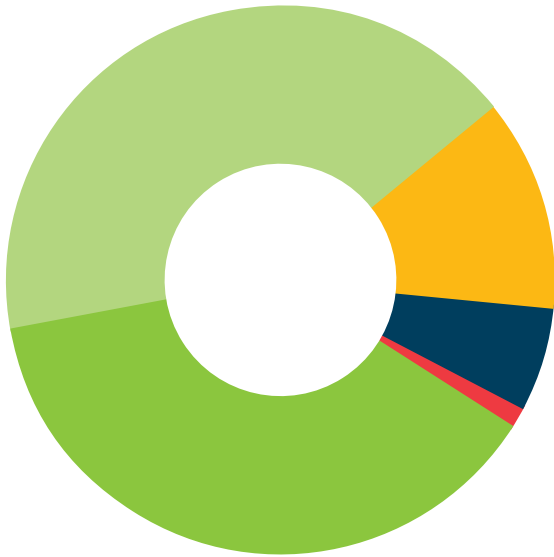
After reading the plan, do you understand what you have to do?



**35 - Mostly**  
**32 - Yes, totally**  
**7 - No, not at all**  
**3 - I'm not sure**  
**2 - A little**

## What people thought about the *Simply Safe & Suitable* Template cont.

How easy was the plan to understand?



**31 - Very easy**  
**34 - Quite easy**  
**10 - Could be easier**  
**7 - Difficult**  
**1 - I didn't understand it**

Would it be practical to use in your business?



**51 - Yes**  
**18 - I'm not sure**  
**9 - No**

### Common questions

**“Why is a diagram of the outside of the business needed?”**

Answer: This is required by the Food Regulations 2015, Reg 6(2).

**“The proposed plan has removed the specific sections (e.g. butcher, fishmonger) and a number of processes such as filled sandwiches and wraps. Are these not required or not applicable?”**

Answer: All of the specific sections have been removed. The cards presented in the new template mitigate the risks associated with all the specific sections and specific cards. The information is being delivered in a different way to the existing template.

## Submissions and outcomes

### Provide a diary and template record sheets

This is being included in a tool-kit which is separate to the template document.

### Make it possible for businesses to personalize their FCP

A digital tool has been developed to allow operators to choose which pages they need.

### Make printable in black and white

Designers have made sure the document is usable in black and white.

### Add requirement/guidance to calibrate thermometer

There is no requirement in the Act to calibrate a thermometer. It is best practice to calibrate your thermometer, guidance on this can be provided in the *Toolkit*.

### Change symbols

The symbols which were ambiguous have been improved, testing was done to make sure understandable symbols were used.

### Add frequency for water checks


Replaced 'regularly' with 'at least annually'. This is consistent with the Drinking-water Standards for New Zealand.

### Key

  
Change made

  
Change not made

  
Applies to *Simply Safe & Suitable*

  
Applies to *Official template December 2015*

  
Applies to both templates

### Change the word bugs

The word bugs is understandable by a wide spectrum of food businesses.

### Add more information to *Clean clothing, Clean hands, Checking for pests* cards

This will be included in guidance.

### I found a mistake or don't understand what the template is saying

Corrected the identified spelling mistakes and errors and clarified the sentences that caused confusion.

### Why do you have to keep fish at 1°C when its 5°C for other potentially hazardous foods?

Fish is now required to be stored at 5°C.

## Submissions and outcomes cont.

### Can you wholesale food using the template FCP?

There is no change to the requirements for limited wholesale.

### Can a business provide their own site map or diagram?

Yes, the *Physical boundaries and layout* page now clarifies you can insert your own map or diagram.

### There's nothing saying whether I can donate home kill or recreationally caught seafood

A sentence has been added to the *Donations* page saying you're not to donate home kill or recreationally caught seafood.

### The Public Health Units often don't do water assessments for self-supplied water.

Changed 'water assessor at a public health unit' to 'water specialist'.

### Is the Voluntary Incidental Trace Allergen Labelling system (VITAL) a requirement?

You may find the VITAL tool helpful but it is not a requirement to use it.

VITAL has been moved into an information box

### Do you have to manage food allergens in all food that is produced or processed?

The requirements only apply when you are making and handling foods that are not intended to contain allergens.

The requirements have been reworded.

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## Sushi

### Can you make the requirements clearer for sushi using non-acidified and acidified rice?

There are now a sections for acidified rice and non-acidified rice (including brown rice).

### The display section and the table that goes with it are confusing

The table has been removed and the requirements for displaying sushi now have examples.

### The cooling requirements for making and displaying sushi need to be clearer

Both acidified and non-acidified rice must be cooled to 21°C in 2 hours and to 15°C or less in another 4 hours.

Keep acidified rice between 5°C and 15°C for up to 8 hours

Keep non-acidified rice for no more than 4 hours above 5°C.

### Why do you have to test sushi 6 times to establish a proven method when it's 3 times elsewhere in the template FCP?

This has been changed to 3 times.

## Sous vide

### When using the Cook-Serve sous vide procedure the requirement to serve sous vide immediately is too restrictive

*Cook-Serve* has changed from 'serving immediately' to 'serving within 2 days'.  
*Cook-Chill* has changed from 'serving within 3 days' to 'serving within 5 days'.

### Why are you allowed to cook sous vide between 55°C-60°C? Isn't this when harmful microbes are more likely to grow?

The importance of this has been highlighted in the *Internal temperature and holding times* table. Provided the procedure is followed exactly, this hazard should be managed.

### Why don't you use the sous vide time and temperature tables devised by Baldwin?

MPI has focused on the food reaching the required internal food temperature/time combination to manage harmful microbes, while the Baldwin method focuses on the temperature, time and thickness of the food.

Measuring the food's internal temperature gives businesses the flexibility to manage their own product configuration while still managing hazards.

### The sous vide pages only cover red meat and poultry. Can I cook other foods using the sous vide method in the template?

You can't use the template for anything other than the foods specified in the template.

To cook sous vide outside the template requirements you will need to develop your own procedure. The sous vide pages give you more information on how to do this.

### What is the difference between the procedures for Cook-Serve and Cook-Chill?

The technical cooking procedures are now combined.

The *Holding times and internal temperatures* list the specific requirements for the *Cook-Serve* and *Cook-Chill* procedures.

### It's not clear when you should start recording the time and temperature when cooking sous vide?

The sous vide procedure identifies when these critical time and temperature measures must be taken. There is a new requirement that the food must reach the selected internal temperature within 4 hours. This is called the 'come up time'.

### Cooling sous vide quickly is extremely important

You are now required to cool sous vide foods from 60°C to 21°C in two hours and then from 21°C to 5°C in a further 4 hours. If this requirement is not met then the sous vide food must be thrown away.

### The requirements are not always clear and some are in the guidance pages.

Wording and technical procedures have been clarified where it was confusing and inconsistencies removed.

The technical procedure and the guidance pages have been reviewed.

## What's coming next

There were a few themes raised by submitters that we're continuing to work on as part of the coming year's work programme. These include:

- publishing verifier guidance to assist EHOs to verify the new template,
- producing guidance to accompany the *Simply Safe & Suitable* cards including water testing, thermometer calibrations, pests, allergens,
- identifying an appropriate level of wholesaling for businesses using the template (*March 2017 template FCP*).