



**New Zealand Food Safety**

**Ministry for Primary Industries**

Manatū Ahu Matua

Evaluation of template or model food  
control plan  
**New Zealand Good Agricultural Practice  
(NZGAP)**

**27 April 2018**





## Introduction

Section 40 of the Food Act 2014 provides that the Ministry for Primary Industries' (MPI) chief executive can approve a template or model Food Control Plan (FCP) 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.

## Context for this Evaluation

Horticulture New Zealand (HNZ) has requested approval of their New Zealand Good Agricultural Practice (NZ GAP) manual (a model FCP) under Section 40 of the Food Act 2014.

The NZ GAP manual sets out procedures for managing hazards in a horticultural setting.

NZ GAP operators are covered by the horticultural sector in Food Act 2014. This sector includes food businesses that grow, harvest, sort, grade, and undertake minimal processing of horticultural produce.

## Evaluation Conclusion (Summary)

The NZ GAP manual, if followed as written, is sufficient to adequately control the relevant food safety hazards.

Several matters have been raised for Horticulture New Zealand (HNZ) consideration. To require users of the manual to:

1. In circumstances where product is contaminated by pests, the grower is to take the necessary corrective action to:
  - a) Monitor and manage the risk to food safety,
  - b) Segregate and destroy the contaminated product,
  - c) Use a pest control plan to monitor the activity of animals
2. Notify MPI as soon as possible if a decision is made to recall food, and notify verifier/verification agency in the event of a breach of the food control plan that could result in food not being safe or suitable.
3. Harmonize the requirements for keeping records with the MPI requirement of four years.
4. Have all production sites (as defined Appendix 3 of NZGAP Scheme Rules v2.1 Nov 2017) must be verified during the first verification.

The evaluator recommends that MPI's chief executive approves the NZ GAP manual as a template or model FCP under section 40 of the Food Act 2014 on condition that growers using the scheme to meet Food Act 2014 requirements must apply the plan to all crops produced for sale in New Zealand.





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## New Zealand Good Agricultural Practices Report

<b>Ref: FR15 Regs for custom plan evaluation</b>	<b>Evaluation criteria</b>	<b>Evaluation findings – New Zealand Good Agricultural Practices (NZ GAP).</b>
<b>10(3)(a)</b>	<b>Name of evaluator</b>	Christopher Kasonde
<b>10(3)(b)</b>	<b>Name of food business</b>	New Zealand Good Agricultural Practices (NZ GAP).
<b>10(3)(c)</b>	<b>Name of operator of food business</b>	Members affiliated to Horticulture New Zealand and participating in the NZGAP programme.
<b>10(3)(d)</b>	<b>Type of food to which the procedure applies</b>	All crops being produced for sale in New Zealand.  These products are covered under Schedule 2 Part 5 "Horticultural sector". Food businesses under this sector can grow, harvest, sort, grade, and undertake minimal processing of horticultural produce.
<b>10(3)(e)</b>	<b>Description of practices and activities carried out</b>	A summary of practices carried out under the Food Control Plan is provided in A7. New Zealand GAP Scope.  Activities include: <ul style="list-style-type: none"><li>• Food safety</li><li>• Environmental management</li><li>• Occupational health and safety</li><li>• Quality</li></ul> The activities are managed using the following principles: <ul style="list-style-type: none"><li>• Good Agricultural Practice (GAP)</li><li>• Hazard Analysis and Critical Control Point (HACCP)</li><li>• Quality grade standards</li></ul>

Ref: FR15 Regs for custom plan evaluation	Evaluation criteria	Evaluation findings – New Zealand Good Agricultural Practices (NZ GAP).
10(3)(f)	List of documents assessed	<ul style="list-style-type: none"> <li>• NZGAP Manual – version 5.0, Nov 2009</li> <li>• NZGAP Checklist – version 5.0, Nov 2009</li> <li>• NZGAP Scheme Rules – Version 2.1, Nov 2017</li> <li>• GLOBALG.A. P. General Regulations Part II - Version 5.1</li> </ul>
10(3)(g)	The name and address of the place assessed on site	N/A (Evaluation did not include an on-site assessment).
10(3)(h)	Places exempted from on-site assessment	N/A
10(3)(i)	Technical expert/s who provided information used in the evaluation process	N/A
10(3)(j)	Copies of the technical expert's reports	N/A
10(3)(k)	Information about the competency of the technical experts	N/A
10(3)(l)	Evaluators' views and reasons on Reg 9(1)(a) requirements (does the plan meet the applicable)	<p><b>(i) Identification of all hazards and other factors that are reasonably likely to occur or arise under S. 42(g):</b></p> <p>Yes – NZ GAP identifies sources of significant food safety hazards on a production site as <b>Land history, Staff, Organic or Animal Fertilizer, Water and Agrichemicals</b>. However, the manual did not provide sufficient information about the following:</p>



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	<b>requirements of the Act)</b>	<ol style="list-style-type: none"><li>1. Taking adequate corrective action when something goes wrong especially where the operator is using chemical plant protection products to control pests, including:<ol style="list-style-type: none"><li>(i) Taking any necessary measures to reduce or eliminate the risk of the safety or suitability of produce; and</li><li>(ii) disposing of any produce that has been contaminated by the pests; and</li><li>(iii) decontaminating or disposing of any produce-related accessory that has been contaminated by the pests.</li></ol></li><li>2. Procedures to be taken, if a decision is made to recall food <b>or</b> if there is any breach of the food control plan that could result in food not being safe or suitable.</li><li>3. Keeping records for four years.</li><li>4. Verifying all sites in the first year, if business is registered as a multisite business.</li></ol> <p><b>(ii) the validation information set out in the plan demonstrates as required by regulation 7(2) that:</b></p> <p><b>(a) the procedures and activities set out in the FCP will enable safe and suitable food to be traded:</b></p> <p>Yes – but subject to evaluator comments above: (The identified areas do not align with requirements of Food Regulations 2015).</p> <p><i>It is recommended that:</i></p>

Ref: FR15 Regs for custom plan evaluation	Evaluation criteria	Evaluation findings – New Zealand Good Agricultural Practices (NZ GAP).
		<p>1. <i>When something goes wrong especially where the operator is using chemical plant protection products to control pests, that :</i></p> <ul style="list-style-type: none"> <li><i>(i) any necessary measures be taken to reduce or eliminate the risk of the safety or suitability of produce;and</i></li> <li><i>(ii) produce that has been contaminated by pests be disposed appropriately; and</i></li> <li><i>(iii) any produce-related accessory that has been contaminated by pests be decontaminated or disposed appropriately.</i></li> </ul> <p>2. <i>MPI have access to registration data for operators using NZ GAP to meet the requirements of Food Act 2014. At a minimum MPI can start with producer name, Physical or electronic address, name of verifier or verification agency, scope of the operations (e.g. product and processes). This information must be made available on the public register as required by law.</i></p> <p>3. <i>MPI be notified as soon as possible, if a decision is made to recall food or the operator's verification agency or verifier be notified, if there is any breach of the food control plan that could result in food not being safe or suitable.</i></p> <p>4. <i>Records be kept for 4 years so as to meet requirement of Food Act 2014.</i></p> <p>5. <i>If a business is registered as a multisite business, all sites are verified at their first verification. (NP1 operators may only get one verification as required by Act).</i></p> <p><b>(b) practices carried out will enable safe and suitable food to be traded:</b></p> <p>Yes – but subject to the above evaluator comments.</p>



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		<p><b>(c) the facilities, equipment and essential services used in relation to those procedures, practices, and activities will enable safe and suitable food to be traded:</b></p> <p>Yes - where they equate to those used for validating the process.</p>
<b>10(3)(l)</b>	<b>Evaluator's views and reasons on Reg 9(1)(b) requirements</b>	<p><b>Is the information believed to be accurate?</b></p> <p>Information is believed to be accurate.</p> <p><b>Any other information provided to the evaluator for assessment under 9(1)(a)?</b></p> <p>N/A</p>
<b>10(2)(a)</b>	<b>Statement of Validity</b>	<p><b>I state that the plan is valid in terms of s.41 of the Act (it is in writing and acceptable form). I state that the plan is valid in terms of s42 of the Act (has all FCP Contents required by that section and FR15 reg 6).</b></p>
<b>10(2)(a)</b>	<b>Statement of Validity</b>	<p>The NZ GAP manual is valid.</p>
<b>10(2)(b)</b>	<b>What conditions does the evaluator recommend to be imposed on the registration of the plan?</b>	<p>Growers using NZ GAP to meet Food Act 2014 requirements must apply the plan to all crops produced for sale in New Zealand.</p>
<b>112-113 or 115-116</b>	<b>ISO requirements</b>	<p>N/A</p>
<b>11(2)(a)-(c)</b>	<b>Endorsement</b>	<p><b>I state that the manual is assessed by me as the Evaluator. I state that this evaluation report is as prepared by me as the Evaluator.</b></p>
<b>11(2)(a)-(c)</b>	<b>Signed and dated</b>	<p><i>Chris Kasonde 27/04/2018</i></p>

