Risk Management Programme (RMP) Template for Bee Products

You can use this RMP template if your operation includes:

- **Extraction of honey**
- **Mobile extraction of honey**
- **Processing of honey**
- **Processing of comb**
- **Processing of pollen**
- **Processing of propolis**
- **Beeswax processing**
- **Royal jelly collection and processing**
- **Bee venom processing**
- **Storage of bee products**
- **Transport of bee products**

This RMP template is issued by the Ministry for Primary Industries in accordance with section 12 (3A) of the Animal Products Act 1999 for the purpose of making the determination that the **Risk Management Programme (RMP) Template for Bee Products** is valid and appropriate for the business of this kind described in the Statement of Application.

Pages i to xix are not part of the RMP.

Statement of Application

The application of the **Risk Management Programme (RMP) Template for Bee Products** is limited to bee products secondary processing businesses that are involved in:

- Extraction of honey
- Mobile extraction of honey
- Processing of honey
- Processing of comb honey
- Processing of pollen
- Processing of propolis
- Beeswax processing
- Royal jelly collection and processing
- Bee venom processing
- Storage of bee products
- Transport of bee products

Dated at Wellington 14th day of August 2023.

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Contents

What this template covers

(1) This RMP template applies to the processing of bee products and associated transport and storage by the RMP operator.

(2) This RMP template applies to operators that process, transport and/or store:

a) bee products or bee materials for human and/or animal consumption; and
b) non-food bee products that are not for human or animal consumption (such as beeswax).

(3) This RMP template does not apply to operators covered under a different RMP, Regulated Control Scheme or a risk-based measure under the Food Act 2014 (e.g. Food Control Plan or National Programme), or operators that process, transport and store:

a) other animal products; and
b) other food products; and
c) other non-food products.

(4) This RMP template has been developed based on New Zealand requirements only and does not cover export requirements such as the:

a) Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products.
Note: Exporters must ensure that they meet all export requirements (e.g. competencies, overseas market access requirements (OMARs) relevant to their product and intended market, official devices such as container seals, etc.).

(5) If your operations are not fully covered by this template, or you decide to deviate from the requirements and procedures given in this template, you can do so by modifying this template, or writing your own RMP. In most cases, these changes will need to be evaluated by an MPI recognised RMP evaluator. If you decide to make changes to this template after you have registered it, you will need to talk to your verifier first.

How to Complete the Template

General

(1) You need to provide complete and accurate information as the registered RMP is a legally binding document that must be complied with. Everything written down needs to accurately reflect or apply to your operation.

(2) You can complete this RMP template electronically as it is an editable PDF document or you can print it off and manually complete it. If you are manually completing your RMP template, you must ensure that all information is clear and easy to read.

(3) The template should be completed by a person or group of people who have full knowledge of the whole operation covered by the RMP.

(4) You need to read each section of this guidance while completing the template.

(5) You must provide the required information by entering information into the empty boxes or blank lines; or ticking the appropriate answer or information.

(6) **Your final RMP will be the completed RMP template (Part 1: Required Information, Part 2: Supporting Systems and selected Modules) and all the additional documents you have written yourself and listed in the document list.**

(7) You must comply with all the requirements and procedures in the final RMP, including those in the supporting systems, selected modules, and all the additional documents you have written yourself and listed in the document list.

(8) If you need to make changes to this template to better suit your operation, you can do so by modifying this template (i.e. adding your own modules) or writing your own RMP. In most cases, these changes will need to be evaluated by an MPI recognised RMP evaluator. If you decide to make changes to this template after you have registered it, you will need to talk to your verifier first.

(9) By complying with the requirements and procedures given in this template, you will be meeting the requirements for the secondary processing of bee products that are specified in the current versions of:

Animal Products Act 1999	www.legislation.govt.nz/act/public/1999/0093/latest/DLM33502.html	
Animal Products Regulations 2021	www.legislation.govt.nz/regulation/public/2021/0400/latest/LMS520972.html	

Animal Products Notice: Production, Supply and Processing	www.mpi.govt.nz/dmsdocument/50182	
Food (Tutin in Honey) Standard	www.mpi.govt.nz/dmsdocument/11137	
Food Standards Code	www.foodstandards.govt.nz/code/Pages/default.aspx	

(10) You may also need to comply with the Animal Products Notice: General Export Requirements for Bee Products (www.mpi.govt.nz/dmsdocument/26500).

(11) A complete list of legal requirements, guidance documents and forms that are relevant to you are listed in the Bee Products Roadmap (www.mpi.govt.nz/dmsdocument/20468).

(12) You can refer to the Operational Code: Processing of Bee Products (www.mpi.govt.nz/dmsdocument/26557) for additional useful information.

(13) For honey that will be exported, a Harvest Declaration for Bee Products intended for Export (mpi.govt.nz) (www.mpi.govt.nz/dmsdocument/1021) must be provided for every consignment.

(14) Where you need to develop additional procedures and forms, you can use and adapt the examples of forms and procedures from the RMP Operator Resource Toolkit (www.mpi.govt.nz/dmsdocument/26566).

Part 1. Required Information

1.1 Identifying Information

RMP ID – if you do not already have a RMP ID, you can nominate your own identifier when you complete the AP4 Application form (www.mpi.govt.nz/dmsdocument/71). Your identifier must be a number/letter combination of at least 3 and no more than 10 characters, with at least one character a number and no leading zeros.

If you have more than one RMP, assign a consecutive two digit number (01-99) to each new RMP you have. Enter 01 if this is your first RMP.

For example: 100% ABC NZ Ltd could nominate an identifier of 100ABC/01 for their first RMP.

If you don't nominate an identifier, MPI will assign one for you. If the identifier you nominate is not in the appropriate format, or is already in use, MPI will suggest an alternative.

1.2 Day-to-day Manager

Day-to-day manager of the RMP – also referred to as the RMP Manager, you must nominate a day-to-day manager who will be responsible for implementing the RMP and ensuring that it is kept up-to-date. They will be the contact person for MPI and the verification agency when dealing with matters relating to the RMP.

It is recommended that the position be given instead of the name of the day-to-day manager to avoid the need for amending the template and notifying MPI when this person is replaced. You may also wish to identify a deputy to the day-to-day manager.

Email – you must enter the email address that can be used to contact the Day-to-day manager of the RMP.

Mobile phone number – you must enter a mobile phone number that can be used to contact the day-to-day manager of the RMP. If there is no mobile number, a landline number may be entered.

1.3 Operator Name, Business Address and Contact Details

NZBN – you must provide your NZBN here if you have one. If you want more information about NZBNs, see www.nzbn.govt.nz.

Full Legal Name - if the business is a registered company, then you must use the full legal name that matches the details given at the Companies Office exactly. If the business is a partnership or a sole trader operation then you must provide the name(s) of the business owner(s)/partners.

Trading Name – you must fill this in if the name the business trades under (i.e. the name used on a shop sign or letterhead) is different to the full legal name. If you don't have a trading name then you can leave this blank.

Physical Address of Premises – you must give the street address of the premises that the RMP applies to. If this RMP is for one business with multiple sites, include the addresses for the additional sites as a separate, clearly named, attachment.

Postal Address – if the postal address is different to the physical address, you must give the address any correspondence should be sent to, including the postcode. If this RMP is for one business with multiple sites, include the addresses for the additional sites as a separate, clearly named, attachment.

Phone number – you must enter a phone number that can be used to contact the RMP operator. Enter a phone number even if this is the same as the phone number under *1.2 Day-to-day Manager*.

Mobile phone number – you must enter a mobile phone number that can be used to contact the RMP operator. Enter a mobile phone number even if this is the same as the mobile phone number under *1.2 Day-to-day Manager*.

Email – you must enter the email address that can be used to contact the RMP operator. Enter an email address even if this is the same as the email address under *1.2 Day-to-day Manager*.

1.4 Multi Business RMP

If any other businesses (additional to that business listed under *1.3 Operator Name, Business Address and Contact Details)* will be covered by this RMP, then you must complete this section. If there is more than one other business operating under this RMP, complete for each additional business, and attach as additional pages to the RMP.

1.5 Scope of the RMP

Physical Boundaries – you must include a site plan as part of the RMP. The site plan should be labelled to make it clear it is part of the RMP. If this RMP covers more than one site, you must attach a site plan for each site. Tick the box to indicate that you have a site plan, and be sure to attach it when submitting the RMP for registration.

Your site plan must show the buildings, facilities and external surroundings included under your RMP. The different rooms or areas within a building and the location of key pieces of processing and hygiene equipment should also be shown in the diagram(s). The physical boundary of the RMP will need to be clearly indicated on the site plan. Generally, the physical boundary of a fixed premises is the legal boundary or the fence line of the property. Areas and facilities within the boundary that are excluded in the RMP should also be clearly indicated on the site plan. See the RMP Manual (www.mpi.govt.nz/dmsdocument/183) for an example.

For a mobile premises: you must show the layout of the vehicle, including storage facilities, and the location of key pieces of processing and hygiene equipment on the site plan. The physical boundaries of the RMP for a mobile premises are formed by the outer extremities of the mobile facility. Note: for a mobile premises, employee amenities do not need to be located within the RMP premises.

Processing – tick the box(es) to indicate what processing your RMP covers. At the time of registration, your operation must be capable of carrying out the processes that you indicate. For each process that your RMP will cover, you must complete the relevant module. (The modules are at the end of this template.)

You may choose to exclude some processes that are part of your operation, if the processing doesn't need to be done under an RMP (e.g. beeswax processing may be excluded if it doesn't require an official assurance).

If you modify the template with additional processes (such as writing your own module), these may need to be evaluated by an MPI recognised RMP evaluator before your RMP can be registered with MPI.

1.6 Other Activities, Risk-based Measures or Operators

You must fill out this table if there are any products or activities that occur on the same premises or within the physical boundaries of the RMP, but are not covered by this RMP template because:

- they are covered under a different risk-based measure (e.g. an RMP, a Regulated Control Scheme, a Food Control Plan, a National Programme or under the Wine Act 2003); or
- they are not covered under a different risk-based measure; or
- they are carried out by a different operator.

Examples of activities that you may wish to keep under the Food Act regime are: retail shop, packing of honey only for the domestic market.

Note: you must have procedures that make sure that these excluded activities are not a source of contamination to any animal products processed or stored within the physical boundaries of the RMP.

Fill out the table as appropriate, listing:

- each activity (including processing of other products) occurring within the RMP physical boundary that is not covered by this RMP; and
- if the activity is covered under a different RMP, Regulated Control Scheme or risk-based measure (if yes, say which one it is covered under and include the ID if there is one); and
- how the activity is controlled, so operations are not adversely affected; and
- who is responsible for ensuring that the control measures are implemented and effective; and

- who is responsible for resolving any issues that occur between this RMP, and the other activity (use name or job title, include name of different operator if applicable).

For example:

Activity	**Covered under a Risk-Based Measure** (if Yes, include which one and ID)	**Control Measures**	**Responsibility** (Name or job title, include name of different operator if applicable)
Packaging of eggs	RMP ID BUS111/01	Kept separate from other product and activities	Packhouse Manager
Processing animal feed for sale	No	Kept separate from other product and activities	Feed Mill Supervisor
Subcontract space to store packed paper boxes	No	Boxes are only allowed to be stored in an ambient storage facility that is not used by this RMP. Storage facility has a separate entrance.	Lead Supervisor of the Pretty Paper Company

If necessary, use extra pages and attach to the RMP.

1.7 External Verification

This section states that you authorise the contracted verifier to have freedom and access to carry out verification activities. You must have a record of the name and contact details of the verification agency and ensure that a letter has been received from the verification agency confirming that they will verify your RMP. This letter must be provided to MPI when applying for registration of your RMP. An electronic letter or email is fine.

The verifier must have access to any and all places, things and information that may reasonably be needed to complete the verification (e.g. lab test results, non-conformances and the corrective actions taken, etc.). You must tick the box to indicate that you have contracted a verifier and have received and attached the letter from the verification agency confirming that they will verify the RMP.

1.8 RMP Document List

Table 1: Documents from the RMP template. This gives the list of all the documents from the RMP template that form part of your RMP. You must complete this table with the date authorised for each document. This will be the date that the RMP is authorised (section 1.9). For modules that will not be part of your RMP, fill the date space with 'n/a'.

Table 2: Procedures, programmes, water-use criteria and additional modules written by the operator. This table is for all the additional documents that make up the rest of the RMP – these documents have been written by you. You must fill in this section with the **name of the document** and include the name of the **person authorising the document and the date of authorisation** for each of the procedures and programmes you have written yourself or used from the RMP Operator Resource Toolkit (www.mpi.govt.nz/dmsdocument/26566). If you have written your own module(s), include them in this table.

Supporting systems of the RMP, and some modules, may require you to write procedures and programmes covering good operating practice (GOP) and process control that are specific to your operation and premises. Examples of the type of documents are: a cleaning programme, cleaning schedules, calibration programme, inventory control procedures, etc. The verifier will confirm the effectiveness of the RMP against these procedures and programmes. You must ensure that all the written procedures and programmes apply to your operation and that you comply with them.

These documents **must be authorised by the day-to-day manager or a nominated person** and may be authorised individually and separately to the documents from the RMP template (Table 1).

Each document must be re-authorised each time it is updated.

1.9 Authorisation of the RMP

The RMP must be authorised by either the day-to-day manager or a nominated person. Tick the boxes to indicate which person is authorising. This person must sign, date and give their job title.

If the person signing is a nominated person, check their name is on the list of nominated persons referred to in the 'Show' section of supporting system **A. Document Control and Record Keeping**.

You must tick the boxes to confirm that you agree to the statements confirming that the RMP is valid and appropriate for the activities it is intended to cover.

Each time you make a minor or significant amendment to the RMP, the RMP needs to be re-authorised (signed and dated).

If you are electronically completing the RMP template and are unable to electronically sign, then print this page, physically sign, and include a scan of the signed page when sending to MPI.

Part 2. Supporting Systems

The supporting systems in Part 2 describe the good operating practices and procedures that you will comply with. They are part of your RMP and you will need to include them when submitting your application.

You will need to:

a) read each supporting system thoroughly; and
b) ensure that everything in each supporting system applies to your operation and that you will be able to comply with them. Delete or cross out anything that does not apply to your operation; and
c) provide information suggested in some supporting systems that's specific to your operation by:
    i) entering information into the empty boxes or blank lines; or
    ii) ticking the appropriate answer or information.
d) ensure that you have written any procedures and programmes that might be required and that these additional documents are listed in the Document List (Section 1.8 in Part 1 of the template).

Your contracted verifier will verify the effectiveness of the RMP against the supporting systems and the additional procedures and programmes you have written. It is a good idea to store a copy of your procedures and programmes with your copy of the RMP.

Each supporting system is written in the Know/Do/Show format.

Know has general information about why this topic is important and gives ideas for how you can comply with food law.

Do outlines what you must do to comply with the food safety laws.

Show gives examples of records which your verifier might want to see as evidence that you've done something.

The pencil icon indicates that you need to:

- enter further details or tick boxes as appropriate (e.g. monitoring frequency for compliance with procedures, etc.) directly in the supporting system; or
- write a procedure, programme or other document that covers the points listed in the supporting system.

You can find help on writing procedures, programmes or other documents in the Operational Code: Processing of Bee Products (www.mpi.govt.nz/dmsdocument/26557)

You can find example forms and procedures in the RMP Operator Resource Toolkit (www.mpi.govt.nz/dmsdocument/26566).

The document icon indicates that you need to keep a record of something.

Monitoring

What is this?

Many of the supporting systems have a section called 'Monitoring', where you write in a frequency for checking that you are meeting the procedures in the supporting system.

Making sure that procedures are being followed is part of the Operator Verification that you are required to do. We have added the 'Monitoring' sections to help you meet these requirements.

What timeframes should I put?

Monitoring of procedures needs to be done at least once a year. For most supporting systems, reviewing every 1-3 months would be appropriate. However, for an activity that happens daily, a monthly review may be too infrequent. For an activity that happens every month (or less often), 3 monthly might be too frequent.

Choose timeframes that are both appropriate for what you are reviewing and are achievable.

Additional guidance for the Water supporting system

Town supply water

If you are using town supply water without treating it yourself, whether you need to develop water-use criteria and perform initial water testing depends on if you have a reason to believe the town supply water will not meet the *E. coli* and turbidity requirements (the standard requirements for all water).

Generally, you can assume that town supply water will meet the standard requirements. In this situation, the completed Water supporting system is your water use plan. You do not need to create water-use criteria, do initial testing or routine monitoring.

If you have a reason to believe that the town supply water will NOT meet the standard requirements, then you need to document the reason you are unsure, and you will need to develop water-use criteria and do initial water testing. Depending on the results of the initial testing, you may need to do routine monitoring as well.

Own-source water

If you are using own-source water, you will need to develop water-use criteria and do initial water testing. Depending on the results of the initial testing, you may need to do routine monitoring as well.

You can complete the Own-source water checklist and template water-use plan (www.mpi.govt.nz/dmsdocument/56140). When this is completed, this, combined with the Water supporting system, will be your water use plan and will include the water-use criteria.

The Own-source water checklist and template water-use plan doesn't cover all possible sources of water. If your source is not covered (e.g. sourced from another RMP operator or water where additional treatment is applied by you), you will have to write your own water-use plan and water-use criteria. You could use the checklist and the Water supporting system to help you do this. You will need to meet the water requirements in Chapter C of the Animal Products Notice: Production, Supply and Processing (www.mpi.govt.nz/dmsdocument/50182).

Modules

The hazard identification and controls that are documented in each module describe the practices and procedures that you will comply with where appropriate. Each module that you select is part of your RMP and you will need to include them when submitting your application.

For each process that your RMP will cover, you must select the relevant module. To select a module, tick the box 'This module is included in the RMP'. Make sure that the modules selected are the same as the modules you ticked in *1.5 Scope of the RMP*. At least one module must be selected for the RMP to be registered.

The modules are:

- Module 1: Honey Extraction (including mobile extraction) and Bulk Storage
- Module 2: Liquid or Creamed Honey
- Module 3: Spilt or Downgraded Honey
- Module 4: Comb Honey
- Module 5: Dried Pollen
- Module 6: Propolis

- Module 7: Beeswax
- Module 8: Royal Jelly
- Module 9: Bee Venom
- Module 10: Transport

Modules 3 and 10 cannot be selected alone. Module 3 must be selected along with at least one of Modules 1, 2, or 4. Module 10 must be selected with at least one of Modules 1-9 (excluding 3).

Each module contains information on:

- intended consumer
- intended use of product that leaves the RMP
- relevant regulatory limits
- the processes and activities that are covered by the module
- a generic process flow diagram (not in all modules)
- risk factor identification and controls for hazards relating to human and animal health, wholesomeness, and false and misleading labelling, including hazard analysis and critical control point (CCP) determination

The risk factor identification and controls are designed to ensure the consistent manufacture of product that is safe and suitable for the intended purpose and that relevant regulatory requirements are met. The contracted verifier will verify the effectiveness of the RMP against these procedures and requirements.

You will need to:

- read each module you have selected thoroughly; and
- ensure that all written procedures apply to your operation and that you will comply with them.

Cross out anything that does not apply to your operation.

You can modify the generic process flow diagram to better reflect your operation, or you can replace it with your own version. (Cross out the generic diagram and attach your own version instead.)

Writing your own module

If you want to add a process to this RMP that is not covered by the existing modules (e.g. flavoured honey), or if an existing module doesn't fully cover the processing you will be doing (e.g. your intended use or intended customer is different) you will need to write your own module. This will need to be evaluated by an MPI recognised RMP evaluator.

Check that you have listed the name of the module(s) you have written in *1.5 Scope of the RMP* and *1.8 RMP Document List*.

Additional guidance for the Bee Venom Module

The intended consumer and intended use for bee venom does not include eating of bee venom by humans. Only topical (application to skin) is covered by the module.

If you want to process bee venom that will be eaten (e.g. added to honey) you will need to write your own module and have it evaluated.

Additional guidance for the Transport Module

Having transport in your RMP allows for bee product to be transferred using your own listed vehicles. However, this module only covers transport:

- of packaged product that is owned by you; and
- that doesn't need temperature control; and
- that is transported using your own vehicle; and
- that moves from your RMP to another RMP, and from that RMP back to your RMP (not final product dispatch).

Examples:

- You can drop your supers at an RMP registered extractor for extracting into drums. This transport is considered incidental to the beekeeping operation, and is exempt from having to be done under a transport RMP.
- You can collect your drums of honey from the extraction RMP in your truck, and take them back to your own RMP registered storage facility - if you have this module in your RMP.
- You can then take those drums of honey in your truck from your RMP registered storage facility to a RMP registered third party packer.
- You can then pick up the finished product in your truck from the packer, and take it back to your RMP registered storage facility.

However, you **cannot** collect your drums of honey from the RMP registered third party extractor and deliver them straight to the RMP registered third party packer. This would need to be transported under a transport RCS or a full transport RMP.
Instead of using this transport module, you can register a transport regulated control scheme (RCS) or a separate transport RMP.

How to Register the RMP

1.1 Complete the RMP template

You must complete all parts of the RMP template and write any additional procedures or other documents that you need.

If changes have been made to the template

If your operations are not fully covered by this template, or you decide to deviate from the requirements and procedures given in this template, you will need to modify this template with additional information (such as writing your own module) or write your own RMP. In most cases, these will need to be evaluated by an MPI recognised RMP evaluator.

If you decide to modify the template after you have registered it, talk to your verifier first.

1.2 Complete the Application forms

Fill in both of these application forms:

- Application Form AP4: Registration of Risk Management Programme (www.mpi.govt.nz/dmsdocument/71)

- Application Form AP49: Processing Categories Tables (www.mpi.govt.nz/dmsdocument/4562)

1.3 Apply for Registration

To apply for registration of your RMP, send the following information to **MPI Approvals** (approvals@mpi.govt.nz):

- completed RMP template, which is **Part 1: Required Information, Part 2: Supporting Systems, and selected Modules**
  - for multi business RMPs, include any additional copies of *1.4 Multi Business RMP* that were needed
  - include any modules you have created yourself
  - check you have added the name and date of issue for each document you have created yourself to *1.8 RMP Document List*
- completed Application Form AP4: Registration of Risk Management Programme
  - check you have included all additional documents required by the AP4 form
- completed Application Form AP49: Processing Categories Tables

MPI may ask for clarification or further information on any part of the RMP. There may be an additional assessment fee charged for the time of the MPI assessor so it is advisable to

complete the RMP template and application forms as best as you can. The RMP will be registered once MPI is satisfied with the RMP and all fees are paid.

1.4 Keeping the Registered RMP up-to-date

Updates to information held in the template can be made. Amendments to contact details such as emails, phone numbers or postal addresses can be made by emailing the information to be changed to approvals@mpi.govt.nz or completing an AP50: Registration of a Minor Amendment (www.mpi.govt.nz/document-vault/4567) form.

Amendments to other details such as the trading name and the name of the day to day manager will be a minor amendment and an AP50: Registration of a Minor Amendment (www.mpi.govt.nz/document-vault/4567) form must be completed and emailed to approvals@mpi.govt.nz.

When making any amendment to an RMP, you have to determine whether the amendment is considered significant or minor. Detailed guidance on RMP amendments is given in the RMP Manual. Appendix G of the manual provides examples of significant and minor amendments. You can also consult your RMP verifier when deciding whether an amendment is significant or minor.

Other minor amendments may require notification to MPI (you will need to submit an AP50: Registration of a Minor Amendment (www.mpi.govt.nz/document-vault/4567) form).

Adding a module to your RMP (either a module from the template, or a module you have written yourself) is a significant amendment.

Significant amendments are to be submitted using the AP6: Risk Management Programme Amendment Registration (www.mpi.govt.nz/dmsdocument/4573). If the amendment relates to an activity outside the scope of the RMP template, the amended RMP will require evaluation.

All amendments made to the RMP should be recorded in an Amendment Register (www.mpi.govt.nz/dmsdocument/26566). A sample register is included in this link to the RMP Operator Resource Toolkit.

Pages i to xix are not part of the RMP and DO NOT need to be submitted to MPI
The RMP starts on the next page, page 1

Risk Management Programme for Bee Products

Part 1: Required Information

Please complete the tables as required.

1.1 Identifying Information

RMP ID	

1.2 Day-to-day Manager

Name, position or designation of the Day-to-day Manager of the RMP	
Email	
In entering this email, I consent to being sent information and notifications electronically.	
Mobile phone number	

1.3 Operator Name, Business Address and Contact Details

NZBN	
Full Legal Name	
Trading Name, if any (if different from legal name)	
Physical address of premises	
Postal address including postcode (if different from the physical address)	
Phone number	
Mobile phone number	
Email	

1.4 Multi Business RMP

Are other businesses covered by this RMP?	☐ **No**	Do not complete this section. Go to section 1.5. Scope of the RMP
	☐ **Yes**	Complete a copy of this section for each other business operating under this RMP. If needed, attach as additional pages to the RMP.
Business RMP or ID		
Full Legal Name		
Trading Name (if different from legal name)		
Physical address of premises		
Postal address including postcode (if different from the physical address)		
Phone number		
Mobile phone number		
Email		
Evidence of sufficient control of RMP operator over this business	☐	Yes, I have sufficient control, authority and accountability for all matters required under this programme.
	☐	Yes, I have made the business operator aware of the implications for their operations in the event of suspension or deregistration of the programme, or the RMP operator ceasing to operate for any other reason.
	☐	Yes, I have obtained the consent of the business operator covered by this programme. Contract or written correspondence between the two parties is attached, or indicated in the table directly below.

Consent of the business operator to being part of the Multi Business RMP	☐	Yes, I consent to being part of this Multi Business RMP and understand my responsibilities
Business Operator Name		
Signature		
Date		

1.5 Scope of the RMP

Physical Boundaries

Physical boundaries of the RMP:	
☐	The physical boundaries of the RMP are shown on the attached site plan(s)

Processing

The RMP covers the following: (tick all applicable)		
☐	Honey Extraction (including mobile extraction) and Bulk Storage	Complete Module 1
☐	Liquid or Creamed Honey	Complete Module 2
☐	Spilt or Downgraded Honey	Complete Module 3
☐	Comb Honey	Complete Module 4
☐	Dried Pollen	Complete Module 5
☐	Propolis	Complete Module 6
☐	Beeswax	Complete Module 7
☐	Royal Jelly	Complete Module 8
☐	Bee Venom	Complete Module 9
☐	Transport to or from my site	Complete Module 10
☐	Additional Module Name: _____ Additional Module Name: _____	

Complete the appropriate module for each item you have selected. These modules will be part of your RMP.
If you have written your own module, it must be evaluated. List its name in the table above.

1.6 Other Activities, Risk-based Measures or Operators

These activities occur within the physical boundaries of the RMP, but are excluded from the RMP and:

- they are covered under a different risk-based measure (e.g. an RMP, a Regulated Control Scheme, a Food Control Plan, a National Programme or under the Wine Act 2003); or
- they are not covered under a different risk-based measure; or
- they are carried out by a different operator.

Procedures are in place for ensuring that these products are not a source of contamination to any products that are stored in the premises.

Activity	**Covered under a Risk-Based Measure** (if Yes, include which one and ID)	**Control Measures**	**Responsibility** (Name or job title, include name of different operator if applicable)

1.7 External Verification

(1) I give my contracted risk management programme verifier access to any and all places, things and information that may reasonably be needed to complete the verification, including:

a) freedom to access premises, places, or facilities covered by a risk management programme; and

b) access to documents, records, and information that relate to a risk management programme; and

c) access to things (including containers and packages) that are used in connection with processing animal material, animal products, non-animal product foods and non-food animal products under a risk management programme; and

d) access to animal material, animal product, equipment, packages, containers, and other associated things used in processing animal material, animal product, non-animal product foods, and non-food animal products under a risk management programme (noting that the verifier may identify and mark any of those things); and

e) such freedom to examine and take samples (for the purpose of analysis or retention) of animal material, animal product, non-animal product foods, non-food animal products, or any other outputs, substance, or associated thing which has been, is, or may be used in contact with, or in the vicinity of animal material, animal product, non-animal product foods, or non-food animal products being produced or processed under a risk management programme.

(2) I will provide my contracted risk management programme verifier with any reasonable assistance requested.

(3) By way of explanation, in the case of a significant risk to the fitness for intended purpose of animal product or suitability of animal material for processing, a recognised risk management programme verifier may:

a) recommend to the operator that processing under the risk management programme be temporarily interrupted; and

b) recommend to the operator that any affected animal product that may not, or no longer, be fit for its intended purpose be detained; and

c) recommend to an Animal Product Officer that the officer exercises their powers of interruption of operations under section 89 of the APA which (in the case only of the powers under section 89(b) and (c)) may be exercised by the Animal Product Officer over the phone if he or she considers that appropriate.

☐ A letter (e.g. hardcopy or electronic confirmation such as an email) has been received from the verification agency confirming they will verify the risk management programme at all sites covered by this risk management programme.

1.8 RMP Document List

Table 1: Documents from the RMP template

The date authorised will be the same as the date Section 1.9 is signed.

Title		**Date Authorised** (write n/a if module not used)
Part 1: Required Information		
Part 2: Supporting Systems		
Module 1	Honey Extraction and Bulk Storage	
Module 2	Liquid or Creamed Honey	
Module 3	Spilt or Downgraded Honey	
Module 4	Comb Honey	
Module 5	Dried Pollen	
Module 6	Propolis	
Module 7	Beeswax	
Module 8	Royal Jelly	
Module 9	Bee Venom	
Module 10	Transport	

Table 2: Additional documents written by the operator

These additional documents include: procedures; programmes; site plan; list of nominated persons; water checklist; additional modules; amendment record etc.

These documents **must be authorised by the day-to-day manager or a nominated person** and may be authorised individually and separately to the documents from the RMP template (Table 1).

Each document must be re-authorised each time it is updated.
Updating a document you have written yourself might be a minor or significant amendment.

Title	Authorisation
	Name:
	Date:
	Name:
	Date:
	Name:
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Title	Authorisation
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1.9 Authorisation of the RMP

I confirm that:

☐	All of the documents listed in Section 1.8 are appropriate for my operation.
☐	All building, facilities and equipment necessary to implement the RMP are available and ready to operate.
☐	Where applicable, multi business or multi-site operations are ready to operate. Note: this must be ticked if 'Yes' was selected to *Are other businesses covered by this RMP?* under **1.4. Multi Business RMP**.
☐	The RMP, including all relevant legislation incorporated into the RMP, will be implemented as written.
☒ ☒	The documents from the RMP template, including all Supporting Systems and the selected modules, have been authorised by: The Day-to-day manager of the programme or A nominated person
Signature	Title: _____
Date	

The RMP must be re-authorised (signed and dated) each time a minor or significant amendment is made to the documents from the RMP template (i.e. Section 1.8 Table 1).

Part 2: Supporting Systems

A. Document Control and Record Keeping

Useful things to know

Know

- To ensure all RMP documents are authorised, controlled, kept up-to-date, and stored properly.
- To ensure records are generated and stored properly.

Rules you must follow

Do

Document control

- Every document that forms part of this RMP is dated and authorised (see RMP Document List (Tables 1 & 2) by:
  - the Day-to-day manager; or
  - a nominated person.
- All current RMP documents and their date of authorisation are listed in the RMP Document List (Tables 1 & 2).
- All RMP documents are:
  - able to be clearly read; and
  - indicate their version or date of authorisation.
- Details of all amendments to the RMP, including minor and significant amendments, are recorded in an Amendment Register. (The RMP Manual (www.mpi.govt.nz/dmsdocument/183) has guidance on determining if an amendment is minor or significant.)
- The most recent amendments made in a document are identified by highlighting or marking the amended part(s).
- Current versions of RMP documents are readily available, in hard copy or electronic form, to persons with key responsibilities in implementing the RMP.

Record keeping

- A list of the nominated people (who can authorise documents, as per above section) is kept.
- All records identified in the RMP are clear and readable.
- All paper and electronic RMP records (e.g. monitoring, corrective action, verification and validation records) include:
  - the date and, where appropriate, the time of the activity or observation;
  - an accurate description of the results of the activity or observation; and
  - the identity of the person(s) who performed the activity (i.e. initials or signature of the person completing the record).
- Any alteration made to a record is made in a way that allows the original entry to remain readable (i.e. erasures or the use of Twink™ or other material to cover the original entry is not allowed) and is initialled by the person making the alteration.

Accessibility and retention of all RMP documents and records, including archived documents

- One copy of all RMP documents and all records, including those that are obsolete/out-dated/previous versions, are:
  - retained for 4 years, or for the duration of the shelf-life of the product (whichever is longest); and
  - stored in a location where they are protected from damage, deterioration or loss.
- All electronic RMP documents and records are backed up regularly.
- All RMP documents and records, including archived documents, are able to be made available to the RMP verifier or any person authorised by MPI, within 2 working days of a request being made.

Amendments

- All amended parts of the RMP are replaced with the current versions without unnecessary delay after authorisation.
- An amendment register, which includes the following information, is maintained by the RMP operator:
  - document and specific part being amended;
  - details of amendment;
  - reason for amendment;
  - date of change; and
  - person approving the amendment.
- Any alterations on records are made alongside the original entry and initialled by the person altering the record.

Monitoring

- Compliance with these procedures is checked at least _____ by the responsible person.

Things to show your verifier

- Document list.
- List of nominated persons (if any)
- Obsolete documents and documents are filed.

- Records are complete and available upon request (e.g. In the RMP Operator Resource Toolkit Amendment Register).
- Supporting System and process control records (including monitoring, corrective action and verification records).
- Record forms.
- All records generated while implementing the RMP.

Examples of these forms can be found in the RMP Operator Resource Toolkit

B. Personnel Health and Hygiene

Useful things to know

- To ensure that all personnel are medically fit to perform their duties, and that they comply with good hygienic practices so as to prevent or minimise the contamination of product, packaging, equipment and the processing environment.
- Personnel include all workers, staff, contractors providing services and visitors.

Rules you must follow

Induction and ongoing supervision of personnel

- New personnel are informed of their job description, health requirements, and hygienic practices and procedures before starting work.
- Ongoing supervision and/or training is provided to ensure that personnel are adequately trained on their specific tasks as written in the RMP hygienic practices and procedures.
- Where appropriate, clear instructions on hand washing, use of protective clothing, and other hygienic practices are posted in the premises to reinforce the procedures.

Health and sickness policy

- The Day-to-day Manager ensures that all personnel understand and comply with the health and sickness requirements discussed in this section.
- All personnel **(including visitors and contractors)** are required to inform the Day-to-day Manager or another responsible person if they are suffering from any of the health conditions listed in Table B.1 below.
- Personnel suffering from a health condition or illness listed in Table B.1 should not carry out tasks where animal products may be affected.

Table B.1. Health conditions

Condition or illness
Diarrhoea or vomiting due to gastroenteritis or other infectious diseases including norovirus and rotovirus. (May also include illnesses involving *E. coli, Salmonella* spp., *Shigella* spp., *Campylobacter, Yersinia, Cryptosporidium, Giardia*, and *Vibrio cholerae*)
Acute respiratory infection
Hepatitis A
Skin infection (e.g. boils, sores, infected wounds, etc.)

- Personnel must not handle products if wounds, particularly on the face, hands or other exposed areas of the body are infected. Clean wounds that are totally

covered may be acceptable. Wounds on unexposed parts of the body are generally acceptable.
- Personnel with a superficial wound or cut may work as a product handler provided the wound or cut has been treated and dressed with a secure waterproof dressing. Wound dressings should be protected from becoming wet (e.g. use of impervious gloves for wounds on the hands, and protective sleeves or clothing over wounds on other areas of the body).

Non-compliance with health and sickness requirements

- If these requirements are not complied with, the following actions are taken:
  - affected equipment and product contact surfaces are cleaned and sanitised prior to reuse; and
  - affected product is managed as non-conforming product, refer to **O. Non-conforming Product and Recall**; and
  - affected packaging materials are either washed and sanitised (where practicable) prior to use or are not used for packing any product for human or animal consumption.

Protective clothing

- All personnel whose presence or action within processing areas may result in contamination of edible bee products wear suitable, clean protective clothing and footwear.
- Ensure that protective clothing is visibly clean at the start of each day's operation.
- Ensure footwear is suitably clean so it does not cause soil, mud, grass and other dirty material to be brought into processing and packing areas.
- Ensure protective clothing and footwear is:
  - maintained in a hygienic condition;
  - made of readily cleanable materials;
  - cleaned or changed if it becomes a source of contamination during processing; and
  - stored in a manner that protects it from contamination.
- Ensure disposable or damaged protective clothing and footwear is:
  - discarded after use, when damaged (e.g. torn), or if it cannot be effectively cleaned when required during use; or
  - repaired.
- Everyday clothes are not worn over protective clothing.

Washing of hands and arms

- All personnel thoroughly wash hands and exposed portions of the arms with approved liquid soap and water, and then dry them using disposable paper towels:
  - after using the toilet;
  - after handling or coming into contact with waste and contaminated surfaces or material; and
  - after contaminating the hand from coughing, sneezing or blowing the nose.

Note: *If clean water is not readily available for hand washing in certain areas, alternative options for sanitising personnel hands may be considered.*

Visitors and contractors

- All visitors and contractors are required to report to the responsible person on arrival and sign the Visitor's Logbook.
- Visitors and contractors who enter processing or storage areas are required to confirm, by signing a statement in the Visitor's Logbook, that to the best of their knowledge they have no medical condition that may pose a risk to food safety.
- If a visitor or contractor is visibly ill, the responsible person can deny them access to processing or storage areas.
- Prior to entering the processing or storage areas visitors and contractors should wear clean protective clothing and footwear that are provided or approved by the Day-to-day Manager.
- Where appropriate, visitors and contractors are supervised by assigned staff while within the premises. The assigned staff are responsible for ensuring that visitors and contractors follow hygienic practices and procedures.

Hygienic practices

- Personnel behave in a manner that prevents the contamination and deterioration of product and the environment.
- Eating, drinking, smoking, vaping or spitting are not allowed inside the processing areas.

Monitoring

- Compliance with these procedures is checked at least _____ by the responsible person.

S

Show

Things to show your verifier

- A record of all employee illnesses and any medical certificates e.g. Staff Sickness form.
- Completed e.g. Register for injuries.
- Completed e.g. Visitors logbook.
- Completed e.g. Personnel Training Form.
- Any problems detected and any corrective actions taken. Refer to **E. Corrective Action**.

Examples of these forms can be found in the RMP Operator Resource Toolkit

C. Personnel Competencies and Training

K
Know

Useful things to know

- To ensure that all personnel have the necessary knowledge, skills, and training to perform their assigned tasks in a competent and hygienic manner.
- For additional useful information, refer to Operator Verification Guidance (www.mpi.govt.nz/dmsdocument/40898)

D
Do

Rules you must follow

Competencies of key RMP personnel

- All personnel (other than the Day-to-day Manager) who have been nominated to authorise the documents that form this RMP are identified (either by position, or by name and position).
- Personnel responsible for key tasks (such as process control, operator verification, corrective action, recalls, and monitoring) are identified (either by position, or by name and position).
- Personnel performing key tasks have the following competencies:
  - knowledge and skills in executing the particular task; and
  - an overall understanding of the area they are working in.

- The skills or competencies are documented on the Personnel Training Form.

Day-to day Manager

- The Day-to-day Manager is responsible for:
  - ensuring proper implementation of documented RMP programmes and procedures, including monitoring of processes and taking corrective actions for any non-compliances;
  - keeping RMP documents up-to-date;
  - verifying the effectiveness of the RMP;
  - communicating with the RMP verifier, as needed; and
  - ensuring all personnel are adequately trained.
- The Day-to-day Manager has a good understanding of the documented RMP, including legal requirements and supporting systems.
- The Day-to-day Manager is identified (either by position, or by name and position) in the RMP.
- The RMP is amended if the Day-to-day Manager changes. Refer to **D. Operator Verification**.

Induction and supervision

- New personnel are informed of the following before they start working:
  - the company's health and sickness requirements;
  - hygienic practices;
  - movement of personnel and materials;
  - cleaning and sanitation;
  - handling of chemicals;

- hygienic handling of materials and products; and
- operational procedures for their assigned tasks.

- Ongoing supervision and/or skills maintenance is provided to ensure that personnel are adequately trained in their specific tasks, and in hygienic practices and procedures.
- The training programme includes:
  - identification of skills and competencies required for key roles;
  - training schedules (including refresher training); and
  - training records of personnel.

Visitors and contractors

- Visitors and contractors report to a responsible person on arrival at the premises. Where appropriate, visitors and contractors are supervised by assigned staff while within the premises.
- It is the responsibility of the assigned staff to ensure that hygienic practices and procedures are followed by the visitor or contractor.
- Visitors and contractors are not allowed to handle materials or product in processing and packing areas, unless they have complied with all hygiene requirements for food handlers.

Monitoring

- Compliance with these procedures is checked at least _____ by the responsible person.

S

Show

Things to show your verifier

- Competencies identified for key tasks e.g. job descriptions, training matrix
- Training and qualification certificates.
- Completed e.g. Training Programme
- Completed e.g. Personnel Training Form.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

D. Operator Verification

K

Know

Useful things to know

- Operator verification is a system of internal checks that confirms the effectiveness of the RMP by:
  - checking procedures are being followed (as noted at the end of most supporting systems)
  - corrective actions and preventative actions are taken
  - reporting requirements are met
  - other operational requirements (i.e. notification, amendments) are met
  - establishing frequencies for checks
  - ensuring checks (including periodic monitoring and internal audits) are done at the required frequencies.
- For additional useful information, refer to Operator Verification Guidance (www.mpi.govt.nz/dmsdocument/40898)

D

Do

Rules you must follow

Operator verification

- The Day-to-day Manager ensures that the RMP is effective by making sure that the following checks are done:
  - all operator verification activities are transparent and traceable, and undertaken by suitably skilled persons nominated by the Day-to-day Manager.
  - persons carrying out operator verification activities are (if possible) independent of the process or operation monitoring and corrective action activities being verified. They are familiar with the contents of the RMP, including its expected outcomes.

Table D.1: Operator verification activities and frequencies

Activity	Details	Frequency
Record checks	• Collect all records and check they are complete, correctly filled out, and that all results are acceptable or the appropriate corrective action has been taken and documented. • Review to identify any trends, new hazards or recurring problems.	• When completed. • At least annually
Personnel supervision	• Ensure that all personnel are following correct practices and procedures.	• As required.

Review of RMP	• Read through the RMP and amend procedures where necessary. • Perform a reality check to ensure documented procedures are followed. • Test your recall plan by conducting mock recalls. • Significant amendments will be evaluated and registered.	• At least annually. • When procedures or premises change. • When RMP is not working effectively.

Internal audits

- Internal audits are an example of operator verification.
- The internal audit involves checking and confirming that:
  - RMP documentation is up-to-date with current legislation;
  - findings or non-compliances identified by the operator, verifier or MPI are being addressed in a timely manner;
  - written procedures reflect actual operations and practices, and are being followed; and
  - regulatory requirements are consistently being met.
- Internal audits are carried out by a suitably skilled person at least annually, and:
  - ensure ongoing compliance with the documented RMP, including good operating practices and procedures; and
  - identify non-compliances and ensure corrective actions are taken to stop them happening again.
- Internal audits can be more frequent as required (on specific or all areas of the RMP).
- The person responsible for undertaking internal audits has:
  - a good understanding of the operations, processes and good operating practices covered by the RMP;
  - is independent from the procedures being audited as much as possible;
  - a good understanding of relevant regulatory requirements; and
  - makes a record of what was checked as part of the internal audits, including any actions taken.
- All records under this RMP are reviewed for:
  - completeness and accuracy of required information;
  - documentation of corrective actions; and
  - compliance with documented control procedures.
- The person performing the internal audit does a reality check, which includes observing staff, equipment and premises to make sure that:
  - staff are following hygienic procedures and operating procedures;
  - staff are following operating parameters (e.g. temperatures); and
  - hygienic status of the premises, internal and external environment and equipment is maintained.
- All findings from previous internal audits and external verification visits are followed up.

- When ongoing or recurring non-compliances occur, the following actions are taken:
  - investigate to determine possible causes of non-compliance;
  - take appropriate corrective actions to regain control and prevent recurrence of the problem;
  - increase surveillance of the system; and
  - review the RMP or the relevant Supporting Systems and make necessary changes.
- Indications that the RMP or parts of it are not working effectively include:
  - repeated non-compliance or out of specification product test results;
  - customer complaints;
  - multiple or repeated issues raised by the RMP verifier; or
  - unacceptable outcomes from external verification visits.

RMP review

- The RMP is reviewed annually to check that any changes (e.g. equipment, facilities, personnel positions, RMP verifier, etc.) have been included.

Significant Amendments

- After any significant amendment to the RMP has come into effect, all parts of the RMP that may be affected by the amendment are checked to ensure they are still effective and properly implemented.

HACCP plan review

- The HACCP plan is reviewed annually to check for any changes (e.g. to process flow, inputs or outputs, new hazards, etc.).

Recording issues and findings

- The completed audits are recorded e.g. in the Annual Internal Audit Check Sheets.
- Issues or findings requiring action and corrective action taken, are recorded e.g. in the Corrective Action Register.

Notification

- The Day-to-day Manager will send an email to Food.Compliance@mpi.govt.nz and their RMP verifier notifying of any product that is recalled because it is not or may not be fit for its intended purpose.
- The Day-to-day Manager will send an email to MPI.Approvals@mpi.govt.nz or a letter to the Manager, Approvals Operations, MPI, PO Box 2526, Wellington 6140 notifying of any (it is recommended to inform your RMP verifier):
  - change to the name, position or designation of the Day-to-day Manager of the RMP; and
  - change in RMP verifier.

- The Day-to-day Manager will send an email to info@mpi.govt.nz or call 0800 80 99 66 (for biological hazards only) notifying of any emerging, new, or exotic biological hazards or new chemical hazards that have been discovered.
- The Day-to-day Manager will send an email or letter to the recognised RMP verification agency without unnecessary delay on discovering:
  - significant concerns about the fitness for intended purpose of any product;
  - that the cumulative effect of minor amendments necessitates the registration of a significant amendment to the RMP;
  - that the RMP is no longer effective;
  - that the premises are no longer suitable for their use;
  - that anything within the physical boundaries of the RMP is used for additional purposes or by other operators, and the RMP has not adequately considered relevant hazards or other risk factors;
  - merging two or more registered RMPs; or
  - splitting a registered RMP into two or more RMPs.

Who's responsible?

Record the name or position of the person(s) responsible for undertaking/organising Operator Verifications _____

_____

_____

S

Show

Things to show your verifier

- Any information or evidence relating to operator verification activities (e.g. temperature readings).
- Internal audit documentation.
- RMP verifier audit reports.
- Completed e.g. Annual Internal Audit Check Sheets.
- Any problems detected and any corrective action taken. Refer to **E. Corrective Action**.
- Copies of any emails or letters sent to MPI or the RMP verifying agency.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

E. Corrective Action

Useful things to know

- To ensure that if problems occur, they are managed appropriately (e.g. restoration of control, product disposition and prevention of recurrence).
- Problems are normally identified by persons as they carry out, monitor or verify the effectiveness of the tasks documented in the RMP. They may also be detected through customer complaints.

Rules you must follow

Corrective action

- When problems occur, corrective actions are carried out in an effective and timely manner.
- Details of corrective actions are recorded (e.g. in a register). This includes any follow-up checks used to make sure the corrective actions are working (e.g. internal audits, external audits).
- Problems detected through the normal day-to-day operation of the RMP are addressed by a suitably skilled person who will:
  - assess the problem;
  - restore control;
  - identify and retain any suspect product, and determine the product disposition appropriate to the nature of the problem and the intended use of the product (e.g. reject, or release as is). Refer to **O. Non-conforming Product and Recall**;
  - take action to stop the problem from recurring (e.g. increase surveillance of the system, make changes to the system, etc.); and
  - record details of the corrective actions (including restoration of control, product disposition, prevention of recurrence and any follow-up checks) in the e.g. Corrective Action Register. Refer to **O. Non-conforming Product and Recall**.

Corrective action for unforeseen circumstances

- The RMP is not written to cover unusual events such as floods, fires or earthquakes. If such an event happens, appropriate corrective actions are determined on a case-by-case basis and taken.
- When problems occur due to unforeseen circumstances, the Day-to-day Manager nominates a suitably skilled person to carry out the “normal” corrective actions (see above) and to be responsible for:
  - completing an in-depth assessment of the suspect product by reviewing relevant processing records, analyses undertaken, inspecting the product, advice from experts, literature review etc.;
  - ensuring product disposition appropriate to the nature of the problem and the intended use of the product (e.g. rework, reject, release under restricted conditions, regrade for alternative use where permitted under the RMP, etc.);

- following appropriate requirements in O. Non-conforming Product and Recall; and
- reporting the following to the RMP verifier:
    - a description of the problem and the affected product;
    - a summary of the assessment made;
    - the decision on the disposition of the product; and
    - any actions taken to prevent recurrence of the non-compliance.

Who's responsible?

Record the name or position of the person(s) responsible for completing Corrective Action reports _____

_____

_____

S

Show

Things to show your verifier

- Any problems detected and any corrective action taken. Refer to **E. Corrective Action**.
- Any reports given to the RMP verifier.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

F. Design, Construction and Maintenance of Buildings, Facilities and Equipment

K
Know

Useful things to know

- To ensure that all buildings, facilities and equipment are designed, constructed, installed and operated in a manner that prevents or minimises contamination of product, packaging, other inputs, equipment and the processing environment.
- For additional useful information, refer to Operational Code: Processing of Bee Products (www.mpi.govt.nz/dmsdocument/26557)

D
Do

Rules you must follow

Buildings and facilities

- The load-in and load-out areas are designed to:
  - facilitate easy drainage;
  - allow easy cleaning; and
  - minimise the risk of contamination of product, packaging, other inputs.
- Internal structures of buildings, including floors, ceilings and walls, are designed and constructed to:
  - minimise contamination and cross-contamination of products;
  - be durable and capable of withstanding repeated exposure to normal cleaning and sanitising;
  - resist corrosion;
  - minimise the entrance and harbourage of pests;
  - minimise the accumulation of condensation;
  - minimise the entry of environmental contaminants; and
  - be free from cracks and crevices that may harbour contaminants.
- Facilities are available and kept in a satisfactory condition for:
  - hygienic processing, packing and storage of products;
  - storage of chemicals, cleaning compounds and other materials, refer to **M. Chemical Control**;
  - storage and reticulation of water;
  - cleaning and sanitation of facilities and equipment;
  - personnel hygiene (e.g. toilets, hand washing units, showering facilities, storage lockers); and
  - drainage and disposal of wastes.
- Facility and equipment layout (e.g. working space) allows for good hygienic practices, access by personnel and effective cleaning.
- Essential services (e.g. lighting, ventilation, process gases) are sourced, used and maintained in a way that enables effective operation.
  - lighting is sufficient to enable effective operations.
- All site and building entrances are clearly marked to deter unauthorised entry.
- Buildings and facilities are managed in a way that protects product, packaging and other inputs from adulteration.

- Vehicle access and parking areas are designed and constructed to prevent contamination of processing areas.
- Any glass, including light fixtures, is safety glass, or otherwise protected to prevent contamination of the products, materials or packaging.
- Windows are sealed.

Mobile extraction premises

- Mobile extraction premises will follow the requirements for buildings (as appropriate).

Equipment

- Equipment that comes into contact with products is designed, constructed, installed and operated in a manner that:
  - ensures the effective performance of the intended task;
  - facilitates cleaning and sanitising; and
  - minimises the contamination of the product.
- Suitable cleaning equipment (maintained in a hygienic condition) is available for cleaning and sanitising of equipment and facilities. Refer to **H. Cleaning and Sanitation**.
- Any equipment designed to cool products is operated within its design and capacity, and consistently delivers the required temperature.
- Measuring equipment (whether stand alone or forming part of a piece of equipment), has the accuracy, precision, and conditions of use appropriate to the task performed. Refer to **L. Calibration**.

Repairs and maintenance

- Alterations, repairs and maintenance are done when necessary to ensure that facilities and equipment are in a suitable condition.
- Processing stops if the facilities and equipment are in a condition that will affect the product and make it not suitable for its intended use.
- Procedures set out:
  - which areas and equipment are regularly checked for any issues that could lead to damage or deterioration of product or packaging, and when or how often checking is done;
  - any other checking or inspection for maintenance that must be done;
  - how assessment of the impact that maintenance work will have on processing is done; and
  - what corrective actions must be taken if product or packaging is affected by maintenance.
- All alterations, repairs and maintenance work on facilities and equipment (including refrigeration and freezing units) are done in a manner that minimises the exposure of product or packaging to hazards introduced by this work. Corrective actions are taken if needed. Refer to **E. Corrective Action**.

- If any maintenance activity affects the suitability for intended use of the product, then action is taken to stop more product being affected, including (if required) stopping processing.
- Before use of facilities and equipment, a suitably skilled person checks that:
  - maintenance is sufficiently complete so that when processing re-starts, product will not be adversely affected; and
  - areas and surfaces have been appropriately cleaned and, where appropriate, sanitised; and
  - if processing had stopped during the work, the area has been returned to a suitable state for processing to re-start.

Changes

- MPI will be notified if there are plans to make major alterations to facilities or equipment which may impact on the product(s) (this can be a significant amendment to the RMP).

Refrigerated and frozen facilities and equipment

- Refrigerated and frozen facilities are designed, constructed and equipped to ensure that the specified preservation temperatures are maintained throughout storage.
- Equipment for the control and accurate monitoring of temperatures and any other required refrigeration or frozen parameters (e.g. humidity, air-flow, etc.) are provided and operated at all times while refrigeration and frozen facilities are in use.
- Temperature measuring devices are located to measure the internal temperature of the storage facility at the warmest point and are calibrated.

  Note: *Temperature measuring devices should be calibrated at a frequency necessary for maintaining its required accuracy. Operators should refer to the equipment supplier's recommendation for guidance.*

Recording issues and findings

- Issues or findings requiring action and the corrective actions that are taken are recorded e.g. in the Repairs and Maintenance Register.

Monitoring

- Compliance with these procedures is checked at least _____ by the responsible person.

Things to show your verifier

Show

- Completed e.g. Repairs and Maintenance Register, Maintenance Schedule, Maintenance Form.
- Any equipment specifications, manufacturers or suppliers instructions (e.g. any specifications or manuals related to refrigeration units).
- Any building reports.

- Any problems detected and any corrective action taken. Refer to **E. Corrective Action**.
- Calibration records.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

G. Water

K
Know

Useful things to know

- To ensure that water is fit for its intended purpose at the point of use and maintains the fitness for intended purpose of product.
- Where the water used can't affect the animal products, this Water Supporting System doesn't apply (e.g. if water used for toilets is from a separate source)

D
Do

Rules you must follow

Water supply

- The source of water used within the premises is (tick all applicable):
  - ☐ **town supply water** (a reticulated water supply that provides drinking water to the public; no further treatment may be applied by the RMP operator)
  - ☐ **own-source water** (water other than town-supply water, or reused or recovered water; e.g. water sourced from a bore, river, stream, roof; water sourced from another RMP operator; water where additional treatment is applied by this operator)
  - ☐ **reused or recovered water**

Water use

- Water is used for:
  - cleaning of facilities and equipment;
  - personal hygiene activities;
  - production of steam;
  - use in washing equipment; and
  - other operational activities where water comes into direct or indirect contact with any product.

Design and management of reticulation system

- The on-site water reticulation system is designed, installed and operated in a manner that ensure water is delivered for the purpose for which it is intended; and:
  - minimises dead ends and backflow; and
  - prevents the contamination of water and unintentional mixing between water intended for different purposes.
- Water lines, including flexible hoses, in processing areas that contain water of different standards (such as water that is unsuitable for direct or indirect contact with animal material or animal product) must be labelled or otherwise identified.
- Water pipes, storage tanks and other parts of the reticulation system are maintained in good condition.
- The reticulation system is flushed (i.e. taps are opened at point-of-use to allow a significant flow of water to occur) when water is not used for an extended

period and after any repairs to the system, to ensure that stagnant water, rust, scale or other material is flushed out of the system.

Standard requirements for all water

Table G.1: Standard requirements for all water

Measurement	Criteria
E. coli	Not Detected per 100 ml
Turbidity	Must not exceed 5 NTU (Nephelometric turbidity units)

Water use criteria

Table G.2: Water-use criteria

Water source	Water-use criteria
Town supply water (without additional treatment)	☐ Water-use criteria is not required (assume the water meets Table G.1 Standard Requirements for All Water) or ☐ Water-use criteria is required (there are reasons to believe the water will not meet Table G.1 Standard Requirements for All Water)
Own-source water	Water-use criteria is required.
Reused or recovered water	Water-use criteria is required.

- If water-use criteria is required under Table G.2, water-use criteria is developed e.g. using Own-source water checklist and template water-use plan
- The water-use criteria must:
  - reflect the source of the water and the purpose for which it is used; and
  - be developed by a suitably skilled person; and
  - be based on an assessment of any chemical, biological, physical, or radiological hazards or other risk factors.
- The suitably skilled person who developed the water use criteria is

_____

Name or position. Complete only if water use criteria is required.

Sampling and Testing

Table G.3: Initial testing and routine monitoring

Water source	Initial testing	Routine monitoring
Town supply water (without additional treatment)	☐ Initial testing is not required (assume the water meets Table G.1 Standard Requirements for All Water) or	No routine monitoring is required.
	☐ Initial testing is required (there are reasons to believe the water will not meet Table G.1 Standard Requirements for All Water)	☐ No routine monitoring is required as initial testing meets Table G.1 Standard Requirements for All Water. or ☐ Routine monitoring is done as per Table G.4 Frequency of Testing and any additional testing required under the water-use criteria.
Own-source water	Initial testing is required.	☐ No routine monitoring is required as initial testing meets Table G.1 Standard Requirements for All Water and the water-use criteria does not require additional testing. or ☐ Routine monitoring as per Table G.4 Frequency of Testing and any additional testing required under the water-use criteria.
Reused or recovered water	Initial testing is required.	Routine monitoring as per Table G.4 Frequency of Testing and any additional testing required under the water-use criteria.

- If testing is required under Table G.3, initial testing is done before processing begins.

- Samples are obtained and handled in a manner that ensures they are:
  - representative of the water being tested; and
  - appropriate to the type of test.
- Water testing to ensure that the water meets the standard water requirements (see Table G.1: Standard Requirements for All Water) and any relevant water-use criteria is performed by a laboratory accredited for those tests.

The accredited laboratory used is

_____

Complete only if water testing is required.

- Water testing to monitor parameters relating to water treatment (e.g. chlorine, pH, turbidity) is performed by a suitably skilled person using methods documented in the water-use plan, and if appropriate, calibrated equipment.

The suitably skilled person(s) who perform the water testing are

_____

Name or position. Complete only if water testing relating to water treatment is required.

Table G.4: Frequency of testing

Average daily use while processing	**Microbiological testing (*E. coli* or total coliforms)**	**Turbidity testing**	**pH testing (for chlorinated water)**	**Chlorine testing (for chlorinated water)**
Operating for up to 6 months during the honey flow	1 per year (before pre-season cleaning of the premises, facilities and equipment)	1 per year (before pre-season cleaning of the premises, facilities and equipment)	1 per year (before pre-season cleaning of the premises, facilities and equipment)	Daily when staff present and premises operating
Operating for 6 months or more	1 per 6 months	1 per 6 months	1 per 6 months	Daily when staff present and premises operating

Additional requirements for water treated by the operator

- When water is treated by the operator (e.g. chlorination, boiling, filtration, UV treatment, etc.), the water-use plan includes:
  - information about the treatment applied, including the type of treatment, operating procedures and parameters, monitoring procedures, and any acceptable limits;

- a water sampling and testing programme for verifying the effectiveness of the specific water treatment applied (frequency as indicated in Table G.4 Frequency of Testing or as necessary for the effective monitoring of any specific water treatment applied); and
- corrective action procedures when the water is found to be unsatisfactory based on the results of any test done.

- All equipment used for treating water is installed, maintained and operated as per the manufacturer's instructions.
- The water treatment system is developed and operated by a suitably skilled person.

Reassessment

- The water supply is reassessed:
  - at least once every 3 years;
  - prior to using a new supply of water (that is, the supply changes, or a new supply is added); and
  - within 1 month after any change (that may adversely affect the water's fitness for intended purpose) to the water source (excluding town supply water); the environment in or around the water source (excluding town supply water); the reticulation system; the intended purpose of the water; and any aspect of the treatment system (if relevant).
- The reassessment is documented.
- Reassessment is done by considering the information that has gone into the water-use plan, water-use criteria and updating.
- When using town supply water, the 3 yearly or new supply of water reassessment also considers whether need to change from 'assume the water meets Table G.1 Standard Requirements for All Water' to 'there are reasons to believe the water will not meet Table G.1 Standard Requirements for All Water' (or the reverse).

Corrective Actions

- When water is not fit for purpose, corrective action is taken (see Table G.5 Examples of Corrective Actions).
- Affected products are managed as non-conforming product, refer to **O. Non-conforming Product and Recall**.

Table G.5: Examples of corrective actions

Example Scenarios	Actions
The **town water supplier** advises that the water is not fit for drinking without additional treatment	The following actions are taken as appropriate to the scenario: **Immediate control and investigation of problem** • all operations requiring the use of water are stopped;
Water fails to comply with any of the requirements of the water management plan (including	

corrective actions) and there are no other means in the RMP to ensure the water meets the original standard at the point of use	• the cause of the problem is investigated; and • appropriate corrective actions are taken to rectify the problem (e.g. through further treatment). **Disposition or handling of affected products and equipment** • any affected product intended for human consumption is not used for that purpose unless assessment by a suitably skilled person indicates that an alternative action will render the product safe and suitable for human consumption; • any affected product intended for human consumption may be regraded for animal consumption (e.g. petfood, stockfood, etc.) when the product meets the applicable requirements; • any affected food contact surfaces are cleaned and sanitised prior to reuse; and • any affected packaging materials and containers that cannot be effectively cleaned and sanitised, are not used for packaging of any product. Records of the assessment and corrective actions taken are kept.
For water supplied by another RMP or FCP, the other RMP or FCP operator advises the operator that the water does not meet the relevant water standard	
Water supply is **contaminated by non-complying water**	
The RMP operator or Day-to-day Manager has **reason to believe that the water is not fit for use** and there are no procedures included in the RMP to ensure the water is fit for purpose at the point of use	

S

Show

Things to show your verifier

- Water reticulation plan (e.g. site plan).
- Own-source water checklist (if applicable) e.g. Own-source water checklist and template water-use plan
- Results of water testing (if applicable).
- Results of ongoing monitoring of any water treatment activities (if applicable).
- Water use criteria (if applicable).
- Documentation of reassessment.
- Any problems informed of or detected (e.g. notification from water supplier, failure of water treatment plant).
- Any problems detected and any corrective action taken. Refer to **E. Corrective Action**.
- Completed e.g. Internal Audit reports.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

H. Cleaning and Sanitation

K
Know

Useful things to know

- To ensure the effective cleaning and sanitation of premises, facilities and equipment to prevent or minimise the contamination of products.
- Cleaning means the physical removal of material from surfaces, including sugar, protein and mineral deposits.
- Sanitising means the inactivation of bacteria on cleaned surfaces and the protection of cleaned surfaces until processing starts.
- For additional useful information, refer to Operational Code: Processing of Bee Products (www.mpi.govt.nz/dmsdocument/26557)

D
Do

Rules you must follow

Cleaning

- There is a cleaning programme or schedule that covers all the different areas of the premises and contains the following information:
  - area, facility and/or equipment to be cleaned;
  - procedures for cleaning the area, facility and/or equipment;
  - type or method of cleaning;
  - chemicals that are used;
  - frequency of cleaning;
  - frequency of cleaning checks or inspections;
  - person/position responsible for cleaning;
  - what corrective actions to take; and
  - records to be kept.
- Cleaning activities are carried out in a way that minimises contamination of ingredients, products, previously cleaned areas, etc.
- Dry areas are cleaned by appropriate dry cleaning methods (e.g. brushing, sweeping, vacuuming, etc.).

CIP (Clean in Place)

- Where CIP occurs, procedures for cleaning also:
  - identify all CIP circuits;
  - identify equipment that is subject to CIP;
  - set CIP parameters (such as the cleaning cycle, frequency, temperature, flow rate, chemical strength);
  - specify how the monitoring of CIP solutions is done and how records are kept; and
  - identify when cleaning out of place or manual cleaning is required (for equipment that is normally CIP'd).

Equipment for cleaning

- Cleaning equipment does not contaminate ingredients, products or packaging.
- Cleaning equipment is:
  - used for cleaning purposes only;

- stored in a hygienic manner when not in use; and
- maintained in a good state of repair.

Wet cleaning

- Wet cleaning (e.g. water, steam, etc.) should be contained within the immediate area that is being wet cleaned to prevent wetting dry ingredients, packaging, products, and dry product areas.
- All equipment and product contact surfaces that are wet cleaned should be free from residues and moisture before processing restarts.

Chemicals

- Cleaning compounds are used in accordance with the procedures given in **M. Chemical Control**.
- Chemicals used for cleaning and maintenance are handled and used:
  - according to the directions of the manufacturer; and
  - in a manner that minimises contamination of product.

Management of allergen cross-contamination

- Pollen, propolis, bee venom and royal jelly are allergens.
- Where allergens are processed, the cleaning programme or schedule includes appropriate cleaning procedures to minimise the possibility of cross-contamination of products that are not intended to contain the allergen.
- If equipment or product contact surfaces are (or are suspected to be) contaminated with an allergen, the affected equipment and product contact surfaces are cleaned and sanitised prior to reuse.
- If product is (or is suspected to be) contaminated with an allergen, the affected product is managed as non-conforming product, refer to **O. Non-conforming Product and Recall**.

Management of cleaning chemical contamination

- If equipment or product contact surfaces are (or are suspected to be) contaminated with residues, the affected equipment and product contact surfaces are cleaned and sanitised prior to reuse.
- If product or packaging is (or is suspected to be) contaminated with residues:
  - affected products are managed as non-conforming product, refer to **O. Non-conforming Product and Recall**;
  - affected packaging materials are either washed and sanitised (where practicable) prior to use or are not used for packing any product for human or animal consumption.

Collection and removal of waste

- Waste (including waste water) is not allowed to accumulate in or around processing areas.
- Solid wastes are:
  - collected in clearly identified waste containers;

- collected using clearly identified equipment that is stored in an identified area when not in use;
- kept under controlled conditions to ensure that they are not mistakenly or fraudulently released as suitable for processing for human consumption; and
- regularly disposed of in a way that ensures that they do not become a source of contamination to products, the work area and the processing or storage environment.

- Outside waste bins (where used) are covered, maintained in a tidy condition, and collected regularly so that they do not attract pests and create objectionable odours.

Cleaning inspection

- Cleaning checks or inspections are undertaken on a regular basis to:
  - ensure compliance with the cleaning and sanitation programme; and
  - check the effectiveness of cleaning.
- Checks of facilities and equipment are done prior to use (including after maintenance) to ensure that operations begin only after sanitation requirements have been met:
  - all observations made during the check are recorded.
- If a problem is found, then:
  - the problem and the corrective actions are recorded;
  - the source of the contamination is fixed (immediately if there is a food safety risk); and
  - the frequency of cleaning is reviewed.

Monitoring

- Compliance with these procedures and the effectiveness of cleaning is checked at least _____ by the responsible person. Poor results mean you increase the frequency of checks. Good results mean you can decrease frequency of checks back to standard.

S

Show

Things to show your verifier

- Cleaning schedules and procedures.
- Cleaning and pre-operational records, forms or check sheets.
- Completed e.g. Chemical Register.
- Any problems detected and any corrective action taken. Refer to **E. Corrective Action**.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

I. Receipt of Incoming Materials

K
Know

Useful things to know

- To ensure that all incoming materials (including ingredients and packaging) are fit for purpose, and sourced, handled and stored according to requirements.
- Information about tutin requirements and how to meet them can be found in:
  - Food Standard: Tutin in Honey (www.mpi.govt.nz/dmsdocument/11137)
  - Compliance Guide to the Food Standard: Tutin in Honey (www.mpi.govt.nz/dmsdocument/20489)

D
Do

Rules you must follow

Receipt of incoming materials

- Suppliers are asked to provide evidence that their materials meet the regulatory requirements (for example providing a harvest declaration or tutin statement).
- The Day-to-day Manager will contact the verifier if they believe that a supplier has supplied materially false information about an animal material.
- Materials are checked (on arrival or prior to use) to ensure they are clearly labelled and are fit for purpose.
  - all honey is checked on receipt to ensure that the tutin requirements are met (e.g. harvest declaration or tutin statement is reviewed). If the RMP operator is also the beekeeper, records equivalent to the harvest declaration or tutin statement are kept.
  - if the requirements are not met or no evidence is supplied (e.g. no harvest declaration supplied, or honey exceeds the tutin limit), the material is managed as non-conforming product. Refer to **O. Non-conforming Product and Recall**.

  - record the name or position of the person(s) responsible for checking that tutin requirements are met (if relevant):

_____

_____

_____

- All consignments are entered in the inventory control system for traceability (including their unique identification and/or label information).

Handling and storage

- All incoming materials are transferred without any unnecessary delay to appropriate storage areas (including chiller, freezer or cold stores) so that appropriate material temperatures are maintained.
- All materials are handled and stored in a manner that minimises any potential contamination, damage or deterioration.
- Materials with damaged packaging are handled in a manner that minimises:
  - contamination or deterioration of the material; and

- contamination of other materials or the processing or storage environment.

Monitoring

- Compliance with these procedures is checked at least _____ by the responsible person.

Things to show your verifier

- Records of products under the RMP (e.g. consignment notes, harvest declarations, tutin statements etc.).
- Any problems detected and corrective action taken. Refer to **E. Corrective Action**.

J. Traceability, Inventory and Labelling

Useful things to know

Know

- To ensure that products are correctly identified sufficiently at receipt, processing, storage and sale for inventory control purposes and to allow for traceability in the event of a recall.

Rules you must follow

Do

Inventory control

- Inventories are maintained for all raw materials (e.g. incoming honey, pollen, starter honey), ingredients and products.
- Non-conforming materials and products are clearly identified and the reasons for non-conformance are in the inventory.
- All outgoing products are clearly labelled and accompanied by appropriate documentation to ensure their traceability. Refer to Labelling of Transportation Outers below.

Traceability

- A tracking system is maintained that:
  - allows for the identification of all animal product (including raw materials, ingredients and products) throughout the entire production chain (i.e. from reception of incoming materials, through processing or manufacturing (including starter honey), to dispatch of products); and
  - can trace animal material and animal product from the supplier to the operator; and from the operator to the next recipient in the supply chain (other than the final consumer).
- Upon request by MPI, traceability information can be provided within 24 hours.
- Rework can be identified and tracked to finished product.
- All outgoing products are clearly labelled and accompanied by appropriate documentation to ensure traceability of the batch.
- There are procedures to track inputs through processing so that products can be quickly and effectively identified and isolated if a problem occurs.

Records

- Records include, as appropriate:
  - name and address of suppliers of raw materials and ingredients;
  - details about the supplied item, including the batch number, quantity and delivery date;
  - supplier status of any approved suppliers;
  - production records indicating the type, formulation and quantity of the finished products manufactured, the production or manufacturing dates and batch numbers, the use of any reworked products, starter honey and any repacking done;

- an inventory system (either electronic or hard copy) that allows finished products to be traced;
- load in and load out checks; and
- the name and address of the person or company to which the batch of products are delivered to.

Labelling of product

- There are procedures to ensure that:
  - labels are designed to meet regulatory requirements;
  - all information printed on labels or packaging are correct and accurate;
  - the correct label is applied to each product unit (including when re-labelling and re-packing);
  - labels are stored in a manner that maintains them in good condition; and
  - damaged or obsolete labels are disposed of appropriately.

Labelling of transportation outers

- There are procedures to ensure that labelling of transportation outers (where required):
  - meets the regulatory requirements; and
  - is correct and accurate.
- Any false or misleading labelling on reused or recycled packaging resulting from previous uses will be removed or defaced.

Monitoring

- Compliance with these procedures is checked at least _____ by the responsible person.

S

Show

Things to show your verifier

- Records showing products received (e.g. consignment notes, harvest declarations etc.).
- Any re-labelling or re-packing done.
- An inventory system (electronic or hard copy) that allows finished products to be traced.
- Copies of labels.
- Any problems detected and corrective action taken. Refer to **E. Corrective Action**.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

K. Packaging, Packing and Re-packing

K
Know

Useful things to know

- To ensure that packaging materials are fit for intended purpose, and that bee products remain fit for intended purpose during packing and re-packing.

D
Do

Rules you must follow

Packaging materials

- All packaging and product contact materials are suitable for food contact use.
- Opened cartons are re-closed and covered during storage to prevent dust contamination.
- Packaging materials and other food contact materials are:
  - checked on delivery to ensure they are fit for their intended use (i.e. clean, undamaged) and properly labelled;
  - protected against contamination or damage during storage; and
  - kept separate from chemicals and other hazardous materials.

Use of packaging materials

- Packaging is clean and undamaged at point of use.
- Dirty or damaged packaging is disposed of appropriately.
- Packaging materials adequately protect the product.
- Reused packaging is visually clean and correctly labelled at the time of reuse. Any labelling from a previous use that is not truthful when applied to the new product is removed or defaced.

Packing and Re-packing

- Packing or re-packing of products is done under appropriately hygienic conditions, in a manner that ensures that any product not enclosed in packaging is protected from contamination and maintains its fitness for intended purpose by:
  - the area being clean;
  - personnel being suitably clothed;
  - ensuring that products designed for re-packing are being managed via the inventory system; and
  - ensuring that all re-packaged products are appropriately labelled.
- Animal product must not be exposed during repacking (i.e. opening the primary packaging).
- All products remain identifiable at all times.
- Damaged packaging is disposed of appropriately.

Monitoring

- Compliance with these procedures is checked at least _____ by the responsible person.

S

Show

Things to show your verifier

- Evidence of packaging suitability provided by suppliers.
- Inventory records.
- Any problems detected and corrective action taken. Refer to **E. Corrective Action**.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

L. Calibration

K
Know

Useful things to know

- To ensure that measuring equipment that is used to take critical measurements is functioning as intended.
- Critical measurements are those that monitor controls for significant hazards.
- If your measurement is not providing a critical measurement, then you do not need to follow this supporting system, however it is recommended to do so.

D
Do

Rules you must follow

Measuring Equipment

- Measuring equipment (such as scales, etc) that is used to provide critical measurements are:
  - accurate and fit for their intended use;
  - calibrated regularly against a reference standard (i.e. shows traceability of calibration to a national or international standard of measurement); or
  - if no such standard exists, calibrated by a suitably skilled person using a documented method; and
  - are uniquely identified (e.g. by using serial numbers, indelible tags or other permanent means of identification) to enable traceability of the calibrations to a reference standard and to identify the calibration status.
- A calibration programme is in place that covers the following:
  - how to calibrate each piece of measuring equipment that requires calibration;
  - whether each piece of measuring equipment is used for taking critical measurements or not;
  - minimum frequencies of calibration for each piece of measuring equipment used to provide critical measurements, or used as reference standards;
  - safeguards for prevention of unauthorised adjustments to the calibration of measuring equipment; and
  - the corrective actions to be taken when a measuring device is damaged or provides inconsistent or inaccurate readings and identification and disposition of any product produced when the device was out of order.

Faulty equipment

- Equipment that is faulty or inaccurate is not used. It is repaired and recalibrated or replaced as soon as possible.

Monitoring

- Compliance with these procedures is checked at least _____ by the responsible person.

S
Show

Things to show your verifier

- Calibration certificates and other calibration records.

- Identification, location and calibration status of equipment.
- Completed e.g. Calibration Form.
- Any problems detected and corrective action taken. Refer to **E. Corrective Action**.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

M. Chemical Control

K
Know

Useful things to know

- To ensure the proper use and storage of chemicals to prevent or minimise the contamination of products, packaging, equipment and the processing and storage environment.
- Chemicals include maintenance compounds used for cleaning, sanitation, fumigation, pest control and repair and maintenance of equipment.

D
Do

Rules you must follow

Chemicals (including maintenance compounds)

- There are procedures for the storage, handling and use of chemicals.
- Only MPI approved maintenance compounds, as listed in the MPI Approved Maintenance Compounds (Non-dairy) Register (www.foodsafety.govt.nz/registers-lists/maintenance-compounds/index.htm), are used:
  - during processing operations;
  - in the maintenance of processing areas; and
  - on equipment.
- An up-to-date list (register) of all chemicals used within the boundary of the RMP is kept and held on the premises.

Storage of chemicals

- Chemicals are stored in a designated area, away from products, ingredients, packaging and processing aids.
- Chemicals are clearly labelled. If it is an approved maintenance compound, it must be labelled with the name as it appears on the list of approved maintenance compounds.
- Chemicals are kept in closed containers when not in use.
- Containers for storing maintenance compounds or other chemicals that are suitable for re-use are only re-used to store the same compounds or chemicals.

Use of chemicals

- Maintenance compounds are used according to the directions of the manufacturer and the conditions of the approval.
- Directions for use (such as the detergent/sanitiser to be used in an area or on a piece of equipment, their concentration, application method and contact time required) are readily available to the user (e.g. given on the label, product information data sheets, etc.).
- Chemicals are handled and used by, or under, the supervision of suitably trained or experienced personnel.
- All containers or implements used for measuring or pouring of hazardous chemicals are labelled 'For Chemicals Only' (or similar), to ensure they are not used for any other purpose.

- Products and unprotected packaging are removed or kept protected (e.g. covered) prior to the use of chemicals (e.g. insecticide sprays) to prevent contamination.
- Equipment and other food contact surfaces are cleaned by thorough washing after exposure to chemicals that are not approved for food contact (e.g. after spraying with insecticide is completed).

Handling and disposal of chemicals

- Empty chemical containers are disposed of and are not re-used in a way that may contaminate product.
- When contamination by a hazardous chemical occurs, the following actions are carried out:
  - affected food contact surfaces are cleaned and sanitised prior to reuse;
  - affected products are considered unfit for human or animal consumption and are disposed of as per **O. Non-conforming Product and Recall**; and
  - affected packaging that cannot be effectively cleaned and sanitised is disposed of properly.

Monitoring

- Compliance with these procedures is checked at least _____ by the responsible person.

S

Show

Things to show your verifier

- Approved chemicals used (e.g. Chemical Register, consignment notes, etc.).
- Any problems detected and corrective action taken. Refer to **E. Corrective Action**.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

N. Pest Control

K
Know

Useful things to know

- To ensure effective control of pests so as to prevent or minimise the contamination of product, packaging, other inputs, equipment and the processing environment. Pests include rodents, wild birds, insects (including bees), dogs and cats.

D
Do

Rules you must follow

Responsibility

- Pest control and monitoring activities within the RMP premises is carried out by (tick applicable box):
  - ☐ **the RMP operator**
  - ☐ **a contracted pest control person or agency**
- Where pest control and monitoring activities are contracted out, the Day-to-day Manager, prior to signing the contract or services agreement, ensures that:
  - the person or agency to be contracted is competent to perform the task and is familiar with the requirements of this Supporting System; and
  - the written contract or services agreement clearly defines the services to be provided by the contracted person or agency.

Controls to prevent entry of pests

- Buildings and facilities are designed and constructed in a manner that minimises the entry of pests.
- External doors that are not screened are kept closed when not in use.
- Animals and pets (e.g. cats and dogs) are not allowed to enter processing, packaging or storage areas.
- Holes, drains, and other places where pests are likely to gain access to buildings must be sealed or covered with screens, or otherwise managed to prevent entry by pests.
- Insect screens are fitted on windows and external doors that are kept open during operations.

Controls to prevent infestation of pests

- Buildings, external surroundings and waste bins are kept clean and tidy to prevent potential breeding sites. Waste bins are regularly collected and emptied.
- Buildings are kept in good repair and condition to prevent pest access and potential breeding sites.
- Regular inspections of the premises, including external surroundings, are carried out to check for evidence of possible infestation.
- If present, electric insect traps are not installed above unprotected product or packaging. The insect tray is emptied when necessary and any UV light bulb changed as recommended by the manufacturer.

Use of pesticides (e.g. fly sprays, rat baits, etc.) and pest traps

- Pesticides are approved, handled, used and stored according to the manufacturer's directions and the MPI conditions of the approval. Refer to **M. Chemical Control**.
- Bait stations are:
  - identified (e.g. numbered); and
  - located and installed so they cannot contaminate product or packaging.
- Bait stations and traps are checked at least _____ for evidence of pest activity (e.g. nibbled bait, bait missing, droppings, etc.) and to confirm they are in good working order.
- Increased monitoring and appropriate corrective actions are undertaken when increased rodent activity is observed. This is recorded on a Vermin Control Register.
- Any pests are regularly removed from the pest stations and the bait replaced if required. This is recorded on a Vermin Control Register.

Handling and disposition

- Where there is evidence of contamination by pests, the following actions are carried out:
  - affected food contact surfaces are cleaned and sanitised prior to reuse;
  - affected products are managed as non-conforming product, refer to **O. Non-conforming Product and Recall**;
  - affected packaging is either washed and sanitised (where practicable) prior to use or is not used for packing any product for human or animal consumption.
- Honey that has been extracted from honey supers where varroa treatments have been used in a way that could contaminate the honey (such as not following the ACVM label use or approval conditions) is managed as non-conforming product. Refer to **O. Non-conforming Product and Recall**.

Monitoring

- Compliance with these procedures is checked at least _____by the responsible person.

S

Show

Things to show your verifier

- A contract or service agreement with the contracted pest control person or agency, if applicable.
- A record of the location of the bait stations, electric fly units and other pest stations may be shown on site plan used to show physical boundaries.
- A record of all Approved Maintenance Compounds (pesticides) used (including name, amount and point of use). Refer to **M. Chemical Control**.
- Completed e.g. Vermin Control Register of pest sighting and monitoring.
- Any problems detected and corrective action taken. Refer to **E. Corrective Action**.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

O. Non-conforming Product and Recall

K
Know

Useful things to know

- To ensure the correct handling and disposition of non-conforming products, including the recall of products from distribution and sale.
- Disposing of product may include reprocessing, downgrading, or disposing of it as waste.

D
Do

Rules you must follow

Non-conforming product

- Non-conforming product is any product that:
  - has not been processed in accordance with relevant regulatory requirements, and procedures written in the RMP, or
  - is not safe or suitable for its intended use.

Suspected non-conforming product

- Product that is suspected of being non-conforming is managed as if it is non-conforming.
- A suitably skilled person may determine that product that is suspected of being non-conforming is actually conforming by considering various factors, such as:
  - what the incident was
  - the risk of breaching a regulatory or operator defined limit
  - has the limit actually been breached (may require testing to be done)
  - discussion with verifier
- If product is determined to be conforming records are kept that cover:
  - identification of the suspected non-conforming product; and
  - a description of the event or circumstance that led to the product being suspected non-conforming; and
  - the justification for the product being determined as conforming.

Managing non-conforming product

- Non-conforming products are handled and stored in a manner that prevents:
  - contamination and deterioration of other products or inputs; and
  - contamination of the processing and storage environment that could lead to contamination of other products or inputs.
- Non-conforming products are:
  - clearly identified;
  - separated from other products;
  - recorded in inventory (unavailable for load-out); and
  - held until disposition is determined by a suitably skilled person or, in certain cases, by the RMP verifier or MPI.
- The RMP verifier is notified as soon as possible when there is significant concern about fitness for intended purpose of any products.

- The disposition of any non-conforming product is determined by a suitably skilled person considering various factors, such as:
  - product safety and suitability;
  - the amount of product affected;
  - options for disposing of the product (such as reprocessing, downgrading, or disposing of it as waste);
  - whether the products have been released for distribution or not;
  - any instructions from MPI or the RMP verifier; and
  - any instructions from the product owner.
- Records are kept that cover:
  - identification of the affected animal material or animal product; and
  - a description of the event or circumstance that led to the product being non-conforming;
  - communications about the product disposal decision; and
  - the products disposal, including confirmation of actual disposal.

Managing Tutin Non-compliance

- For honey that exceeds the maximum tutin level, the honey is disposed of by:
  - diluting the honey with uncontaminated honey (comb honey is extracted and then diluted), and homogenising and testing the honey to prove compliance with the maximum level prior to packing for sale; or
  - feeding the honey back to bees when honey supers are not present on hives; or
  - in a way approved, in writing, by the RMP verifier or MPI.

Unforeseen Events

- During any unforeseen events (such as floods earthquakes, pandemic, unavailability of contractors, power failure, etc.), appropriate steps will be taken by the day-to-day manager to manage any risks to products, and to identify any non-conforming or suspected non-conforming product.
- The RMP verifier is notified with an incident report including:
  - a description of the problem and any affected product;
  - a summary of the assessment made; and
  - any corrective actions taken to prevent the recurrence of the non-conformance.

Corrective actions

- Refer to **E. Corrective Action**.
- Corrective actions will be taken to minimise the occurrence of non-conformance.
- The corrective actions may include:
  - amending procedures to correct deficiencies;
  - increasing the frequency of inspections or internal audits;
  - revising supervision or training programmes when staff, visitors or contractors are not following GOP as required;
  - managing repeat offenders; and
  - a series of escalating responses for repeated non-conformances.

Determining if a recall is required

- A recall is considered when the Day-to-day Manager believes that products have been released that have a food safety problem or are not fit for their intended purpose. A recall can be initiated by MPI. Examples of food safety problems include: a breach of a regulatory limit; presence of foreign matter that could cause harm; levels of a chemical (e.g. tutin) that could cause harm; presence of a microorganism that could make someone sick etc.
- A risk assessment is done to determine if a recall is needed:
  - information is gathered to assist in understanding the source and extent of the problem;
  - refer to MPI Recall Guidance Material (www.mpi.govt.nz/food-safety/food-recalls/);
  - the RMP verifier is contacted for assistance.
- Identification of affected product will be started. Any stock still on hand will be held until a decision has been made on whether to recall product.

Recall

- If it is determined that a recall is likely, the Day-to-day Manager is responsible for the recall and will ensure that the following is done:
  - refer to MPI Recall Guidance Material;
  - **Investigate** – gather information, understand the problem, identify all affected products, hold any stock still on hand;
  - **Inform** – tell the verifier (if you can't make contact, tell New Zealand Food Safety);
  - **Assess** – assess the risk, decide if a recall is needed, and at what level (trade or consumer);
  - **Check** – check if New Zealand Food Safety agrees with your risk assessment and decision;
  - **Communicate** – communicate your decision to recall with impacted businesses, and consumers (for a consumer level recall);
  - **Audit** – audit how much product was returned, review and identify corrective actions.
- You can contact New Zealand Food Safety on 0800 00 83 33 or at Food.Recalls@mpi.govt.nz

Simulated Recall

- A simulated, mock, or trial recall is done at least every 12 months to demonstrate the effectiveness of the traceability and recall process.
- Refer to MPI Simulated Food Recall Guidance (www.mpi.govt.nz/food-business/food-recalls/doing-food-recall/)
- Effectiveness is measured by:
  - the time taken to trace affected product;
  - the time taken to complete the mock recall of affected product; and
  - the proportion of product that would have been successfully recalled.

Who's responsible?

Record the name or position of the person(s) responsible for co-ordinating recalls

_____

_____

Monitoring

- Compliance with these procedures is checked at least _____ by the responsible person.

S

Show

Things to show your verifier

- Load-out dockets or consignment notes for products.
- Diary detailing all communication about the recall and copies of all written correspondence.
- Recall review notes.
- Inventory records.
- Records of assessment and disposition of non-conforming products.
- Records of recall activities, including mock recall.
- Any correspondence with the RMP verifier or MPI.

P. Storage

K
Know

Useful things to know

- To ensure the storage environment will maintain the intended state of preservation and prevent contamination so that products and materials remain fit for purpose.

D
Do

Rules you must follow

General requirements

- People hygienically handle product.
- People with any condition or illness of public health concern do not handle any unprotected product. Refer to **B. Personnel Health and Hygiene**.

Storage and handling

- All products and materials remain identifiable at all times.
- Products and materials are stored in a manner that:
  - minimises contamination and deterioration (e.g. by separation);
  - minimises damage to packaging;
  - facilitates effective cleaning; and
  - facilitates effective inventory control; and
  - keeps separate any products that are not suitable for human consumption (or processing for human consumption).
- Spills are cleaned within a reasonable timeframe.
- Chemicals and maintenance compounds are stored in a way that minimises contamination.
- Stored raw materials, ingredients, products and packaging are disposed of appropriately when it is no longer safe or suitable for use (e.g. past its use-by date).

Refrigerated or ambient storage

- Any chilling of product is conducted without unnecessary delay and in a manner that minimises deterioration, e.g. venom, pollen.
- Any defined temperature is reached as quickly as necessary to ensure the product remains fit for purpose and does not deteriorate.

Storage of waste materials

- All waste materials are covered in a pest-proof containers, regularly collected and disposed of. Refer to **H. Cleaning and Sanitation**.

Controlling non-conforming product

- Refer to **O. Non-conforming Product and Recall**.

Monitoring

- Compliance with these procedures is checked at least _____ by the responsible person.

S

Show

Things to show your verifier

- Inventory records.
- Completed e.g. Vermin Control Register.
- Completed e.g. Cleaning and Maintenance Records.
- Any problems detected and corrective action taken. Refer to **E. Corrective Action**.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

Module 1: Honey Extraction (including mobile extraction) and Bulk Storage

This module is included in the RMP	☐ Yes

1. Additional Scope of the RMP

Intended Consumer

Intended consumer	• Humans (general public)

Intended Use

Intended use of product that leaves RMP	• Further processing and packing of liquid/creamed honey or other honey products • Ingredient for preparation of other foods • Further processing into products for pharmaceutical use and manufacture of cosmetics

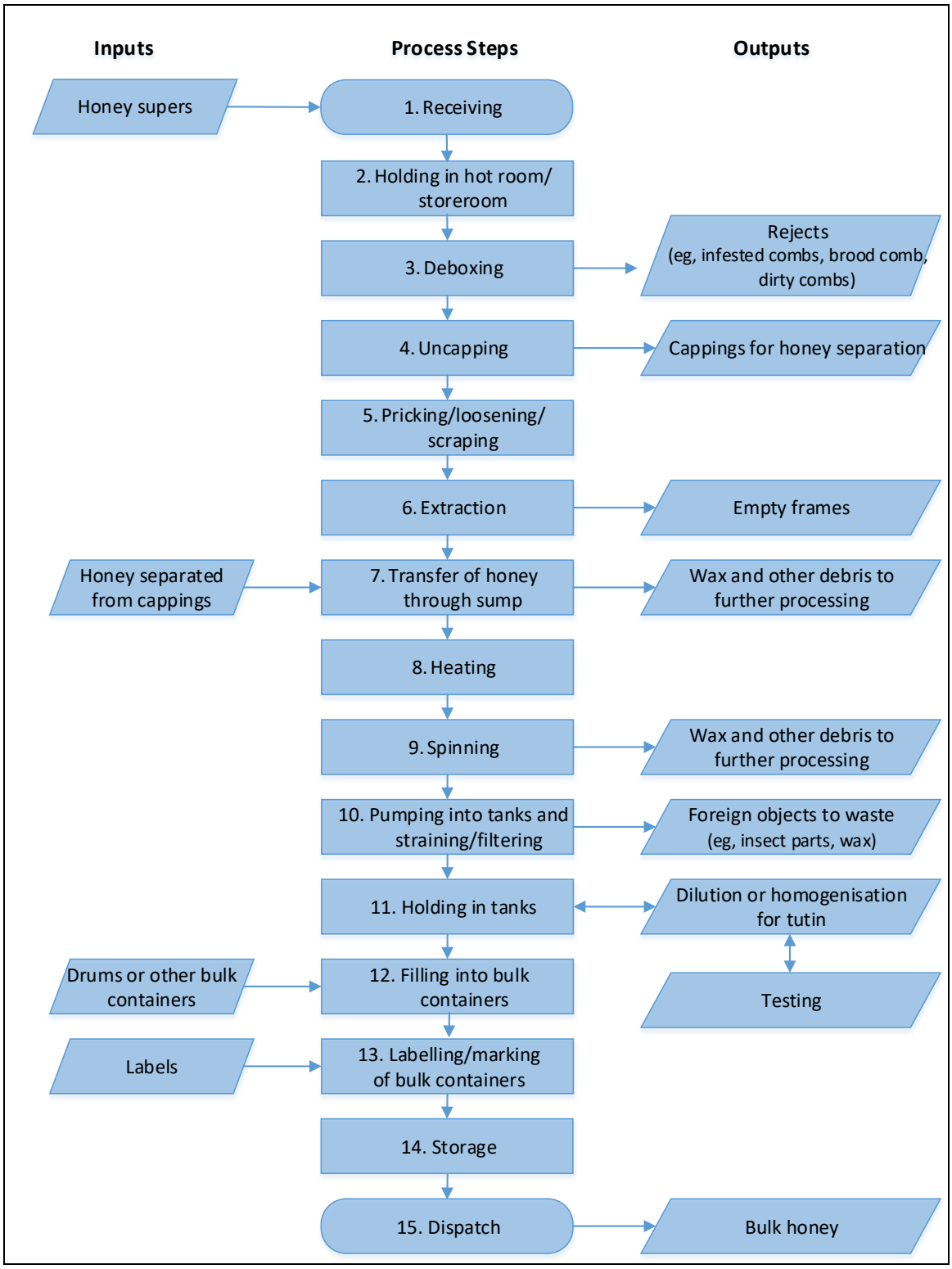
Regulatory Limits

Regulatory limits	• Food Standards Code – Tutin 0.7mg/kg
Other regulatory requirements specific to product	• Honey composition from the Food Standards Code – reducing sugars ≥ 60% – moisture ≤ 21%
	• Every consignment of honey must comply with the Animal Products Notice: Production, Supply and Processing • For export, a Harvest Declaration must be provided for every consignment and products must comply with the GREX
Labelling requirements	• Labelling of transportation outers as per the Animal Products Notice: Production, Supply and Processing

Processes and Activities

The RMP covers the following processes and activities for honey extraction and bulk storage: (tick all applicable processes or activities)	
☐	Receiving supers
☐	Holding in hot room/store room
☐	Deboxing
☐	Uncapping
☐	Pricking/loosening
☐	Extraction
☐	Transfer through sump
☐	Heating
☐	Spinning
☐	Pumping into tanks & straining
☐	Holding in tanks
☐	Filling of honey into drums or other bulk containers
☐	Labelling/marking of drums or other bulk containers
☐	Storage
☐	Dispatch

Generic Process Flow Diagram: Honey Extraction (including mobile extraction) and Bulk Storage



2. Risk Factor Identification and Control

K
Know

Useful things to know

- To identify the risk factors (from hazards to human and animal health, wholesomeness, false and misleading labelling) that are reasonably likely to occur at each process step (including all inputs).
- To ensure that appropriate controls are included in the RMP so that products are fit for their intended purpose.

D
Do

Rules you must follow

Risks from hazards to human and animal health

- A hazard analysis and critical control point (CCP) determination has been conducted (see Table 1.1)
- A CCP has been identified (see Table 1.2)
- The CCP (for tutin) is controlled by the use of a Harvest Declaration or equivalent records, tutin test results and blending plan (as appropriate)
- Good operating practices (GOP) are followed as outlined in the RMP Part 2: Supporting Systems
- All identified hazards are expected to be adequately controlled by the control measures listed in Tables 1.1 and 1.2.

Risks to wholesomeness

- Risk factors have been identified (see Table 1.3)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 1.3.

Risks from false and misleading labelling

- Risk factors have been identified (see Table 1.4)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 1.4.

S
Show

Things to show your verifier

- Completed records of good operating practices.
- Records covering tutin control (e.g. harvest declarations, tutin statements, test results etc.).

Table 1.1: Hazard analysis and CCP determination for honey extraction and bulk storage

Process step	**Inputs**	**Hazard reasonably likely to occur on or in the product at this step**	**Justification**	**Q1. Is there a control measure(s) for the hazard at this step?** If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	**Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit?** If yes, this step is a CCP. If no, this step is not a CCP.	**CCP no.**
1. Receiving	Supers	B – Bacterial pathogens	Bacterial spores (e.g. *Bacillus* spp*, Clostridium* spp) may occur[1]	No	No	
		C – Tutin toxin	Reported incidence of tutin in NZ honey[2]	Yes – Harvest Declarations confirming beekeeper controls and options 1-5	Yes	1
		C – Chemical residues	Residues may occur in honey, e.g. natural, weed killers, etc.[3]	Yes – Harvest Declarations confirming beekeeper controls	No	
2. Holding in hot room / storeroom	Supers	B – Bacterial pathogens	Hazard carried over from previous step	No		
3. Deboxing	Supers	B – Bacterial pathogens	Micro contamination from boxes (e.g. dirt, insect larvae, rodent excretions) can occur	Yes – GOP: visual inspection of combs; removal of defective and infested combs; keeping	No	

Table 1.1: Hazard analysis and CCP determination for honey extraction and bulk storage

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
				the mobile extraction unit fully enclosed; hygienic practices and suitable immediate surrounds; and maintenance of equipment may prevent contamination		
4. Uncapping	Combs	B – Bacterial pathogens	Micro contamination from the cappings (e.g. dirt, dust, dead bees, brood, pollen and other foreign matter) can occur	Yes – GOP: removal of damaged and dirty combs / frames; keeping the mobile extraction unit fully enclosed; hygienic practices; and maintenance of uncapping knife may prevent contamination	No	

Table 1.1: Hazard analysis and CCP determination for honey extraction and bulk storage

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
		P – Foreign objects	Foreign objects from the cappings (e.g. dirt, dust, dead bees, brood and other foreign matter etc.) can occur	Yes – GOP: hygienic practices may prevent contamination	No	
5. Pricking / loosening / scraping	Combs • uncapped • capped	B – Bacterial pathogens	Micro contamination from the pricker / loosener can occur	Yes – GOP: cleaning of pricker / loosener may prevent contamination	No	
6. Extraction	Uncapped or pricked combs	B – Bacterial pathogens	Micro contamination from the comb and frames can occur	Yes – GOP: removal of damaged and dirty combs/frames; and cleaning and maintenance of equipment may prevent contamination	No	
		P – Foreign objects	Wood pieces, wire fragments and nails from wooden frames,	Yes – GOP: maintenance of frames may prevent	No	

Table 1.1: Hazard analysis and CCP determination for honey extraction and bulk storage

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
			and plastic from plastic frames can occur	the hazards; and straining of honey		
7. Sump	Extracted honey	B – Bacterial pathogens	Micro contamination from the sump and surroundings can occur	Yes – GOP: cleaning of sump; regular removal of debris; keeping the mobile extraction unit fully enclosed; and covering of sump may prevent contamination	No	
		P – Foreign objects	Hazard carried over from previous step	Yes – GOP: removal of debris from the sump will remove some physical hazards	No	
	Honey separated from cappings	B – Bacterial pathogens	Honey separated from cappings can have higher micro levels	Yes – Excluding cappings from honey will minimise micro contamination of honey	No	

Table 1.1: Hazard analysis and CCP determination for honey extraction and bulk storage

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
8. Heating	Extracted honey	B – Bacterial pathogens	Hazard carried over from previous step	No		
		P – Foreign objects	Hazard carried over from previous step	No		
9. Spinning	Extracted honey	B – Bacterial pathogens	Hazard carried over from previous step	No		
		P – Foreign objects	Hazard carried over from previous step	Yes – GOP: most physical hazards are removed when honey is passed through the spinner[4]	No	
10. Pumping into tanks and straining / filtering	Extracted honey	B – Bacterial pathogens	Micro contamination from equipment can occur	Yes – GOP: hygienic practices and cleaning of equipment will minimise contamination	No	
		P – Foreign objects	Hazard carried over from previous step	Yes – GOP: any remaining physical hazards are	No	

Table 1.1: Hazard analysis and CCP determination for honey extraction and bulk storage

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
				removed by the strainer/filter[4]		
11. Holding in tanks	Extracted honey	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: hygienic practices and cleaning of equipment may prevent contamination	No	
12. Filling into bulk containers	Extracted honey	B – Bacterial pathogens	Hazard carried over from previous step	No		
	Bulk containers	B – Bacterial pathogens	Micro contamination from left over honey or other food residue can occur	Yes – GOP: compliance with bulk container cleaning / drying requirements may prevent contamination Suppliers guarantee or certificate on file	No	

Table 1.1: Hazard analysis and CCP determination for honey extraction and bulk storage

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
		C – Chemical residues	Chemical residues from re-used containers can occur	Yes – GOP: compliance with container requirements; track recycled containers	No	
13. Labelling / marking of bulk containers	Bulk honey	B – Bacterial pathogens	Hazard carried over from previous step	No		
14. Storage	Bulk honey	B – Bacterial pathogens	Hazard carried over from previous step	No		
15. Dispatch	Bulk honey	B – Bacterial pathogens	Hazard carried over from previous step[1]	No		
		C – Tutin toxin	Hazard carried over from step 1 ≤0.7 mg/kg[2]	Yes – GOP: inventory, load out and transport is monitored by supporting systems	No	

Table 1.1: Hazard analysis and CCP determination for honey extraction and bulk storage

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
		C – Chemical residues	Residues may occur in honey[3]	No	No	

1. Bacterial spores (e.g. Bacillus spp, Clostridium spp) may occur in honey. Although these spores will not grow in honey, when it is used as an ingredient in another food, the bacterial spores from honey could be introduced to and grow in that food.

2. The Food Standard: Tutin in Honey describes 5 options for managing tutin in honey to ensure tutin level is ≤0.7 mg/kg.

3. Chemical residues can occur when beekeepers or farmers use agricultural chemicals and veterinary medicines in and around hives. Beekeepers must follow all product label directions when directly treating hives and work to minimise bee's exposure to pastures sprayed with agricultural chemicals while honey supers are on their hives. If beekeepers inform you of any potential concerns regarding chemical exposure of bees or honey supers, or declare a known or suspected exposure, defer extracting the affected supers and contact your verification agency or MPI for advice.

4. If the operation has no steps for removing foreign matter (e.g. spinner or other strainer device), bulk honey produced from this operation is likely to contain foreign matter, including objects that may be considered as physical hazards (e.g. wire, stones). The operator who will further process or pack the bulk honey must ensure that these hazards are eliminated by their process.

Table 1.2: CCP summary for the honey extraction and bulk storage

CCP No.	Process step	Hazard	Critical limits	Monitoring procedures / tools	Corrective actions	Verification procedures	Validation	Records
1	Receiving	C – Tutin toxin	Tutin level is ≤0.7 mg/kg	Receipt of incoming goods procedures	Hold any ineligible product and determine disposition	Product testing Internal audit External audit HACCP review	Blending equipment (where appropriate)	Harvest Declaration or equivalent records Tutin test results Blending plan

Table 1.3: Summary of identified risk factor and controls related to wholesomeness of honey

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Fermented Honey	High moisture content	Measure honey moisture in the comb Proper draining and drying of equipment Preventing water or steam from getting into the product Proper storage
	High yeast level	Hygienic practices Cleaning and sanitation
Insect and insect parts Other pest contamination	Bees and other insects Other pests	Removal or prevention of ingress of live bees Covering of equipment Pest control Proper storage of supers Straining or filtering Freezing or fumigation of comb honey

Table 1.3: Summary of identified risk factor and controls related to wholesomeness of honey

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Other foreign matter that are not considered as physical hazards, (e.g. wood, propolis, wax, other debris)	From frames, capping surfaces	Maintenance of frames in good condition Hygienic practices Cleaning and sanitation Proper storage of supers Straining

Table 1.4: Summary of identified risk factor and controls from false or misleading labelling

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Incorrect details on label or transportation outers, for example: • type of product • claims (e.g. organic) • product description • lot identification or batch number • floral species	Incorrect label design	Procedures for ensuring correct label design and compliance with regulatory requirements
	Processing errors, for example: • wrong identification of containers • wrong product put in a pre-labelled container • wrong label or information put on product, (e.g. date, batch number)	Procedures for ensuring correct packaging and labelling of products

Module 2: Liquid or Creamed Honey

This module is included in the RMP	☐ Yes

1. Additional Scope of the RMP

Intended Consumer

Intended consumer	• Humans (general public)

Intended Use

Intended use of product that leaves RMP	• Ready-to-eat • Ingredient for preparation of other foods

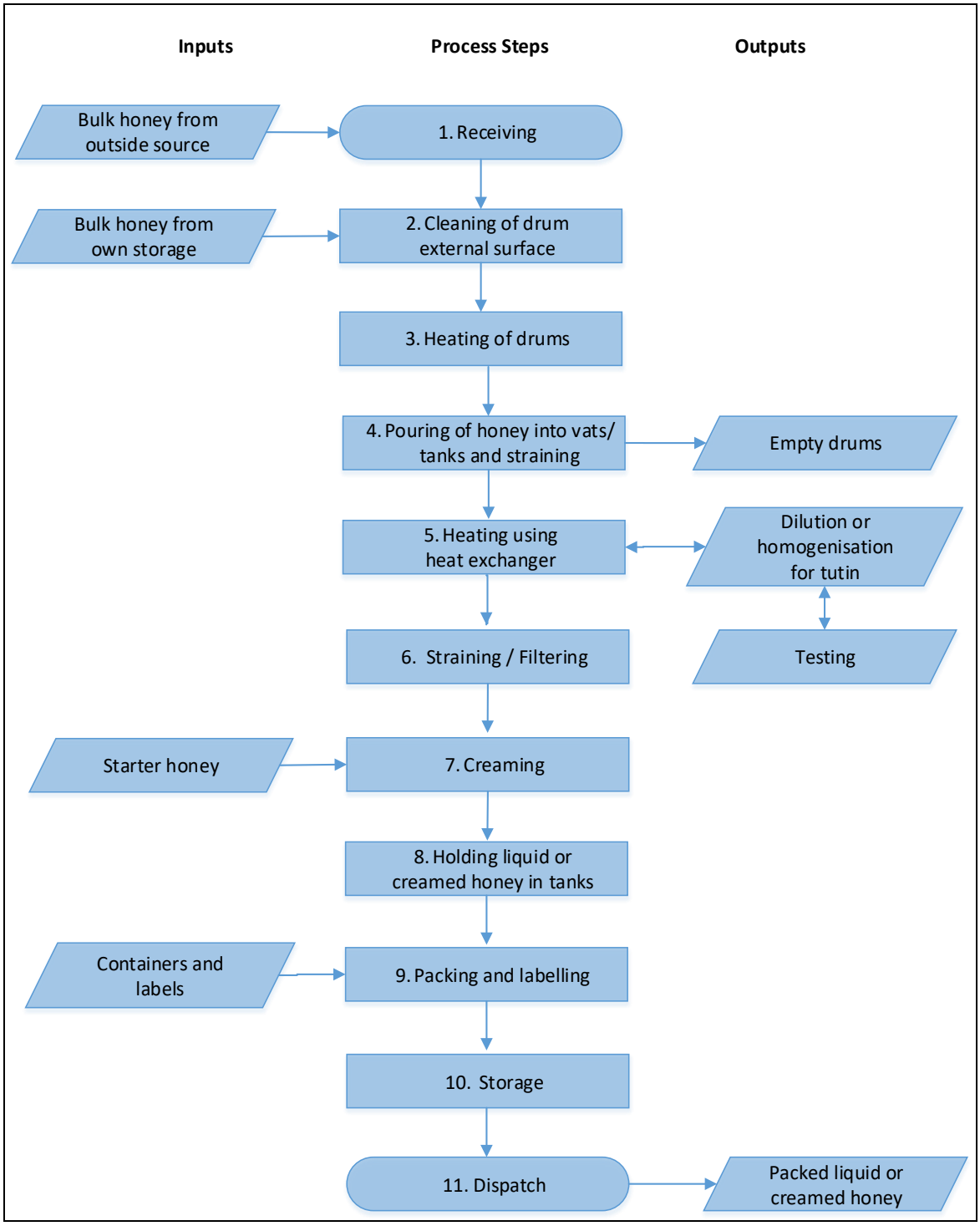
Regulatory Limits

Regulatory limits	• Food Standards Code – Tutin 0.7mg/kg
Other regulatory requirements specific to product	• Honey composition from the Food Standards Code – reducing sugars ≥ 60% – moisture ≤ 21%
	• Every consignment of honey must comply with the Animal Products Notice: Production, Supply and Processing • For export, a Harvest Declaration must be provided for every consignment and products must comply with the GREX
Labelling requirements	• Labelling of retail packs as specified in the Food Standards Code • Labelling of transportation outers as per the Animal Products Notice: Production, Supply and Processing

Processes and Activities

The RMP covers the following processes and activities for liquid or creamed honey: (tick all applicable processes or activities)	
☐	Receiving of bulk honey
☐	Storage
☐	Cleaning drum/container external surface
☐	Heating
☐	Pouring honey into vats/tanks
☐	Heating
☐	Straining
☐	Creaming
☐	Holding in tanks
☐	Packing and labelling
☐	Storage
☐	Dispatch

Generic Process Flow Diagram: Liquid or Creamed Honey



2. Risk Factor Identification and Control

Useful things to know

- To identify the risk factors (from hazards to human and animal health, wholesomeness, false and misleading labelling) that are reasonably likely to occur at each process step (including all inputs).
- To ensure that appropriate controls are included in the RMP so that products are fit for their intended purpose.

Rules you must follow

Risks from hazards to human and animal health

- A hazard analysis and CCP determination has been conducted (see Table 2.1).
- A critical control point (CCP) has been identified (see Table 2.2)
- The CCP (for tutin) is controlled by the use of a Harvest Declaration or equivalent records, tutin test results and blending plan (as appropriate)
- Good operating practices (GOP) are followed as outlined in the RMP Part 2: Supporting Systems
- All identified hazards are expected to be adequately controlled by the control measures listed in Tables 2.1 and 2.2.

Risks to wholesomeness

- Risk factors have been identified (see Table 2.3)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 2.3.

Risks from false and misleading labelling

- Risk factors have been identified (see Table 2.4)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 2.4.

Things to show your verifier

- Completed records of good operating practices.
- Records covering tutin control (e.g. harvest declarations, tutin statements, test results etc.).

Table 2.1: Hazard analysis and CCP determination for the processing of liquid or creamed honey

Process step	**Inputs**	**Hazard reasonably likely to occur on or in the product at this step**	**Justification**	**Q1. Is there a control measure(s) for the hazard at this step?** If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	**Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit?** If yes, this step is a CCP. If no, this step is not a CCP.	**CCP no.**
1. Receiving	Bulk honey	B – Bacterial pathogens	Bacterial spores (e.g. *Bacillus* spp*, Clostridium* spp) may occur[1]	No	No	
		C – Tutin toxin	Reported incidence of tutin in NZ honey[2]	Yes – Harvest Declarations confirming beekeeper controls and options 1-5	Yes	1
		C – Chemical residues	Residues may occur in honey, e.g. natural, weed killers, etc.[3]	Yes – Harvest Declarations confirming beekeeper controls	No	
2. Cleaning of drum/container external surface	Bulk honey	B – Bacterial pathogens	Hazard carried over from previous step	No		
3. Heating in hot room	Bulk honey	B – Bacterial pathogens	Hazard carried over from previous step	No		

Table 2.1: Hazard analysis and CCP determination for the processing of liquid or creamed honey

Process step	**Inputs**	**Hazard reasonably likely to occur on or in the product at this step**	**Justification**	**Q1. Is there a control measure(s) for the hazard at this step?** If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	**Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit?** If yes, this step is a CCP. If no, this step is not a CCP.	**CCP no.**
4. Transfer of honey into vats / tanks and straining or filtering	Bulk honey	B – Bacterial pathogens	Micro contamination from equipment can occur	Yes – GOP: hygienic practices and cleaning of equipment may prevent contamination	No	
5. Heating using heat exchanger	Honey	B – Bacterial pathogens	Hazard carried over from previous step	No		
6. Filtering	Honey	B – Bacterial pathogens	Hazard carried over from previous step	No		
7. Creaming	Honey	B – Bacterial pathogens	Micro contamination from equipment can occur	Yes – GOP: hygienic practices and cleaning of equipment may prevent contamination	No	

Table 2.1: Hazard analysis and CCP determination for the processing of liquid or creamed honey

Process step	**Inputs**	**Hazard reasonably likely to occur on or in the product at this step**	**Justification**	**Q1. Is there a control measure(s) for the hazard at this step?** If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	**Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit?** If yes, this step is a CCP. If no, this step is not a CCP.	**CCP no.**
	Starter honey	B – Bacterial pathogens	Bacterial spores (e.g. *B. cereus, Clostridium* spp) can occur in honey	No		
8. Holding in tanks	Liquid or creamed honey	B – Bacterial pathogens	Micro contamination from equipment can occur	Yes – GOP: hygienic practices and cleaning of tanks may prevent contamination	No	
9. Packing and labelling	Honey	B – Bacterial pathogens	Hazard carried over from previous step	No		
	Glass jars and lids	P - Glass	Pieces of broken glass are occasionally found in glass consignments; jars can also break during handling and processing	Yes – GOP: supplier agreements; visual inspection; correct handling procedures; and correct equipment set-up may prevent contamination	No	

Table 2.1: Hazard analysis and CCP determination for the processing of liquid or creamed honey

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
	Plastic containers	P - Plastic pieces	Plastic pieces are occasionally found in container consignments	Yes – GOP: supplier guarantee or certificate on file; visual inspection; and correct handling procedures may prevent contamination	No	
10. Storage	Packed honey	B – Bacterial pathogens	Hazard carried over from previous step	No		
11. Dispatch	Packed honey	B – Bacterial pathogens	Hazard carried over from previous step[1]	No		
		C – Tutin toxin	Hazard carried over from step 1 ≤0.7 mg/kg[2]	Yes – GOP: inventory, load out and transport is monitored by supporting systems	No	
		C – Chemical residues	Residues may occur in honey[3]	No	No	

1. Bacterial spores (e.g. Bacillus spp, Clostridium spp) may occur in honey. Although these spores will not grow in honey, when it is used as an ingredient in another food, the bacterial spores from honey could be introduced to and grow in that food.

2. The Food Standard: Tutin in Honey 2016 describes 5 options for managing tutin in honey to ensure tutin level is ≤0.7 mg/kg.

3. Chemical residues can occur when beekeepers or farmers use agricultural chemicals and veterinary medicines in and around hives. Beekeepers must follow all product label directions when directly treating hives and work to minimise bee's exposure to pastures sprayed with agricultural chemicals while honey supers are on their hives. If beekeepers inform you of any potential concerns regarding chemical exposure of bees or honey supers, or declare a known or suspected exposure, defer extracting the affected supers and contact your verification agency or MPI for advice.

Table 2.2: CCP summary for liquid or creamed honey

CCP No.	Process step	Hazard	Critical limits	Monitoring procedures / tools	Corrective actions	Verification procedures	Validation	Records
1	Receiving	C – Tutin toxin	Tutin level is ≤0.7 mg/kg	Receipt of incoming goods procedures	Hold any ineligible product and determine disposition	Product testing Internal audit External audit HACCP review	Blending equipment (where appropriate)	Harvest Declaration or equivalent records Tutin test results Blending plan

Table 2.3: Summary of identified risk factor and controls related to wholesomeness of liquid or creamed honey

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Fermented Honey	High moisture content	Measure honey moisture Proper draining and drying of equipment Preventing water or steam from getting into the product Proper storage

Table 2.3: Summary of identified risk factor and controls related to wholesomeness of liquid or creamed honey

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
	High yeast level	Hygienic practices Cleaning and sanitation
Insect and insect parts Other pest contamination	Insects and other pests	Covering of equipment Pest control Straining or filtering
Other foreign matter that are not considered as physical hazards, (e.g. wood, propolis, wax, other debris)	From extraction and packing process	GOP and hygienic practices Cleaning and sanitation Straining

Table 2.4: Summary of identified risk factor and controls from false or misleading labelling of liquid or creamed honey

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Incorrect details on label or transportation outers, for example: • type of product • claims (e.g. organic) • product description • lot identification or batch number • floral species	Incorrect label design	Procedures for ensuring correct label design and compliance with regulatory requirements
	Processing errors, for example: • wrong identification of retail packs • wrong product put in a pre-labelled container • wrong label or information put on product, (e.g. date, batch number)	Procedures for ensuring correct packaging and labelling of products

Module 3: Spilt or Downgraded Honey

This module is included in the RMP	☐ Yes

1. Additional Scope of the RMP

Intended Consumer

Intended consumer	• Animals • Industrial use

Intended Use

Intended use of product that leaves RMP	• Feed for bees and other animals • Industrial use

Regulatory Limits

Regulatory limits	• Food Standards Code – Tutin 0.7mg/kg (for animal consumption only)
Other regulatory requirements specific to product	• Fit for purpose
	• Every consignment of honey for animal consumption must comply with the Animal Products Notice: Production, Supply and Processing • For export, a Harvest Declaration may be required for every consignment and products must comply with the GREX
Labelling requirements	• Labelled "Not for Human Consumption" • Labelling of transportation outers as per the Animal Products Notice: Production, Supply and Processing

Processes and Activities

The RMP covers the following processes and activities for spilt or downgraded honey: (tick all applicable processes or activities)	
☐	Filling of honey into drums or other bulk container
☐	Labelling/marking of drums or other bulk container
☐	Storage
☐	Dispatch

Inputs and Outputs

Inputs	• Spilt honey • Downgraded honey • Non-conforming honey (i.e. not suitable for any product use other than animal feed or industrial use)
Outputs	• Honey for animal feed • Honey for industrial use

2. Risk Factor Identification and Control

K
Know

Useful things to know

- To identify the risk factors (from hazards to animal health, wholesomeness, false and misleading labelling) that are reasonably likely to occur.
- To ensure that appropriate controls are included in the RMP so that products are fit for their intended purpose.

D
Do

Rules you must follow

Risks from hazards to animal health

- Hazards and controls have been identified (see Table 3.1)
- Good operating practices (GOP) are followed as outlined in the RMP Part 2: Supporting Systems
- All identified hazards are expected to be adequately controlled by the control measures listed in Table 3.1.

Risks to wholesomeness

- Risk factors have been identified (see Table 3.2)
- All identified hazards are expected to be adequately controlled by the control measures listed in Table 3.2.

Risks from false and misleading labelling

- Risk factors have been identified (see Table 3.3)
- All identified risk factors are expected to be adequately controlled by the control measures listed in Table 3.3

S
Show

Things to show your verifier

- Completed records of communication with customers
- If used by the operator of this RMP (e.g. if fed to bees), justification of why hazard is not of concern for the intended use of the batch.

Table 3.1: Summary of identified hazards and controls for spilt or downgraded honey

Hazard	Control measures for minimising the risk factor
Tutin level is ≥0.7 mg/kg	Operator that will further process the product will be notified of tutin levels so they can determine what controls they need to have in place to accept the product If the product will be fed to bees, the honey must be fed when honey supers are not present on hives.
Chemical residues (e.g. pesticides)	Operator that will further process the product will be notified of any chemical residues known or suspected to be present in the product so they can determine what controls they need to have in place to accept the product
Wire, wood, and nails from wooden frames Plastic from plastic frames Other physicals hazards from environment or other sources	Operator that will further process the product will be notified of any possible physical hazards so they can determine what controls they need to have in place to accept the product

Table 3.2: Summary of identified risk factor and controls related to wholesomeness of spilt or downgraded honey

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Insect and insect parts Other pest contamination	Bees and other insects Other pests	The operator that will further process the product will be notified of any possible wholesomeness risk so they can determine what controls they need to have in place to accept the product
Other foreign matter that are not considered as physical hazards, (e.g. wood, propolis, wax, other debris)	From frames, capping surfaces, environment	The operator that will further process the product will be notified of any possible wholesomeness risk so they can determine what controls they need to have in place to accept the product

Table 3.3: Summary of identified risk factor and controls from false or misleading labelling of spilt or downgraded honey

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Incorrect details on label or transportation outers, for example: • suitability for human or animal consumption • lot identification or batch number	Processing errors, for example: • wrong identification of container • wrong product put in a pre-labelled container • wrong label or information put on product, (e.g. date, batch number)	Procedures for ensuring correct packaging and labelling of products including checking that product is labelled as “Not for Human Consumption”

Module 4: Comb Honey

This module is included in the RMP	☐ Yes

1. Additional Scope of the RMP

Intended Consumer

Intended consumer	• Humans (general public)

Intended Use

Intended use of product that leaves RMP	• Ready-to-eat • Ingredient for preparation of other foods

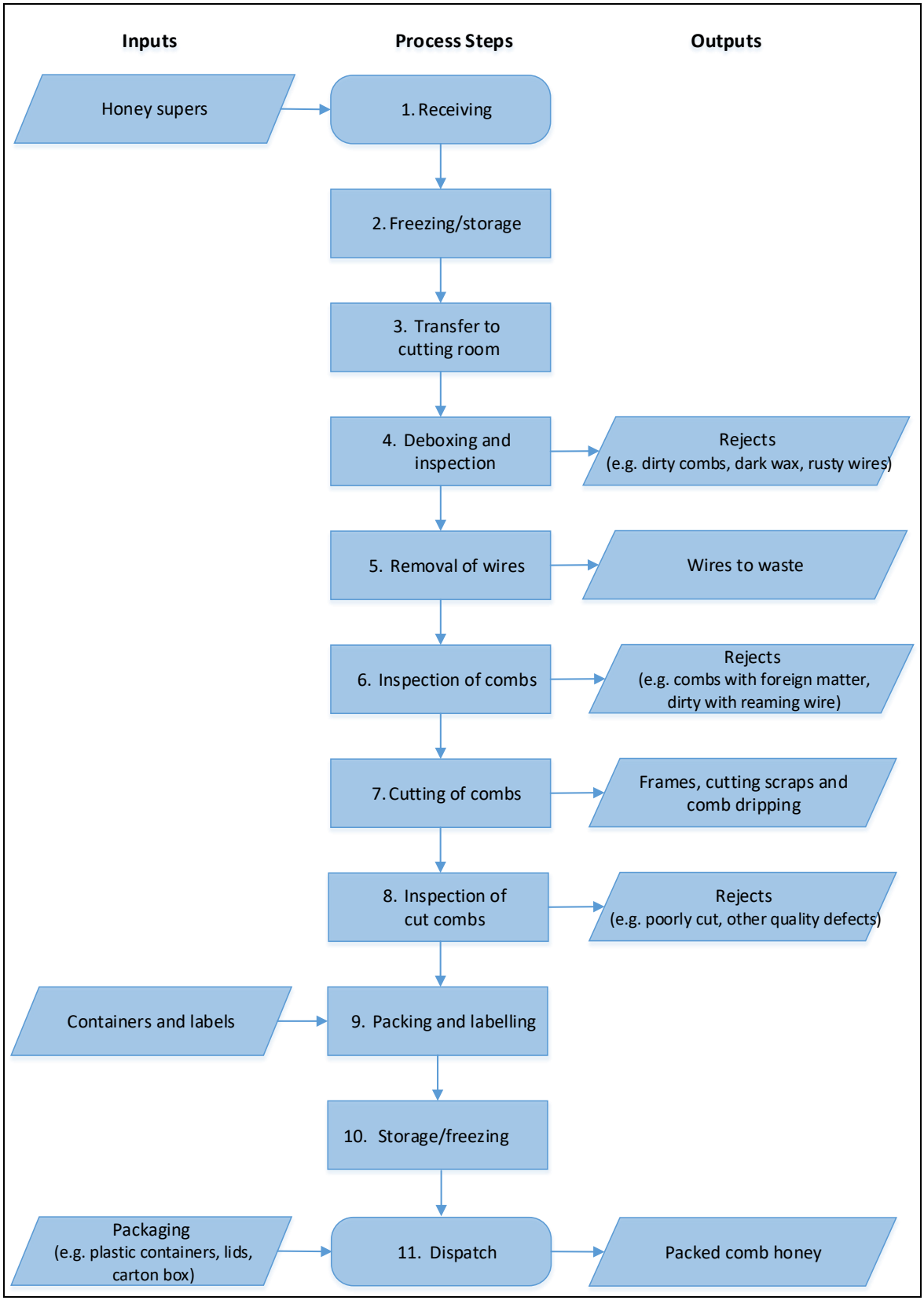
Regulatory Limits

Regulatory limits	• Food Standard: Tutin in Honey – Testing cut comb honey* - 0.01mg/kg (meeting this limit is sufficient to demonstrate that cut comb honey meets the Tutin limit in the Food Standards Code – Targeted testing for cut comb and box section honey* – 0.035mg/kg • Food Standards Code – Tutin 0.7mg/kg (testing to meet the above limit(s) is sufficient to show this limit is met) * For a full explanation of testing cut comb honey and box comb honey for tutin, see the Food Standard: Tutin in Honey and the Compliance Guide
Other regulatory requirements specific to product	• Honey composition (Food Standards Code – reducing sugars ≥ 60% – moisture ≤ 21%
	• Every consignment of honey must comply with the Animal Products Notice: Production, Supply and Processing • For export, a Harvest Declaration must be provided for every consignment and products must comply with the GREX
Labelling requirements	• Labelling of retail packs as specified in the Food Standards Code. • Labelling of transportation outers as per the Animal Products Notice: Production, Supply and Processing.

Processes and Activities

The RMP covers the following processes and activities for comb honey: (tick all applicable processes or activities)	
☐	Receiving of honey supers
☐	Storage of supers
☐	Deboxing
☐	Removal of wires
☐	Inspection of combs
☐	Cutting of combs
☐	Packing and labelling
☐	Freezing
☐	Storage
☐	Dispatch

Generic Process Flow Diagram: Comb Honey



Freezing is used for killing wax moth. Wax moth is not a food safety risk.

2. Risk Factor Identification and Control

K

Know

Useful things to know

- To identify the risk factors (from hazards to human and animal health, wholesomeness, false and misleading labelling) that are reasonably likely to occur at each process step (including all inputs).
- To ensure that appropriate controls are included in the RMP so that products are fit for their intended purpose.

D

Do

Rules you must follow

Risks from hazards to human and animal health

- A hazard analysis and critical control point (CCP) determination has been conducted (see Table 4.1)
- A CCP has been identified (see Table 4.2)
- The CCP (for tutin) is controlled by the use of a Harvest Declaration or equivalent records and tutin test results (as appropriate)
- Good operating practices (GOP) are followed as outlined in the RMP Part 2: Supporting Systems
- All identified hazards are expected to be adequately controlled by the control measures listed in Tables 4.1 and 4.2.

Risks to wholesomeness

- Risk factors have been identified (see Table 4.3)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 4.3.

Risks from false and misleading labelling

- Risk factors have been identified (see Table 4.4)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 4.4.

S

Show

Things to show your verifier

- Completed records of good operating practices.
- Records covering tutin control (e.g. harvest declarations, tutin statements, test results etc.).

Table 4.1: Hazard analysis and CCP determination for comb honey

Process step	**Inputs**	**Hazard reasonably likely to occur on or in the product at this step**	**Justification**	**Q1. Is there a control measure(s) for the hazard at this step?** If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	**Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit?** If yes, this step is a CCP. If no, this step is not a CCP.	**CCP no.**
1. Receiving	Supers	B – Bacterial pathogens	Bacterial spores (e.g. *Bacillus* spp*, Clostridium* spp) may occur[1]	No	No	
		C – Tutin toxin	Reported incidence of tutin in NZ honey[2]	Yes – Harvest Declarations confirming beekeeper controls and options 1-5	Yes	1
		C – Chemical residues	Residues may occur in honey, e.g. natural, weed killers, etc.[3]	Yes – Harvest Declarations confirming beekeeper controls	No	
2. Freezing / storage	Supers	B – Bacterial pathogens	Hazard carried over from previous step	No		
3. Transfer to cutting room	Supers	B – Bacterial pathogens	Hazard carried over from previous step	No		
4. Deboxing and inspection	Supers	B – Bacterial pathogens	Micro contamination from boxes (e.g. dirt,	Yes – GOP: visual inspection of combs; removal of defective and	No	

Table 4.1: Hazard analysis and CCP determination for comb honey

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
			insect larvae, rodent excretions) can occur	infested combs; hygienic practices and suitable immediate surrounds may prevent contamination		
5. Removal of wires	Combs	B – Bacterial pathogens	Hazard carried over from previous step	No		
		P – Wire	Broken wire can be left inside the comb	Yes – GOP: correct techniques will minimise occurrence of broken wires	No	
6. Inspection of combs	Combs	B – Bacterial pathogens	Hazard carried over from previous step	No		
		P - Wire	Broken wire can occasionally be left inside the comb	Yes – GOP: inspection using a light box and	No	

Table 4.1: Hazard analysis and CCP determination for comb honey

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
				rejection of affected combs		
7. Cutting of combs	Combs	B – Bacterial pathogens	Hazard carried over from previous step	No		
9. Packing and labelling	Combs	B – Bacterial pathogens	Hazard carried over from previous step	No		
	Plastic containers	P – Plastic pieces	Plastic pieces are occasionally found in container consignments	Yes – GOP: supplier guarantee or certificate on file; visual inspection and correct handling procedures may prevent contamination	No	
10. Storage	Packed comb honey	B – Bacterial pathogens	Hazard carried over from previous step	No		
15. Dispatch	Packed comb honey	B – Bacterial pathogens	Hazard carried over from previous step[1]	No		

Table 4.1: Hazard analysis and CCP determination for comb honey

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
		C – Tutin toxin	Hazard carried over from step 1 ≤0.7 mg/kg[2]	Yes – GOP: inventory, load out and transport is monitored by supporting systems	No	
		C – Chemical residues	Residues may occur in honey[3]	No	No	

1. Bacterial spores (e.g. Bacillus spp, Clostridium spp) may occur in honey. Although these spores will not grow in honey, when it is used as an ingredient in another food, the bacterial spores from honey could be introduced to and grow in that food.

2. The Food Standard: Tutin in Honey describes 5 options for managing tutin in honey to ensure tutin level is ≤0.7 mg/kg.

3. Chemical residues can occur when beekeepers or farmers use agricultural chemicals and veterinary medicines in and around hives. Beekeepers must follow all product label directions when directly treating hives and work to minimise bee's exposure to pastures sprayed with agricultural chemicals while honey supers are on their hives. If beekeepers inform you of any potential concerns regarding chemical exposure of bees or honey supers, or declare a known or suspected exposure, contact your verification agency or MPI for advice.

Table 4.2: CCP summary for comb honey

CCP No.	Process step	Hazard	Critical limits	Monitoring procedures / tools	Corrective actions	Verification procedures	Validation	Records
1	Receiving	C – Tutin toxin	Tutin level is ≤0.7 mg/kg	Receipt of incoming goods procedures	Hold any ineligible product and determine disposition	Product testing Internal audit External audit HACCP review	Sampling and sample homogenisation process	Harvest Declaration or equivalent records Tutin test results

Table 4.3: Summary of identified risk factor and controls related to wholesomeness of comb honey

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Fermented Honey	High moisture content	Measure honey moisture in the comb Proper draining and drying of equipment Preventing water or steam from getting into the product Proper storage
	High yeast level	Hygienic practices Cleaning and sanitation
Insect and insect parts Other pest contamination	Bees and other insects Other pests	Removal or prevention of ingress of live bees Covering of equipment Pest control Proper storage of supers Freezing or fumigation of comb honey

Table 4.3: Summary of identified risk factor and controls related to wholesomeness of comb honey

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Other foreign matter that are not considered as physical hazards, (e.g. wood, propolis, wax, other debris)	From frames	Maintenance of frames in good condition Hygienic practices Cleaning and sanitation Proper storage of supers

Table 4.4: Summary of identified risk factor and controls from false or misleading labelling of comb honey

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Incorrect details on label or transportation outers, for example: • type of product • claims (e.g. organic) • product description • lot identification or batch number • floral species	Incorrect label design	Procedures for ensuring correct label design and compliance with regulatory requirements
	Processing errors, for example: • wrong product put in a pre-labelled container • wrong label or information put on product, (e.g. date, batch number)	Procedures for ensuring correct packaging and labelling of products

Module 5: Dried Pollen

This module is included in the RMP	☐ Yes

1. Additional Scope of the RMP

Intended Consumer

Intended consumer	• Humans (general public)

Intended Use

Intended use of product that leaves RMP	• Ready to eat • Ingredient for preparation of other foods

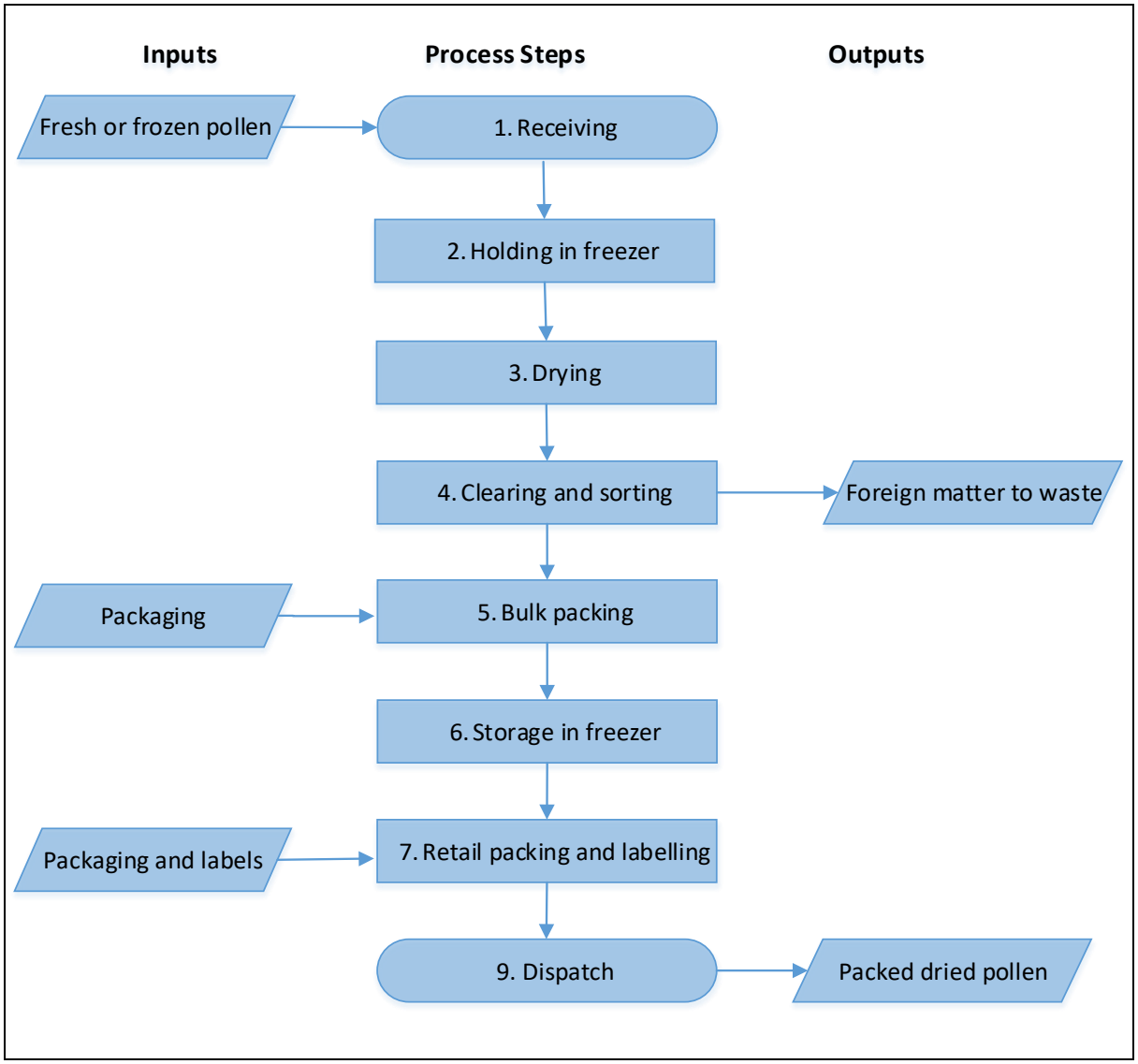
Regulatory Limits

Regulatory limits	• None
Other regulatory requirements specific to product	• Fit for purpose
	• Every consignment of bee product must comply with the Animal Products Notice: Production, Supply and Processing • For export, a Harvest Declaration must be provided for every consignment and products must comply with the GREX
Labelling requirements	• Labelling of retail packs as specified in the Food Standards Code and advisory statement • Labelling of transportation outers as per the Animal Products Notice: Production, Supply and Processing

Processes and Activities

The RMP covers the following processes and activities for dried pollen: (tick all applicable processes or activities)	
☐	Receiving pollen
☐	Holding in freezer
☐	Drying
☐	Cleaning and sorting
☐	Bulk packing
☐	Retail packing and labelling
☐	Storage
☐	Dispatch

Generic Process Flow Diagram: Dried Pollen



Freezing destroys pollen mites but pollen mites are not a food safety risk.

2. Risk Factor Identification and Control

K

Know

Useful things to know

- To identify the risk factors (from hazards to human and animal health, wholesomeness, false and misleading labelling) that are reasonably likely to occur at each process step (including all inputs).
- To ensure that appropriate controls are included in the RMP so that products are fit for their intended purpose.

D

Do

Rules you must follow

Risks from hazards to human and animal health

- A hazard analysis and critical control point (CCP) determination has been conducted (see Table 5.1)
- No CCP has been identified
- Good operating practices (GOP) are followed as outlined in the RMP Part 2: Supporting Systems
- All identified hazards are expected to be adequately controlled by the control measures listed in Table 5.1.

Risks to wholesomeness

- Risk factors have been identified (see Table 5.2)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 5.2.

Risks from false and misleading labelling

- Risk factors have been identified (see Table 5.3)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 5.3.

S

Show

Things to show your verifier

- Completed records of good operating practices.

Table 5.1: Hazard analysis and CCP determination for dried pollen

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
1. Receiving	Fresh or frozen pollen	B – Bacterial pathogens	Bacterial pathogens may be present in fresh pollen from contaminants such as rodent droppings, insect parts and wastes, dust	Yes – Supplier agreements and inspection for contaminants at receipt can prevent contamination	No	
		C – Chemical residues	Residues can occur in pollen[1]	Yes – Harvest Declaration confirming beekeeper controls	No	
		C - Allergens	Pollen is known to cause severe allergic reactions in certain people[2]	No		
2. Holding in freezer	Pollen	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: proper freezing may prevent micro growth[3]	No	

Table 5.1: Hazard analysis and CCP determination for dried pollen

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
3. Drying	Pollen	B – Bacterial pathogens	Hazard carried over from previous step	Yes – Proper drying may reduce micro levels and prevent micro growth[3]	No	
4. Cleaning and sorting	Dried pollen	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: effective cleaning and removal of dust, insect and other physical contaminants can reduce micro levels[3]	No	
5. Bulk packing	Dried pollen	None	5. Bulk packing			
	Packaging	B – Bacterial pathogens	Micro contamination from left over pollen or other food residues from recycled containers can occur	Yes – GOP: new packaging used; supplier guarantee or certificate on file	No	
		C – Chemical residues	Chemical residues can occur from recycled packaging	Yes – GOP: new packaging used; supplier	No	

Table 5.1: Hazard analysis and CCP determination for dried pollen

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
				guarantee or certificate on file		
6. Storage in freezer	Dried pollen	None				
7. Retail packing and labelling	Dried pollen	C - Allergens	Hazard carried over from step 1[2]	No. Labelling will not control the hazard but it will minimise the risk to the consumer	No	
	Packaging	B – Bacterial pathogens	Micro contamination from left over pollen or other food residues from recycled containers can occur	Yes – GOP: new packaging used; supplier guarantee or certificate on file	No	
		C – Chemical residues	Chemical residues can occur from recycled packaging	Yes – GOP: new packaging used; supplier guarantee or certificate on file	No	

Table 5.1: Hazard analysis and CCP determination for dried pollen

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
8. Storage	Packed dried pollen	C – Allergens	Carried over from previous step[2]	No		
9. Dispatch	Packed dried pollen	C – Allergens	Carried over from previous step[2]	Yes – GOP: inventory, load out and transport is monitored by supporting systems		

1. Chemical residues can occur when beekeepers or farmers use agricultural chemicals and veterinary medicines in and around hives. Beekeepers must follow all product label directions when directly treating hives, and work to minimise bee's exposure to pastures sprayed with agricultural chemicals while honey supers are on their hives. If beekeepers inform you of any potential concerns regarding chemical exposure of bees or bee pollen, or declare a known or suspected exposure, and contact your verification agency or MPI for advice.

2. Food Standards Code Schedule 9 requires that the label on a package of bee pollen must include an advisory statement to the effect that the product contains bee pollen which can cause severe allergic reactions.

3. There is insufficient information on the impact of certain process steps (e.g. freezing, drying, cleaning) on the microbiological load in bee pollen. Limited industry data suggests that proper collection of pollen, application of GOP during processing and the thorough removal of physical contaminants minimises the microbiological load in bee pollen. The hazard analysis shown in this table is based on limited industry information, and scientific information on the general impact of these process steps on microorganisms in food.

Table 5.2: Summary of identified risk factor and controls related to wholesomeness of dried pollen

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Mouldy pollen	High moisture content	Rejection of mouldy pollen at receipt Drying to correct moisture content
	Improper holding temperature	Proper freezing of fresh pollen
	Improper packaging and/or storage	Proper packaging and storage of dried pollen
Foreign matter that are not considered as physical hazards, (e.g. wood, wax, insect parts, other debris)	Contaminants from hives, bees and other debris collected in or surrounding pollen traps	Supplier agreements covering good hive maintenance and practices; hygienic collection; incoming material specifications Rejection of fresh pollen with high levels of foreign matter Sieving and cleaning

Table 5.3: Summary of identified risk factor and controls from false or misleading labelling of dried pollen

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Incorrect details on label or transportation outers, for example: • type of product • claims (e.g. organic) • product description • lot identification or batch number • floral species	Incorrect label design Missing advisory statement	Procedures for ensuring correct label design and compliance with regulatory requirements
	Processing errors, for example: • wrong identification of containers • wrong product put in a pre-labelled container • wrong label or information put on product, (e.g. date, batch number)	Procedures for ensuring correct packaging and labelling of products

Module 6: Propolis

This module is included in the RMP	☐ Yes

1. Additional Scope of the RMP

Intended Consumer

Intended consumer	• Humans (general public)

Intended Use

Intended use of product that leaves RMP	• Further processing into products for pharmaceutical use • Ingredient for preparation of other foods and dietary supplements

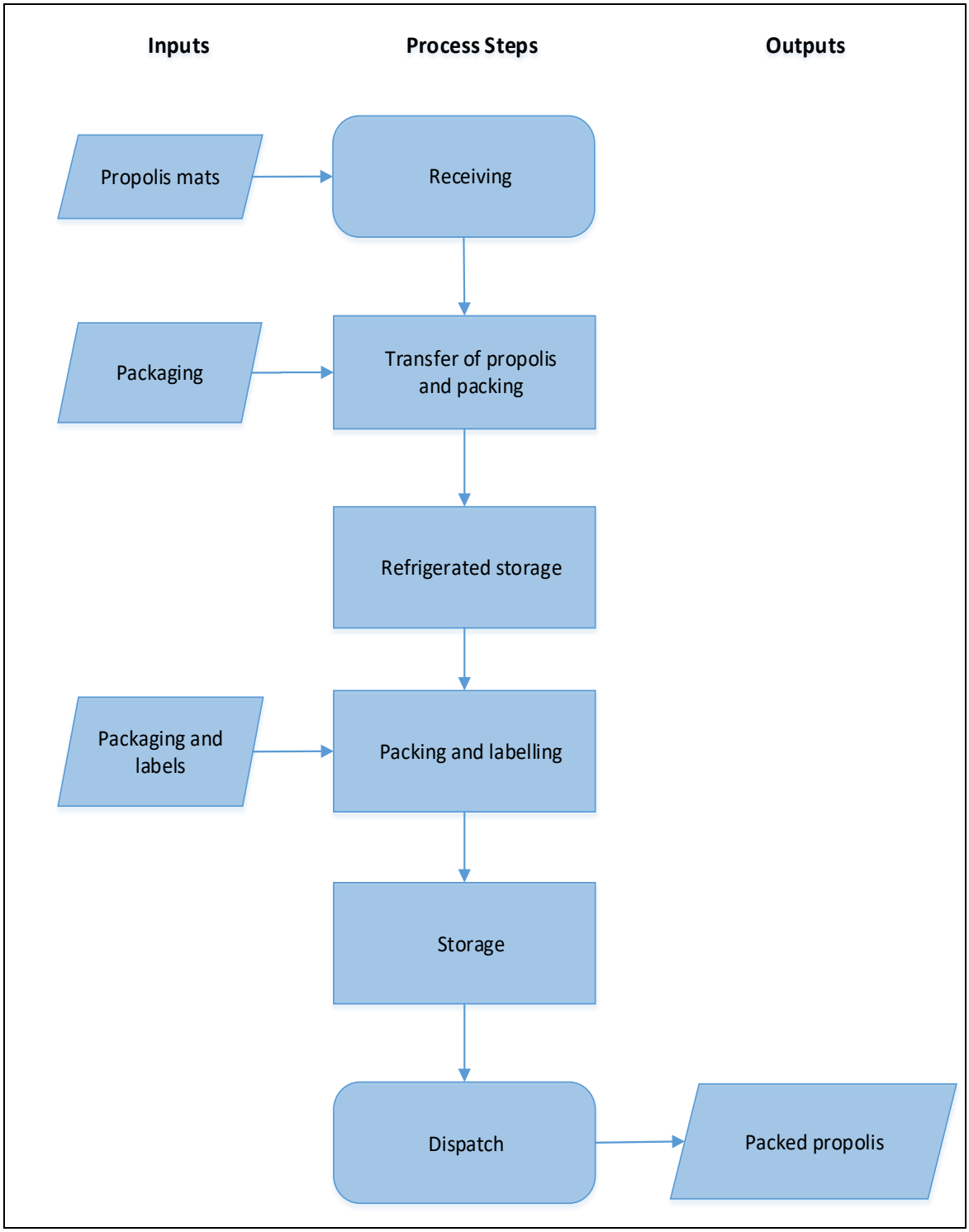
Regulatory Limits

Regulatory limits	• None
Other regulatory requirements specific to product	• Fit for purpose
	• Every consignment of bee product must comply with the Animal Products Notice: Production, Supply and Processing • For export, a Harvest Declaration must be provided for every consignment and products must comply with the GREX
Labelling requirements	• Labelling of transportation outers as per the Animal Products Notice: Production, Supply and Processing • Advisory statement as specified in the Food Standards Code

Processes and Activities

The RMP covers the following processes and activities for propolis: (tick all applicable processes or activities)	
☐	Receiving propolis
☐	Transfer
☐	Refrigerated storage
☐	Packing and labelling
☐	Storage
☐	Dispatch

Generic Process Flow Diagram: Propolis



2. Risk Factor Identification and Control

K
Know

Useful things to know

- To identify the risk factors (from hazards to human and animal health, wholesomeness, false and misleading labelling) that are reasonably likely to occur at each process step (including all inputs).
- To ensure that appropriate controls are included in the RMP so that products are fit for their intended purpose.

D
Do

Rules you must follow

Risks from hazards to human and animal health

- A hazard analysis and critical control point (CCP) determination has been conducted (see Table 6.1)
- No CCP has been identified
- Good operating practices (GOP) are followed as outlined in the RMP Part 2: Supporting Systems
- All identified hazards are expected to be adequately controlled by the control measures listed in Table 6.1.

Risks to wholesomeness

- Risk factors have been identified (see Table 6.2)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 6.2.

Risks from false and misleading labelling

- Risk factors have been identified (see Table 6.3)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 6.3.

S
Show

Things to show your verifier

- Completed records of good operating practices.

Table 6.1: Hazard analysis and CCP determination for propolis

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
1. Receiving	Propolis mats	B – Bacterial pathogens	Micro contamination from personnel; and transfer container or packaging can occur	No		
		C – Chemical residues	Residues can occur in propolis from the environment and agricultural activities[1]	Yes – Harvest Declarations confirming beekeeper controls; and testing for heavy metals, ash, etc.	No	
		C – Allergens	Propolis is known to cause severe allergic reactions in certain people[2]	No		
2. Transfer of propolis	Propolis removal	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: hygienic practices can prevent contamination	No	

Table 6.1: Hazard analysis and CCP determination for propolis

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
	Packing	B – Bacterial pathogens	Micro contamination from left over propolis or other food residues from recycled containers can occur	Yes – GOP: new packaging used	No	
		C – Chemical residues	Chemical residues can occur from recycled packaging	Yes – GOP: new packaging used	No	
3. Storage	Refrigerated storage	B – Bacterial pathogens	Micro contamination can occur from transfer container	Yes – GOP: ensuring transfer container is cleaned before use; and temperature control <5˚C may prevent micro growth	No	
		B – Bacterial pathogens	Microbiological growth due to refrigeration failure, and/or non-compliance with	Yes – GOP: ensuring design and construction is suitable; and	No	

Table 6.1: Hazard analysis and CCP determination for propolis

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
			established refrigeration parameters, (e.g. loading capacity)	refrigeration monitoring procedures		
		B – Bacterial pathogens	Increase in micro levels due to non-compliance with shelf life	Yes – GOP: procedures for ensuring storage periods are met	No	
		C – Chemical residues	Cleaner residue on transfer container surface	Yes – GOP: transfer containers are rinsed with isopropyl alcohol	No	
4. Packing and labelling	Transfer container	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: outside of transfer containers are rinsed with isopropyl alcohol	No	
		C – Allergens	Hazard carried over from step 1[2]	No. Labelling will not control the hazard but it will minimise the risk to the consumer		

Table 6.1: Hazard analysis and CCP determination for propolis

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
5. Storage	• Packed propolis	B – Bacterial pathogens	Hazard carried over from previous step	No		
6. Dispatch	Packed propolis	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: inventory, load out and transport is monitored by supporting systems	No	

1. Chemical residues can occur when beekeepers or farmers use agricultural chemicals and veterinary medicines in and around hives. Beekeepers must follow all product label directions when directly treating hives, and work to minimise bee's exposure to pastures sprayed with agricultural chemicals while honey supers are on their hives. If beekeepers inform you of any potential concerns regarding chemical exposure of bees or honey supers, or declare a known or suspected exposure, defer extracting the affected product and contact your verification agency or MPI for advice.

2. Food Standards Code Schedule 9 states that if a food is or includes propolis as an ingredient, then a mandatory advisory statement is required on the label.

Table 6.2: Summary of identified risk factor and controls related to wholesomeness of propolis

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Insect and insect parts Other pest contamination	Bees and other insects Other pests	Removal or prevention of ingress of live bees Covering of equipment Pest control Proper storage of supers
Other foreign matter that are not considered as physical hazards, (e.g. wood, propolis, wax, other debris)	From frames	Maintenance of frames in good condition Hygienic practices Cleaning and sanitation Proper storage of supers

Table 6.3: Summary of identified risk factor and controls from false or misleading labelling of propolis

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Incorrect details on label or transportation outers, for example: • type of product • claims (e.g. organic) • product description • lot identification or batch number • floral species	Incorrect label design Missing advisory statement	Procedures for ensuring correct label design and compliance with regulatory requirements
	Processing errors, for example: • wrong identification of containers • wrong product put in a pre-labelled container • wrong label or information put on product, (e.g. date, batch number)	Procedures for ensuring correct packaging and labelling of products

Module 7: Beeswax

This module is included in the RMP	☐ Yes

1. Additional Scope of the RMP

Intended Consumer

Intended consumer	• Beeswax for comb foundation • Humans (general public) for topical (application to skin) uses • Industrial use

Intended Use

Intended use of product that leaves RMP	• Comb foundation • Further processing into comb foundation • Further processing into products for topical uses, such as pharmaceutical use or manufacture of cosmetics • Further processing for animal or industrial use

Regulatory Limits

Regulatory limits	• None
Other regulatory requirements specific to product	• Fit for purpose
	• Every consignment of bee product must comply with the Animal Products Notice: Production, Supply and Processing • For export, a Harvest Declaration must be provided for every consignment and products must comply with the GREX
Labelling requirements	• Labelling of transportation outers as per the Animal Products Notice: Production, Supply and Processing

Processes and Activities

The RMP covers the following processes and activities for beeswax: (tick all applicable processes or activities)	
☐	Collection of wax and cappings
☐	Separation of honey from cappings
☐	Melting of wax
☐	Filling of wax into moulds
☐	Cooling
☐	Storage
☐	Dispatch

Inputs and Outputs

Inputs	• Wax and cappings
Outputs	• Comb foundation • Wax for comb foundation • Wax for further processing (animal use, industrial use)

2. Risk Factor Identification and Control

K
Know

Useful things to know

- To identify the risk factors (from hazards to human and animal health, wholesomeness, false and misleading labelling) that are reasonably likely to occur at each process step (including all inputs).
- To ensure that appropriate controls are included in the RMP so that products are fit for their intended purpose.

D
Do

Rules you must follow

Risks from hazards to human and animal health

- Hazards and controls have been identified (see Table 7.1)
- Good operating practices (GOP) are followed as outlined in the RMP Part 2: Supporting Systems
- All identified hazards are expected to be adequately controlled by the control measures listed in Table 7.1.

Risks to wholesomeness

- No risk factors have been identified (see Table 7.2)

Risks from false and misleading labelling

- Risk factors have been identified (see Table 7.3)
- All identified risk factors are expected to be adequately controlled by the control measures listed in Table 7.3

Things to show your verifier

- Completed records of good operating practices.

Table 7.1: Summary of identified hazards and controls for beeswax

Hazard	Control measures for minimising the risk factor
Chemical residues (e.g. pesticides)	Operator that will further process the product will be notified of any chemical residues known or suspected to be present in the product so they can determine what controls they need to have in place to accept the product
Wire, wood, and nails from wooden frames Plastic from plastic frames Other physicals hazards from environment or other sources	Operator that will further process the product will be notified of any possible physical hazards so they can determine what controls they need to have in place to accept the product

Table 7.2: Summary of identified risk factor and controls related to wholesomeness of beeswax

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
No risk factors identified	n/a	n/a

Table 7.3: Summary of identified risk factor and controls from false or misleading labelling of beeswax

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Incorrect details on label or transportation outers, for example: • suitability for animal or industrial use • lot identification or batch number	Processing errors, for example: • wrong identification of blocks • wrong product put in a pre-labelled container • wrong label or information put on product, (e.g. date, batch number)	Procedures for ensuring correct packaging and labelling of products including checking that (if required) product is labelled as "Not for Human Consumption"

Module 8: Royal Jelly

This module is included in the RMP	☐ Yes

1. Additional Scope of the RMP

Intended Consumer

Intended consumer	• Humans (general public)

Intended Use

Intended use of product that leaves RMP	• Ingredient for preparation of other foods • Further processing into products for pharmaceutical use

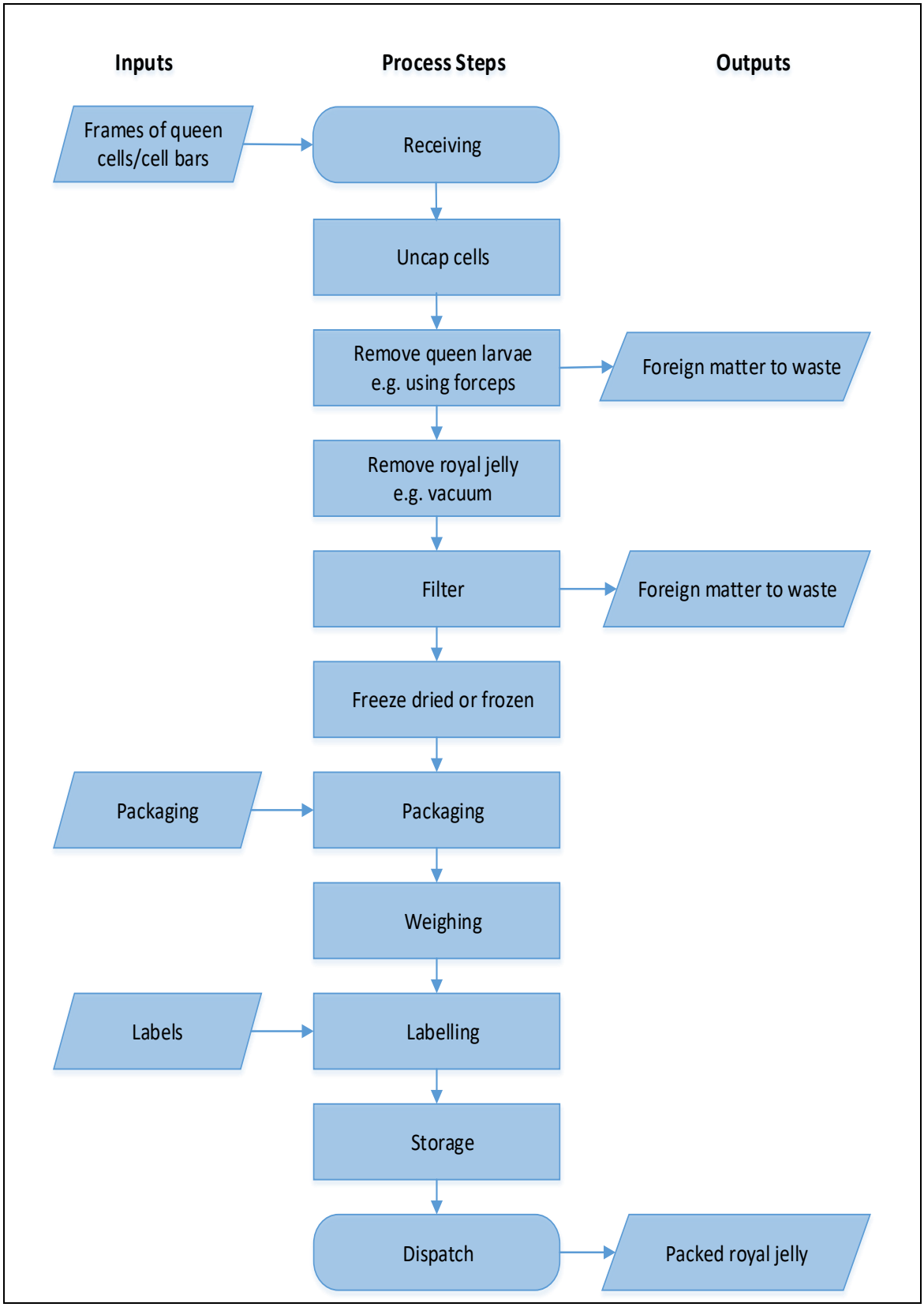
Regulatory Limits

Regulatory limits	• None
Other regulatory requirements specific to product	• Fit for purpose
	• Every consignment of bee product must comply with the Animal Products Notice: Production, Supply and Processing • For export, a Harvest Declaration must be provided for every consignment and products must comply with the GREX
Labelling requirements	• Labelling of transportation outers as per the Animal Products Notice: Production, Supply and Processing • Warning statement as specified in the Food Standards Code

Processes and Activities

The RMP covers the following processes and activities for royal jelly: (tick all applicable processes or activities)	
☐	Receiving queen cells
☐	Remove queen larvae from cells
☐	Remove royal jelly
☐	Filter
☐	Freeze
☐	Freeze dry
☐	Packing and labelling
☐	Storage
☐	Dispatch

Generic Process Flow Diagram: Royal Jelly



2. Risk Factor Identification and Control

K

Know

Useful things to know

- To identify the risk factors (from hazards to human and animal health, wholesomeness, false and misleading labelling) that are reasonably likely to occur at each process step (including all inputs).
- To ensure that appropriate controls are included in the RMP so that products are fit for their intended purpose.

D

Do

Rules you must follow

Risks from hazards to human and animal health

- A hazard analysis and critical control point (CCP) determination has been conducted (see Table 8.1)
- No CCP has been identified
- Good operating practices (GOP) are followed as outlined in the RMP Part 2: Supporting Systems
- All identified hazards are expected to be adequately controlled by the control measures listed in Table 8.1.

Risks to wholesomeness

- Risk factors have been identified (see Table 8.2)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 8.2.

Risks from false and misleading labelling

- Risk factors have been identified (see Table 8.3)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 8.3.

S

Show

Things to show your verifier

- Completed records of good operating practices.

Table 8.1: Hazard analysis and CCP determination for royal jelly

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
1. Receiving	Queen cells / cell bars	B – Bacterial pathogens	Micro contamination from queen cells (e.g. dirt, insect larvae, rodent excretions) can occur	No		
		C – Chemical residues	Residues can occur in queen cell comb / wax[1]	Yes – Harvest Declarations confirming beekeeper controls	No	
		C – Allergens	Royal jelly is known to cause severe allergic reactions in certain people[2]	No		
2. Uncapping	Queen cells / cell bars	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: visual and odour inspection of cells; and hygienic practices may prevent contamination	No	

Table 8.1: Hazard analysis and CCP determination for royal jelly

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
		P – Foreign objects	Foreign objects include plastic and wood pieces	Yes – GOP: maintenance of cell bars may prevent the hazards	No	
3. Larvae removal with, e.g. forceps	Queen cells / cell bars	B – Bacterial pathogens	Micro contamination can occur when the larvae are not removed from cell intact	Yes – GOP: visual inspection of cells; and hygienic practices may prevent contamination	No	
		P – Foreign objects	Fine tips on tools can wear and damage at different rates	Yes – GOP: equipment inspection and replacement controls	No	
4. Remove royal jelly, e.g. vacuum	Queen cells / cell bars	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: freezing of cell bars before re-use may prevent contamination	No	

Table 8.1: Hazard analysis and CCP determination for royal jelly

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
	Royal jelly	P – Foreign objects	Broken wire can be left inside the comb	Yes – GOP: correct sanitation of vacuum tank and hygienic practices may prevent contamination	No	
5. Filtering	Royal jelly	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: replacement of filter bag per batch; and hygienic practices may prevent contamination	No	
	Packaging	P – Foreign objects	Foreign objects include, e.g. tooling steel, wood, plastic cell cup fragments	Yes – GOP: replacement of filter bag per batch; and hygienic practices may prevent contamination	No	

Table 8.1: Hazard analysis and CCP determination for royal jelly

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
6. Freeze drying	Royal jelly	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: sanitation of freeze drier; and hygienic practices may prevent contamination	No	
		B – Bacterial pathogens	Microbiological growth due to refrigeration failure, and/or non-compliance with established refrigeration parameters (e.g. loading capacity)	Yes – GOP: ensuring design and construction is suitable; and refrigeration monitoring procedures	No	
		C – Chemical residues	Sanitiser residues may occur. Freeze dryer sanitised and air dried before and after use and between different products.	Yes – GOP: sanitation of freeze drier; and hygienic practices may prevent contamination	No	

Table 8.1: Hazard analysis and CCP determination for royal jelly

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
7. Packaging	Royal jelly	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: containers kept sealed until used; and supplier's guarantee or certificate on file	No	
8. Weighing	Royal jelly	B – Bacterial pathogens	Hazard carried over from previous step	No		
9. Labelling	Royal jelly	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: inventory control	No	
		C – Allergens	Hazard carried over from step 1[2]	No. Labelling will not control the hazard but will minimise the risk to the consumer		
10. Storage	Packed royal jelly	B – Bacterial pathogens	Hazard carried over from previous step	No		

Table 8.1: Hazard analysis and CCP determination for royal jelly

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
11. Dispatch	Packed royal jelly	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: inventory, load out and transport is monitored by supporting systems	No	

1. Chemical residues can occur when beekeepers or farmers use agricultural chemicals and veterinary medicines in and around hives. Beekeepers must follow all product label directions when directly treating hives, and work to minimise bee's exposure to pastures sprayed with agricultural chemicals while honey supers are on their hives. If beekeepers inform you of any potential concerns regarding chemical exposure of bees or honey supers, or declare a known or suspected exposure, and contact your verification agency or MPI for advice.

2. Food Standards Code 1.2.3 states that if a food is or includes royal jelly as an ingredient, then a mandatory warning statement is required.

Table 8.2: Summary of identified risk factor and controls related to wholesomeness of royal jelly

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Insect and insect parts Other pest contamination	Bees and other insects Other pests	Removal or prevention of ingress of live bees Covering of equipment Pest control Proper storage of supers Straining or filtering
Other foreign matter that are not considered as physical hazards, (e.g. wood, propolis, wax, other debris)	From frames, capping surfaces	Maintenance of frames in good condition Hygienic practices Cleaning and sanitation Proper storage of supers Straining

Table 8.3: Summary of identified risk factor and controls from false or misleading labelling of royal jelly

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Incorrect details on label or transportation outers, for example: • type of product • claims (e.g. organic) • product description • lot identification or batch number • floral species	Incorrect label design Missing warning statement	Procedures for ensuring correct label design and compliance with regulatory requirements
	Processing errors, for example: • wrong identification of containers • wrong product put in a pre-labelled container • wrong label or information put on product, (e.g. date, batch number)	Procedures for ensuring correct packaging and labelling of products

Module 9: Bee Venom

This module is included in the RMP	☐ Yes

1. Additional Scope of the RMP

Intended Consumer

Intended consumer	• Humans (general public) for topical (application to skin) uses only

Intended Use

Intended use of product that leaves RMP	• Further processing into products for topical uses only, such as pharmaceutical use or manufacture of cosmetics

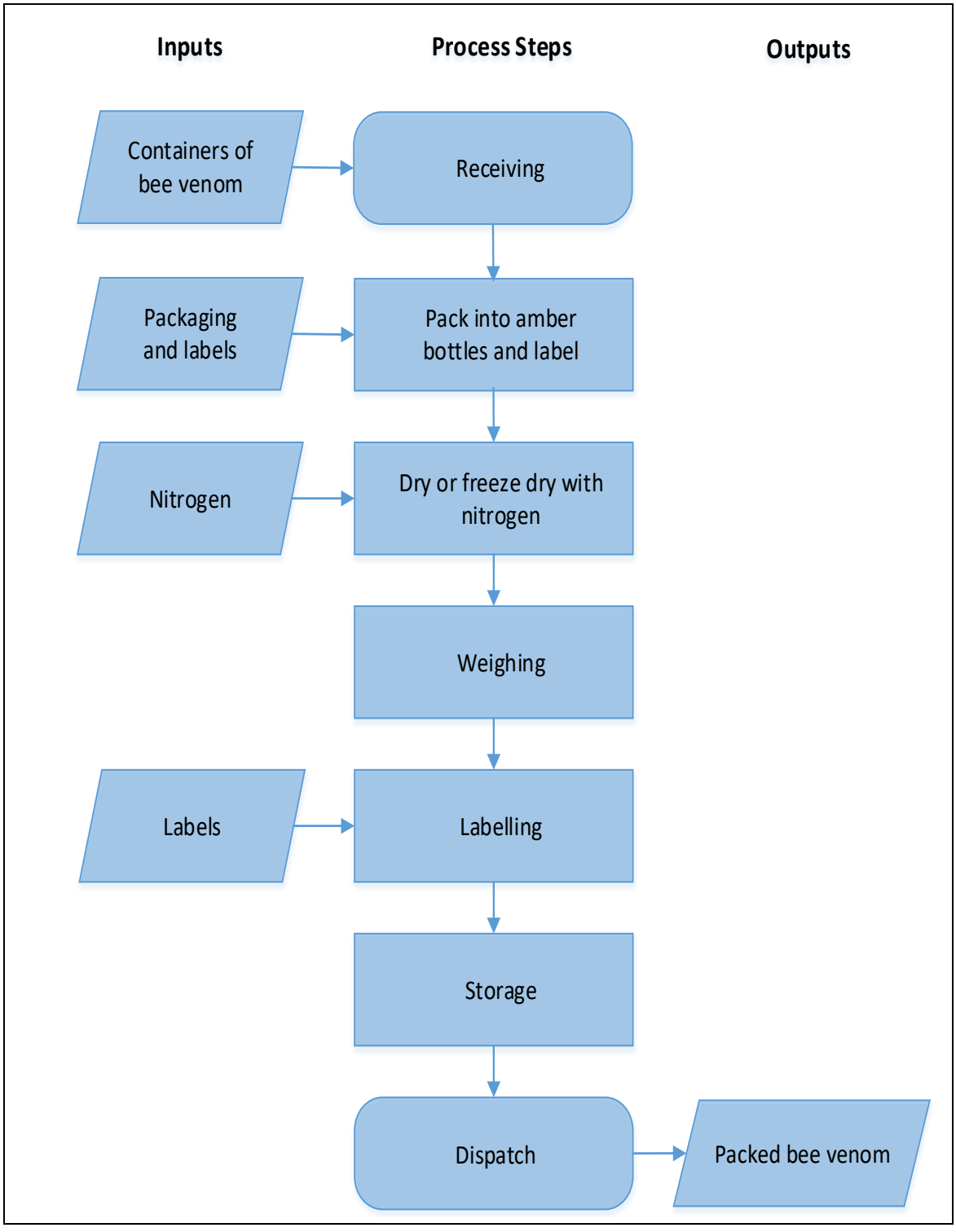
Regulatory Limits

Regulatory limits	• None
Other regulatory requirements specific to product	• Fit for purpose
	• Every consignment of bee product must comply with the Animal Products Notice: Production, Supply and Processing • For export, a Harvest Declaration must be provided for every consignment and products must comply with the GREX
Labelling requirements	• Labelling of transportation outers as per the Animal Products Notice: Production, Supply and Processing

Processes and Activities

The RMP covers the following processes and activities for bee venom: (tick all applicable processes or activities)	
☐	Receiving bee venom
☐	Packing and labelling
☐	Freeze
☐	Freeze dry
☐	Weighing and labelling
☐	Storage
☐	Dispatch

Generic Process Flow Diagram: Bee Venom



2. Risk Factor Identification and Control

K

Know

Useful things to know

- To identify the risk factors (from hazards to human and animal health, wholesomeness, false and misleading labelling) that are reasonably likely to occur at each process step (including all inputs).
- To ensure that appropriate controls are included in the RMP so that products are fit for their intended purpose.

D

Do

Rules you must follow

Risks from hazards to human and animal health

- A hazard analysis and critical control point (CCP) determination has been conducted (see Table 9.1)
- No CCP has been identified
- Good operating practices (GOP) are followed as outlined in the RMP Part 2: Supporting Systems
- All identified hazards are expected to be adequately controlled by the control measures listed in Table 9.1.

Risks to wholesomeness

- Risk factors have been identified (see Table 9.2)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 9.2.

Risks from false and misleading labelling

- Risk factors have been identified (see Table 9.3)
- All identified risk factors are expected to be adequately controlled by following good operating practices (GOP) as outlined in the RMP Part 2: Supporting Systems and the control measures listed in Table 9.3.

S

Show

Things to show your verifier

- Completed records of good operating practices.

Table 9.1: Hazard analysis and CCP determination for bee venom

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
1. Receiving	Transfer container	B – Bacterial pathogens	Micro contamination can occur from transfer container	Yes – GOP: ensuring transfer container cleaned before use; and temperature control e.g. <5˚C may prevent micro growth	No	
		C – Chemical residues	Cleaner residue on transfer container surface	Yes – GOP: transfer containers are rinsed with isopropyl alcohol; Harvest Declarations confirming beekeeper controls[1]	No	
		C – Allergens	Bee venom is known to cause allergic reactions in certain people[2]	No		

Table 9.1: Hazard analysis and CCP determination for bee venom

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
2. Packing and labelling	Transfer container Amber glass bottles	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: outside of transfer containers are rinsed with isopropyl alcohol	No	
		B – Bacterial pathogens	Micro contamination can occur from amber bottles	Yes – GOP: amber bottles are cleaned before use; and supplier guarantee or certificate on file	No	
		P – Glass fragments	Pieces of broken glass are occasionally found in glass containers; jars can also break during handling and processing	Yes – GOP: correct equipment set-up and maintenance; and routine observation during checking; breakage procedures	No	
3. Freeze dry with nitrogen	Nitrogen gas	C – Chemical residues	Possible chemical contamination	Yes – GOP: supplier's guarantee or certificate on file	No	

Table 9.1: Hazard analysis and CCP determination for bee venom

Process step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and then answer Q2. If no, consider hazard at next step.	Q2. Is the control measure at this step essential to food safety as defined by a regulatory limit? If yes, this step is a CCP. If no, this step is not a CCP.	CCP no.
	Nitrogen tank	B – Bacterial pathogens	Micro contamination from tank can occur	Yes – GOP: hygienic practices; and cleaning of tank may prevent contamination	No	
4. Weighing	Bee venom into amber glass bottles	B – Bacterial pathogens	Hazard carried over from previous step	No		
5. Labelling	Bee venom into amber glass bottles	B – Bacterial pathogens	Hazard carried over from previous step	No		
6. Storage	Packed bee venom	B – Bacterial pathogens	Hazard carried over from previous step	No		
7. Dispatch	Packed bee venom	B – Bacterial pathogens	Hazard carried over from previous step	Yes – GOP: inventory, load out and transport is monitored by supporting systems	No	

1. Chemical residues can occur when beekeepers or farmers use agricultural chemicals and veterinary medicines in and around hives. Beekeepers must follow all product label directions when directly treating hives, and work to minimise bee's exposure to pastures sprayed with agricultural chemicals while honey supers are on their hives. If

beekeepers inform you of any potential concerns regarding chemical exposure of bees or honey supers, or declare a known or suspected exposure, and contact your verification agency or MPI for advice.

2. Bee venom can cause allergic reactions in certain people and careful handling is needed.

Table 9.2: Summary of identified risk factor and controls related to wholesomeness of bee venom

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Foreign matter	Environment, equipment	Collection techniques Cleaning

Table 9.3: Summary of identified risk factor and controls from false or misleading labelling of bee venom

Risk factor	Source or cause of risk factor	Control measures for preventing/ minimising the risk factor
Incorrect details on label or transportation outers, for example: • type of product • claims (e.g. organic) • product description • lot identification or batch number • floral species	Incorrect label design	Procedures for ensuring correct label design and compliance with regulatory requirements
	Processing errors, for example: • wrong identification of containers • wrong product put in a pre-labelled container • wrong label or information put on product, (e.g. date, batch number)	Procedures for ensuring correct packaging and labelling of products

Module 10: Transport

This module is included in the RMP	☐ Yes

1. Additional Scope of the RMP

Regulatory Limits

Regulatory limits	• None

Processes and Activities

The RMP covers the following processes and activities for bee products: (tick all applicable processes or activities)	
☐	• Transport of packaged bee products that are: – owned by the RMP operator; and – that do not require temperature control; and – are moving from this RMP to another RMP, and from that RMP back to this RMP; and – are transported using vehicles owned by the RMP operator.

2. Additional Requirements

K Know

Useful things to know

- To ensure that the honey or other bee product maintains its status as suitable for processing and to minimise hazards, when being transported between premises or places operating under an RMP.

D Do

Rules you must follow

Procedures

- Vehicles (or transportation units e.g. containers) are designed, constructed, equipped and operated to:
  - maintain the status of products as suitable for processing and fit for intended purpose; and
  - minimise hazards and other risk factors.
- Vehicles are kept clean and maintained in a good working order. This is recorded in the e.g. Load-out Check Sheets.
- Products are kept separate from any source of contamination or protected from cross-contamination.
- People hygienically handle product.

- All products are adequately protected from the elements and environmental contaminants during loading.
- When issues occur during transportation that may affect the suitability for processing of the product, the product concerned is managed as non-conforming product. Refer to **O. Non-conforming Product and Recall**.

Monitoring

- Compliance with these procedures is checked at least _____ by the responsible person.

S
Show

Things to show your verifier

- List of own transport vehicles including registration or fleet number e.g. Transportation Units
- Maintenance Records for Transportation Units
- Completed e.g. Repairs and Maintenance Register
- Completed e.g. Cleaning and Maintenance Records
- Any problems detected and corrective action taken. Refer to **E. Corrective Action**.

Examples of these forms can be found in the RMP Operator Resource Toolkit.

3. Risk Factor Identification and Control

K
Know

Useful things to know

- To identify the risk factors (from hazards to animal health, wholesomeness, false and misleading labelling) that are reasonably likely to occur at each process step (including all inputs).
- To ensure that appropriate controls are included in the RMP so that products are fit for their intended purpose.

D
Do

Rules you must follow

Risks from hazards to human and animal health

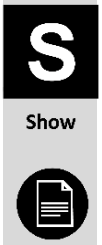
- Hazards and controls have been identified (see Table 10.1)
- No CCP has been identified.
- Good operating practices (GOP) are followed as outlined in the RMP Part 2: Supporting Systems and in Module 10: Transport.
- All identified hazards are expected to be adequately controlled by GOP and the control measures listed in Table 10.1.

Risks to wholesomeness

- Risk factors have been identified (see Table 10.2)
- All identified hazards are expected to be adequately controlled by GOP and the control measures listed in Table 10.2.

Risks to labelling

- Risk factors have been identified (see Table 10.3)
- All identified hazards are expected to be adequately controlled by GOP and the control measures listed in Table 10.3.



Things to show your verifier

- Completed records of good operating practices.

Table 10.1: Summary of identified hazards and controls for transport

Hazard	Control measures for minimising the risk factor
Damage to packaging	Product is loaded and transported in a manner that prevents damage to packaging.
Water damage to packaging	Enclosed water-tight containers such as drums and pallecons are acceptable on open trucks. Finished products in bags, cartons or other packaging that is susceptible to water damage must be carried in a manner so as to protect the product from moisture. If open trucks are used, water-tight tarpaulins or other suitable covers should be used to protect product.
Dented bulk containers (may result in damage to the food grade lining)	Bulk containers are transported in a manner that prevents dents and other forms of damage.
Contamination	Product is transported in clean vehicles in a manner that minimises dust, engine fumes and other road-based contamination.
Cross-contamination	Bee product that is conveyed together with any other animal material or product or any other thing that may be a source of contamination is adequately separated from the source of contamination or protected in a manner that prevents cross contamination.

Table 10.2: Summary of identified risk factor and controls related to wholesomeness

Risk factor	Control measures for preventing/ minimising the risk factor
Contamination	Product is transported in clean vehicles in a manner that minimises dust, engine fumes and other road-based contamination.
Damage to packaging	Product is loaded and transported in a manner that prevents damage to packaging.

Table 10.3: Summary of identified risk factor and controls related to labelling

Risk factor	Control measures for preventing/ minimising the risk factor
Labelling of transportation outers is damaged during loading or transport	Product is loaded and transported in a manner that allows labelling to remain legible and adhered.