



Discussion Document on the Review of the Code for Bee Products and the Two RMP Templates

Purpose of the Review:

To include more bee products and processes in the Operational Code: Processing of Bee Products and update the two associated RMP templates.

Background:

The Operational Code: Processing of Bee Products was published 15 December 2017. At that time the aim was to update the Code of Practice (COP) to bring it into line with legislative changes, e.g. requirements for tutin, and to make some obvious changes e.g. the inclusion of allergen management.

Now the Working Group are proposing to include more bee products and processes and update the two associated RMP templates ([RMP Template for the Processing of Honey and Dried Pollen](#) and [RMP Template for the Storage of Bulk Honey](#)) accordingly as the final step of this review.

The current documents are available on this [web page](#).

Changes to the existing Code/RMP templates are shown by track changes or yellow highlighting in the 3 documents.

Summary of changes for the Code

1. General updates include:
 - a. References to the RMP Operators Resource Toolkit;
 - b. Resources for developing an RMP;
 - c. New references to the GREX;
 - d. The day-to-day manager should be present at announced verification audits;
 - e. Changes to the description for amenities location; and
 - f. Clarification on transport requirements.
2. Part 1 has better linkages from the Code to the RMP templates and a new 'Where Do I Fit?' decision tree.
3. More products and processes including:
 - a. Imported bee products and ingredients;
 - b. Mobile extraction;
 - c. Flavoured honey;
 - d. Processing of propolis;
 - e. Royal jelly collection and processing;
 - f. Bee venom collection and processing;
 - g. Product design and formulation;
 - h. Process development and validation; and
 - i. Packing/re-packing in a store.

4. HACCP Part 7:

- a. New analysis tables for propolis, royal jelly, bee venom and mobile extraction; and
- b. The order of flow diagrams and analysis tables has changed so that the diagram and analysis tables for each process are grouped together.

Summary of changes for the RMP Templates

1. The current templates are called: [RMP Template for the Processing of Honey and Dried Pollen](#) and [RMP Template for the Storage of Bulk Honey](#) and these have been transferred into a new style of template.
2. The RMP templates are published as a pdf for this consultation, however when the final versions are published operators will be able to select or type in information in the appropriate spaces. The rest of the content will be locked down.
3. The major changes are to the Honey and Dried Pollen template with more processes/activities.
4. The inclusion of packing/re-packing and transport for the Storage template will be a significant improvement for these operators.
5. RMP templates are pre-approved by MPI and reduce costs for (new) operators e.g. there is no evaluation step for those processes/activities covered in scope of the template. Also those existing template users can add these extra in-scope processes/activities without evaluation should they expand their operations to include any of these that are provided.
6. The information that was covered in the attachments of the current Storage template has been covered in the Code.
7. Adding any additional process/activities to a template must be evaluated e.g. Revolutionary Beekeeping.
8. Operators currently using an RMP template will need to change to the new template not only because of more products/processes are included but because the COP references have also changed in the templates. Operators will need to re-register their RMP template with MPI. Operators will expect to change to the new applicable template by the time their first verification audit takes place after publication.

Other documents

The Working Group is proposing to remove [Processing Premises RMP Transport Supporting Systems](#) and the associated [BPSC memo](#). Transport will be well covered in the Code and is an option in the templates and thus these documents are obsolete now.

Bee products specific forms are now available in the [RMP Operators Resource Toolkit](#) as well as other generic forms/procedures for operators to use.

What happens next

All submissions will be considered after consultation has closed. A summary of submissions and analysis will be sent to all submitters and posted on the MPI website in due course. The revised Code and templates should be in place shortly after consultation has closed depending on submissions.