



# Summary of submissions

## Food Safety Template for Winemakers

This document provides a summary of submissions for the consultation of the Food Safety Template for Winemakers.

Submissions were made by email and by an online survey. This summary document includes:

- The number of submissions, how submissions were made and who the submitters were,
- Graph conveying the results from questions asked,
- Submissions and outcomes for the template pages and,
- General comments about the template, guidance card and record blanks.

### Proposal for Cheese template

Formal consultation period:  
22nd June – 13th July 2018

15 Submissions:

- 3 from email
- 12 from online survey

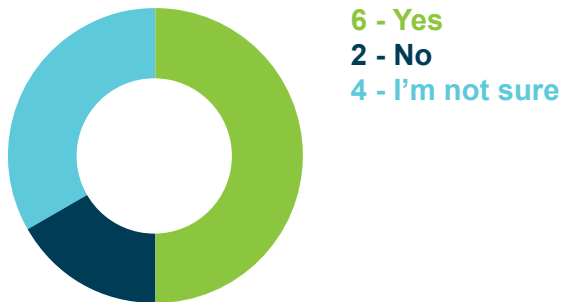
Submissions:

- Wineries
- Bottler
- Industry Body
- Unknown

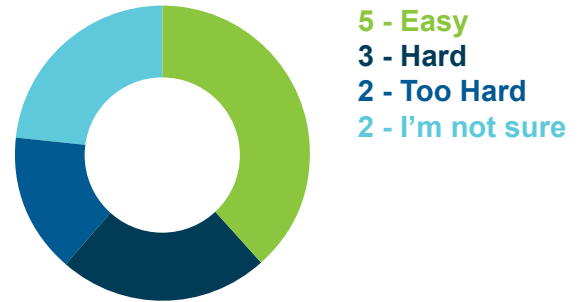
# Overview of online survey submissions

Note: not all submitters answered every question. These graphs show the total number of responses to each question.

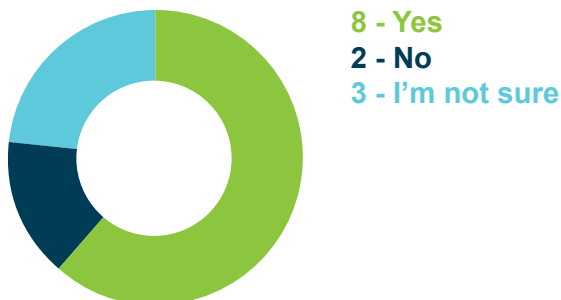
Referring to the 'Draft Wine Standards Management Plan': Are the cards in a logical order?



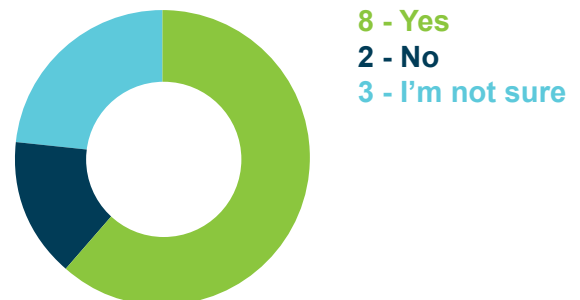
Referring to the 'Draft Wine Standards Management Plan': Is the Plan easy to use and follow?



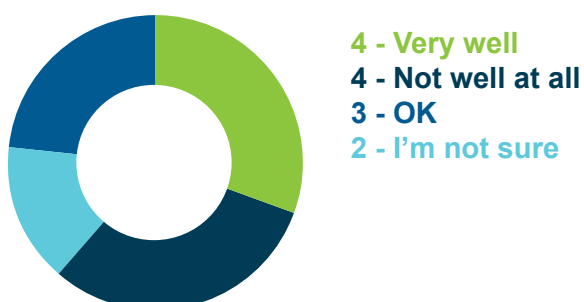
Referring to 'Draft Wine Standards Management Plan': Does the Template cover everything you need to know to make safe and suitable wine, cider and food?



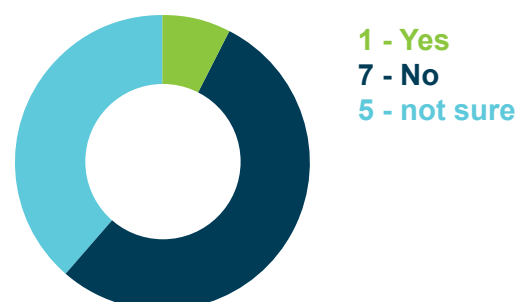
Referring to the 'Draft Wine Standards Management Plan': After reading the cards, are the rules outlined in the 'Do' section easy to understand?



Referring to the 'Draft Wine Standards Management Plan': It is really important you are able to identify when something goes wrong so you can trace and recall your product, if necessary. How well does the template help you to do this?



Referring to 'Draft Wine Standards Management Plan': Do you think that MPI has changed any requirements for wine and cider makers?



Referring to 'Draft Wine Standards Management Plan': Do you feel that MPI has lowered the standard of winemaking in NZ?



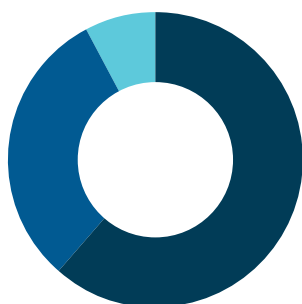
1 - Yes  
8 - No  
3 - I'm not sure

Referring to the 'Draft persona document': Do the personas help you to easily identify the parts of the plan that apply to you?



8 - Yes  
3 - No  
3 - not sure

Referring to the 'Draft Record Blanks for the Wine Standards Management Plan' Will you use the record blanks?



0 - Yes  
8 - No  
4 - I will use some  
1 - I'm not sure

# Summary of feedback

## Confusing use of Terminology



**“We do not see any advantage in merging the Wine Act requirements and the Food Act requirements into a single plan. The resulting document is a confusing concept and will be confusing in practice for winemaking staff and food staff who elect to apply the plan.”**

**“The FSTW has been created as a food template with winemaking requirements layered in; the result seems likely to confuse both winemaking and food staff. Although wine is a food (within the Food Act), the use of the terms “wine” and “food” and “drink” within the FSTW is quite confusing, and frequently a single term is used in different ways on one page”**

Comment: This template has a primary audience of winemakers who have a food component to their business. To make this clear we have listed on the front cover of the plan what type of businesses this plan is aimed at. We have also used icons throughout the plan (a wine bottle and a plate with cutlery) to show where a requirement is either only for the food part of your business or only for the winemaking part of the business. An introductory card has also been added to the plan to describe to the user how the icons are used and definitions for key terms. The template is modular – this means that any sections that a business does not need can be removed. MPI has also built an online tool businesses can use to compile a plan covering what they do by answering a few questions.

### Key



Change  
made



Change  
not made



Working  
on it

## Process



**“Racking and blending is before filtration. You filter at the last step before bottling.”**

Comment: We agree with this submission and the template has been updated to reflect this.

## Transporting



**“We query the inclusion of most of the “Transporting” content in relation to wine, and especially as it relates to temperature control and the so-called “danger zone” of “5-60 degrees”. According to the guidance provided in this section, wine must be thrown out after spending four hours above 5 degrees. There is no regulatory basis for this. The section’s content seems to be largely premised on the risk of cross-contamination, which – except as noted below – is not really a risk for wine transport.”**

Comment: The temperature control and cross contamination requirements during transport relate to food – we have updated the template to better reflect this.

## Not enough time to consider submissions



**“We have serious concern that there is insufficient time between the final submission date and the launch date as it only allows three working days to for all feedback to be equally weighed up prior to the launch.”**

Comment: Submissions were received, considered and responded to throughout all phases of consultation. Two tests of the template were sent via email to all industry and a third testing event was held in Marlborough and then finally a formal consultation period. This equates to a period of eight weeks where submissions on the template were being received and amendments were being made.

## Personas & Categorisation



**“The personas don’t specifically identify a category of “Winemaker - Sells Domestically (Including Australia) with Cellar Door Tasting and online sales. May also require separate categorisation for supply of cheese and crackers?”**

**“There seems to be an emphasis on Food Safety as applicable to a restaurant association whereas the differentiation between winemaking, cider making (Almost identical processes), and brewing are more stand-alone activities aligned more with having a cellar door (Also taking into consideration that Off-license and On-license sales are separate considerations)”**

Comment: These personas have been co-designed and tested with winemakers to capture what would work for most businesses. The personas are only guidance, intended to capture the major categories at this stage. The online tool available from our website to help pick the relevant sections will provide extra clarity.

## Recording



**“Easy to follow, some items such as hydrometers are cleaned 40 times a day during harvest. Should this be recorded every time? The emphasis needs to be on cleaning. Not on recording the cleaning. Vintage is an tiring enough time, there is no way I am going to write down each of the 30 times I clean a pH probe, the 40 times I clean a hydrometer each day. I am there long enough, without making it dangerous by having to record every item I clean.”**

Comment: We agree that the emphasis does need to be on cleaning and not on recording. It isn’t intended that you record every time you clean – only that you have a record of your cleaning tasks, who does it, and when and that you can demonstrate this to your verifier.

## Inconsistency in messaging



**“In terms of messaging during consultation period whether the template is an optional or mandatory requirement and this has caused a lot of confusion in the industry.”**

Comment: The template is one of the options that businesses have. Businesses can choose to use this template or use a customised plan that suits them better. This template is intended to be used by businesses that are winemakers that also make, serve and sell food.

## Separation of Food and Wine parts of the template



6 out of 12 submitters wanted a separation of the food and wine parts of the template

**“Leave food parts out and keep separate”**

**“It is all blurred by the lumping of food handling and wine processing procedures under one consideration. A wine having excess SO2 is determined at bottling and rectified at that time whereas food contamination is more aligned with bad practices after the event e.g. fridge temperatures,”**

**“There needs to be some additional clarity on the divisions and safe management of each sub-heading e.g. under the DO section for designated manager, these would be at least two persons under the separated Winemaking and Food Handling businesses. The two need to be addressed separately or at least clarified as to whether they are indeed run as separate businesses.”**

**“But it certainly has confused the standards and management processes. There needs to be more focus on delineation as well as separation and differentiation of the areas of responsibility to simplify management processes”**

**“It is too long and complicated, with too many sections most of which are not at all relevant to our operation at all.”**

**“As above. Far too much irrelevant content. Brushes the main issues of our business (wine production!)”**

**“The older format / doc was far simpler and relevant to our operation - wine production. Honestly I find it hard to find the relevant info to me among all the sushi and reheating food info!!”**  
**“For most part yes, then it becomes quite muddled in the Wine maker, Kitchen, Tasting room area. I believe these should be sub grouped in the yellow section, to avoid confusion for employees that work in winery but have nothing to do with the kitchen and vs versa”**

**“Rather than having the food and wine information together they should be separated as most wineries don’t have food and don’t need to go through pages of food related info to find the wine specific notes.”**

**“The cards are great, however as mentioned there should be a clear separation re winemaking/chefs etc”**

Outcome: This template’s primary audience is winemakers who have a food component to their business. To make this clear we have listed on the front cover of the plan what type of businesses this plan is aimed at. We have also used icons throughout the plan (a wine bottle, a bunch of grapes and a plate with cutlery) to show where a requirement is either only for the food part of your business or the winemaking parts of the business. The template is modular – this means that any sections that a business does not need can be removed.

## Registration



2 out of 14 submissions expressed concern about dual registrations

**“I operate a bottling plant mainly packaging fortified wine for export. This largely involves blending high proof alcohol with wine and packaging it and the business operates under a WSMP. My principal client has asked that we blend and pack a run of spirits for them. This will involve taking the same high proof alcohol and blending it with water, rather than wine, and packaging it. However to undertake this work we will be required to register under NP3 and maintain both WSMP and NP3 registrations and inspections. Given that the purpose of the new Template is to provide businesses who operate under both the Wine and Food Acts with the option to operate under a single plan. I wonder if the requirement for dual registration in our own case is to be addressed.”**

**“If it were possible for the FSTW to be registered as a winemakers WSMP under the Wine Act, it seems that the FSTW would need to be separately registered as the business’s Food Control Plan (FCP) under the Food Act with separate fees paid for each.”**

Comment: This is the sort of scenario the new template will cover. The Food Safety Template for winemakers operates as both a WSMP under the Wine Act and an FCP under the Food Act. How your business will be using it will be indicated on registration and you will register only once under both regimes.

## HAACP/Process



**“More detail required and a process flow chart”**

**“What is the relationship between the FSTW and HAACP requirements? We note that for winemakers using the NZW Code of Practice the generic HAACP plan for grape wine production has been agreed.”**

Comment: The risks and hazards for winemaking have been identified and are covered throughout the template. The generic HACCP plan for grape wine available on the MPI website was referred to during development of the template.

## Too much focus on food



**“Too much focus on sushi and reheating food for a WSMP! Incredible. I cannot believe this doc is supposed to be a step forward for the wine industry. Current system has worked well for decades.”**

Comment: The new template is only providing another way to meet the existing winemaking requirements – if you are happy with your current plan, you do not need to change from your current plan. Winemakers who do choose the template will only receive and have to use the parts of the template relevant to them.

## Legal validity of Plan



**“Following careful review we do not see any way, under current law, for a single document addressing both winemaking operations and general food operations to be approved for use, or used, as a template for simple registration under the Wine Act as a WSMP in the manner currently achieved with the NZW Code of Practice.”**

Comment: If a business is not exporting wine they can apply to have their winemaking sections included in their food control plan (FCP) and register under the Food Act. If the business is making wine for export, the wine sections of the plan will be registered as a WSMP under the Wine Act and the food sections registered as an FCP under the Food Act.



## General comments about the template

**“Colour Coding is effective as are the Know, Do, Show categories”**