Ministry for Primary Industries
Manatū Ahu Matua

Custom Food Control Plan

A guide to help develop your custom Food Control Plan

Making safe and suitable food

The Food Act 2014 is outcome based which means you can show how you will manage your risks in a way that works for your business. There could be a number of different ways for you to show you are making your food safe.

As a food business you take responsibility for ensuring that you have ways to make your food safe in how it is made, produced, transported or sold. It is up to you to decide how to best meet the food safety requirements in a way that works for you. Your plan is the way you will demonstrate how you are going to meet those requirements.

Version dated 01 May 2017

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Introduction

What is a custom Food Control Plan (FCP)?

A custom Food Control Plan (FCP) outlines the rules a business follows to produce safe food. You have to produce a written plan that shows you can make safe and suitable food. Your plan can take many forms such as a procedures manual, a recipe book, posters or any combination of these.

The plan tells the story of what your business does. It is a step-by-step break down of:

- what happens (processes),
- when it happens (products and procedures),
- who does what (roles),
- what you do when something goes wrong (managing risks).

Why are you writing a custom Food Control Plan?

- You work with unique or specialised foods.
- There is not a generic way of managing your food risks.
- It is likely that you make or handle high risk foods.
- The Food Act 2014 says you must.

  OR
- You have chosen to write your own plan.

Where can I find more information?

You can find more information on the MPI website.

- Call the Ministry for Primary Industries (MPI) for information about how to register, and the rules and processes for your plan.
- Contact your industry association (if you have one) for help or information.
- Call a consultant for questions or help about writing your plan.

How do you know if your plan is ready?

You will know it is correct when MPI registers your plan because:

- We are able to understand how you will manage your risks.
- We can be confident that you know how what you do affects food safety.

Imagine your plan is like a contract between your business and MPI. MPI trusts that you will provide safe and suitable food for your customers. Your plan will show MPI how you will manage to do this.

How should I use the guide?

This guide has been written to help you develop your own custom plan. It is likely that you will need a specialist to help you write your plan if you do not have the in-depth, technical understanding in your business. There will be parts of the plan you can write yourself and some sections you might need help with. For this reason we have split the guide into four colour coded sections — green, yellow, red and blue.

- **Green** — you can fill this in without technical support.
- **Yellow** — you may be able to complete this, but you might need to seek advice if there are complex technical processes and procedures in your business.
- **Red** — only a technical specialist will be able to complete these sections. Red indicates an area where you have to identify any dangers and risks associated with your business in relation to food safety. In order to complete this section you must be skilled and knowledgeable in the food safety issues that might occur. It is essential that this part of your plan is right as it will include the areas where people could get sick or die if not accurately identified and outlined.
- **Blue** — the blue section explains what to do after you have registered your business.

Technical specialist — someone who is technically knowledgeable in food safety and understands any risks and potential dangers in the products and procedures involved in making your food. They may have tertiary (e.g. university) training and qualifications in food safety. Qualifications could include a Food Science or Food Technology degree or an NZQA qualification in HACCP.

When developing your plan you have three options:

1. Write all of your plan because you have the technical food safety knowledge.
2. Employ someone to work for you who has the technical knowledge and can write these sections of the plan or recruit someone trained in this.
3. Contact a consultant who can help you write the red sections of the plan.

Awesome toast: Think of it like this...

You may know the best way to make awesome toast, how to spread the right amount of butter, how long to bake it to get the perfect crisp bite and the secret ingredient which makes your bread better than anyone else's. It doesn't mean you know the food safety hazards when making toast and you might not be able to identify what the really dangerous parts of the process are that could lead to someone getting sick.

Making toast is generally seen as a low risk process, and toast is considered a low risk food. But you could still make people sick by:

- Putting the toast on a bench used to prepare raw food (without cleaning in between).
- Mixing up gluten-free bread with other bread — serving non gluten-free bread to a person with coeliac disease.
- Using the peanut butter knife to spread the butter.

To help you navigate through this guide, we have placed specific icons throughout to help you decide what you need to do next.

Stop

Help

Think

Technical Specialist

How long does it take to write a plan?

It can take a while to write your plan and then have it evaluated and registered. You should probably allow up to 6 months depending on the complexity of your business. Creating your plan should ideally start at the same time as you decide you want to develop and open your business. Food safety considerations can impact on your business plan and your budget. Getting it right the first time means you don't make costly mistakes that need to be corrected later. From day one it is important to consider the date you want to be able to sell food. Once you know this, you can work back from that date and schedule in appointments with your evaluator (and where you may require it, contact a consultant). A template calendar has been included for you to map out each step (see page 26).

Do you want to open your business soon?

If you are reading this guide and have left it too late to develop your plan, contact MPI and we will see if we can help.

There are a few points you will want to think about before you start writing your plan.

- You should think about what food safety actions you need to take as early as possible. There are some parts of the process that need to be scheduled in advance. Find out all of the information you need before you start writing that part of the plan such as your building specifications and layout.
- Food safety is part of many decisions you will need to make when setting up your business. You may need to make critical decisions about the type of materials you use in the build of your kitchen. For example, you may need to seal your concrete walls to prevent bugs from growing.
- Your plan can be lots of different things — think about if you want it to be a training tool as well as a plan.
- Decide whether you will be using your plan to train others. If yes, you will want to consider how your plan can be used in that way.
- If you employ staff you will need to document robust procedures that they can follow.
- It might be easier for you to write your plan in a different language.
  Note: You will still have to submit it in English for evaluation and registration.

Overview

Steps you need to follow

Below is a high level overview of the process you need to follow before you can sell food.

Plan what you need to do

- Research your food safety obligations
- Write out a timetable
- If required, contact a consultant
- Contact an evaluator and a verifier

Write plan

- Business details
- Processes and procedures
- Essential food safety steps
- After registration

Test plan

- Laboratory testing
- Small scale trials

Evaluate and register plan

- Evaluate plan
- Submit application to register your business
- First verification
- Keep your plan up-to-date

Building blocks

We have outlined the process you should go through to build your custom plan. It breaks down the previous overview into more detailed steps.

You will have to complete specific actions that show you are going to make safe food. A calender is provided at the end of this document to help you plan ahead. An example is given on page 7. You are not legally allowed to sell food unless you have completed the following:

- Having **evidence** that your plan works (which may include testing).
- Your plan has been **evaluated**.
- Submitted a **registration** form for your business to MPI.
- Have a **certificate** from MPI that proves you are allowed to sell food.

Once you are selling food you must schedule a verification of your business within 3 months.

- Decide to open a new business.
- Complete research including finance, feasibility and **food safety**.

- Understand what you need to do to write your plan.
- Write a timetable working back from the date you want to sell food.
- **Note:** You may need to reconsider your budget if you need to do food testing or engage a consultant.

- Decide whether you can complete the red section.
- If required, contact a consultant who can help you write your plan.
- Complete the green sections of your plan.
- Find a suitable evaluator. Book in the date your plan will be sent to the evaluator and schedule a site visit.

- Complete any other parts of the plan that you can do yourself.
- If required, work with the consultant to complete the sections you need help with.
- Your plan will be complete.

- Test your plan (validate it).
- Complete any required testing that you can do now.
- Where you do not have the quantities for a full test you may be able to conduct small scale trials.
- If you can't fully test your plan until you are registered by MPI and start operating, outline how you will handle any food produced in your plan until it is proven safe.

You need to prove that your plan will allow you to produce safe and suitable food. This may require you to produce technical scientific evidence including sending samples off for testing.

- Send your plan to the evaluator.
- If required, revise and retest.
- Receive a report confirming your plan has been evaluated.

The evaluation shows you can produce safe food and confirms that the plan meets the requirements of the law.

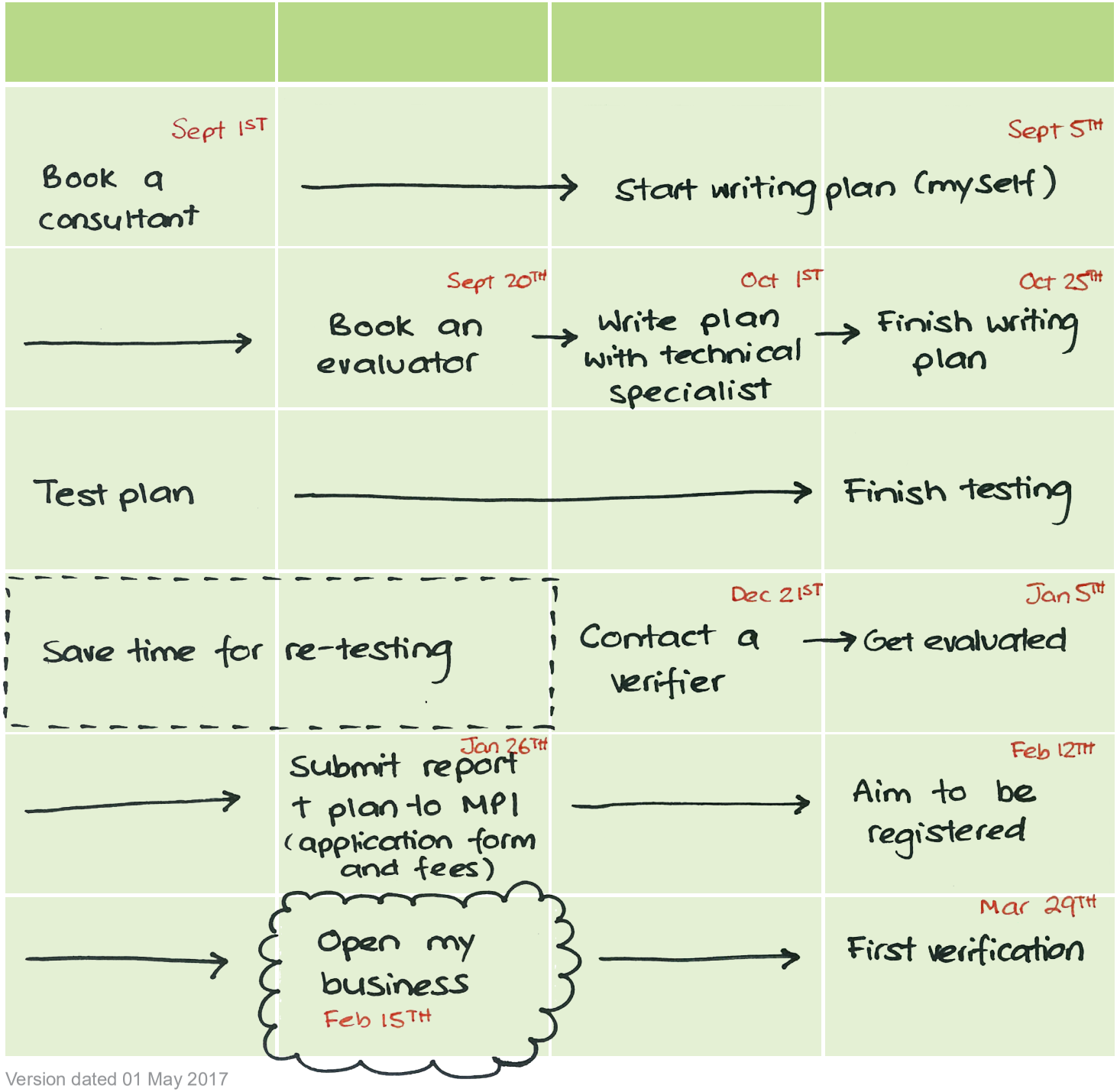
- Submit evaluated plan, report, registration form and scope of operations to MPI.
- If required, answer any questions MPI might have about your plan.
- MPI will check your plan and evaluation report and, if everything meets requirements, issue you with a registration certificate.
- You may have food safety conditions that you have to follow from the testing part of your plan.

You need to outline how you will prove your plan ensures food will be safe. You will not be able to sell food until you can prove this. You may need to monitor and test until you have evidence that proves people will not get sick from your food.

You cannot start selling food until your registration is complete. It can take up to 25 days for MPI to approve your registration. It will save you time and money if you submit accurate and complete documents that don't need to be resubmitted.

- Your business can now sell food.
- You must have your business checked by a verifier within 3 months of selling food.
- As you begin making and selling food you might identify procedures that don't work as well in practice as they looked like they would in theory. Discuss these with your verifier to see if adjusting these procedures would be a good idea. If you do, they might require a 'significant amendment' to be registered with MPI.

Example: Planning ahead template



What you need to do

You need to take specific actions in order to complete your custom Food Control Plan. Write down these key stages in the template provided on page 32.

1. **Open date —** When you would like to start selling food.
2. **Consultant** — Schedule a consultant (optional).
3. **Write plan.**
4. **Testing —** Test your food is safe which may include lab testing. This could be an iterative process and can take some time. Plan how long you estimate testing your plan will take and write this into the calendar.
5. **Evaluation** — Booking an evaluator may take time to schedule. They can be busy and they will most likely need to visit your business. Allow three weeks for them to evaluate your plan. Schedule in the template when you are planning to be evaluated and book early.
6. **Register** — Register your plan and report with MPI.
7. **Verification** — You have to book your first verification within 3 months of selling your food.

How to write your plan

There are four main sections in your plan. These are:

- **Business details**
- **Processes and procedures**
- **Essential food safety steps**
- **After registration**

For an explanation of the colour coding see page 2.

When writing your plan imagine you are writing the story of your business. Your story will include:

- What are you making?
- Where are you making it?
- Who does what (roles)?
- Why are they doing these roles and how were they trained?
- Who will answer questions about how different parts of the business work?
- What your processes look like?
- How it works?
- What happens when things go wrong?
- How will you know something has gone wrong?
- How will you put it right?
- Who is in charge of making sure the essential food safety procedures are followed?
- Who will keep your plan up to date and keep records of what happens when?

Ask yourself...

Writing your own plan is not easy. Ask yourself ‘do I know how’ or ‘does someone in my business know how to do this?’

- **Yes** — I understand all of the technical food safety implications.
- **Some of it** — I will complete sections that I can and leave the rest to a technical specialist.
- **No** — I need specialist expertise and I will contact a consultant.

If you do not have the knowledge in your business seek help as soon as possible. It may take time to schedule a consultant who can help you.

Getting help with your plan

In order to meet your regulatory requirements, you need to identify and control hazards that could make your food unsafe. It requires:

- A detailed understanding of the products and processes within your business.
- Knowledge and understanding of complex microbiological, chemical or engineering concepts.
- Understanding of some legislative requirements relating to labelling and composition of foods which may require expert assistance to ensure compliance is being achieved and maintained.

It may be that your food business employs regulatory and technical staff (subject matter experts) specifically to ensure your business is able to meet your food safety responsibilities. It is more likely that you don't have food safety subject matter experts on staff if you are a smaller business. In this case you may want to consider how a consultant could be engaged to provide this food safety expertise on an 'as required' basis.

Ask yourself if you need to recruit a technical expert or consultant to help you write your plan. It will save you time and money if you get your plan right the first time. Before you contact a consultant work out:

- **What can you do yourself?**
- **What do you need help with?**
- **When will you need help (schedule this in)?**
- **How long will it take to write those sections of your plan?**
- **Will your plan be written in time for the evaluation date?**

What help could a consultant provide?

The role of a consultant could include:

- Writing your processes and procedures.
- Writing your Hazard Analysis Critical Control (HACCP) plan.
- Assessing your food labels.
- Validating your food safety protocols.
- Determining the shelf-life of your foods.

It is likely that the consultant will need to spend time with you in your business. Some activities could take time and require an in-depth of knowledge about your business location, equipment and layout, that cannot be achieved over the phone or by reviewing documentation.

Business details

You don't have to reinvent the wheel. There are templates you can use in the Food Control Plan template on the MPI website.

This section explains how to outline your business details. It is colour coded green as you should be able to complete this yourself. You can fill this section out as soon as you know where your business will be located and what you will be doing. You need to draw a map and floor plan that includes:

- **Your building.**
- **The buildings surrounding it.**
- **What happens in the different areas on your map.**
- **What happens in your buildings.**
- **What happens in the different areas of the building.**
- **Example** (see page 11 site map inside).
- **Example** (see page 12 site map outside).
- **Some non-food activities being conducted in the same or neighbouring building / property that might affect food safety may need to be included in your map of your business.**

Business and management responsibilities

You need to tell us about your business and management responsibilities. This includes:

- **The business(es) included in your plan.**
- **Who will run your business (operator).**
- **Who will be the day to day manager and be responsible for your plan.**
- **Information about your business including the address(es).**

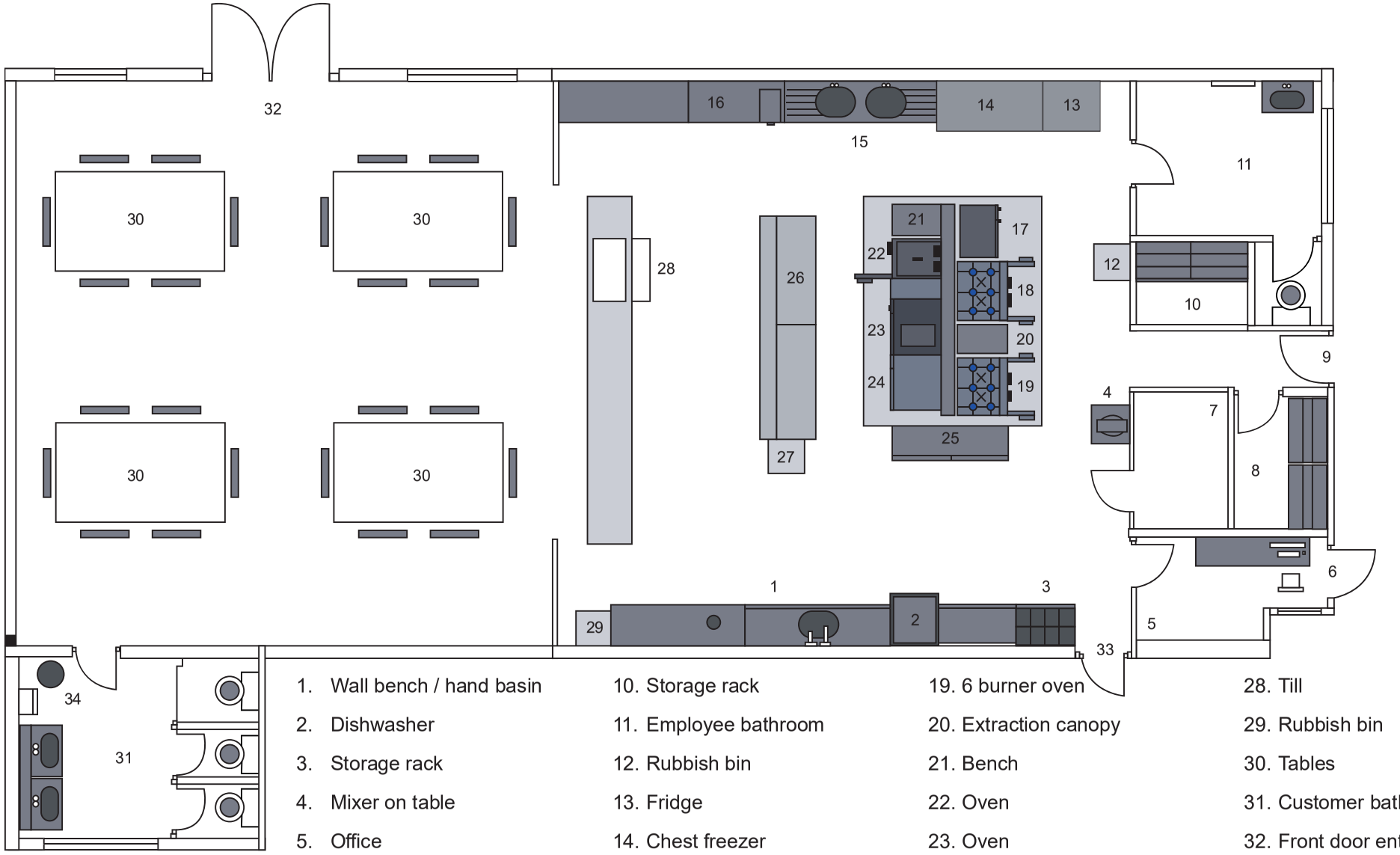
Roles and responsibilities

You need to tell us about who will work in your business and what they will do. This includes:

- **Job roles and responsibilities (this could be a job description).**
- **Any training requirements for anyone who works in your business.**
- **What knowledge and experience they have.**
- **Who is responsible for managing your processes, procedures and hazards (Good Operating Practice and Hazard Analysis Critical Control Point).**

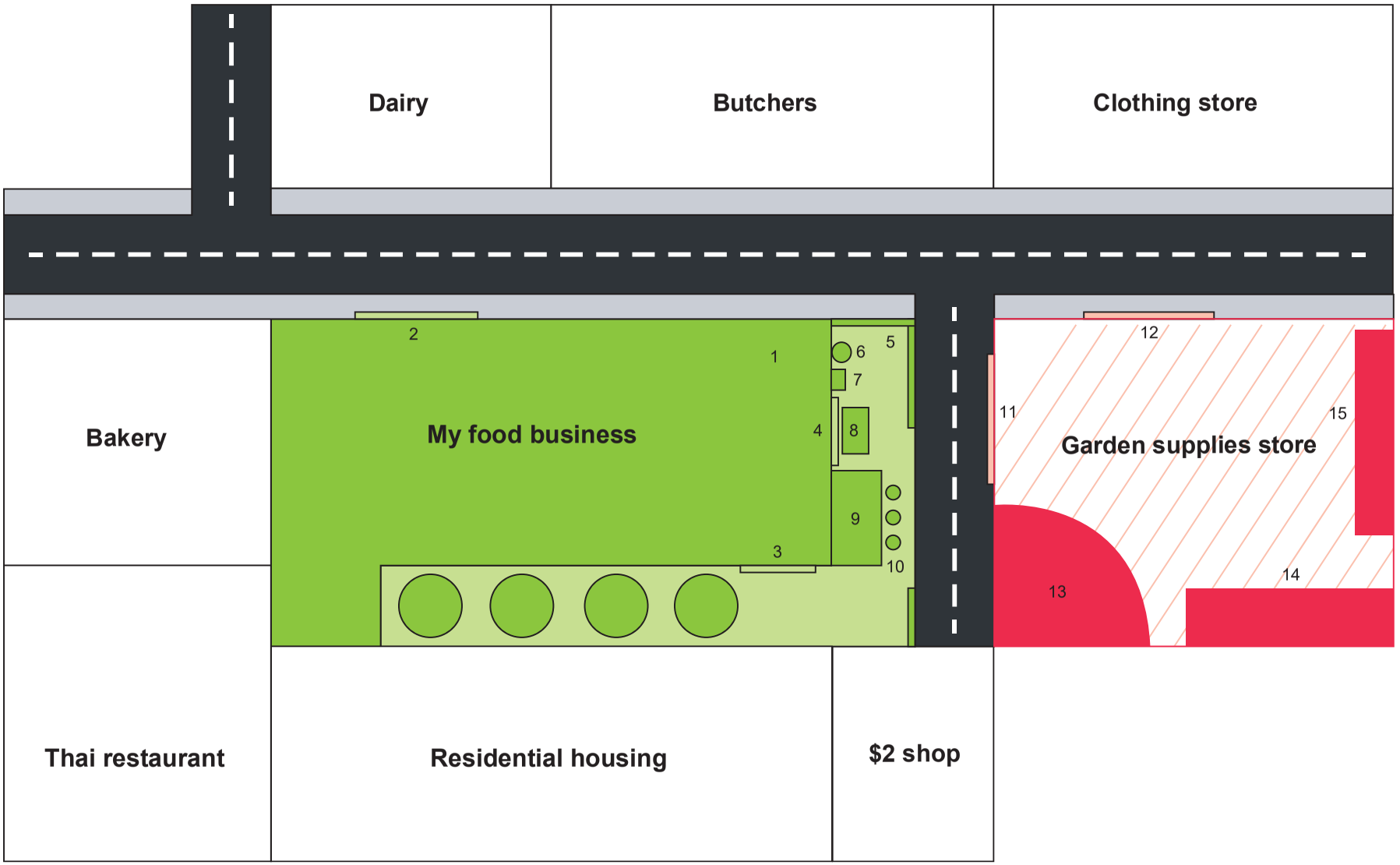
- **A day to day manager** is the person who has the overall responsibility to make sure your plan is being followed and the appropriate checks and records are completed. It is most likely to be someone getting paid by the business.
- **Operator** means the owner or the manager of the food business or person with overall responsibility for the business.
- They can be the **same person** or **different people**.

Example: Site map (inside). This can be hand drawn.



1. Wall bench / hand basin
2. Dishwasher
3. Storage rack
4. Mixer on table
5. Office
6. Office door
7. Cold room
8. Storage rack
9. Service entrance
10. Storage rack
11. Employee bathroom
12. Rubbish bin
13. Fridge
14. Chest freezer
15. Sink unit
16. Wall bench with drawers
17. Fryer
18. 6 burner oven
19. 6 burner oven
20. Extraction canopy
21. Bench
22. Oven
23. Oven
24. Oven
25. Food preparation
26. Food preparation
27. Rubbish bin
28. Till
29. Rubbish bin
30. Tables
31. Customer bathroom
32. Front door entrance
33. Back door
34. Rubbish bin

Example: Site map (outside). This can be hand drawn.



1. My food business
2. Front door entrance
3. Back door
4. Service entrance
5. Courtyard
6. Drain
7. Foot bath
8. Sticky mat
9. Large skip
10. Rubbish bins
11. Service entrance
12. Front door entrance
13. Compost
14. Chemical supplies
15. Garden supplies

Writing processes and procedures

We have colour coded this section yellow. You may be able to write this part yourself even if you are not a technical specialist. It will depend on how complex your business processes are.

Can you do the following?

1. I can write the well-known and well documented procedures such as cooking poultry or cooling down food (I can use the procedures outlined in the template food control plan). https://www.mpi.govt.nz/food-safety/food-act-2014/forms-and-templates/

2. There are some processes which contain more complex issues where some information is available already but there are a few gaps. I think I can use similar processes that already exist to show it is safe. I will also seek some technical peer review and corroboration to confirm it works.

3. There are processes in my business that are so unique that I don't know what the procedures, risks and controls are to make the food safe. I will need to back these procedures up with testing and prove they are creating safe and suitable food. I will need technical help with this.

Writing out your products and processes

What you do. List your:

- **Products / ingredients / incoming goods** — Start with the products and ingredients you use and where they come from. If you make similar products you might only have to do this once. If you make different products you may have to do this a number of times.
- **Quantities** — Add the quantities and frequency that you use these products.
- **Equipment** — List the equipment you use and how you use that equipment.
- **Actions** — Write out how you do these things, processes (what) you have in place and the procedures (how) you follow.

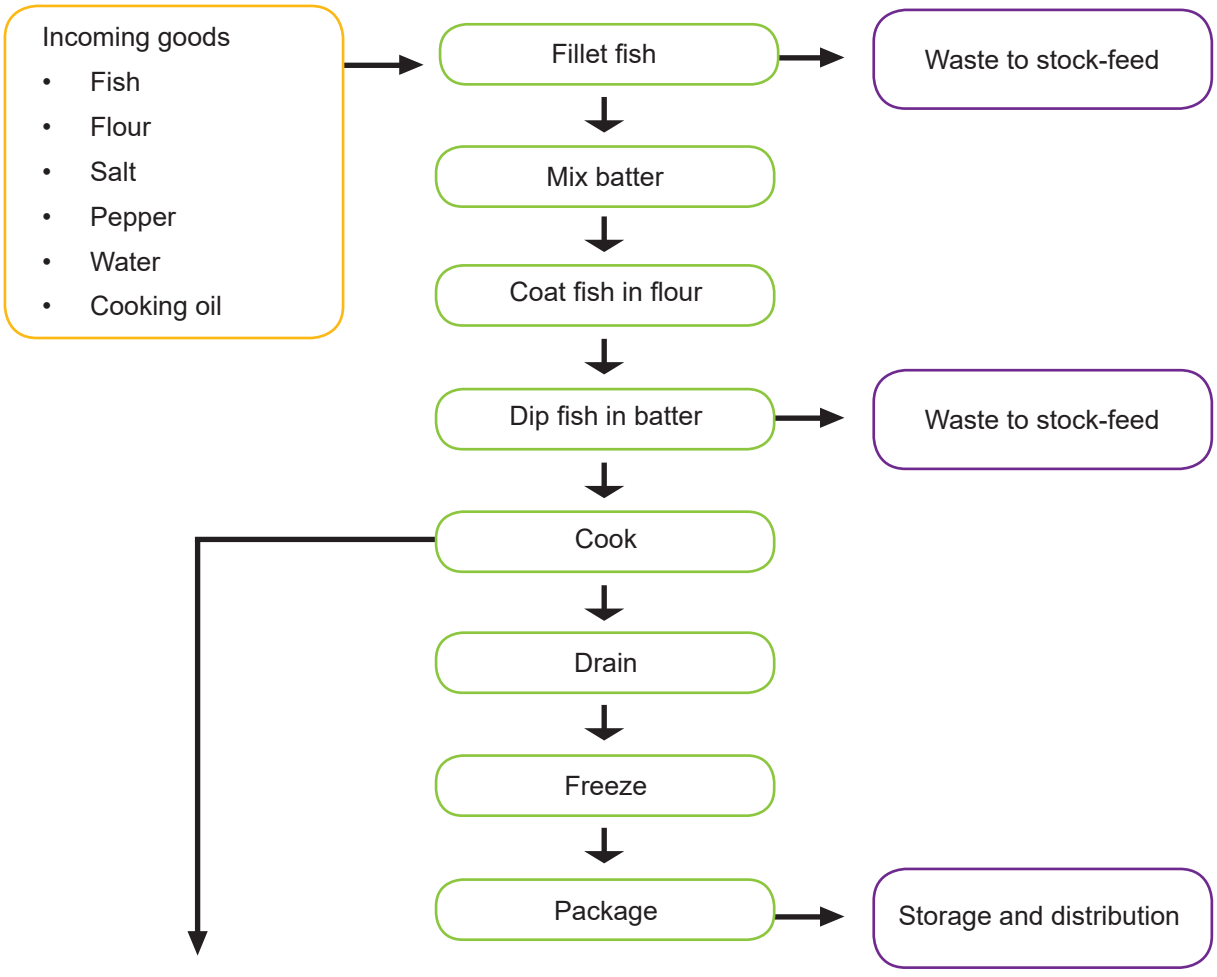
You should consider writing what you do in enough detail so that someone can follow your plan or procedure without any prior knowledge of your business or product.

Imagine you and all of your staff are going on holiday and someone who has never worked in a food business has to run your business safely while you are away. This will make your plan a useful tool for your business.

You have to write down what you do in your business and outline the steps for how each of your products are made. We need to be able to understand how it works. You could do this by writing down everything you do in a day from when you get to work until you go home. A new starter could use it as a training guide. By reading it they would know how to do their job safely and accurately.

1. You might want to start with a process flow diagram — this shows what you do.
2. For each box in the diagram you will need a procedure (or instructions on how to do this). Some procedures will be simple, others might be more complex — this shows how you will do it.
3. Some procedures may have steps that have to be done right every single time — otherwise people might get sick or could die. You will have to identify how you and your verifier will know these steps are done correctly every single time. You will need to keep records of this. These steps will be identified in the HACCP plan (next section).

Example: Process flow diagram (cooking fish for packaged frozen fish fillets (small factory local distribution)



Procedure: 'Cook' procedure

- The cook checks that the temperature of the oil is measured as 180˚C, and writes down the time he did this and the actual oil temperature.
- The cook places fish in the fryer with no more than 20 pieces at a time.
- When the last piece of fish goes into the fryer the cook starts the timer.
- The fish is cooked for at least 3 minutes.
- Then the cook checks the colour against the colour chart once per day.
- The biggest piece in a batch (randomly selected by the manager) is checked to see the internal temperature has reached 72˚C and the batter colour is at least 'golden'.

Common procedures - How you will manage common food business procedures? (Good Operating Practice - GOP or 'the basics')

Did you know that a lot of actions you do every day are for food safety reasons, for example, cleaning, taking out the rubbish, washing hands?

- Look at what you have written down so far. Are there common things you are going to do to make sure your product is safe? Write out these common activities.
- When writing a food safety plan there are often common ways people find to keep their food safe. These are called Good Operating Practice (GOP) and include procedures for things like cleaning and personal hygiene.

Don't reinvent the wheel!

- We have developed a template food control plan which includes common procedures.
- Once you have identified the common procedures your business will need you can use the procedures outlined in the template.
- You can use them as they are or amend them for your plan without having to write them yourself from scratch.
- You can find these in the template food control plan https://www.mpi.govt.nz/food-safety/food-act-2014/forms-and-templates/
- If you are looking for GOP in the template food control plan it is called 'The Basics.'

A list of GOP procedures are available in the template including:

- Building facilities and equipment
- Allergen management
- Chemical control
- Cleaning and sanitising
- Identification and traceability
- Incoming materials
- Personal hygiene and behaviour
- Pest control
- Product information (labelling and composition)
- Process control
- Complaints, non-conforming product, corrective action and recall
- Repairs and maintenance
- Storage and transport
- Training, education and competency
- Waste management
- Water — council / network supply
- Water — roof water supply
- Water — ground or surface water

Essential steps for food safety

Notes for food business:

This section has been colour coded red. This is because you are required to identify the hazards reasonably likely to occur. The most common way to identify these is through writing a Hazard Analysis and Critical Control Point (HACCP) plan and that can be complicated.

A HACCP plan identifies where in your food business / process you need to be especially careful to get things right to avoid making people sick. Some parts of the process will be essential to get right, (a critical control point), otherwise you risk people getting sick or dying. Essential steps will need to be checked regularly to ensure they are being done properly.

You only need to include elements that have not been covered by Good Operating Practice ('the basics')

Staff carrying out these steps will have to keep records of measuring key things. These will be the evidence the verifier will look at as part of checking you are managing food safely.

The person completing the HACCP plan needs to:

1. Demonstrate safety

- Show how you are making safe food for each stage.
- Write out how you are going to know it is safe (this is the bit MPI will take most interest in).

2. Identify safety measures

- Add the safety measures you are putting in place to demonstrate how you know it is safe.
- Outline how you will check this to make sure it is safe. Here you will need to add sound scientific references to prove that your technical safety measures work.
- If you conduct any testing (such a laboratory testing) you write it in this part of your plan and explain what you did and the results of that testing.

3. Describe unique and high risk activities

- Here you will need to write out how you will manage activities that are unique and high risk in your business.

Completing a HACCP plan can be complicated and this might be where you are most likely to need the help of a consultant or someone who understands it.

Ask yourself...are you someone that knows about the seven principles of HACCP? If no, you will need someone who does to write this section.

You or your consultant should identify the really dangerous things you do in your business. From a food safety perspective it is essential you get this part of your plan right.

When you or a technical specialist writes your HACCP plan you identify the things you do. Part of writing a HACCP plan will be identifying the things that **if you don't get them right every single time people might get sick and die.** These are called Critical Control Points (CCP).

You could think of HACCP like this…

The HACCP plan is the glue that holds it all together.

A Jesus nut can be found on a helicopter and holds the main rotor to the mast. If it fails, the chances are high that everyone dies. It has come to represent a single point of failure that has catastrophic consequences.

The failure of the Jesus nut can happen for three main reasons.

1. The **manufacturer** made it badly.
2. The **engineer** didn't fit it properly.
3. The **pilot** hasn't checked it was tightened properly before the flight.

- A pilot has to check the Jesus nut **every single time** the helicopter is used. Although it is unlikely that the nut will fail it has to be checked as the consequences could be fatal.
- In most cases where the Jesus nut fails it is because it hasn't been tightened properly. The safety procedures of checking the nut every single time is critical.
- Different people have different roles. You wouldn't have your pilot make the nut or design it, as it is a critical safety feature and the pilot's job is to fly the helicopter, not build it.

So in food safety terms…

- A HACCP plan helps you identify the things that you have to get right every single time as people could get sick or die if you don't identify your critical control point(s) or Jesus nut.
- You may have a procedure in place that has to be followed without fail.
- You have a way of knowing if something has gone wrong before people get sick or die.
- The cook or the manager's job is to cook the food and to check the CCP - but not necessarily to identify the CCP. You need a technical expert to do this and it is unlikely they are the same person.

- You or your consultant should identify the really dangerous things you do in your business. It is essential you get this part of your plan right.

Notes for technical experts / consultants

- MPI assumes you are preparing the HACCP plan because you are qualified and experienced enough to do so. It is critical that you only take the job if you have the necessary knowledge and skills.

- When you prepare a HACCP plan it does not have to be part of the FCP. However a description of the hazards and other factors reasonably likely to occur (after GOP is taken into account) must be submitted with the plan for evaluation.

- MPI expects you to conduct HACCP analysis on hazards that are reasonably likely to occur.

- It is a good idea to refer to the MPI hazard database because this identifies hazards reasonably likely to occur in New Zealand's food and ingredients.

- It is part of your job to make sure the person who has to carry out critical actions or measure critical limits knows that these are essential and know, how to do this.

- You need to describe the critical actions and measures in a language that makes sense to them. This generally refers to style (e.g. simple pictures and diagrams). But this may include languages other than English. If the documentation used by the business is not in English, an English translation must be available for evaluation, registration and verification purposes.

- You must ensure the CCP's are validated, or if they can't be validated until after the business opens you must write a validation protocol for the business to follow.

- You must explain what the operator will do with any product produced during trials before it has been shown to be safe. For example: Put the product aside until it is proven safe. This product may be sold once proven safe. If the product is not safe explain how the operator will dispose of it.

- An example of a completed HACCP plan is shown on pages 21 - 27.

The HACCP plan needs to include:

Regulatory requirements or limits applying to the food or process used in the business.

There are areas you need to check to see if they apply to the business and then write about them in the plan. Are there any rules or regulations that apply to these products? Check the following:

- The Australia New Zealand Food Standards Code
- Food Act 2014
- Food Regulations 2015
- Food Notice: Importing Food
- Food Notice: Food Control Plans and National Programmes
- Drinking-water Standards for New Zealand 2005 (Revised 2008)
- Interface with and relevant requirements under other enactments e.g. Animal Products Act 1999, Fair Trading Act 1986, Agricultural Compounds and Veterinary Medicines Act 1997, Consumer Guarantees Act 1993.

It is a good idea to review the site plans produced by the operator and ensure activities in the same or neighbouring properties that could affect food safety have been identified.

References you might find useful are available online and include:

- Codes of Practice
- Process guidance
- Scientific literature
- Guidance for control of Listeria monocytogenes in ready-to-eat foods
- Microbiological reference criteria for food
- Further processing — Code of Practice
- Processed meats — Code of Practice
- Industry standards and guides
- Food labelling guide

Once your HACCP plan is complete you will need to review the FCP in its entirety to make sure:

- Appropriate control and critical control points have been identified.
- The plan can be followed by staff members.
- If it is followed, it will ensure the safety and suitability of food.

What happens after registration

- You need to be able to use your plan and have it accessible at all times.
- You must keep all of your records from the testing so you can prove you are making safe food. If you don't have this in place you could be shut down.
- Make sure your plan is kept up-to-date and continues to be relevant.
- Have your plan ready for your first check when your verifier visits.
- Remember that your plan is like a contract between you and MPI. If you break the contract there are consequences ranging from warnings to prosecution.

Verification involves checking you are following your plan and that everyone in your food business is doing their part to keep food safe and suitable.

If you fail your first verification you will be checked more often and this will cost you more.

If you pass two verifications in a row you will be checked less often, costing you less.

How to keep a valid and relevant plan

You must do the following to keep your plan valid and up to date. These include:

- Ensure anyone that either works for you (staff) or checks the business (verifiers and regulators) can access your plan.
- You must develop a procedure outlining who can change parts of the plan as required. This procedure needs to outline when changes will be needed to the plan and when it will need to be resubmitted to MPI. These are called significant amendments or significant change in circumstances. If you make any changes to the critical control points in your HACCP you will need to have your plan re-evaluated.
- You must have, and follow, a procedure for managing versions of your plan to make sure everyone is working to the most up-to-date copy.

A significant amendment or significant change in circumstances most commonly relates to the following:

- A change in your scope of operations (ingredients, products or processes).
- A new person taking over an important role in your business (e.g. the manager).
- The location of your business.

Other examples of this include:

- A change of operator.
- Adding a new process.
- Cooking a new type of food.
- A change in any of your essential food safety steps (critical control points).

HACCP plan example

This is not a template, it is an example to show you what a HACCP plan might look like. We have added comments about our 'workings' in the blue speech bubbles.

To complete a HACCP plan yourself for your own business you need to be trained in HACCP and / or a technical specialist.

Scope and product description to establish food safety requirements

Plant Address:
XYZ Tofu Ltd
987 Karori Road
Karori
Wellington

Product
Firm tofu
Tofu to be eaten cooked or raw (ready to eat product), to be kept refrigerated (0-4°C)
For general human consumption
Shelf life 21 days from manufacture
MPI hazard database: Soy bean is a potential allergen, this means there is a mandatory allergen labelling requirement under standard 1.2.3 of the Australia New Zealand Food Standards Code (the Code).

Hazard identification and analysis — HACCP principle 1

(Look at the inputs and process steps to determine what (if any) hazards they might introduce)

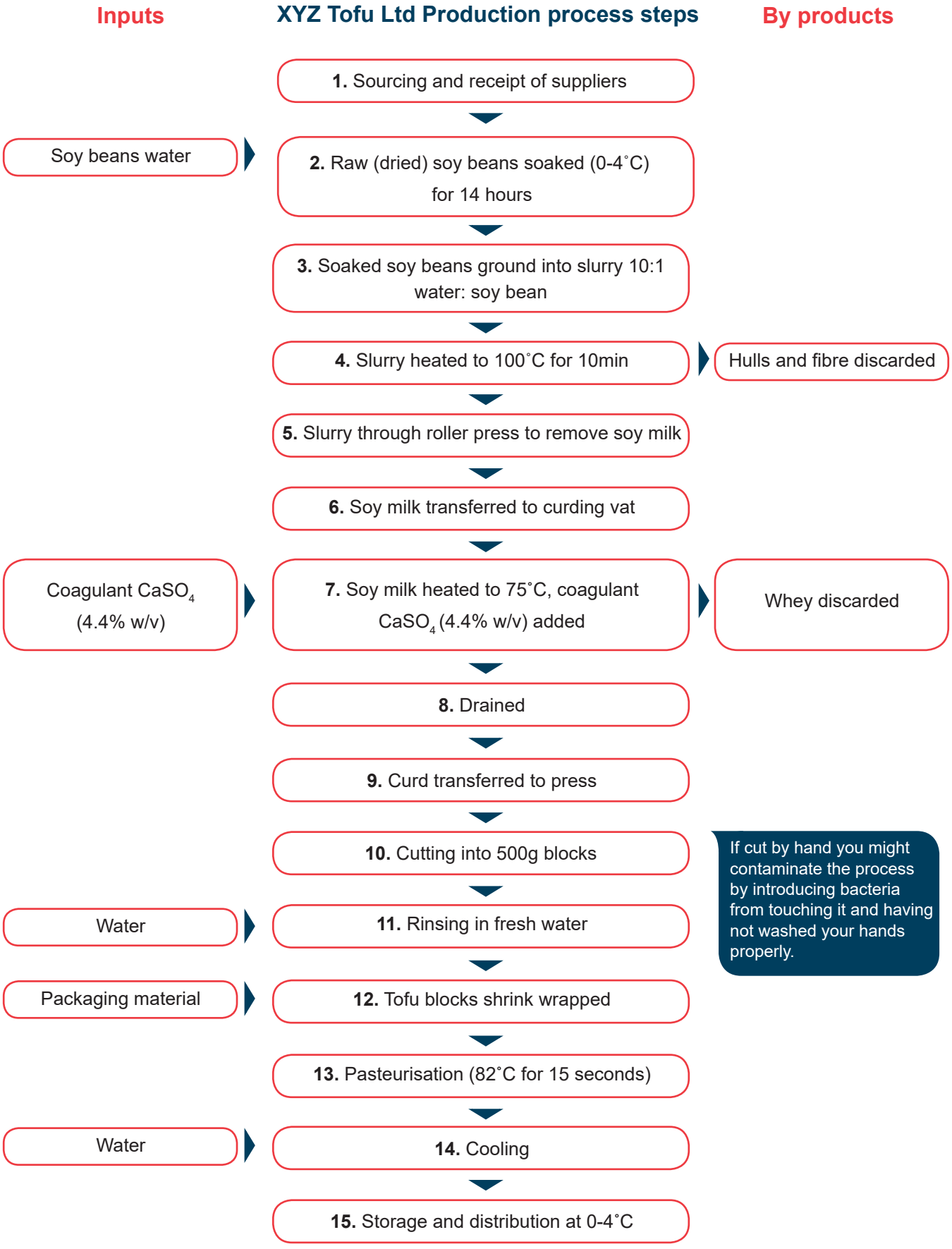
List all inputs and any hazards (physical, chemical or biological) that comes in with them. E.g. raw chicken has bacteria. Your supplier will tell you if it might contain listeria or e.coli.	Inputs	Description/ specification	Biological hazard	Chemical hazard	Physical hazard
	Soy beans*	Dried soy beans (certified for MRLs and microbial contamination)	Bacterial contamination • Listeria • B. cereus • E.coli	Nil	Stones / foreign objects
Assuming water is safe and has been tested as per GOP.	Water**	Town supply water	Nil	Nil	Nil
	CaSO4	Coagulant (food grade certified)	Nil	Nil	Nil
	Packaging***	BRC Certified Supplier	Nil	Nil	Nil

All suppliers approved under GOP.

- *Soy bean supplier inspected and approved, supplies documentation showing soy beans meet standards for chemical residues and microbial contamination
- **Water tested for available chlorine and turbidity before each days production
- ***Packaging supplier inspected and approved, has BRC Standards certification

HACCP plan example

(Break the process down step-by-step)



Critical control point determination — HACCP principle 2

(Go through each process step to see if it is a CCP)

These numbers in the process steps refer to the numbers in the production process example on the previous page.	Process step	Inputs	Hazard	Q1 Is there a regulatory or operator defined limit? Yes go to Q2 No: Step is not a CCP Consider control in GOP	Q2 Is a control measure(s) essential to achieve the limit from Q1? Yes: Step is CCP No: Step is not CCP, consider other control measures in GOP
These hazards were identified as coming in with source ingredients during the hazard identification step.	**2.** Raw (dried) soy beans soaked (0-4°C) for 14 hours	Soy beans Water	Listeria monocytogenes	Yes	No
			B. cereus		
Hazard (from step 2) not yet controlled.	**3.** Soaked soy beans ground to slurry	Water	Listeria monocytogenes	Yes	No
			B. cereus		
Here we have identified a CCP. Hazards from previous steps carried forward.	**4.** Slurry heated to boiling (100°C) 10 min, continuous agitation		Listeria monocytogenes	Yes	Yes, **CCP1**
			B. cereus	Yes	Kills vegetative cells but not spores
	5. Slurry through roller press to remove soy milk		B. cereus spores	Yes	No
	6. Soy milk transferred to curding vat		B. cereus spores	Yes	No
	7. Soy milk heated to 75°C, coagulant added	CaSO4	B. cereus spores	Yes	No
	8. Drain		B. cereus spores	Yes	No
	9. Curd transferred to press		B. cereus spores	Yes	No

Critical control point determination — HACCP principle 2 continued

	Process step	Inputs	Hazard	Q1 Is there a regulatory or operator defined limit? Yes go to Q2 No: Step is not a CCP Consider control in GOP	Q2 Is a control measure(s) essential to achieve the limit from Q1? Yes: Step is CCP No: Step is not CCP, consider other control measures in GOP
If you are manual cutting by hand you could introduce something new to the process that wasn't there before. Make sure you eliminate contamination with good operating practise (cleaning) or washing hands.	**10.** Cutting into 500g blocks [by hand or by machine?]		B. cereus spores S.aureus (if cut by hand)	Yes	No
	11. Rinsing in fresh water	Water	B. cereus spores S.aureus (if cut by hand)	Yes	No
	12. Tofu blocks shrink wrapped [by hand or by machine?]	Packing materials	B. cereus spores S.aureus (if cut or wrapped by hand)	Yes	No
If you introduce any bacteria while cutting they must be killed here with pasteurisation. Have you killed B. cereus spores or S.aureus? If yes then this becomes the second CCP.	**13.** Pasteurisation (82°C, 15 seconds)	Water	B. cereus spores S.aureus (if cut by hand)	Yes	No (but pasteurisation has been shown to increase shelf life) Yes — **CCP2**
	14. Cooling (cool to ≤25°C within 60 minutes)	Water (non-food	B. cereus spores	Yes	No
	15. Storage and distribution at 0-4°C		B. cereus spores	Yes	No

Establishing Critical Limits — HACCP Principle 3

(You must establish limits from all of your CCP's - you then use these to show how you can control each CCP)

	Hazard	n (number of samples per batch)	c (number of samples returning result ≤ m before rejection)	m (acceptable level) cfu/g	Source	
Under the Foods Standards Code we found a limit for Listeria monocytogenes	Listeria monocytogenes	5	0	10^2	FSC 1.6.1	Regulatory Requirement
Internet provided a reliable source (FDA Philippines) to provide a limit for B. cereus.	B. cereus	5	2	2	FDA Philippines	Operator defined limit

Note: Check legal limits. If you can not find suitable limits in the law, you will need to come up with your own and these need to be based on reliable scientific literature.

Other hazards

The table shows hazards identified in a customer specification that were not included in the HACCP analysis as they are considered not reasonably likely to occur.

Hazard	n (number of samples per batch)	c (number of samples returning result ≤ m before rejection)	m (acceptable level) cfu/g	Source		
E. coli	5	0	0	FDA Philippines	Operator defined limit	We can assume these hazards have been controlled by GOP — E.g. mitigated when washing hands, (the basics covers see page 15).
S. aureus	5	2	2	FDA Philippines	Operator defined limit	

Hazard database: Soy bean is a potential allergen, this means there is a mandatory allergen labelling requirement. E.g. standard 1.2.3 of the Australia New Zealand Foods Standards Code.

CCP Monitoring — HACCP principle 4

Each CCP must be monitored

CCP1: Time at temperature monitored for Step 4: Slurry heated to boiling (100°C) for 10 min, continuous stirring. Temperature during boiling continuously monitored by thermocouple and logged and recorded by data recorder.

CCP2: Appropriate time and temperature conditions established for Pasteurisation (82°C, 15 seconds) (e.g. into water bath at 90°C for 5 minutes to achieve internal temp of 82°C for 15 seconds – demonstrated by on-site validation). Water bath temperature to be monitored constantly. 5 units per batch to be tested to ensure achieving 85°C for minimum of 15 sec.

CCP Corrective Actions — HACCP principle 5

What do you do when monitoring shows loss of control?

If monitoring shows the critical control point is out of control, production to be halted until the situation is remedied and control regained. Any product produced during the loss of control must be clearly identified, segregated, and either disposed of immediately, or:

1. Reprocessed
2. Stored until test results show it is safe to release for sale.
3. Redirected into a new process that will render it safe/suitable.

Any product from the affected batch/es that was released should be recalled immediately.

Operator Verification — HACCP principle 6

How do you check to show that you are controlling your hazards?

HACCP application to be reviewed at six monthly intervals. Monitoring and any corrective action records reviewed monthly by production manager. In particular if temperatures at CCPs are regularly not being met then the process should be altered.

Any substantive change in the process, ingredients or products will trigger a HACCP review.

Review process to be documented and records filed.

HACCP Documentation and record keeping — HACCP principle 7

You need to keep records of all of the above

HACCP documentation to be maintained under documentation control system ensuring current version of

Accompanying documents

Bacillus cereus:

- http://www.foodsafety.govt.nz/elibrary/industry/Bacillus_Cereus-Spore_Forming.pdf

Listeria monocytogenes:

- http://www.foodsafety.govt.nz/elibrary/industry/Listeria_Monocytogenes-Science_Research.pdf

Staphylococcus aureus:

- http://www.mpi.govt.nz/document-vault/11051

FDA Philippines Food standards

- http://www.fda.gov.ph/attachments/article/17218/FC2013-010.pdf

Australia New Zealand Food Standards Code

- http://www.foodstandards.govt.nz/code/Pages/default.aspx

Business Management Details

Business details

Legal Name _____

Trading Name _____

Legal status (tick as appropriate)

☐ **Sole trader** ☐ **Partnership** ☐ **Limited liability company**

☐ **Other** (specify): _____

Type of business (tick as appropriate)

☐ **Single outlet** ☐ **Managed branch of company** ☐ **Franchise**

☐ **Other** (specify): _____

This plan applies to:

☐ **A single site** ☐ **Multiple sites**

☐ **Multiple businesses** (in this case fill in one copy of FCP *Information for Multi Business Operations* for each business)

Postal address _____

_____

Telephone _____

Fax _____

Email _____

Location(s)

Street address (premises where food business operates)

_____

_____

Water supply

☐ **Registered water supplier** (provide name of supplier) _____

_____

☐ **Roof water** ☐ **Ground or surface water**

Additional sites (continue on additional sheet if needed and attach)

List below any other premises that are used in connection with the food business (e.g. premises used for storage or pre-preparation of food). These activities and sites will also be covered by this FCP. If water is used for food purposes, identify the source of the water supply.

Street address _____

Activities / water supply source _____

Street address _____

Activities / water supply source _____

Street address _____

Activities / water supply source _____

Management

Operator

The operator is the owner or other person in control of the food business. If the food control plan applies to more than one food business, the operator is the person responsible for the food control plan*

Name _____

Physical address (Business or residential) _____

_____

Electronic address _____

Telephone _____

*Operator of each food business

(if plan applies to more than one food business) Add additional rows as necessary.

Name _____

Physical address (Business or residential) _____

_____

Electronic address _____

Telephone _____

Day-to-day Manager

(write 'as above' if the day-to-day manager is the operator)

The day-to-day manager is the person who has the overall responsibility to make sure that the FCP is being followed and the appropriate checks and records are completed.

Name and/or position _____

Telephone _____

Delegated responsibilities

In some cases, specific tasks maybe undertaken by someone other than the day-to-day manager. Delegated tasks and the people responsible are identified below (unless otherwise stated, the back-up person for these tasks is the day-to-day manager).

Name and/or position _____

Delegated duty (write name of procedure or task that is delegated) _____

_____

Name and/or position _____

Delegated duty (write name of procedure or task that is delegated) _____

_____

Name and/or position _____

Delegated duty (write name of procedure or task that is delegated) _____

_____

FCP information for Multi Business Operations

Other business details

Copy and fill out this form for each other business operating under this FCP

Business identifier _____

Full legal name _____

Trading name (if different) _____

Physical address of premises _____

_____

Postal address (for communication) _____

_____

Phone no. _____

Fax no. _____

Email _____

Day-to-day manager of FCP _____

Evidence of sufficient control of FCP operator over this business:

☐ **Contract or written correspondence between the two parties is attached**

Consent of this business operator: _____

Signature (of operator or day-to-day manager of FCP)

Date ____/____/____

Scope of FCP:

☐ **A site plan showing the physical boundaries that the FCP applies to is attached**

FCP details: Clarify all variations between the main FCP and this business. Where necessary, write details or attach extra pages to the FCP

_____

_____

FCP documentation list: Explain where necessary, which documents or parts of documents apply or do not apply to this business

_____

_____

				What you need to do
				You need to take specific actions in order to complete your custom Food Control Plan. Write down these key stages in the template provided. 1. **Open date —** When you would like to start selling food. 2. **Consultant** — Schedule a consultant (optional). 3. **Write plan.** 4. **Testing —** Test your food is safe which may include lab testing. This could be an iterative process and can take some time. Plan how long you estimate testing your plan will take and write this into the calendar. 5. **Evaluation** — Booking an evaluator may take time to schedule. They can be busy and they will most likely need to visit your business. Allow three weeks for them to evaluate your plan. Schedule in the template when you are planning to be evaluated and book early. 6. **Register** — Register your plan and report with MPI. 7. **Verification** — You have to book your first verification within 3 months of selling your food.