

Proposals for notices under the Food Act 2014

Summary of submissions

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### 1. Introduction

#### Proposals for notices under the Food Act 2014: submissions summary

The consultation document *Proposals for notices under the Food Act 2014 (MPI discussion paper 2015/36)* sought feedback on the proposals for notices to regulate businesses operating with a Food Control Plan based on a template, and notices for National Programmes under the Food Act 2014. A copy of the consultation document is here: <a href="http://www.mpi.govt.nz/news-and-resources/consultations/proposals-for-notices-under-the-food-act-2014/">http://www.mpi.govt.nz/news-and-resources/consultations/proposals-for-notices-under-the-food-act-2014/</a>

Public consultation on proposals for notices under the Food Act 2014 (the Notices) closed on 6 November 2015. The Ministry for Primary Industries (MPI) alerted industry and the public of the consultation process for the notices before consultation began.

Consultation on the proposals was web-based, with the consultation document available publicly on the MPI website. Submissions could be made via email, post or hand delivered mail. Submissions were received from 47 sources representing various groups, including associations, councils, territorial authorities, sector representatives, food businesses and individuals.

#### Submissions on the proposals for notices were received from the following:

- 19 from local government;
- 6 from individuals;
- 6 from the food service and retail sector;
- 4 from government ministries;
- 4 from verifiers and verifying agencies;
- 2 from poultry/meat sector;
- 2 from the early childhood and education sector;
- 2 from allergy organisations;
- 2 from horticultural sector;

A summary of the submissions is set out below. In making the summary, MPI has grouped submissions received about the same or similar themes and/or issues and put them into a table according to those issues. The table headed 'common themes' gives an explanation of how MPI has recognised these 'common themes' when finalising the notices.

## 2. Acronyms and abbreviations

The following is a list of commonly used acronyms and abbreviations in the summary of submissions.

Acronym/abbreviation	Meaning
ECE	Early Childhood Education
FCP	Food Control Plan
FSANZ	Food Standards Australia New Zealand
FSP	Food Safety Programme
MPI	Ministry for Primary Industries
MRLs	Maximum Residue Limits
NP	National Programme
QMS	Quality Management System
ТА	Territorial Authority

### 3. Common themes

The following table summarises the MPI response to a number of common themes from submitters.

	Theme	MPI response
1.	Simplify monthly verification reporting.	Under the Food Act 2014, MPI has an obligation to monitor verification performance. A principle of the Food Act is consistent and fair application of the Act including the assessment of food safety and suitability.
		MPI has assessed the monthly reporting requirements as the minimum data requirements needed to effectively assess verification performance. While MPI took into account suggestions made in submissions the decision was made to not change the Notice at this stage.
		Once reports are received and analysed MPI will again review whether monthly reporting requirements can be simplified.
2.	Clarification on the evaluation	MPI has clarified that NP businesses do not require evaluation.
	competency requirement for inspecting National	The requirements for evaluation competency are in the Food Regulations 2015 and the Notices.
	Programmes (NP) businesses.	Guidance on the evaluation process will be provided in due course.
		Those wishing to be recognised as evaluators will need to be competent for the role. For this reason, deemed 'recognised persons' will not be allowed to do evaluation activities.

Table 1. Common themes and the MPI responses

3.	Definition for 'readily perishable food'.	MPI has replaced 'readily perishable food' with 'potentially hazardous food' in the final Notice.	
		This change was made to maintain a level of consistency with the Australia Food Standards Code (FSC 3.2.2). It is anticipated that the change will help prevent confusion caused by using different terms to refer to the same thing.	
4.	Clarification and requirements for	MPI has clarified the requirements for self-supplied water.	
	self-supplied water.	Food Regulations (that were being finalised at the time of the Notice consultation process) stipulate that a food business operator needs to ensure that any water being used in the preparation of food must be suitable for intended purpose and not adversely affect the safety and suitability of final food.	
		The Notice specifies requirements for the use of self-supplied water and contains the definition of 'clean water.'	
		Further work is being done to identify any other requirements that are appropriate for water so as to align these water requirements with best practice.	
5.	Suggestions made to improve template	MPI has undertaken a thorough review of the template FCP.	
	FCP.	The structure and content of the template has been reviewed, and where appropriate, changes were made. The changes reflect legal requirements, correct errors and where relevant, submitters' feedback was taken into account. The template has also been extended to cover food retail businesses.	
		MPI advises that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user-friendliness' into account wherever appropriate.	

# Summary of submissions 4. Recognised Agencies and Persons

Submitter Reference	Notice	Summary of feedback	MPI Response
Professional Organisation (038)	Recognised Agencies and Persons	Clarification requested for definitions of processes, classes of food operation, status of deemed recognised persons and mechanism to monitor critical non-compliance issues.	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>refined definitions and amended the Notice.</li> <li>explained that affected agencies must reapply for recognition under the new Act and all critical non-compliance must also be reported to MPI.</li> <li>advised that guidance will be provided in due course to help operators understand their classes of food operation.</li> </ul> </li> </ul>
		<ul> <li>Higher level of evaluator/verifier approval be required for higher level food processing.</li> </ul>	<ul> <li>Noted. MPI will be addressing this in the near future.</li> </ul>
		<ul> <li>Simplify monthly verification reporting requirements.</li> </ul>	<ul> <li>Noted, but not feasible at this stage. (See Table 1, for full MPI response).</li> </ul>
Special Interest Group (029)	Recognised Agencies and Persons	Evaluator/ verifier requirements needed.	<ul> <li>Noted and actioned.</li> <li>The requirements for evaluators/verifiers are provided in the Food Regulations 2015 and the Notices.</li> <li>MPI is in the process of developing further guidance on competency requirements for evaluators/verifiers.</li> </ul>
Territorial Authority (027)	Recognised Agencies and Persons	<ul> <li>Clarification needed for the definitions of 'regulator' and 'regulation agency'.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has: <ul> <li>refined definitions for 'regulator' and</li> <li>'regulation agency' in the Notice.</li> </ul> </li> </ul>

		<ul> <li>Simplify monthly verification reporting requirements.</li> </ul>	• Noted, but not feasible at this stage. (See Table 1, for full MPI response).
Professional Organisation (041)	Recognised Agencies and Persons	• Suggested that commercial sterilisation be defined in Notice.	<ul> <li>Noted and actioned.</li> <li>MPI has amended the Notice. Commercial sterilisation has been replaced with aseptic processing and packaging, and this has been defined.</li> </ul>
		<ul> <li>Clarification requested for: P1.3. (i), (iii); P1.4 – a), b), c), d); P1.6.2 and P1.6.3 relating to reporting requirements for recognised agencies and persons and general requirements for recognition as an evaluator or verifier of specific classes of food operation.</li> </ul>	<ul> <li>MPI has:</li> <li>advised that P1.3. (i) – Is a requirement of the Food Act 2014.</li> <li>advised that guidance will be provided in due course for P1.3 (iii).</li> <li>removed P1.4 – a), b), c), d); P1.6.2 and P1.6.3 from the Notice.</li> </ul>
		<ul> <li>Information requested about recognition status for deemed recognised agencies after the expiry date of 30 June 2016 deadline, criteria for determining competencies of TAs, and conflict of interest.</li> </ul>	<ul> <li>MPI has provided guidance on recognition status and conflict of interest in Notice.</li> <li>MPI is in the process of developing further guidance on competency requirements for evaluators/verifiers</li> </ul>
Territorial Authority (018)	Recognised Agencies and Persons	<ul> <li>Clarification requested concerning TAs abilities to verify businesses that transferred to Voluntary Implementation Programme (VIP). More information needed on movement from VIP to new system and on conflict of interest.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>provided guidance on functions of deemed recognised persons in Territorial Authorities and on conflict of interest in the Notice.</li> <li>explained that VIP premises are to remain in current database under existing processes and systems until they apply to transfer over to the new Food Act 2014.</li> </ul> </li> </ul>
		<ul> <li>Clarification sought on the meaning of 'suitably qualified' and 'critical issues'.</li> </ul>	MPI has provided guidance for identifying critical non-compliance including

		<ul> <li>Clarification sought on procedure to be taken when deciding to refer non-compliant issues to MPI.</li> </ul>	<ul> <li>procedures for monitoring audit frequencies in the Notice.</li> <li>MPI is in the process of developing guidance on competency requirements for evaluators/verifiers. Meaning of 'suitably qualified' will be explained in guidance.</li> <li>MPI has provided guidelines relating to ongoing issues for operators not addressing corrective actions in the Notice.</li> </ul>
Territorial Authority (011)	Recognised Agencies and Persons	<ul> <li>Clarifications sought in relation to requirements for the need to report to 'the regulator' if a food business fails to undertake a corrective action report (CAR).</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has amended reporting requirements to align with the Food Regulations 2015. Audit methods and procedures are provided in the Notice.</li> </ul>
		• Proposed aligning of the reporting requirements.	• MPI has amended reporting requirements to align with the Food Regulations 2015.
		Simplify monthly verification reporting requirements.	• Noted, but not feasible at this stage. (See Table 1, for full MPI response).
		<ul> <li>Clarification sought on the need for recognised persons to 'meet all additional requirements as set out in Schedule 1, including operation of an effective Quality Management System (QMS)'.</li> <li>Requested that TAs be granted deemed recognition to audit FCP businesses without additional requirements being imposed for the transitional period.</li> </ul>	<ul> <li>The requirements for verifiers of NPs are provided in the Food Regulations 2015 and not the Notices.</li> <li>MPI is in the process of developing guidance for QMS. QMS is intended to provide specific requirements for individuals and agencies to meet audit expectations of MPI and the Food Act 2014.</li> </ul>
		<ul> <li>Wondered why TAs could not audit lower risk NPs if considered competent to audit higher risk FCP businesses.</li> </ul>	<ul> <li>MPI has explained that there are some differences in competency requirements</li> </ul>

			<ul> <li>between verifiers of FCP and NP businesses.</li> <li>MPI has advised that further guidance on competency requirements for verification of NP businesses will be provided in due course.</li> </ul>
		<ul> <li>Clarification sought on process needed to recognise conflict of interest and the meaning of 'approved systems'.</li> </ul>	<ul> <li>MPI has:</li> <li>provided guidance in the Notice for verifiers to use when deciding issues of conflict of interest.</li> <li>clarified that 'approved systems' are quality management systems used for audit purposes and are assessed by MPI.</li> </ul>
Territorial Authority (036)	Recognised Agencies and Persons	<ul> <li>More information requested about deeming of recognised agencies and persons. Concern raised that it appeared TAs needed to gain extra competencies to inspect the lower risk NP premises as they transition into the new system.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has explained that there are some differences in competency requirements between verifiers of FCP and NP businesses.</li> <li>The requirements for verifiers of NPs are provided in the Food Regulations 2015 and not the Notices.</li> <li>MPI has advised that further guidance on competency requirements for verification of NPs will be provided in due course.</li> </ul>
		<ul> <li>Greater clarification sought on evaluation competency requirement for inspecting NP businesses.</li> </ul>	<ul> <li>MPI has clarified that NP businesses do not require evaluation. Only custom FCPs will require evaluation by a recognised evaluator prior to application to MPI as a requirement of Food Act 2014.</li> </ul>
Professional Organisation (042)	Recognised Agencies and Persons	<ul> <li>Clarification sought on definition for aseptic filling, requirements to audit lower risk NPs, and QMS.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has provided a definition for aseptic filling and amended the Notice accordingly.</li> </ul>

		<ul> <li>Wanted to know why 'deemed Recognised Persons' are not allowed to do evaluation activities.</li> </ul>	<ul> <li>The requirements for verifiers of NPs are set in the Food Regulations 2015.</li> <li>MPI is in the process of developing guidance for QMS. Definition for QMS will be provided in guidance.</li> <li>MPI has clarified that evaluation of custom Food Control Plans is a new function under the Food Act 2014 and has different competency requirements than either food safety programme auditors (under the previous Act) or verifiers (under the new Act). Therefore it was not appropriate for deemed recognised persons to perform this function (they will need to demonstrate they have the required competency by going through the approval process).</li> </ul>
Individual (043)	Recognised Agencies and Persons	<ul> <li>Simplify monthly verification reporting requirements.</li> </ul>	<ul> <li>Noted, but not feasible at this stage. (See Table 1, for full MPI response).</li> </ul>
Territorial Authority (023)	Recognised Agencies and Persons	<ul> <li>Requested clarification about competency requirements and procedures needed to obtain recognition as a recognised agency.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has provided competency requirements in the Food Regulations 2015.</li> <li>Guidance on recognition process will be provided in due course.</li> </ul>
Professional Organisation (044)	Recognised Agencies and Persons	<ul> <li>Simplify monthly verification reporting requirements.</li> <li>Clarification sought on meaning of aseptic/pasteurisation/hot fill processing and effective QMS. Asked for criteria needed to gain QMS qualification.</li> </ul>	<ul> <li>Noted, but not feasible at this stage. (See Table 1, for full MPI response).</li> <li>Noted and actioned.</li> <li>MPI has provided a definition for aseptic filling/pasteurisation and amended the Notice accordingly.</li> </ul>

			<ul> <li>MPI is in the process of developing guidance for QMS. Requirements for gaining QMS competency will be provided in guidance.</li> </ul>
		<ul> <li>Clarification sought on requirements needed to gain evaluator/verifier competencies.</li> </ul>	<ul> <li>The requirements for evaluators/verifiers are provided in the Food Regulations 2015 and in the Notice.</li> <li>MPI is in the process of developing further guidance on competency requirements for evaluators/verifiers.</li> </ul>
		<ul> <li>Clarification sought on expiry date for deemed recognised agencies.</li> </ul>	<ul> <li>MPI has provided the expiry date for recognition of deemed recognised agencies in Notice.</li> </ul>
Territorial Authority (045)	Recognised Agencies and Persons	Clarification sought on requirements for verifiers of NPs.	<ul> <li>Noted and actioned.</li> <li>The requirements for verifiers of NPs are provided in the Food Regulations 2015.</li> <li>MPI is in the process of developing further guidance on competency requirements for verifiers.</li> </ul>
Territorial Authority (034)	Recognised Agencies and Persons	<ul> <li>Simplify monthly verification reporting requirements.</li> </ul>	• Noted, but not feasible at this stage. (See Table 1, for full MPI response).
		<ul> <li>Clarification requested for definition of 'regulator' in the Act under P6 1.3(1) d).</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has refined definition of 'regulator' and amended the Notice.</li> </ul>
		<ul> <li>Clarification requested on meaning of 'approved systems' for record keeping, training, supervision and conflicts of interest. Wanted to know who was responsible for approval of these systems.</li> </ul>	<ul> <li>MPI has clarified that 'approved systems' are quality management systems used for audit purposes and are assessed by MPI.</li> </ul>
Professional Organisation (046)	Recognised Agencies and Persons	<ul> <li>Greater clarification sought on evaluation, national grading scheme and expiry dates of existing accreditation for audit purposes.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:</li> <li>clarified that NP businesses do not require evaluation. Only custom FCPs will require</li> </ul>

			<ul> <li>evaluation by a recognised evaluator prior to application to MPI as a requirement of Food Act 2014.</li> <li>explained that a National Grading Scheme is not being proposed at this time. When proposals for a scheme have been developed they will undergo a consultation process.</li> </ul>
			<ul> <li>explained that the Food Regulations 2015 state that 1<sup>st</sup> March, 2016 is the date on which all remaining provisions of the Food Act 1981 are repealed. Deemed FCPs (i.e. FSPs that were registered under the Food Act 1981) must be verified (audited) against the Food Act 2014.</li> </ul>
Professional Organisation (015)	Recognised Agencies and Persons	<ul> <li>Clarification sought on competency recognition requirements for evaluator/verifier, training opportunities with MPI, time frames for corrective action and classes of food operation.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>The requirements for evaluator/verifier are provided in the Food Regulations 2015.</li> <li>MPI has provided time frames for corrective action and guidance on classes of operation in Notice.</li> <li>MPI is in the process of developing further guidance for evaluator/ verifiers and associated training materials.</li> </ul>

# 5. Importing Food

Submitter Reference	Notice	Summary of Submission/ Proposal	MPI Response
Special Interest Group (029)	Importing Food	More information on labelling requested for importers wishing to bring food into NZ.	<ul> <li>Noted.</li> <li>MPI has already got requirements to help importers ensure that the food being imported is assessed to be safe and suitable. This includes compositional and labelling requirements in accordance with the Australia New Zealand Food Standards.</li> </ul>
Professional Organisation (047)	Importing Food	<ul> <li>Requested more information be provided for importers buying products from countries where the food allergen labelling standards and/or regulations are not the same or at least equivalent to the Australia New Zealand Food Standards.</li> </ul>	<ul> <li>Noted.</li> <li>MPI advises that Importers are required to ensure that food being imported is safe and suitable for sale in New Zealand. It is the responsibility of the importer to be conversant with labelling and other requirements of the Australia and New Zealand Food Standards Code.</li> </ul>
		Clarification sought on management of non- compliant consignments/products that do not meet the requirements for importers wishing to bring food into NZ.	<ul> <li>Noted and actioned.</li> <li>MPI has developed guidance that explains rules on how to deal with non-compliant consignments. The rules say non-compliant consignments are:         <ul> <li>destroyed; or</li> <li>returned to sender; or</li> <li>reprocessed to remove the hazard or otherwise make them compliant (e.g. relabelled/heat treated). All this is done at the importers cost.</li> </ul> </li> </ul>

# 6. Food Control Plans and National Programmes

Submitter Reference	Notice	Summary of Submission/ Proposal	MPI Response
Individual (026)	Food Control Plans and National Programmes	Difficult to find necessary information relating to NPs on the website.	<ul> <li>Noted and actioned.</li> <li>MPI has updated the website and provided more information about NPs. More resources are being added on a regular basis.</li> </ul>
Individual (000)	Food Control Plans and National Programmes	<ul> <li>Suggested that food products also be tested for the presence of Glyphosate and Sodium Fluoroacetate (Compound 1080).</li> </ul>	<ul> <li>Noted.</li> <li>MPI advises that MRL standards are made under the Food Act 2014 and subject to separate consultation process.</li> </ul>
Territorial Authority (002)	Food Control Plans and National Programmes	<ul> <li>Suggestion made that when reheating 'readily perishable food' just one specific temperature (75°C) be recognised regardless of whether the food is being cooked or cooled.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>aligned the time/ temperature conditions across all Notices.</li> <li>amended the Notice so that the operator is required, when cooking food, to ensure that the same effect (e.g. of cooking to 75°C) is obtained when the food is cooked at lower temperatures for longer periods of time.</li> </ul> </li> </ul>
Individual (031)	Food Control Plans and National Programmes	<ul> <li>Concerned that P1.6 (4) a) would increase operator costs and so should only apply to Early Childhood Centres that have a history of food borne illnesses directly caused by poorly prepared poultry.</li> </ul>	<ul> <li>Noted.</li> <li>When considering risk ranking for businesses in relation to foodborne illnesses, the history of the food sector was considered as part of the criteria necessary to develop risk management options.</li> </ul>

			• The requirements that centres are required to meet are therefore dependent on the food they provide.
Special Interest Groups (029)	Food Control Plans and National Programmes	<ul> <li>Requested more information on food allergens.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has further enhanced the template FCP section dealing with allergens.</li> <li>MPI is continuing to review and enhance information about food allergens.</li> </ul>
Territorial Authority (008)	Food Control Plans and National Programmes	<ul> <li>Clarifications sought on time/temperature requirements for P1.3.b. (iv); P1.4.3; P1.6; P1.7; P1.8 in relation to receiving, storing and displaying, cooking, cooling and reheating 'readily perishable food'.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has aligned the time/ temperature conditions across all Notices.</li> </ul>
		<ul> <li>Clarification sought for P2.5 in relation to requirements for operators using self-supplied water.</li> </ul>	<ul> <li>MPI has:</li> <li>clarified that Food Act 2014 is concerned with water being fit for purpose with regards to food preparation.</li> <li>explained that requirements for water are provided in the Food Regulations 2015 and the Notices.</li> <li>advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as to align requirements with best practice.</li> </ul>
		<ul> <li>Clarification sought on frequency of using self- supplied water under NPs.</li> </ul>	<ul> <li>MPI has:</li> <li>clarified in the Notices that self-supplied water must be fit for purpose with regards to food preparation.</li> <li>advised that there are no limits regarding frequency with which self-supplied water can be used.</li> </ul>

Special Interest Group (030)	Food Control Plans and National Programmes	<ul> <li>Concerned that cost of compliance would increase as a result of the requirement to keep additional records. Thought that current Ministry of Education's licensing criteria for handling food were more than sufficient.</li> </ul>	<ul> <li>Noted.</li> <li>MPI advises that verification under the Food Act 2014 is performance based. Successful businesses should expect fewer visits by the verifier thus incurring less cost.</li> <li>MPI advises also that NP businesses are classified as low risk and so verified less frequently than those under a FCP. Cost of compliance should therefore be cheaper for NP than for FCP businesses.</li> </ul>
Government Agency (009)	Food Control Plans and National Programmes	<ul> <li>Clarifications sought for P2.3, P2.4 in relation to use of self-supplied water in the preparation of food. Suggested that the terms used to describe water be consistent with those used in other legislation.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>refined definition and amended the Notice.</li> <li>clarified that Food Act 2014 is concerned with water being fit for purpose with regards to food preparation.</li> <li>advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as to align requirements with best practice.</li> </ul> </li> </ul>
Territorial Authority (027)	Food Control Plans and National Programmes	<ul> <li>Clarifications sought and more information required on 'readily perishable food'.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has replaced 'readily perishable food' with 'potentially hazardous food' and amended Notice.</li> </ul>
		<ul> <li>Asked whether templates will be developed for operators to record temperature requirements.</li> </ul>	<ul> <li>MPI has provide a diary for recording temperatures in final template. Other record sheets are also included in template FCP.</li> </ul>
		<ul> <li>Clarification sought on quality of water.</li> </ul>	<ul> <li>MPI has:</li> <li>clarified that Food Act 2014 is concerned with water being fit for purpose with regards to food preparation.</li> </ul>

			<ul> <li>explained that water requirements are provided in the Food Regulations 2015 and the Notices.</li> <li>advised that further work to be incorporated in Tranche 2 legislation so as to align requirements with best practice.</li> </ul>
		<ul> <li>Suggested changes be made to procedures to follow whenever considering significant amendment of a FCP.</li> </ul>	• MPI has provided requirements needed for making significant amendment to a food control plan in the Notice.
Food Business (024)	Food Control Plans and National Programmes	<ul> <li>Clarification sought on definition for 'readily perishable food'.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has replaced 'readily perishable food' with 'potentially hazardous food' and amended Notice.</li> </ul>
		<ul> <li>Clarification sought on overall scope of P8.5 in relation to fresh produce.</li> </ul>	MPI has provided clarification in final Notice.
Territorial Authority (018)	Food Control Plans and National Programmes	<ul> <li>Clarification sought on time /temperature requirements for P1.6; P1.7; P1.8 in relation to cooking, cooling and reheating 'readily perishable food'.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>clarified and aligned the time/ temperature conditions across all Notices.</li> <li>replaced 'readily perishable food' with 'potentially hazardous food' and amended Notice.</li> </ul> </li> </ul>
		• Clarification sought on quality of water for P2.4.	<ul> <li>MPI has:</li> <li>clarified that Food Act 2014 is concerned with water being fit for purpose with regards to food preparation.</li> <li>explained that water requirements are provided in the Food Regulations 2015 and the Notices.</li> <li>advised that further work is being carried out and may be incorporated in legislation</li> </ul>

			(subject to consultation) in the future so as to align requirements with best practice.
Government Agency (005)	Food Control Plans and National Programmes	<ul> <li>Proposed the use of sub headings as reflected in the content section of the Notice to make it easy for businesses to follow. P1.3, P1.4, P1.5, P1.7, P1.8 and P1.9 in relation to requirements for receiving, storing and displaying, transporting, cooling, and reheating 'readily perishable food'.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>reviewed the templates and where appropriate changes were made. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> <li>replaced 'readily perishable food' with 'potentially hazardous food' and amended Notice.</li> <li>explained that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user-friendliness' into account wherever appropriate.</li> </ul> </li> </ul>
Food Business (025)	Food Control Plans and National Programmes	<ul> <li>Clarifications sought on time/temperature requirements for P1.3; P1.4 in relation to receiving, storing and displaying of 'readily perishable food'.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>clarified and aligned the time/ temperature conditions across all Notices.</li> <li>replaced 'readily perishable food' with 'potentially hazardous food' and amended Notice.</li> </ul> </li> </ul>
		<ul> <li>Suggested that a critical limit for temperature be specified, at least for ice-cream, to ensure that the product is frozen throughout the handling process.</li> </ul>	-
		<ul> <li>Clarifications sought on P3.3 in relation to significant amendment to a FCP.</li> </ul>	<ul> <li>MPI has provided requirements needed for making significant amendments to a FCP in the Notice.</li> </ul>

Territorial Authority (014)	Food Control Plans and National Programmes	<ul> <li>Asked which records NP businesses were required to be kept. Wanted to know if record sheets or some form of templates were going to be made available for NP operators to use.</li> </ul>	<ul> <li>Noted.</li> <li>MPI advises that there is no template for NP records but operators can choose to use the template FCP record sheets to do their records.</li> </ul>
		<ul> <li>Observed inconsistency between time/ temperature requirements for P1.4; and P1.7 in relation to storing and displaying and cooling readily perishable food.</li> </ul>	<ul> <li>MPI has reviewed and aligned the time/ temperature conditions across all Notices.</li> </ul>
Territorial Authority (036)	Food Control Plans and National Programmes	<ul> <li>Proposed change to format of NPs to make them consistent with that of FCPs.</li> </ul>	<ul> <li>Noted.</li> <li>MPI advises that drafting of the NP requirements took into consideration form and content of FCP Notices.</li> </ul>
Territorial Authority (023)	Food Control Plans and National Programmes	<ul> <li>Clarifications sought and suggestions made to review requirements for hot holding of perishable food being handled by both FCPs and NPs.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has: <ul> <li>clarified and aligned the time/ temperature conditions across all Notices.</li> <li>replaced 'readily perishable food' with 'potentially hazardous food' and amended the Notice.</li> </ul> </li> </ul>
Territorial Authority (034)	Food Control Plans and National Programmes	<ul> <li>Clarification sought on time /temperature requirements for P1.4; P1.6; P1.7; P1.8; P1.9 in relation to storing and displaying, cooking, cooling, reheating and transporting, 'readily perishable food'.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has: <ul> <li>clarified and aligned the time/ temperature conditions across all Notices.</li> <li>replaced 'readily perishable food' with 'potentially hazardous food' and amended the Notice.</li> </ul> </li> </ul>
		<ul> <li>Suggestions made for methods to be considered when testing self-supplied water.</li> </ul>	<ul> <li>MPI has:</li> <li>explained that requirements for water are provided in the Food Regulations 2015 and the Notices.</li> </ul>

			<ul> <li>advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as to align requirements with best practice.</li> </ul>
Government Agency (035)	Food Control Plans and National Programmes	<ul> <li>Clarifications sought on time /temperature requirement for P1.4 and P1.6 in relation to storing and displaying, and cooking food. Suggested that wording be changed to ensure businesses whose core business is not food be also captured.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>clarified and aligned the time/ temperature conditions across all Notices.</li> <li>reviewed wording in final Notice and where appropriate, changes were made. The changes reflect legal requirements, correct errors and where relevant, submitters' feedback was taken into account.</li> </ul> </li> </ul>
		<ul> <li>Requested guidance on management of risks associated with infant formula prepared from self- supplied water.</li> </ul>	<ul> <li>MPI has:</li> <li>explained that requirements for water are provided in the Food Regulations 2015 and the Notices.</li> <li>advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as to align requirements with best practice.</li> </ul>
Government Agency (007)	Food Control Plans and National Programmes	<ul> <li>Clarifications sought in relation to consistency of water requirements with Ministry of Health's guidelines on water.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>advised that Food Act 2014 is concerned with water being fit for purpose with regards to food preparation. As such, MPI has provided definition for water.</li> <li>explained that requirements for water are provided in the Food Regulations 2015 and the Notices.</li> <li>advised that further work is being carried out and may be incorporated in legislation</li> </ul> </li> </ul>

Government Agency (039)	Food Control Plans and National Programmes	<ul> <li>Suggested review of title so as to remove 'self- supply' from title since P2 is titled 'Requirements for self-supply water at places used for food', whereas P2.3 and P2.4 apply to all businesses using all types of water.</li> </ul>	<ul> <li>(subject to consultation) in the future so as to align requirements with best practice.</li> <li>Noted and actioned.</li> <li>MPI has reviewed wording in final Notice and where appropriate, changes were made. The changes reflect legal requirements, correct errors and where relevant, submitters' feedback was taken</li> </ul>
		<ul> <li>Clarification sought on definition of 'clean water' that is to be used in production, processing, and handling of food.</li> </ul>	<ul> <li>into account.</li> <li>MPI has: <ul> <li>clarified that Food Act 2014 is concerned with water being fit for purpose with regards to food preparation. As such, MPI has provided definition for water.</li> <li>explained that requirements for water are provided in the Food Regulations 2015 and the Notices.</li> <li>advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as to align requirements with best practice.</li> </ul> </li> </ul>
Professional Organisation (015)	Food Control Plans and National Programmes	<ul> <li>Clarification sought on definition for 'readily perishable food' in relation to P1.2; and time /temperature requirements for P1.3; P1.6; P1.7 – relating to receiving, cooking and cooling 'readily perishable food'.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>replaced 'readily perishable food' with 'potentially hazardous food' and amended the Notice.</li> <li>reviewed and aligned the time/ temperature conditions across all Notices.</li> </ul> </li> </ul>
		<ul> <li>Asked for a more precise definition of ready-to-eat (RTE) foods.</li> </ul>	<ul> <li>MPI has refined definition of (RTE) foods and amended the Notice.</li> </ul>

		<ul> <li>Explanation sought for what constitutes a 'significant change' to FCP; and competency of verifiers needed to recognise such change.</li> </ul>	<ul> <li>MPI has advised that 'significant change' is defined in Food Act 2014, Section 58(3).</li> <li>Competency requirements for evaluators/ verifiers will be provided in due course.</li> </ul>
		<ul> <li>Wanted to know when an FCP can change to a custom FCP as a result of significant deviation from a template.</li> </ul>	<ul> <li>In a situation where a business is operating with the official template FCP, explanations provided in Section 58(3) will provide guidance for businesses wishing to make 'significant change' to a template FCP.</li> </ul>
		<ul> <li>Asked whether a NP business could be modified and if so how this would be done. Also wanted to know what activities operators were allowed to do in each class identified in the Food Act 2014.</li> </ul>	<ul> <li>MPI has advised that 'significant change' for NP businesses is defined in Food Act 2014, Section 58(3) (a) (ii).</li> <li>Any 'significant change' in the nature of the food business that would affect the level of NP activity must be communicated to the registration authority in writing giving details of the 'significant change' in circumstances.</li> <li>Schedule 1, 2 and 3 of the Act provides guidance on activities that operators are allowed to do.</li> <li>If a NP business operates in more than one food sector, then registration needs to reflect that information in scope of operations.</li> </ul>
		• Example, can an ECE facility make high risk food products to serve at a later date.	MPI has provided guidance for ECE facilities handling foods considered high risk.
Territorial Authority (013)	Food Control Plans and National Programmes	<ul> <li>Requested that there be consistency of information in P1.6 referring to cooking and food processing for FCPs and NPs and the other guidelines found on food safety website.</li> </ul>	<ul> <li>Noted.</li> <li>MPI has advised that P1.6 in relation to cooking and food processing in Notice is referring to requirements for preparing poultry in NP2 (childcare).</li> </ul>

# 7. Approved Template FCP for Schedule 1 Food Businesses: Food Service and Food Retail

Submitter Reference	Notice	Summary of Submission/ Proposal	MPI Response
Professional Organisation (004)	Approved Template FCP for Schedule 1 Food Businesses: Food Service and Food Retail	<ul> <li>Requested changes on format of template and suggested inclusion of a calibration reminder in template FCP.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has reviewed and where appropriate changes were made to templates. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> </ul>
Territorial Authority (002)	Approved Template FCP for Schedule 1	• Editorial feedback - corrections and typos.	<ul> <li>Noted and actioned.</li> <li>MPI has reviewed and where appropriate changes were made to templates. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> </ul>
Individual (022)	Approved Template FCP for Schedule 1	<ul> <li>Suggestions provided on ways to manage awareness of allergens in the ingredients being used to make food products sold to consumers.</li> <li>Proposed that level of awareness on presence and amount of allergens in ingredients be increased.</li> </ul>	<ul> <li>Noted.</li> <li>MPI to review allergens section in the Notice. Feedback from submitters will be taken into account when further work is being carried out and may be incorporated in legislation (subject to consultation) in the future.</li> </ul>
Special Interest Groups (029)	Approved Template FCP for Schedule 1	<ul> <li>Requested review of Notice to include FSANZ Food Code Standard 1.2.3 so as to align contents with procedures for handling customer complaints concerning food allergens. Suggested that it be obligatory to have an established process for making information available to customers. Advised that MPI discuss with the Ministry of Health the potential need for mandatory reporting of food-triggered anaphylaxis by health</li> </ul>	<ul> <li>Noted.</li> <li>MPI to review allergens section in the Notice. Feedback from submitters will be taken into account when further work is being carried out and may be incorporated in legislation (subject to consultation) in the future.</li> </ul>

		professionals (similar to requirements for food- borne illnesses).	
Territorial Authority (008)	Approved Template FCP for Schedule 1	<ul> <li>Clarifications sought on meaning of 'approved', 'site' in the context of registration for the template FCP Subpart (1).</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has provided clarification and amended Notice.</li> </ul>
		<ul> <li>Check and correct if required wording in Subpart (2) 'business's home address'. The Act refers to 'business address'.</li> </ul>	<ul> <li>MPI has reviewed and where appropriate changes were made to templates. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> </ul>
Government Agency (009)	Approved Template FCP for Schedule 1	<ul> <li>Proposed that people who have been sick should not be allowed to enter the food handling area or handle food for the 48 hour period after their last episode of vomiting or diarrhoea. In addition, suggested that sick people be also examined for Shigella, Salmonella and VTEC as these are already considered important for health safety.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has reviewed and aligned requirements so as to maintain consistency with the Communicable Disease Control Manual.</li> </ul>
Territorial Authority (033)	Approved Template FCP for Schedule 1	<ul> <li>Proposed reducing the amount of information in FSP and FCP. Favoured use of simple language.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has reviewed and where appropriate changes were made to templates. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> <li>MPI advises that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user-friendliness' into account wherever appropriate.</li> </ul>
		<ul> <li>Suggested that it would be useful to have this information online.</li> </ul>	<ul> <li>MPI considering format options including an online version.</li> </ul>
Special Interest Group (003)	Approved Template FCP for Schedule 1	<ul> <li>Suggested more information be provided on allergens.</li> </ul>	• Noted.

			<ul> <li>MPI to review allergens section in the Notice. Feedback from submitters will be taken into account when further work is being carried out and may be incorporated in legislation (subject to consultation) in the future.</li> </ul>
Food Business (010)	Approved Template FCP for Schedule 1	<ul> <li>Suggested amendments to Sous Vide guidance in FCP and to time/temperature parameters.</li> </ul>	<ul> <li>Noted.</li> <li>MPI working with submitter to review guidance on preparation of Sous Vide.</li> </ul>
Territorial Authority (027)	Approved Template FCP for Schedule 1	<ul> <li>Concern raised that there is a lot of detail with regards to the template FCP and the specialist sections.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has reviewed and where appropriate changes were made to templates. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> <li>MPI advises that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user-friendliness' into account wherever appropriate.</li> </ul>
Territorial Authority (019)	Approved Template FCP for Schedule 1	<ul> <li>Clarifications sought and suggestions provided for display of self-service chilled foods and labelling of re-packed bulk foods; defrosting frozen food and P2.31 in relation to monitoring of Sushi on display; and thermometer calibration.</li> </ul>	<ul> <li>Noted.</li> <li>MPI has reviewed and where appropriate changes were made to templates. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> <li>MPI has made corrections to infra-red calibration and inserted calibration reminder in diary.</li> </ul>
Food Business (016)	Approved Template FCP for Schedule 1	<ul> <li>Clarifications sought for P1.19; P1.23; P1.31; P1.35; P1.51; P1.75; P4.13; P4.33 and P4.37 in relation to scope, hand washing basins, <i>Listeria</i>,</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has reviewed and where appropriate changes were made to templates. The</li> </ul>

		cleaning, defrosting food, hot holding food in template FCP.	changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.
Territorial Authority (001)	Approved Template FCP for Schedule 1	<ul> <li>Proposed that wording in template FCP be changed. Suggested use of subdivisions so that section A covers the basics, while section B (specialist sections) covers processes. Also observed some inconsistencies in template concerning time/temperature requirements.</li> </ul>	<ul> <li>Noted.</li> <li>MPI has reviewed and where appropriate changes were made to templates. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> <li>MPI advises that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user-friendliness' into account wherever appropriate.</li> <li>MPI has reviewed and aligned the time/ temperature conditions across all Notices.</li> </ul>
Territorial Authority (011)	Approved Template FCP for Schedule 1	• Raised concern on the format of the template FCP.	<ul> <li>Noted.</li> <li>MPI has reviewed and where appropriate changes were made to templates. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> <li>MPI advises that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user-friendliness' into account wherever appropriate.</li> </ul>
		<ul> <li>Noticed categorisation of business activities into food sectors when in reality operators run diversified businesses. Suggested that there be flexibility in the system for a business to select procedures from any FCP template to cover all of their activities.</li> </ul>	<ul> <li>MPI advises that this is broadly the intent of the template. To enable a business to mix 'n' match procedures.</li> <li>MPI advises that template reviews are ongoing, and will continue to take user feed-back about structure, wording and</li> </ul>

		<ul> <li>Clarification sought on P1.3 in relation to topics. Observed that two topics were missing from the contents section under management. These were on re-opening a food business after a power cut or civil emergency, and the other was on <i>Listeria</i>.</li> <li>Clarification sought on water quality and treatment of water with chlorine. Suggested that appropriate application of chlorine such as 10gm/m3 be used to treat water held in tanks then flushed out with potable water.</li> </ul>	<ul> <li>'user-friendliness' into account wherever appropriate.</li> <li>MPI has reviewed and where appropriate changes were made to template. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> <li>The requirements for water are provided in the Food Regulations 2015 and the Notices.</li> <li>MPI has clarified that overall water is to be fit for intended purpose. The 'water supply' section in Notice identifies what a business must do if water is found not to be suitable for food processing.</li> <li>MPI has advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as to align requirements with best practice.</li> </ul>
Individual (028)	Approved Template FCP for Schedule 1	<ul> <li>Concerns raised over level of appreciation for food standards in relation to application of these standards by ordinary operators.</li> </ul>	• Noted.
Territorial Authority (014)	Approved Template FCP for Schedule 1	<ul> <li>Observed some inconsistencies with regards to references, use of infra-red thermometers and typos in the template FCP.</li> <li>Proposed improvements to format of the template FCP.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has reviewed and where appropriate changes were made to template. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> <li>MPI advises that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user-friendliness' into account wherever appropriate.</li> </ul>

		<ul> <li>Proposed addition of extra words to P1.41 and P1.42 in relation to keeping water supply safe.</li> </ul>	<ul> <li>MPI has:</li> <li>explained that requirements for water are provided in the Food Regulations 2015 and the Notices.</li> <li>advised that overall water is to be fit for intended purpose. The 'water supply' section in the Notice identifies what a business must do if water is found not to be suitable for food processing.</li> <li>advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as to align requirements with best practice.</li> </ul>
Territorial Authority (036)	Approved Template FCP for Schedule 1	<ul> <li>Concerned that format of basic template FCP plus accompanying seven specialist sections will confuse operators of food businesses who would like to know activities applicable to their businesses.</li> </ul>	<ul> <li>Noted.</li> <li>MPI advises that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user-friendliness' into account wherever appropriate.</li> </ul>
		<ul> <li>Requested for additional information on P1.41 in relation to water supply.</li> </ul>	<ul> <li>MPI has:</li> <li>explained that requirements for water are provided in the Food Regulations 2015 and the Notices.</li> <li>advised that overall water is to be fit for intended purpose. The 'water supply' section in the Notice identifies what a business must do if water is found not to be suitable for food processing.</li> <li>advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as to align requirements with best practice.</li> </ul>

Territorial Authority (023)	Approved Template FCP for Schedule 1	<ul> <li>Observed that language used in template FCP was very technical. Suggested use of plain English with sections in the Notice covering definitions of technical terms and appendices explaining the difficult terms.</li> <li>Proposed also that improvements be made to the template for parts comprising water supply, temperature requirements for storage of fish, food vending machines, food stalls, calculating shelf life, thawing and tampering of meat, preparation of sushi and hot holding of food.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has reviewed and where appropriate changes were made to the template. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> <li>MPI advises that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user-friendliness' into account wherever appropriate.</li> </ul>
		<ul> <li>Requested for more information for the water section in the Notice relating to testing and treatment of water.</li> </ul>	<ul> <li>MPI has:</li> <li>explained that requirements for water are provided in the Food Regulations 2015 and the Notices.</li> <li>advised that overall water is to be fit for intended purpose. The 'water supply' section in the Notice identifies what a business must do if water is found not to be suitable for food processing.</li> <li>advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as to align requirements with best practice.</li> </ul>
Territorial Authority ( 039)	Approved Template FCP for Schedule 1	<ul> <li>Observed inconsistencies in parts comprising time /temperature requirements, thawing procedures, making and using ice, and physical boundaries and layout in template FCP.</li> <li>Suggestions made to improve template FCP.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>reviewed and where appropriate changes were made to the template. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> </ul> </li> </ul>

			<ul> <li>advised that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user- friendliness' into account wherever appropriate.</li> </ul>
		<ul> <li>Requested clarification on preparation of Sous Vide.</li> </ul>	<ul> <li>MPI has reviewed and where appropriate changes were made to the template. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> <li>MPI has advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as to align requirements with best practice.</li> </ul>
Territorial Authority (034)	Approved Template FCP for Schedule 1	<ul> <li>Observed some inconsistencies in template FCP. Concerned that there was too much technical information in template FCP. Suggestions provided for improvement of different sections of template.</li> </ul>	<ul> <li>Noted.</li> <li>MPI has:         <ul> <li>reviewed and where appropriate made changes to template. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> <li>advised that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user-friendliness' into account wherever appropriate.</li> </ul> </li> </ul>
Food Business (032)	Approved Template FCP for Schedule 1	<ul> <li>Requested for more information on treatment of water with chlorine to include corrective and preventive actions in the template FCP.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>explained that requirements for water are provided in the Food Regulations 2015 and the Notices.</li> <li>advised that overall water is to be fit for intended purpose. The 'water supply'</li> </ul> </li> </ul>

			<ul> <li>section in the Notice identifies what a business must do if water is found not to be suitable for food processing.</li> <li>advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as to align requirements with best practice.</li> </ul>
Territorial Authority (12)	Approved Template FCP for Schedule 1	<ul> <li>Requested for guidance on corrective and preventive actions with regard to microbial limits. Suggested improvement of template FCP in relation to cooking meats and poultry. In addition, wanted more information to be provided on <i>Listeria</i> management.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>reviewed and where appropriate made changes to template. The changes reflect legal requirements, correction to errors and where relevant, submitters' feedback.</li> <li>advised that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user-friendliness' into account wherever appropriate.</li> <li>reviewed and amended section on <i>Listeria</i> in Notice.</li> </ul> </li> </ul>
		<ul> <li>Requested more information on self- supplied water.</li> </ul>	<ul> <li>MPI has:</li> <li>explained that water requirements are provided in the Food Regulations 2015 and the Notices.</li> <li>advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as to align requirements with best practice.</li> </ul>
Special Interest Group (004)	Approved Template FCP for Schedule 1	<ul> <li>Proposal to review thawing temperatures given in guidance.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has provided thawing guidelines in final Notice.</li> </ul>

Government Agency Approved Template (035) FCP for Schedule 1	<ul> <li>Proposal to consider developing a single robust cooling section in the template FCP.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has:         <ul> <li>reviewed and aligned the time/ temperature conditions across all Notices.</li> <li>advised that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user- friendliness' into account wherever</li> </ul> </li> </ul>	
		<ul> <li>Requested for guidance to be provided in relation to requirements needed to operate a self-supply drinking water facility.</li> </ul>	<ul> <li>appropriate.</li> <li>MPI has: <ul> <li>explained that water requirements are provided in the Food Regulations 2015 and the Notices.</li> <li>advised that overall water is to be fit for intended purpose. The 'water supply' section in the Notice identifies what a business must do if water is found not to be suitable for food processing.</li> <li>advised that further work is being carried out and may be incorporated in legislation (subject to consultation) in the future so as</li> </ul> </li> </ul>
Government Agency (007)	Approved Template FCP for Schedule 1	<ul> <li>Clarification sought on transition period required to transition across to the new Act for ECE and schools.</li> </ul>	<ul> <li>to align requirements with best practice.</li> <li>Noted and actioned.</li> <li>MPI has provided clarification on the MPI website.</li> </ul>
Territorial Authority (006)	Approved Template FCP for Schedule 1	<ul> <li>Requested for guidance to be provided for handling raw or uncooked meats.</li> </ul>	<ul> <li>Noted.</li> <li>MPI advises that there is adequate information in the meat section of the template FCP. Further information on the subject can be found on the website under food safety.</li> </ul>

		<ul> <li>More information needed for cleaning schedules in template FCP- (1.55) to include dilution factors, contact time, and rinse off details.</li> </ul>	<ul> <li>MPI advises that cleaning schedules are operator driven. However, businesses need to get guidance from manufacturer's instructions for dilution of chemicals, contact time, and rinse off details.</li> </ul>
Food Business (017)	Approved Template FCP for Schedule 1	<ul> <li>Proposed that guidance be provided for thawing meat.</li> </ul>	<ul> <li>Noted and actioned.</li> <li>MPI has provided thawing guidelines in final Notice.</li> </ul>
		<ul> <li>Simplify monthly verification reporting requirements.</li> </ul>	Noted, but not feasible at this stage. (See Table 1, for MPI full response).
Special Interest Groups (015)	Approved Template FCP for Schedule 1	<ul> <li>Suggestions that there be a library of specialist sections to enable operators pick out sections that are relevant to their operation. Suggested that all high risk foods be thoroughly cooked and records kept.</li> </ul>	<ul> <li>Noted.</li> <li>MPI has:         <ul> <li>advised that template reviews are ongoing, and will continue to take user feed-back about structure, wording and 'user-friendliness' into account wherever appropriate.</li> <li>provided control measures for preparation of high risk foods in Notice.</li> </ul> </li> </ul>