

# Evaluation of template or model food control plan

BIANZ

9 March 2018



## Introduction

Section 40 of the Food Act 2014 provides that MPI's chief executive can approve a template or model food control plan developed outside of MPI.

This allows food businesses or commercial operations to:

- develop a food control plan and have it approved so that each business using the plan does not need to submit their plan for individual evaluation;
- make adjustments to the MPI templates to include multi-site or multi-business specific procedures or practices, or to reflect common language/terminology used in the business and have those changes approved;
- be able to demonstrate that they meet the requirements of the Food Act 2014 when using commercial or private food safety and suitability programmes.

## Context for this Evaluation

Baking Industry Association New Zealand (BIANZ) requested approval of their food control plan under Section 40 of the Food Act 2014.

The initial BIANZ food control plan submitted was an amended version of the Baking Industry Code of Practice that was previously recognised as "a document providing a sound basis for the design, implementation, and operation of a Food Safety Programme" under the Food Act 1981. Amendments included updating references to relevant legislation and incorporating new requirements under the Food Act 2014 for site plans and operator details to be included in the Food Control Plan. This Code of Practice was designed to interface with MPI's template "*Food control plan: Food service and food retail* (March 2017 version)".

While the BIANZ document was still undergoing evaluation, MPI signalled that the "*Food control plan: Food service and food retail* template was to be phased out, as a new template (the Simply Safe & Suitable template food control plan) had been developed.

BIANZ subsequently redesigned their plan entirely. The final document amends the MPI Simply Safe & Suitable template food control plan (March 2017 version) to incorporate relevant information from MPI's National Programme guidance material to enable BIANZ members to use the template to cover almost all activities they may undertake. The scope includes all activities relating to wholesale baking and food service and food retail sectors listed in the Food Act 2014 schedules 1 & 2.

Further amendments to the MPI documents include providing advice for when members may seek assistance from BIANZ, and incorporation of a proprietary process for cooling pie fillings that will undergo a subsequent thorough cooking step that provides a longer cooling period than the 6 hours specified in the current MPI template food control plan.

## Evaluation conclusion (summary)

The BIANZ template food control plan meets the requirements of the Food Act 2014 and Food Regulations 2015.

The evaluator recommends that MPI's chief executive approves the BIANZ template food control plan as a template or model food control plan under section 40 of the Food Act 2014.

The evaluator has further recommended:

- the registration application should include confirmation that the applicant has been provided with the plan by BIANZ,
- the verifier engaged by the applicant is recognised for the function "Food Act Verifier – custom FCP".



## BIANZ Evaluation Report

Ref: FR15 regs for custom plan evaluation	Evaluation criteria	Evaluation findings – BIANZ
10(3)(a)	Name of evaluator	Simon Holst
10(3)(b)	Name of food business	<b>N/A (This template applies to all food businesses who will adopt and tailor this template to their specific needs).</b>
10(3)(c)	Name of operator of food business	<b>N/A</b>
10(3)(d)	Type of food to which the procedure applies	<p>The scope of the original template submitted was limited to bakery products:</p> <ul style="list-style-type: none"> <li>bread and bread products, cakes, biscuits, muffins, loaves, savoury pastries, sweet pastries, filled breads, desserts, beverages, soups, pancakes, pikelets, pre-packaged products</li> </ul> <p>Characteristics: Shelf-stable, frozen or chilled</p> <p>However the template also provided for bakers to incorporate all relevant products and procedures from MPI's template <i>"Food control plan: Food service and food retail"</i> (March 2017 version).</p> <p><b>Redesigned plan:</b></p> <p>The redesigned plan is a "one-stop-shop". Wholesale bakers that also conduct food service or food retail activities that are described in the Food Act 2014 Schedules 1 and 2 will be able to use this plan. This plan incorporates the products and processes able to be conducted under MPI's Simply Safe &amp; Suitable template food control plan including specialist procedures for sushi, Chinese style roast duck, doner kebabs, and cooking using sous vide. This plan does not include the procedure for preparing red meat for mincing and serving lightly cooked or raw. This plan also includes pre-validated MPI information from National Programme guidance material, reworked into a procedures format, to cover activities associated with wholesaling foods (e.g. packaging and labelling, traceability, transport and distribution).</p>

Ref: FR15 regs for custom plan evaluation	Evaluation criteria	Evaluation findings – BIANZ
10(3)(e)	Description of practices and activities carried out	<p>The practices and activities covered in the template include:</p> <ul style="list-style-type: none"> <li>• Management of the food control plan (e.g. risk assessment, hazard identification, taking responsibility, operator verification, document control, record keeping, and reporting non-compliances).</li> <li>• Good Operating Practice: cleaning and sanitation, operational checks, calibration and monitoring, and allergen control.</li> <li>• Manufacturing and food service activities including sourcing and receiving ingredients, storage, handling/preparing raw ingredients and cooked food, washing, chopping/cutting, mixing, filling, chilling, freezing, thawing, reheating, cooking, displaying, serving, packaging and labelling products, final product storage and dispatch.</li> </ul> <p>Product flow descriptions and HACCP plans were provided with the original template.</p> <p>The Bakery Industry Association NZ HACCP plans and MPI's HACCP analysis for the Simply Safe &amp; Suitable template food control plan and hazard analysis conducted for national programme guidance indicate the plan provides relevant control points for the hazards reasonably likely to occur in wholesale bakery, food service and food retail settings.</p>
-	List of documents assessed	<p>The original template submitted for assessment was:</p> <p>BIANZ FSP Issue 1 5 October 2016; 53 documents, Sections: 1-20, Appendices: 1-12, Supplements: 1-5; 78,140 words, 674 pages.</p> <p>Some of the material (e.g. HACCP and validation information) contained in this document can be considered supporting information for the redesigned plan subsequently submitted:</p>

Ref: FR15 regs for custom plan evaluation	Evaluation criteria	Evaluation findings – BIANZ
		<p>BIANZ Wholesale bakery template food control plan, 9 March 2018, 132 pages, 16,532 words.</p> <p>The template contents are:</p> <ul style="list-style-type: none"> <li>Introduction</li> <li>Day cycle</li> <li>Business details</li> <li>Business layout</li> <li>Taking responsibility</li> <li>Checking the plan is working well</li> <li>Training and competency</li> <li>Water supply: Registered supplier</li> <li>Water supply: Roof water and Surface or ground water</li> <li>Personal hygiene</li> <li>Keeping food cold</li> <li>Checking for pests</li> <li>Separating food</li> <li>Producing, processing or handling food</li> <li>Sourcing, receiving and tracing food</li> <li>Safe storage and display</li> <li>Cooking/baking food</li> <li>Proving the method you use to kill bugs works every time</li> <li>Cooling freshly cooked food</li> <li>Defrosting food</li> <li>Keeping foreign matter out of food</li> <li>Reducing water content, making food acidic and hot-smoking to control bugs</li> </ul>

<i>Ref: FR15 regs for custom plan evaluation</i>	<i>Evaluation criteria</i>	<i>Evaluation findings – BIANZ</i>
		Reheating food Transporting your food Knowing what's in your food Packaging and labelling your food Cleaning and sanitising Maintaining equipment and facilities When something goes wrong Dealing with customer complaints Recalling your food Making sushi with acidified rice Making Chinese style roast duck Making doner kebabs Cooking using sous vide
<b>10(3)(g)</b>	<b>The name and address of the place assessed on site</b>	<b>N/A (Evaluation did not include on-site assessment).</b>
<b>10(3)(h)</b>	<b>Places exempted from on-site assessment</b>	<b>N/A – the template is evaluated by MPI for use by BIANZ businesses, and adoption of this template by businesses requires compliance with any template conditions.</b>
<b>10(3)(i)</b>	<b>Technical experts who provided information used in the evaluation process</b>	Scientific Literature was consulted and references cited in the document were referred to.



Ref: FR15 regs for custom plan evaluation	Evaluation criteria	Evaluation findings – BIANZ
10(3)(j)	Copies of the technical expert's reports	N/A. Scientific literature was referenced.
10(3)(k)	Information about the competency of the technical experts	N/A. Articles in international scientific journals were reviewed for technical input into this template review.
10(3)(l)	Evaluator's views and reasons on Reg 9(1)(a) requirements	<ul style="list-style-type: none"> <li><b>Evaluator's views on whether the Plan meets the applicable requirements:</b></li> </ul> <p>The original BIANZ template (including Appendices) required several corrective actions to be undertaken to meet all the applicable requirements of the Food Act and Reg 9 (1). These primarily relate to temperature control, and are included here in case other evaluators may be reviewing custom food control plans based on the original Code of Practice:</p> <ul style="list-style-type: none"> <li><i>Corrective Action needed in Section 7.1.2 (Product specifications: (i) Raw fresh meat, poultry and fish, excluding seafood; and (ii) Chilled seafood) (iii) Dairy (iv) Deli goods).</i></li> </ul> <p>Rationale for Corrective Action request:</p> <ul style="list-style-type: none"> <li>The template states 'Temperature: ideally 5°C or colder, critical limit 7°C or colder upon delivery'.</li> <li>The critical limit of '7°C or colder', is inconsistent with the pre-validated requirements of the 'Food Service and Food Retail' template and is thus outside MPI pre-validated criteria. Section 5.5 page 1 of the MPI template states that 'potentially hazardous food must be stored at or below 5°C'.</li> </ul> <p><i>This corrective action was addressed in the final template by adopting MPI template criteria.</i></p>

Ref: FR15 regs for custom plan evaluation	Evaluation criteria	Evaluation findings – BIANZ
		<ul style="list-style-type: none"> <li>• <i>Corrective Action needed:</i> Describe how the existing template critical limit of '7°C or colder on delivery' aligns with the MPI pre-validated criteria of keeping potentially hazardous foods at 5°C or colder. This may be done by: <ul style="list-style-type: none"> <li>○ providing validation or justification for the BIANZ template temperature criteria; or</li> <li>○ amending the criteria to meet MPI pre-validated limits.</li> </ul> <p>This corrective action was addressed in the final template by adopting MPI template criteria.</p> </li> <li>• <i>Corrective Action needed in Section 9.3: Reheating pies for the pie warmer.</i> Rationale for Corrective Action request: <ul style="list-style-type: none"> <li>○ This template states 'The temperature shall be 74°C or hotter'.</li> <li>○ <b>The critical limit of '74°C or hotter', is inconsistent with the pre-validated requirements of the 'Simply Safe &amp; Suitable' MPI template and is thus outside MPI pre-validated criteria.</b></li> </ul> </li> <li>• <i>Corrective Action needed:</i> Describe how the existing template critical limit of '74°C or hotter' aligns with the MPI pre-validated criteria of reheating these foods to 75°C or hotter. This may be done by: <ul style="list-style-type: none"> <li>○ providing validation or justification for the BIANZ template receiving criteria; or</li> <li>○ amending the criteria to meet MPI pre-validated limits.</li> </ul> <p>This corrective action was addressed in the final template by adopting MPI template criteria.</p> </li> <li>• <i>Corrective Action needed in Section 9.11.4.3.4 (Set up and food display).</i> Rationale for Corrective Action request: <ul style="list-style-type: none"> <li>○ This section of the template states that 'Food displayed must be monitored including: food is at the correct temperature, i.e. very cold to touch'.</li> </ul> </li> </ul>

Ref: FR15 regs for custom plan evaluation	Evaluation criteria	Evaluation findings – BIANZ
		<ul style="list-style-type: none"> <li>○ Regulation 22 of the Food Regulations 2015 states that ‘the operator must provide, and ensure the use of, any measuring equipment needed to ensure the safety and suitability of— (a) the food produced or processed and handled; and (b) anything that is used in producing or processing and handling the food’.</li> </ul> <ul style="list-style-type: none"> <li>• <i>Corrective Action needed:</i> Describe how the template aligns the Food Regulations 2015 requirement for the ‘operator to ensure the use of a measuring device to ensure food safety and suitability’ with the monitoring of displayed food by assessing that it is ‘very cold to touch’. This may be done by: <ul style="list-style-type: none"> <li>○ providing validation or justification for the BIANZ template temperature monitoring criteria; or</li> <li>○ amending the criteria to meet the Regulation 22 of the Food Regulation 2015.</li> </ul> <p>This corrective action was addressed in the final template by adopting MPI template criteria.</p> </li> <li>• <i>Corrective Action needed in Section 9.3: Cooling of meat, cooling limits (Temperature/Time):</i>  Rationale for Corrective Action request: <ul style="list-style-type: none"> <li>○ This section states ‘for pie filling - pie filling temperature must reach <b>10°C</b> within 15 hours’.</li> </ul> <p>Corrective Action needed: Correction of this error is needed; amend the cooling time to the time validated in the BIANZ template.</p> <p>This corrective action was addressed in the final template with a new cooling section developed specifying processes for cooling of pie fillings that will undergo a subsequent thorough cooking step (an extended cooling time has been agreed).</p> </li> </ul>

Ref: FR15 regs for custom plan evaluation	Evaluation criteria	Evaluation findings – BIANZ
		<p>BIANZ provided a cooling study and the raw data used to inform the conclusions of the cooling study, 'Development of guidelines for cooling cooked meat pie filling', carried out by ESR, Baking Research Institute and BIANZ executive member bakeries.</p> <p>Although the cooling study did not meet all the requirements expected of a validation, it contained sufficient scientific evidence to agree a different (extended) cooling process for pie fillings that will undergo a subsequent thorough cooking step. This extended cooling process is included in the "cooling freshly cooked food". This procedure also includes the MPI pre-validated criteria that must be applied to all other freshly cooked foods (i.e. those that are not subject to a later thorough cooking step).</p> <ul style="list-style-type: none"> <li>• <i>Corrective Action needed in Section 9.3: Mashed potato prepared from dehydrated potato flakes or granules</i> Rationale for Corrective Action request: <ul style="list-style-type: none"> <li>○ This section states that once rehydrated, the product should be either held hot (60°C or hotter) or cooled (from 54.5°C to 27°C in 1.5 hours and then from 27°C to 4.4°C in 5 hours and stored under refrigeration until used.</li> <li>○ The critical limit of 'cooled from 54.4°C to 27°C in 1.5 hours and then from 27°C to 4.4°C in 5 hours' is inconsistent with the pre-validated requirements of the 'Simply Safe &amp; Suitable' MPI template and is thus outside MPI pre-validated criteria.</li> </ul> </li> </ul> <p>The MPI template criteria state that 'the food must get from 60°C to 5°C or below in in less than 6 hours or it must be thrown out or; 60°C to 21°C in less than 2 hours, then from 21°C to 5°C in less than 4 hours. Both these (the MPI recommendations) are a total of 6 hours.</p> <p>The BIANZ template states that a total of 6.5 hours is suitable.</p>

		<ul style="list-style-type: none"> <li>• <i>Corrective Action needed:</i> Describe how the existing template critical limit of 6.5 hours to cool from 54.4°C to 4.4°C aligns with the MPI pre-validated criteria a total of 6 allowable hours to cool from 60°C to 5°C. This may be done by: <ul style="list-style-type: none"> <li>○ providing validation or justification for the BIANZ template cooling criteria; or</li> <li>○ amending the criteria to meet MPI pre-validated limits.</li> </ul> <p>This corrective action was addressed in the final template by adopting MPI template criteria.</p> </li> <li>• <i>Corrective Action needed in Section 15.1 Premises, repairs and maintenance.</i>  Rationale for Corrective Action request: <ul style="list-style-type: none"> <li>○ Regulation 13f of the Food Regulations 2015 states ‘ensuring, to the extent reasonably practicable, that the following materials are not capable of contamination: materials used to construct the place; materials used for the surfaces of fixtures, fittings and equipment used in the place.</li> <li>○ Section 15.1 of the template details premises standards and procedures but does not cover the requirement for construction materials used in construction, fixtures, fittings, equipment to not be capable of contaminating food.</li> </ul> <p><i>Corrective Action needed:</i> Describe how the existing template meets Regulation 13f in ensuring that the materials used for construction of the premises, fixtures, fittings and equipment are not capable of contaminating the food produced.</p> <p>This corrective action was addressed in the final template by adopting the MPI pre-validated procedures.</p> <p>In conclusion, the BIANZ wholesale bakery template food control plan now meets the requirements of Regulation 9(1)(a).</p> </li> </ul>
10(3)(l)	Evaluator’s views and reasons on Reg 9(1)(b) requirements	<p>The information in the BIANZ wholesale bakery template food control plan is primarily drawn from pre-validated MPI information, so is believed to be accurate.</p> <p>Validation/Cooling study information was provided in both summary and raw data forms – no discrepancies were identified, therefore this information is believed to be accurate.</p>

<i>Ref: FR15 regs for custom plan evaluation</i>	<i>Evaluation criteria</i>	<i>Evaluation findings – BIANZ</i>
10(2)(a)	Statement of Validity	I state that the FCP is valid in terms of s41 of the Act (in writing and in an acceptable form).
10(2)(a)	Statement of Validity	I state that the FCP is valid in terms of s42 of the Act (has all FCP Contents required by that section and FR15 Reg 6).
10(2)(b)	What conditions does the evaluator recommend to be imposed on the registration of the plan?	<ul style="list-style-type: none"> <li>• <i>A mechanism should be established to confirm the registrant has been provided a copy of the template food control plan by BIANZ</i></li> <li>• <i>The verifier for this food control plan should be accredited to ISO17020.</i></li> </ul>
112-113 or 115-116	ISO requirements	N/A
11(2)(a)-(c)	Endorsement	<p>I state that:</p> <ul style="list-style-type: none"> <li>• this food control plan is assessed; and</li> <li>• this evaluation report is as prepared by me as the Evaluator; and</li> <li>• the plan is valid as per sections 41 and 42 of the Food Act 2014.</li> </ul>
11(2)(a)-(c)	Signed and dated	<i>Simon Holst</i>
		<i>13 March 2018</i>