Ministry for Primary Industries
Manatū Ahu Matua

Guidance Document

Guidance for Risk Management Programme (RMP) Template for Dairy Processors

Liquid Milk, Domestic Supply

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Title

Guidance Document: Guidance for Risk Management Programme (RMP) Template for Dairy Processors

About this document

This document provides an overview of the RMP Template for liquid milk processors, the documents that comprise the template, any supporting documents and guidance, and outlines the requirements of the legislation.

This guideline also provides guidance on completing the RMP Template for Dairy Processors – Liquid Milk, Domestic Supply.

Related Requirements

Risk Management Programme (RMP) Template for Dairy Processors – Liquid Milk Domestic Supply

Change history

Previous Version Date	Current Version Date	Section Changed	Change(s) Description
December 2008		All	Updated references to MPI and migrated to new MPI Guidance template Removed text relating to Appendix M in section 4
May 2014		All	Minor formatting

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1 Purpose of the RMP Template for Dairy Processors – Liquid Milk, Domestic Supply

A risk management programme (RMP) template for dairy processors involved in the manufacture of liquid milk has been developed by the Ministry for Primary Industries (MPI) to assist liquid milk processors to meet the requirements of the Animal Products Act 1999 and process liquid milk which is fit for intended purpose. The template interfaces with the Farm Dairies RMP Template to provide coverage of dairy operations that include a farm dairy operation.

Introduction

The processing of dairy material, must comply with the requirements of the Animal Products Act 1999. The Animal Products Act 1999 gives domestic dairy manufacturers (supplying only the New Zealand and/or Australian market) the option of operating under either a registered RMP or a Food Safety Programme (FSP) approved in accordance with section 8G of the Food Act 1981. Note that Farm Dairies must operate under a registered RMP.

RMP Template

The RMP Template for Dairy Processors – Liquid Milk, Domestic Supply, enables a RMP to be developed that is suitable for liquid milk processors who produce liquid milk for the domestic market (New Zealand and Australia). By adopting and completing this template, liquid milk processors are not required to submit the RMP for independent evaluation.

This template may be used as a model for the development of an alternative RMP for liquid milk manufacturers that:

- include novel processes;
- prefer to meet key requirements by an alternative means
- wish to make a significant amendment to the template; or
- intend to export dairy product.

Such an RMP will, however, require evaluation by a person recognised by MPI to evaluate an RMP prior to applying for registration.

2 Risk Management Programme

2.1 Contents of a Risk Management Programme

The documented RMP must include the following:

Good operating practice

- Good operating practice (GOP) includes the practices and procedures designed to ensure the manufacture of dairy product that is safe and suitable for its intended purpose, and that meets relevant regulatory requirements. It includes several interacting components such as hygienic practices, process control and quality assurance systems.

Application of HACCP principles

- The operator must apply HACCP principles, as appropriate, to the product and process to ensure a systematic approach to the identification, and analysis of hazards and their control. In the case of the RMP Template for Dairy Processors – Liquid Milk, Domestic Supply, MPI has completed the hazard analysis and critical control point (CCP) determination.

Other RMP requirements

- Other RMP requirements such as business identification, operator's details, and provision for verifiers' rights must also be documented in the RMP.

3 Development of an RMP using the RMP Template for Dairy Processors – Liquid Milk

The Animal Products Amendment Act 2002 allows for a RMP to be based on a code of practice, a template, or a model. The RMP Template for Dairy Processors – Liquid Milk, Domestic Supply, has been formally recognised as valid and appropriate for liquid milk processors wishing to supply only to the domestic market. It has been determined that an RMP based entirely on the template does not require evaluation provided that it is completed in full and that no significant change is made to the template.

The template is a valuable tool to use in the development of the RMP. Using the RMP Template for Dairy Processors – Liquid Milk, Domestic Supply will:

- ensure that the liquid milk processor follows acceptable dairy industry practices and procedures
- ensure that the liquid milk processors meet the relevant regulatory requirements and obligations; and
- simplify and reduce the cost of developing, evaluating and implementing the RMP.

3.1 Liquid Milk Processing fully covered by the RMP Template

3.1.1 Development

When the RMP Template fully covers the scope of liquid milk processing activities, the simplest approach for developing an RMP is to use the RMP template provided. The RMP template allows the liquid milk processor to complete the RMP by filling in the required information in the appropriate boxes and confirm that the procedures described by the template will be adhered to.

The template provides the necessary procedures to ensure good operating practice (GOP) will be met as well as the application of HACCP principles.

The liquid milk processor will only need to include any required records and any documents/records for additional products/processes/procedures that are specific to their operation.

The liquid milk manufacturer's RMP will, therefore, consist of:

- the completed RMP template
- any procedures documents/records for additional products/processes/procedures that are specific to their operation
- HACCP application for liquid milk manufacturing and additional documents referenced such as a water management plan and heat treatment plan; and
- a set of records.

The liquid milk manufacturer is required to confirm that certain requirements have been met and that the template is appropriate and valid for their operation.

3.1.2 Evaluation

RMPs that are fully based on an MPI approved template do not require an evaluation prior to registration as MPI has already determined that the requirements and procedures set out in the approved template are valid, and will deliver the relevant regulatory requirements. Verification of the accuracy of the documented RMP, and the operator's compliance to the RMP will be carried out at the initial verification by the contracted verifier.

3.2 Activities not fully covered by, or with significant variation to, the RMP Template

3.2.1 Development

Since the RMP template follows accepted industry practice and specifies the processes and procedures to be followed, some liquid milk processors may have, or wish to implement, novel or alternative means to meet requirements. Some liquid milk processors may also need to, or want to, develop their own specific RMP.

The RMP template may still be used but the liquid milk processor will need to add their own information, documents or procedures for those parts not covered by the template.

The liquid milk processor must be able to demonstrate the effectiveness of any alternative procedures or parameters to consistently meet all relevant regulatory requirements and produce products that are safe and suitable for their purpose. Demonstration of its effectiveness may involve the collection of evidence (e.g. data from testing or trials, published scientific information, report from an expert) by the operator for assessment by the recognised evaluator or MPI.

3.2.2 Evaluation

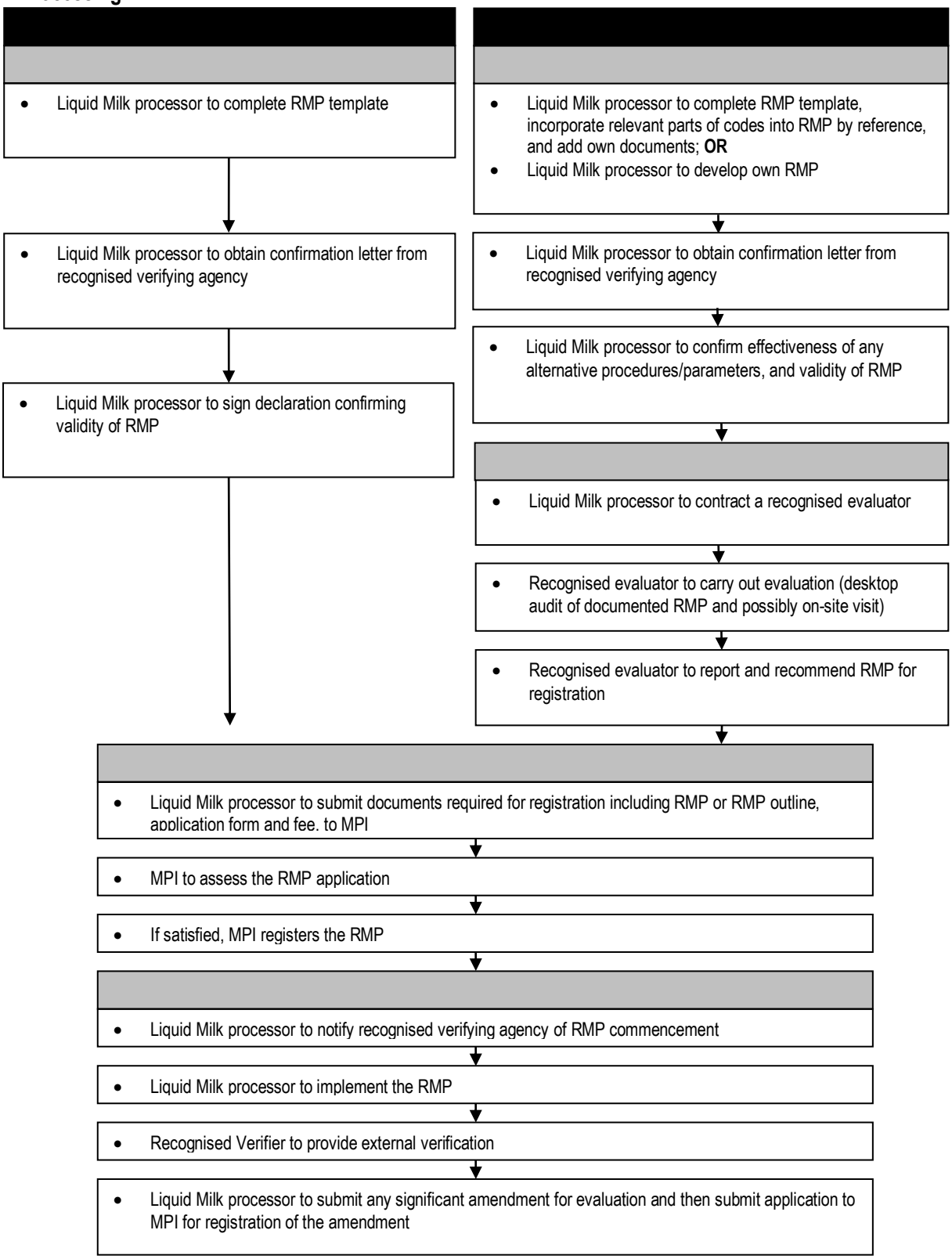
RMPs that are not fully covered by an approved RMP template or those with variations from the template will need to be evaluated by an independent evaluator recognised by MPI to confirm the adequacy of the RMP. Evaluation will involve a desk-top audit of the documented RMP and may require an on-site visit. The evaluators report is then submitted to MPI when making an application for registration of the RMP.

3.3 Steps for the development, registration and implementation of an RMP

The steps for the development, registration and implementation are summarised in Figure 1. The diagram shows the steps for two options:

- Option 1: For liquid milk processors whose activities are fully covered by the Risk management Programme (RMP) Template for Dairy Processors – Liquid Milk, Domestic Supply.
- Option 2: For liquid milk processors whose activities are not fully covered by the Risk management Programme (RMP) Template for Dairy Processors – Liquid Milk, Domestic Supply, or who have decided to apply procedures or processing parameters that differ significantly.

Figure 1: Steps for the development, registration and implementation of an RMP for Liquid Milk Processing



4 Guidelines for Completing the RMP Template

4.1 General Instructions

The person completing the template suitable to their operation should:

a) Read this guideline while completing the template.
b) Provide the required information by:

   i) entering information into the space provided
   ii) if prompted or if insufficient space is provided, documenting separately and noting the title or location of the additional documentation; or
   iii) entering a tick where prompted to acknowledge acceptance of the criteria.

c) Ensure that all information provided is legible.
d) Ensure that every thing written down accurately reflects or applies to all dairy processing activities intended to come under the RMP, and that they can and will comply with them at all times.

Template reference number.	Subject and description
1	**Operator Name and Day-to-Day Manager Details**
1.1	**Full legal name (company, sole trader or partnership):** If the business is a company, then the full legal name must match the details given at the Companies Office exactly. If the business is a partnership or a sole trader operation then the name(s) of the business owner(s) must be provided.
1.2	**Trading name (if different from 1.1):** If different from the full legal name.
1.3	**Contact details:** Give the contact phone numbers, fax number email address and address of business. Tick the box to indicate that you give consent to being provided with electronic information (e.g. emails).
1.4	**Day-to-day manager of the RMP:** Give the name/position or designation of the day-to-day manager, or the person responsible for the day-to-day management of the RMP.
1.5	**Name of the person(s) nominated to authorise a part of a document that makes up this RMP:** Give the name of any person(s) who are allowed to include documentation in the RMP.
1.6	**Name of persons performing key tasks under the RMP including, corrective action and operator verification activities:** Give the name of any person(s) performing key tasks, for example, CCP monitoring, or who is responsible for any corrective actions.
1.7	**Key competencies needed by the day-to-day manager, the persons identified in section 1.5 and the persons identified in section 1.6 to enable the effective operation of this RMP:** Identify what competencies the staff may require.
1.8	**The procedures detailing how records (demonstrating that the competencies documented under section 1.7 have been achieved and maintained) are kept are specified in Appendix D, section 2.** Indicate that training records are kept as a requirement of Appendix D, section 2.
2	**Scope of the RMP**
2.1	**Description of the physical boundaries to which this RMP applies (a plan may be included to amplify the description):** Describe the site to which the RMP applies. It may be easiest to attach a site plan to illustrate the physical boundaries.

2.2	**Business ID/Unique location identifier:** Unique business identifiers are required for each application. The identifier should be chosen by the applicant. The business ID must be a number or a number-letter combination of at least 3 characters, no more than 10, with at least one character a number and no leading zeros. Where a business identifier is not nominated, or does not adhere to the criteria, an identifier will be assigned by MPI. For the purposes of traceability and certification, the operator must nominate a unique identifier for each location specified in the RMP. The unique location identifier will appear on the Notice of Registration for each registered RMP.
2.3	**The RMP covers the following processes or activities, and considers the potential risk factors involved in them:** Tick the box(s) to confirm what the RMP covers relevant to your operation.
2.4	**The relevant sources of potential risk factors that may affect the dairy material or dairy product operations within the physical boundaries of this RMP are specified in Table 4 of Appendix M:** Tick the box to confirm.
2.5	**The following products or activities of the operator that occur within the physical boundaries of the RMP are excluded because they are covered under a different RMP or under the Food Act (if applicable):** Product or Activity: Covered under either: (please select) [ ] Another RMP No:_____; or [ ] Food Act If any products or activities within your operation are not covered by the RMP template because they are covered by another RMP or the Food Act, please indicate in this RMP.
2.6	**The interfaces between the products under this RMP and the products excluded from this RMP are managed in the following way (if applicable):** Indicate how these interfaces (if any) are managed.
2.7	**In the event that a person other than the operator uses areas inside the physical boundaries of this RMP for any activity not covered by the RMP, then the interface with the activity outside the physical boundaries will be managed in the following way (to ensure the effectiveness of the RMP is not compromised)(if applicable):** If another person (other than the RMP operator) uses areas within the physical boundaries of the RMP, please indicate how any interfaces will be managed so the effectiveness of the RMP is not compromised.
2.8	**The authorities and responsibilities for resolving issues associated with the activity referred to in clause 2.7 (if applicable):** Indicate authorities and responsibilities (i.e. who is responsible) for resolving any issues if clause 2.7 applies.
2.9	**Where a loss stream is identified e.g. animal feed, then this is handled in accordance with the Agricultural Compounds and Veterinary Medicines Act 1997 (ACVM Act):** Tick the box to confirm (if appropriate).
3	**Animal Product Description**
	This section has already been completed by MPI.
4	**Limits**
4.1	**Regulatory limits in relation to risks from hazards to human health:** This section has been completed by MPI.
4.2	Regulatory limits in relation to wholesomeness are outlined in Appendix N.
4.3	**Any operator defined limits (in relation to hazards to human health, wholesomeness):** If

	you have identified any limits yourself that you want to include in the RMP, insert them here.
4.4	Regulatory limits in relation to risks from false or misleading labelling or representation of Liquid Milk are addressed by compliance with the Food Standards Code.
4.5	If the regulatory limits are not met then the process outlines in Appendix I is carried out.
5	**Description of Process**
	This section has been completed by MPI.
6	**Uncontrolled Hazard**
	This section has been completed by MPI.
7	**Identification and Control of Hazards and Other Risk Factors**
	This section has been completed by MPI. Please note the relevant legislative requirements.
8	**RMP Document list, Responsibilities For and Authorisation of RMP**
	Record completed requirements as appropriate, and reference any additional documents and records (being careful to record the date and person responsible for implementation)
9	**Notification Procedures**
	This section has been completed by MPI.
10	**Recall of Liquid Milk**
	This section has been completed by MPI.
11	**Operator Verification**
	This section has been completed by MPI.
12	**External Verification**
	This section states that you authorise the contracted verifier to have freedom and access to carry out verification activities. Record the name and contact details of the verifying agency and ensure that a letter has been received from the verification agency confirming that they will verify the RMP. The verifier must have access to any and all information that may be desired to support the audit findings (e.g. lab test results, failing actions and the corrective actions taken). Confirm that any testing is conducted in a MPI registered laboratory accredited/recognised in the appropriate category for the required analysis.
13	**Document Control**
	This section sets out requirements for control of the programme and the obligations to be met when making amendments. Significant amendments include: • a departure from the requirements set out in this programme • making major alterations to the processing facilities or equipment which may impact on fitness for intended purpose of the dairy material or dairy product • relocating processing operations to a new physical address • processing dairy material or dairy product that is not covered by the RMP • setting up a new process or process modification that is not covered by the RMP For further details on RMPs and appropriate forms, please refer to food safety guidelines on the MPI website.
14	**Requirements for Records**
	This section has been completed by MPI.
8	**Confirmation**

	This section contains a set of declarations confirming that in the view of the proposed RMP operator i.e. liquid milk processor, the RMP is valid and appropriate for the activities it is intended to cover. Once completed, the RMP operator or liquid milk processor who signs the RMP declaration also dates and initials each page of the programme.

GOP is an integral component of the RMP template. Supporting Systems covering GOP must be developed and documented prior to HACCP application. The HACCP approach used in the RMP Template for Dairy Processors – Liquid Milk, Domestic Supply, is based on the expectation that these systems are/will be effectively implemented. Each Appendix has a number of requirements which the Processor must adhere to, and a number of requirements for records as appropriate.

Template Appendix number.	**Subject and description**
Appendix A	Design, Construction and Maintenance of Buildings, Facilities and Equipment
Appendix B	Potable Water
Appendix C	Cleaning and Sanitation Some liquid milk producers voluntarily elect to use AsureQuality Limited for reviews of maintenance compounds to assist with determining the acceptability of compounds. For further information on these reviews contact AsureQuality Limited. It should be noted that these reviews do not have any legal standing in their own right.
Appendix D	Personnel Competency, Health and Hygiene
Appendix E	Pest Control
Appendix F	Packaging Material and Ingredients (Specifications, Use, Storage and Handling)
Appendix G	Document Control and Record Keeping
Appendix H	Traceability and Inventory Control
Appendix I	Handling of Non-conforming Product and Recall
Appendix J	Reporting
Appendix K	Operator Verification and Other Operational Requirements
Appendix L	Process Control and Other Operational Requirements For pasteurisation, including minimum temperature and minimum holding times and operational considerations, including holding time calculation, steam condensate and single phase flow, please refer to “Approved Criteria”, in the dairy manufacturing section of the MPI website.
Appendix M	HACCP application – Liquid Milk
Appendix N	Product safety limits The sampling and testing programme should be based on the hazard analysis and recognise the way in which the control measures (as CCPs or GOP) are able to manage the related hazards. Each business will need to justify what it tests and how often it tests on the basis of the following criteria: • The likelihood of hazards entering the process. • The need to manage other product (not food safety) variables. • Whether or not the product is homogenous and consistent (factors such as

	whether the process is batch or continuous need to be considered). • Monitoring used for critical control points. • Monitoring associated with GOP. • Size of run or batch. • History of results to prove confidence of processing. • Knowledge of the history of the particular class of liquid milk products. • Knowledge about the effectiveness (validation) of the control measures for a particular hazard. For further guidance see Operational Guideline, Dairy HACCP Plans, under 'Guidance and Codes of Practice (COPs)' on the MPI website.

Information specific to dairy manufacturers is available on the MPI website.