



Consultation:

Proposals for changes to food safety notices

Closing Date: 5 December 2016

Your views sought

MPI is consulting on changes to food safety regulations and notices. Both regulations and notices set rules that food businesses have to follow under the Food Act 2014.

Why are we consulting?

The new Food Act came into effect on 1 March 2016, and applies to all food for sale in New Zealand. Existing regulations and notices were consulted on in February last year, and set out what businesses need to do to comply with the law.

As the new law is rolled out, we monitor and evaluate the changes. These proposals are intended to make improvements where needed, and make sure the new law works as intended.

What's being proposed?

This document consults on the changes to existing notices, and proposals for new notices. These will:

- provide more clarity for businesses that need to meet national programme requirements
- provide requirements for low-acid canning as these will no longer be covered by the Food (Safety) Regulations 2002
- make minor amendments to the Recognised Agencies and Persons Notice to correct errors and remove redundant sections
- make a few minor changes and corrections to the existing food notices, including the food control plan template for higher risk businesses.

At the same time, changes are also being proposed to food regulations to reduce regulatory requirements for lower risk businesses and revoke unnecessary rules. These proposals can be found in the *Changes to Food Regulations* paper on the MPI website.

Who should give feedback?

The consultation is relevant to all food businesses, and anyone involved in regulating them. Certain parts will be of particular interest to certain groups:

- Businesses who fall under a national programme under the Food Act and use processes such as pasteurisation, acidification, fermentation, concentration, drying and canning;
- Food business operators canning low-acid foods;
- Food businesses registering a food control plan based on the MPI template
- Recognised agencies and verifiers

How to give feedback?

Email: foodregulations@mpi.govt.nz

You can also write to: Ministry for Primary Industries, PO Box 2526

Or hand deliver to: Ministry for Primary Industries, Pastoral House, 25 The Terrace, Wellington

Questions are included through the documents. A summary of all the questions is provided at the back of this document. You can answer as many of these questions as you like, or provide any other feedback. Please make sure you include the number of each question you are answer.

You can provide your submission in any format. Please include:

- The title of this document (*Changes to food safety notices*)
- Your name and title
- Your organisations name (if you are submitting on behalf of an organisation)
- Your contact details (e.g. phone number, address or email)

Take an online survey. This short survey makes it easy to give feedback. It summarises our proposals into key questions. Go to: www.surveymonkey.com/r/foodactconsultation

Feedback received is public information

Note that feedback you provide is public information. Your feedback may be the subject of requests for information under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA.

You may wish to indicate grounds for withholding specific information contained in your feedback, such as information being commercially sensitive or personal information to be withheld. MPI will take such indications into account when determining whether or not to release the information. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

Changes to food safety notices

Notice highlights

- More detailed requirements for national programme businesses that can or bottle high-acid foods, pasteurise, acidify, ferment, dry, or concentrate products (Section 1)
- A specified process for national programme businesses who operate innovative or unique processes such as high pressure processing or aseptic processing/packaging (Section 2)
- Setting the processing and competency requirements for low-acid food canning that are currently in the Food (Safety) Regulations 2002. This is because these regulations are being revoked. (Section 3)
- Make minor changes to the existing Food Notices to correct inconsistencies and errors (Section 4)

Requirements for businesses who fall under a national programme under the Food Act 2014

Under the new Food Act there are different rules for different businesses depending on what they do. Low and medium risk businesses work under a national programme. To check what type of regulation applies to you, use the *Where do I fit* tool on the MPI website.

Section 1: More detailed requirements for specific food processes

Businesses who fall under national programmes and operate certain processes will need to meet processing criteria set by MPI. These criteria are understood to make a safe product.

Pasteurisation

A pasteurised food, such as a fruit juice, will need to be heated to 75°C for 15 seconds.

Acidification

An acid food, such as shelf-stable condiment, will need to be thoroughly cooked and have a pH of 4.6 or less.

Fermentation

A fermented vegetable product, such as sauerkraut, will need to have a pH of 3.6 or less.

Concentration and drying

A concentrated food, such as a beverage, a shelf-stable condiment or sugar-based product, will need to have a water activity of less than 0.85.

Dried foods, such as cereals, herbs and spices, shelf-stable grain-based products and dried fruit and vegetables will need to have a water activity of less than 0.85.

Bottling or canning acidic and acidified food

Bottled or canned acidic or acidified foods (foods where their pH is less than 4.6) will need to either be heated to:

- 100°C for 20 *minutes*, or
- 121°C for 25 *seconds*

Using other criteria for these processes

Where other valid criteria are in common use to make the same product safe and suitable, the business can show the registration authority how their process will meet those criteria.

If an operator wants to make a product using other criteria, such as their own (unique) criteria, they may show how their process makes a safe and suitable product by registering a food control plan.

There is further information in Appendix 1.

Tell us your views about these proposals?

- 1.1. Do you agree with the proposed food processing criteria?
- 1.2. Are there products you make under a national programme that need a longer time or higher temperature to pasteurise or bottle them safely, or use different criteria to be acidified, or concentrated, or dried? What criteria do you use? What bugs (harmful microorganisms) do they control? What foods are the processes used for?
- 1.3. Are there other criteria for any of the above food processes that are in common use that will achieve the same level of control? What are these criteria, what bugs do they control, and what foods are the processes used for?
- 1.4. Do you agree that where there are commonly-used alternative methods for any of the above food processes that will achieve the same level of control, and a business can show that their process will meet these criteria, the business should be able to operate under a national programme?
- 1.5. Do you agree that businesses that wish to use alternative (unique) processing criteria to those proposed for notice should operate under a food control plan?

Section 2: Specific food processes where MPI is unable to set processing criteria

Technology is constantly evolving, and there are innovative and unique food processes that can be operated under a national programme for which MPI has not set processing criteria at this stage. MPI proposes that operators of these processes use a food control plan to show how their process makes safe food.

We cannot set general processing criteria because:

- MPI has insufficient data about the processes used for making products under a national programme, or
- the criteria that could be used are too varied, or
- the process is highly specific to one product or industry.

If an operator could identify valid criteria commonly used to make their product safe and suitable, and were able to show that their process achieved those criteria, MPI propose that the business could remain under a national programme.

These processes include:

- High pressure processing
- Aseptic processing/packaging
- Innovative or unique processes such as ohmic, cold plasma, ultrasonification, hydrodynamic, electromagnetic (pulsed electric field, radio frequency, ultraviolet processing etc)
- Microwave pasteurisation
- Experimental cuisine

There is further information in Appendix 1.

Tell us your views about these proposals?

- 2.1. Do you agree that a business using the innovative or unique processes on the above list should register a food control plan?
- 2.2. Are there criteria that MPI could set for these processes where criteria haven't been set? What are these, what bugs (harmful microorganisms) do they control, and what foods are the processes used for?
- 2.3. Are there other innovative or unique processes operated under national programmes that should be added to the list above?
- 2.4. Do you agree that where process criteria have not been set for a food process, businesses should operate the process under a food control plan?

Requirements for businesses operating under food control plans

Section 3: Low-acid canning

Low-acid canning is a specialised process that needs to be carried out under a food control plan.

Regulations currently set for low-acid canned food will no longer be covered by the Food (Safety) Regulations 2002. A copy of these regulations is on the New Zealand legislation website.

These will be moved over to a food notice under the Food Act 2014. MPI views the notice as a better fit as low-acid canning requirements are highly technical in nature. References to standards will be updated where necessary, but there will be no change to the intent of the current rules. These require low-acid canning to be supervised by a qualified person, and be carried out according to principles contained in recognised low-acid canning standards and will align with similar requirements for low-acid canning prescribed under the Animal Products Act 1999.

There is further information in Appendix 2.

Tell us your views about these proposals?

3.1. Do you agree that low-acid canning requirements should be revoked from regulation and re-set in a food notice under the Food Act 2014?

Requirements for businesses operating under food control plans and national programmes

Section 4: Make minor changes to the existing Food Notices

These changes will be relevant to both national programme businesses and some higher-risk businesses required to operate under a food control plan, such as:

- food service businesses – e.g. restaurants, cafes, takeaways, catering, or hospital kitchens
- food retailers that prepare or manufacture and sell food – e.g. retail butchers, fishmongers, delicatessens, and supermarkets

The notices changes will be made to are:

- Recognised Agencies and Persons
- Food Control Plans and National Programmes

- Official Template Food Control Plan for Schedule 1 Food Businesses: Food Service and Food Retail.

MPI will make small changes to the above food notices where there are inaccuracies and typographic errors, or where information in MPI templates can be made clearer.

There is more information on the proposed changes in Appendix 3.

Tell us your views about this proposal?

4.1. Do you have any concerns relating to the proposed changes to the food notices?

Appendix 1

Section 1: Requirements for businesses who fall under a national programme under the Food Act 2014

Proposed criteria for specific food processes

MPI has identified that businesses registered under a national programme could operate food processes that present a higher level of risk than is expected to be managed at national programme level. In order to be able to operate these processes under a national programme MPI is proposing to set the processing criteria listed in Table 1 in a notice. By processing in this way a business can remain under their national programme.

Or equivalent

MPI recognises that there may be alternative valid criteria for the specific food processes in Table 1. MPI is proposing that where an operator can show that these valid criteria are in common use to make the same product safe and suitable and their process will meet those criteria, the business can remain under their national programme.

Table 1: Specific food processes and processing criteria

Specific food Process	Product(s)	Bug(s) (harmful microorganism(s)) controlled by the proposed process criteria	Proposed process criteria	Rationale
Pasteurisation (with heat)	Various. Any product where the bugs of concern are those listed.	<i>Salmonella</i> species (spp). <i>Yersinia enterocolitica</i> , <i>Listeria monocytogenes</i> (<i>L. monocytogenes</i>) <i>Escherichia coli</i> O157:H7	Heat to 75°C and hold for 15 seconds	This time/temperature is appropriate for pasteurising fruit juices and most other non-animal based foods. Note. Some bugs will not be adequately controlled by pasteurising at this temperature/time. E.g. <i>C. botulinum</i>

		(<i>E. coli</i> O157:H7) Vegetative cells (in general)		
Acidification	Pickles, some shelf-stable condiments where the bugs of concern are those listed.	<i>Clostridium botulinum</i> (<i>C. botulinum</i>)	The product must be cooked-through thoroughly and final product must have a pH of 4.6 or less throughout all parts of the product.	A pH higher than 4.6 will not control growth and toxin production by bugs such as <i>C. botulinum</i>
Fermentation	Kimchee, sauerkraut, pickles and similar fermented vegetable products where the bugs of concern are those listed	<i>L. monocytogenes</i> , <i>C. botulinum</i> , aerobic toxigenic moulds, other pathogens from potentially contaminated produce, for example, <i>E. coli</i> O157:H7, <i>Salmonella</i> spp	Where a starter culture is used a fresh starter culture should be used each time the product is made. Final product must have a pH of 3.6 or lower.	A final pH of 3.6 developed at the end of the fermentation will prevent growth and toxin production by <i>C. botulinum</i> , and will control growth of acid-tolerant pathogenic bacteria (like <i>E. coli</i> O157:H7 and <i>L. monocytogenes</i>) that may contaminate the produce.

Canning/retorting and bottling acidic foods and acidified foods (food with a pH lower than 4.6)	Acid foods and Acidified foods (pH lower than 4.6) where the bugs of concern are those listed	<i>Bacillus coagulans</i> <i>Bacillus polymxa</i> <i>Bacillus macerans</i> <i>Clostridium pasteurianum</i> <i>Bacillus licheniformis</i>	Heat to 100°C and hold for 20 <i>minutes</i> * (if not using pressure) or Heat to 121°C and hold for 25 <i>seconds</i> * (if using pressure) *minimum time and temperature at coolest part of product.	This applies to foods that are acidic (pH is <i>lower</i> than 4.6) Note: MPI is also consulting on setting requirements for canning low-acid food (food where pH is <i>higher</i> than 4.6). These proposals are discussed in Section 3 and Appendix 2 of this document.
Concentration	Non-alcoholic beverages, shelf-stable condiments, sugar or related products where the bugs of concern are those listed	<i>Staphylococcus aureus</i> (S. aureus) <i>Salmonella</i> spp <i>E. coli</i> O157:H7 <i>L. monocytogenes.</i> <i>Bacillus</i> spp <i>Clostridium</i> spp	Concentrate to a water activity (a_w) of less than 0.85	Bugs need water to grow. The a_w in a food is a way of measuring how easily available water is. The closer the a_w number is to 1, the more easily available the water. For products with an a_w of more than 0.85, additional preservation methods will be needed, for example adding sugar, salt, other preservatives, cooking, the temperature-controlled storage of the final product

Drying	Cereals/grain where the bugs of concern are those listed	<i>Salmonella</i> spp Mycotoxin producing moulds	Dry to a water activity (a_w) of less than 0.85.	Bugs need water to grow. The a_w in a food is a way of measuring how easily available water is. The closer the a_w number is to 1, the more easily available the water. For products with an a_w of more than 0.85, additional preservation methods will be needed, for example adding sugar, salt, other preservatives, cooking, the temperature-controlled storage of the final product.
Drying	Herbs and spices, dry mix products, shelf-stable grain based products where the bugs of concern are those listed	<i>S. aureus</i> , <i>Salmonella</i> spp <i>Bacillus</i> spp <i>Clostridium</i> spp	Dry to a water activity (a_w) of less than 0.85.	Bugs need water to grow. The a_w in a food is a way of measuring how easily available water is. The closer the a_w number is to 1, the more easily available the water. For products with an a_w of more than 0.85, additional preservation methods will be needed, for example adding sugar, salt, other preservatives, cooking, the temperature-controlled storage of the final product

Drying	Fruit and vegetable products where the bugs of concern are those listed	Vegetative pathogens: <i>S. aureus</i> , <i>Salmonella</i> spp, <i>E. coli</i> O157:H7, <i>L. monocytogenes</i> . Viable spores: <i>Bacillus</i> spp, <i>Clostridium</i> spp	Dry to a water activity (a_w) of less than 0.85.	Bugs need water to grow. The a_w in a food is a way of measuring how easily available water is. The closer the a_w number is to 1, the more easily available the water. For products with an a_w of more than 0.85, additional preservation methods will be needed, for example adding sugar, salt, other preservatives, cooking, the temperature-controlled storage of the final product
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Other specific food processes where MPI is unable to set processing criteria

MPI is not able currently to set criteria for some other, and more innovative, food processes that might take place under a national programme and which are identified in Section 2 of this document. This may be because the technology is very new, or the criteria that could be used are too varied, or the process is highly specific to one product or industry, or that MPI has insufficient data about the use of the processes with products made under a national programme.

MPI is proposing that a national programme business wanting to use any other type of innovative food process not listed in Table 1, or in the existing notices, will need to demonstrate how their food process produces safe and suitable food.

The operator will be able to do this by documenting their approach using a registered food control plan. A food control plan gives flexibility but developing, evaluating and verifying a food control plan is likely to cost more.

Or equivalent

MPI recognises that there may be valid criteria for these food processes for certain foods, and is seeking these additional criteria as part of this consultation to identify where they may be set by notice. MPI is then proposing that where an operator can show their process will meet those criteria, the business can operate under their national programme.

Appendix 2

Low-acid canning

Food (Safety) Regulations 2002

Regulations 13, 14 and 15 of the Food (Safety) Regulations make rules about low-acid canning. The regulations state that low-acid canning must be supervised by a qualified person, and lists the various standards that the canning operations must comply with, along with enforcement provisions. The Food (Safety) Regulations, which were made under the Food Act 1981, will otherwise be revoked at the end of the introductory period for the Food Act 2014.

Proposal

We propose **revoking** regulations 13, 14 and 15 of the Food (Safety) Regulations now and **re-stating** them with a notice under the Food Act 2014. MPI is consulting separately on revoking the Food (Safety) Regulations 2002. Details are available from [MPI's website](#).

Rationale

The risks posed by low-acid canning are potentially significant. The bacterium *Clostridium botulinum* can multiply rapidly in moist, low-acid foods. The bacterium can cause serious, and sometimes fatal illness. Internationally-recognised risk management systems exist to manage these risks effectively.

MPI is not aware of any case for changing the intent of the requirements for managing the risks associated with criteria for low-acid canning. However, MPI's view is that a notice is a more appropriate instrument than a regulation for managing the risks it poses. This is because low-acid canning requirements are highly technical in nature. A notice will enable the most current codes relevant to low-acid canning to be accurately referenced. It will promote certainty by enabling qualifications that must be held by supervisors to be listed in greater detail, and pose less of a barrier to new educational providers who wish to provide low-acid canning qualifications.

A notice would provide the opportunity for greater alignment of Food Act requirements with the Animal Products Act low-acid canning regulatory system (which is regulated via a notice).

Appendix 3

Make minor changes to the existing Food Notices

These changes will be relevant to both national programme businesses and the higher risk businesses required to operate under a food control plan.

The notices changes will be made to are:

- Recognised Agencies and Persons
- Food Control Plans and National Programmes
- Official Template Food Control Plan for Schedule 1 Food Businesses: Food Service and Food Retail.

Amending the Recognised Agencies and Persons Notice

Background

Recognised persons and agencies are defined in the Food Act 2014. They are people, or groups of people who are formally recognised by MPI's Chief Executive to carry out certain functions or roles.

Proposal

MPI proposes minor amendments to the notice to correct errors and remove redundant sections. The proposals and their rationales are detailed in Table 2.

Table 2: proposed amendments to the Recognised Agencies and Persons Notice

Proposed amendment	Rationale
Add to section 1.3(2)(a): "xii) whether a technical expert was used".	This will enable MPI to check that verifiers use appropriately qualified experts where this is necessary.

Remove the word “of” in the first line of section 1.3(1) so that the line reads “A recognised agency must inform the Chief Executive in writing as soon as practicable if any of the following occur, if applicable:”	Typographical error.
Remove the following courses listed in section 1.5.2(2): b) Retort Supervisors Certification Course, DWC FoodTech Pty Ltd, Australia; and c) New Zealand Retort Supervisors and Process Control School, Food Processing Specialists Pty. Australia.	These courses do not apply to aseptic processing and packaging.
Add the words “section 8ZV of the Food Act 1981” to section 2.3.3(1) so that it reads: “A deemed recognised person must continue to meet the conditions that applied to their approval under section 8ZV of the Food Act 1981 immediately before 1 March 2016, and meet all the requirements as set out in the Schedule of this Notice”.	Correction of omission.
Remove the “Verification reports for new applications” section of the Schedule (page 13).	No longer necessary as the information is collected via monthly reporting.
Replace “MPI (contact MPI Food Compliance at food.compliance@mpi.govt.nz or 0800 008 333” with “the registration authority” in the “Critical issues identified during a verification” section of the Schedule (page 14).	The registration authority is not always MPI (it may be the territorial authority).
Replace approvals@mpi.govt.nz with “the registration authority” in the “Ongoing issues relating to operators not addressing corrective actions” section of the Schedule (page 14).	The registration authority is not always MPI (it may be the territorial authority).

Amending the Notices: Food Control Plans and National Programmes and Official Template Food Control Plan for Schedule 1 Food Businesses: Food Service and Food Retail.

Background

These notices set out what steps a business operating under these notices needs to take to keep food safe.

Proposal

MPI proposes minor amendments to these notices to correct errors. Examples of the types of errors and their rationale are provided in Table 3. Note that this is a **selection** of the changes to be made. It is not the full list.

MPI also proposes to provide greater clarity around the use of the template. These changes are intended to clarify who can use the template.

In the Serve Safe section of the template food control plan MPI proposes to review the timeframes for sous vide Cook-Serve and Cook-Chill. .

Table 3: Proposed amendments to the Food Control Plans and National Programmes and Official Template Food Control Plan for Schedule 1 Food Businesses: Food Service and Food Retail notices

Food Control Plans and National Programmes Notice		
Type of error	Issue	Proposed amendment and rationale
Inaccurate reference	Food Notice 1.8 Reheating potentially hazardous food. The clause refers to reheating cooked and cooled food according the Clause 1.7 Clause 1.7 deals with freshly cooked potentially hazardous food. Reheated food is not freshly cooked food.	It is proposed to correct the reference to read Clause 1.4 which deals with the storage and display of potentially hazardous food once it has been reheated.
Omission	Food Notice 1.4 Storage and display of potentially hazardous food. Clause (a) refers to temperatures in Clause 1.3 (1)(b) but omits a reference to frozen food (Clause 1.3 (1)(a)(iii)).	It is proposed to add the reference clarify the condition for stored and displayed frozen food.
Official Template Food Control Plan for Schedule 1 Food Businesses: Food Service and Food Retail notice		
Issue	Proposed amendment and rationale	

When to use the templates	Changes will be made to clarify use of the template.	
Sous vide Cook/Serve and Cook/Chill pages Feedback indicates a definite time period for Cook/Serve would clarify when these pages are applicable	It is proposed to: • change Cook-Serve time period to 2 days (48 hours) • change Cook-Chill time period to 5 days (120 hours) Rationale: MPI has reviewed the science behind the existing time periods and concluded that food safety will be maintained with longer time periods.	
Example of type of error	Issue	Proposed amendment and rationale
Publication error	Food Basics Section - Customer complaints section. Page FOOD 5.16. The section ‘ complaints about a foodborne illness ’ in the guidance section on page 2 is a requirement.	It is proposed to incorporate the section under ‘how this is done’ on Page FOOD 5.16 page 1.
Omission	Food Basics Section – Donated food guidance section. Page FOOD 5.21 Missing information that home kill and recreational catch must not be traded/donated	It is proposed to add this information to Page FOOD 5.21
Contradiction	<u>Food Basics Section – Purchasing and receiving goods. Page FOOD 5.3</u> <u>The section ‘receiving incoming goods’ requires delivered chilled seafood to be at a temperature of no more than 1°C.</u>	The temperature for receiving and storing seafood will be changed to align with the <u>Food Notice: Food Control Plans and National Programmes Clauses 1.3 and 1.4</u>

	<u>And</u> <u>Food Basics Section – Chilled and frozen food storage. Page FOOD 5.5</u> <u>The section ‘Chilled food’ requires the storage of chilled fish and seafood at a temperature of no more than 1°C.</u> <u>These temperatures contradict temperatures stated in the Food Notice: Food Control Plans and National Programmes Clauses 1.3 ‘Receiving food’ and 1.4 ‘Storage and display of potentially hazardous food.’</u>	
Typographic error	Specialist fishmonger Section – Composition guidance Page FISH 14.3 page 2. ‘...the level of histamine in fish or fish products must not exceed 20mg/kg.’	Correction. Level of histamine in fish or fish products must not exceed 200mg/kg
Repetition error	Retail Basics Section – Training records. Page RECORD 9.1 page 1 The ‘essential training’ section repeats records already provided in the ‘Basic records’ section. Retail Basics – Foods that can be reused. Page RECORD 9.6 page 1 Duplicates RECORD 9.2 page 1	Remove the repeated record sections.
Reference error	Places Basics Section – Roof water supply page PLACES 3.4 page 3 and Surface water or groundwater supply page PLACES 3,5 page 2 Helpful information box: Recommendation to seek a review from a water assessor at a public health unit. This is not a service provided by water assessors.	Remove the information box.

Omission	Specialist Serve Safe Section. Page SERVE 10.13 – Sushi made with acidified rice: Propose removal of the sentence; ‘Acidified rice must only be stored outside of temperature control for up to 8 hours after which it must be discarded.’	The statement contradicts other parts of this page which specify that depending on the type of sushi, it can be kept outside of temperature control for up to 8 hours (Nigiri) and up to 12 hours (Nori).
Contradictions	Specialist Serve Safe section. Page SERVE_10.17 page 2. Cooking using the Sous vide technique (cook-serve). “If red meat is held at 55°C to 60°C for more than 4 hours, or poultry is held at less than 60°C, it must be discarded.”(i.e. 240 minutes) Contradicts the first two rows of ‘Cook-Serve’ table which give times over 240 minutes (that is - ‘at 55°C for 420 minutes and at 56°C for 296 minutes’)	Delete the following sentence “If red meat is held at 55°C to 60°C for more than 4 hours, or poultry is held at less than 60°C, it must be discarded.

Summary of questions

Section 1: More detailed requirements for specific food processes

- 1.1. Do you agree with the proposed food processing criteria?
- 1.2. Are there alternative criteria for any of the above food processes that are in common use that will achieve the same level of control? For example, they need a longer time or higher temperature to pasteurise or bottle them safely, or use different criteria to be dried? What are these, what bugs (harmful microorganisms) do they control, and what foods are the processes used for?
- 1.3. Do you agree that where there are commonly-used alternative methods for any of the above food processes that will achieve the same level of control, and a business can show that their process will meet these criteria, the business should be able to operate under a national programme?
- 1.4. Do you agree that businesses that wish to use alternative (unique) processing criteria to those proposed for notice should operate under a food control plan?

Section 2: Innovative and unique food processes

- 2.1. Do you agree that a business using the innovative or unique processes on the above list should register a food control plan?
- 2.2. Are there criteria that MPI could set for these processes where criteria haven't been set? What are these, what bugs (harmful microorganisms) do they control, and what foods are the processes used for?
- 2.3. Are there other innovative or unique processes operated under national programmes that should be added to the list above?
- 2.4. Do you agree that where process criteria have not been set for a food process, businesses should operate the process under a food control plan?

Section 3: Low acid canning

- 3.1. Do you agree that low-acid canning requirements should be revoked from regulation and re-stated in a notice under the Food Act 2014?

Section 4: Changes to the Food Notices

- 4.1. Do you have any concerns relating to the proposed changes to the Food Notices?