



Guidance Document

Farm Dairies RMP Verification

10 May 2019

Title

Guidance Document: Farm Dairies RMP Verification

About this document

This guidance document is intended to assist farm dairy risk management programme verifiers and to inform farm dairy assessors, farm dairy assessment organisations and farm dairy RMP operators.

Related Requirements

- [Animal Products Notice: Dairy Recognised Agencies and Persons Specifications](#)
- [Animal Products Notice: Export Verification Requirements](#)
- [Animal Products Act 1999](#)
- [NZCP1: Design and Operation of Farm Dairies](#)
- [NZCP2: Code of Practice for the Assessment of Farm Dairies](#)
- [Animal Products Notice: Dairy Processing Specifications](#)
- [Animal Products \(Dairy\) Regulations 2005](#)

Document history

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1 Purpose

- (1) This guideline sets out the MPI expectations for verification of registered risk management programmes (RMPs) that cover farm dairies. In particular this guideline:
 - a) identifies RMP elements to be considered during the on-farm component of a farm dairies RMP verification;
 - b) sets out how to determine the number of farm dairies to be visited as part of the RMP verification; and
 - c) clarifies the expectations now that farm dairy assessors and assessment organizations are required to be recognised by MPI following the September 2018 amendment to the [Animal Products Notice: Dairy Recognised Agencies and Persons Specifications](#).
- (2) RMPs covering farm dairies can be highly variable in terms of the level of customisation, farm numbers, milk production volumes, species, geographical spread and the level of RMP operator resourcing to support the farm dairy operators covered by the programme. As such this guideline is intended to assist decision making by the RMP verifier. However, the verifier may opt to deviate from the recommendations contained in this guideline at any time when, in their professional opinion, there is sound rationale and justification.

2 Background

2.1 Purpose of Farm Dairy RMP Verification

- (1) The purpose of verification of an RMP covering farm dairies is to confirm whether:
 - a) the RMP continues to provide a valid means of meeting requirements set out under the [Animal Products Act 1999](#);
 - b) both the RMP operator and farm dairy operators are fulfilling their obligations with respect to the procedures, requirements and duties set out in the RMP and the [Animal Products \(Dairy\) Regulations 2005](#), and that information does flow as intended in a timely manner;
 - c) the farm dairy assessment system is being applied as expected and consistent with [NZCP2](#) or an equivalent farm dairy assessment procedure that has been evaluated and registered as part of the RMP;
 - d) non-conformances raised at previous verification visits, during farm dairy assessments or via other operator verification activities are closed out within agreed timeframes and remain closed; and
 - e) the operational state of farm dairies, including milking equipment, services, yards and storage areas.
- (2) The verifier will assess whether this aligns with the information provided by the farm dairy assessment reports, test results and other information held by the RMP operator.

2.1.1 Purpose of On-site Farm Dairy RMP Verification

- (1) On-site verification at farm dairies provides a reality check to confirm that:
 - a) the RMP is being applied as described;
 - b) required farm dairy operator procedures are available and followed;
 - c) required records are available; and
 - d) farm dairy operators are aware of their obligations and receive information from the RMP operator in accordance with the RMP.
- (2) The RMP verifier is expected to observe farm dairy assessments periodically. Clause 6.0 of this guidance sets out the role of farm dairy assessment, and how it differs from RMP verification.

- (3) On occasions RMP operators may still need to source information from their contracted recognised farm dairy assessment organisation(s) when collating information to demonstrate that they are meeting their own obligations under the RMP, especially as noted under clause 4.5.

3 Definitions

- (1) In this document, unless the context otherwise requires:

APA means the Animal Products Act 1999

NZCP1 means the MPI Operational Code: NZCP1: Design and Operation of Farm Dairies

NZCP2 means NZCP2: Code of Practice for the Assessment of Farm Dairies

RA&P Notice means the Animal Products Notice: Dairy Recognised Agencies and Persons Specifications

RMP means risk management programme

4 Components of Farm Dairy RMP Verification

4.1 RMP Management – is the RMP current and applied effectively?

- (1) RMP verification is one of the methods used to confirm that the RMP is fit for purpose, that the measures applied by the RMP are adequate and practical, and that the RMP operator is applying the RMP effectively.
- (2) Farm dairy RMP verification will require review of procedures and records held by the RMP operator, and so will often commence at the RMP operators central premises and then move to a reality check on-farm. Further verification at the RMP operators central premises may be required depending upon the observations made on-farm. In the case of RMPs that cover one farm dairy it is likely that all activities will occur at the farm dairy.
- (3) The purpose of the off-farm component is to confirm that the RMP operator is fulfilling their obligations. Even when the farm dairy operator and RMP operator are the same person the verification will likely look at the responsibilities separately.
- (4) RMP elements that will typically be considered include:
 - a) standard review to confirm currency of the RMP, for example;
 - i) confirming that farm dairies, farm dairy locations and farm dairy operator contact details are documented and current;
 - ii) review of the Hazard Identification and Analysis or HACCP Plan in light of emerging trends (e.g. from NCCP reports, MPI notification or RMP operator findings); and
 - iii) review of amendments to referenced documents such as [NZCP1](#) which require consequential review of the RMP.
 - b) where farm dairy assessment is required under the RMP;
 - i) determining whether all farm dairies received a farm dairy assessment in the previous dairy season. For RMPs covering multiple farm dairies this will include un-notified assessments and observation of milking;
 - ii) consideration of the current season farm dairy assessment progress and evidence that all farm dairies will be assessed within the dairy season;
 - iii) determining whether, as of October 2018, farm dairy assessments are being completed by a recognised farm dairy assessor;

- iv) review of a sample of farm dairy assessment reports, including RMP requirements additional to those set out in [NZCP1](#) and [NZCP2](#) such as farm dairy assessment protocols, supplier handbooks and milk supply contracts; and
 - v) determining whether the RMP operator is maintaining consistency of performance across farm dairy assessment providers when the RMP applies requirements additional to, or alternatives equivalent to, those in [NZCP2](#).
- c) confirming that applicable OMAR requirements are met;
 - d) review of trends in terms of milk quality, unacceptable farm dairy assessment outcomes, RMP non-conformances and previous non-conformances whether closed or open;
 - e) review of operator verification reports, findings and corrective actions. Farm dairy assessments will cover most on-farm aspects. For RMPs that do not include farm dairy assessment the verifier should consider the extent of operator verification on-farm when determining the scope of farm dairy operator facilities, activities, RMP procedures and records to be verified;
 - f) review of procedures for;
 - i) responding to raw milk consignments that breach action limits, food safety limits or other RMP operator defined criteria (and review of examples); and
 - ii) raising exception reports and taking required actions (and review of examples).
- (5) The number of farm dairies to visit during a farm dairy RMP verification is covered under clause 4.3.
- (6) Review of each recognised farm dairy assessment organisation is no longer required, though RMP operators may need to source information from their contracted recognised farm dairy assessment organisations in order to meet their own obligations.

4.2 On-Farm Verification – do expectations align with reality?

- (1) On-farm verification provides a reality check and will likely consider (but not be limited to) review of:
- a) the most recent farm dairy assessment report and RMP operator information such as test reports and whether these reflect the reality of the situation;
 - b) milking facilities, equipment and procedures, including the ability of the farm dairy operator to determine when teat cleaning is required;
 - c) cleaning procedures and use of approved dairy maintenance compounds;
 - d) use and storage of veterinary medicines, vet authorisations for restricted veterinary medicines, and treatment records;
 - e) pesticide storage and use in or around the dairy, including fly sprays;
 - f) chemicals stored in or adjacent to the farm dairy, or used in the farm dairy, including containers and labels;
 - g) other facilities, including storage areas for consumables such as filter socks and rubberware;
 - h) water supplies, the Water Checklist ([DPF201](#)) and water test results for clarity/turbidity and *E. coli*;
 - i) other records, including milk cooling checks, change of rubberware, purchased feeds, periodic veterinary visit, milking machine tests and animal status declarations (ASDs) for milking animals introduced to the herd;
 - j) confirmation that test results and milk temperatures at collection are being provided to the farm dairy operator;
 - k) dispensations to [NZCP1](#) given by the RMP operator or Farm Dairy Assessor (e.g. distances) and whether these are appropriate (justification may be held by the RMP operator);
 - l) any use of new technology, novel dairy premises or equipment designs or practices (as per [NZCP1](#)), experimental equipment, or experimental animal treatments;
 - m) wastes applied to land used for the production of feed for milking animals;
 - n) the additional requirements applicable to the harvesting of raw milk for raw milk products;
 - o) applicable OMAR specific requirements as per clause 4.1(4)(c); and
 - p) non-conformances from farm dairy assessments and whether these have been closed and remain closed.

- (2) As with farm dairy assessments, on-farm verification is a snapshot of the situation at a particular point in time. The primary purpose is to confirm that the reality on-farm reflects the measures applied by the RMP and the information and trends made available by the RMP operator. The intent of on-farm verification is not to replicate the farm dairy assessment (nor milking machine testing or veterinary visits), though some elements will overlap with those of the farm dairy assessment. In particular, the verifier will be less focused on having the milking plant dismantled for a hygiene inspection when milk test results and on-farm procedures indicate that the farm dairy operator is managing plant hygiene appropriately.
- (3) In the case of domestic only, farm dairy RMPs that do not contract a farm dairy assessor, the verifier will need to consider looking at some of the elements usually covered by the farm dairy assessor.
- (4) As noted under clause 2.11(2) confirmation of farm dairy assessor competence is no longer required as part of farm dairy RMP verification. However, there will be times when the verifier may want to observe a farm dairy assessment or farm dairy assessor. This may be for various reasons, for example to confirm that the assessment system is being followed or that any other obligations under the RMP are being met.

4.3 Determining the Farm Dairies for On-Site Verification

4.3.1 Establishing the number of Farm Dairies to visit

- (1) The default number of farm dairies to verify under each RMP will be determined by MPI and notified directly to the relevant verification recognised agency. A range of factors are considered when determining the minimum number of farm dairies that should be observed under each RMP, including:
 - a) the number of farm dairies covered by the RMP;
 - b) geographical distribution and, within each region, farm dairy density and milk production volume;
 - c) the milking animal species covered;
 - d) the number of contracted recognised farm dairy assessment organisations;
 - e) the RMP operator's structure and the level of resourcing to support the farm dairy operators covered by the programme;
 - f) trends and emerging issues; and
 - g) historic performance.
- (2) The farm dairy RMP verifier may elect to vary the number of farms to visit based on their professional judgement, observations made during verification off and on-farm, and the circumstances at the time of the verification. Factors that may encourage the RMP verifier to vary the number of farms to observe include:
 - a) trends in farm dairy assessment outcomes;
 - b) compliance to MPI food safety and action limits;
 - c) response to non-conformances;
 - d) operator verification findings;
 - e) significant amendments to the RMP;
 - f) indications that emerging hazards have not been identified or assessed; and
 - g) unconventional farming or milk harvesting practices, including novel animal husbandry practices, premises design, milk harvesting equipment or other technologies utilized.
- (3) A reduced frequency for on-farm verification should only be considered when:
 - a) compliance to food safety and action limits has been adequate;
 - b) there have been no serious non-conformances raised in the current or previous dairy season,
 - c) all farm dairy specific non-conformances have been closed and appropriate corrective actions have been taken to resolve past non-conformances; and
 - d) the verifier has no reason to suspect that activities at the farm dairy may be inadequate.
- (4) For domestic farm dairy RMPs covering a single farm dairy where the RMP operator and the farm dairy operator are the same person, the verifier may elect to either:

- a) undertake the on-farm verification at a reduced frequency; or
- b) undertake selected components of the on-farm verification at each verification visit.

4.4 On-Farm Verification at Short Notice or without Prior Notice

Clause 3.3 of the [Animal Products Notice: Export Verification Requirements](#) requires a certain number of verification visits to be without prior notice or with short notice. In addition, a verifier may determine that it is desirable to undertake on-farm verification visits at short notice or without prior notice for other reasons.

When a verifier elects to undertake on-farm verification without prior notification the RMP operator and farm dairy operator will still require reasonable advanced notification to enable them to be present at the time of the visit. This advanced notification may be for the same day provided that it is sufficient to ensure that food defence and occupational health and safety obligations can be met. Arrangements for the on-farm visit will typically be the responsibility of the RMP operator. If the verifier becomes concerned that the RMP operator is being un-cooperative or obstructive, then this should be escalated within the verification recognised agency and, if necessary, MPI.

4.5 Consistency of Farm Dairy Assessments across Organisations

- (1) If the RMP operator utilises more than one recognised farm dairy assessment organisation and either:
 - a) applies a custom farm dairy assessment system as an alternative to [NZCP2](#) under the RMP (for example via a farm dairy assessment protocol or similar); or
 - b) applies farm dairy assessment requirements under the RMP that are additional to [NZCP2](#);then the RMP operator is expected to have a method for confirming the consistency across the contracted recognised farm dairy assessment organisations.
- (2) One example of an acceptable method for confirming consistency would include:
 - a) performance monitoring of farm dairy assessments across randomly selected individuals from each recognised farm dairy assessment organisation; and
 - b) review of farm dairy ratings by individuals to determine whether there is an organizational or individual bias. Such a review would take into account the nature of farm dairies within the coverage of the recognised farm dairy assessment organisation or individual based on historic performance data. As an example, more non-conformances related to “structures” can be expected when the catchment under review has a higher proportion of older farm dairies.
- (3) If the RMP operator is required to confirm consistency across recognised farm dairy assessment organisations then the RMP verifier may, at their discretion, elect to:
 - a) review the method of confirming consistency and a sample of the records;
 - b) have the RMP operator source evidence from the recognised farm dairy assessment organisation to establish consistency of farm dairy assessments; and/or
 - c) observe individual farm dairy assessors from one or more of the contracted recognised farm dairy assessment organisations.
- (4) For clarity, confirming consistency across recognised farm dairy assessment organisations is not typically required when the RMP incorporates [NZCP2](#) as the farm dairy assessment system.

5 Adverse Verification Findings

- (1) In situations where the premises, facilities, activities, animal health or other relevant standards at a farm dairy are considered to be substandard then, in addition to issuing non-conformances, the RMP verifier should consider:

- a) undertaking additional on-farm verification audits following a sufficient period of time to enable corrective actions to be completed;
 - b) in the case of a serious non-compliance where no milk has been affected and there is no immediate threat to public health, advising the RMP operator to rectify the situation immediately; or
 - c) in the case of a critical non-compliance where milk has been affected, advising the RMP operator to:
 - i) suspend collections;
 - ii) ensure that any potentially affected milk is disposed of appropriately;
 - iii) ensure milk supply, and the storage of milk for supply, only recommences once the cause of the non-compliance has been resolved; and
 - iv) raise an exception report covering potentially affected milk consignments that have been accepted for further processing. Note that once further information has been obtained and assessed it may be possible for the RMP operator to establish that some or all of the milk was conforming, and the exception report can be updated accordingly.
- (2) In extreme cases the standards at a particular farm dairy may potentially represent a critical situation. Under these circumstances the verifier must notify the RMP operator and MPI immediately in accordance with clauses 2.2(5) and 2.6(2) of the RA&P Notice. The RMP operator is expected to immediately suspend milk collections (unless instructed otherwise by MPI) and to manage any milk that has been processed as non-conforming, unless it is possible to confirm that milk consignments have not been adversely affected, for example by way of appropriate testing.
- (3) In situations where the farm dairy standards observed through verification indicate a potential failure on the part of the RMP operator to effectively apply the RMP, the verifier may elect to:
- a) review additional farm dairy assessment reports on a random or targeted basis;
 - b) observe further farm dairies on either a random or targeted basis, either of which may be notified or non-notified (minimal advanced notification);
 - c) consult MPI or the recognised farm dairy assessment organisation; or
 - d) undertake any other relevant action within the right of access and freedoms that have been granted to the verifier by the RMP operator through the RMP.
- (4) If a verifier has concerns regarding the performance or competence of individuals operating under the RMP this should be noted within the verification report so that the RMP operator and MPI are aware and can take any action deemed appropriate.

5.1 Verifier Conflict of Interest

- (1) In situations where a Recognised Agency provides both verification and farm dairy assessment services, the Recognised Agency must have procedures to ensure that the verification activities are unbiased in accordance with clause 2.2(5)d) of the RA&P Notice. For RMPs covering export eligible milk, the same individual (a verifier) must not verify a farm dairy where they have also performed the most recent farm dairy assessment within the same season unless written agreement has been provided by MPI (refer to the [Animal Products Notice: Dairy Processing Specifications](#)).

6 Farm Dairy Assessment

6.1 What is a Farm Dairy Assessment?

- (1) A farm dairy assessment is an operator verification activity under the RMP. In broad terms, the purpose of a farm dairy assessment is to confirm:

- a) the suitability of the farm dairy location, design, structure, fabrication, facilities, services and management of milking animals and milking animal health; and
 - b) that farm dairy operators;
 - i) comply with the farm dairy design and operational criteria that are set out in the RMP or incorporated by reference in the RMP, for example [NZCP1](#);
 - ii) meet milk filtration, milk cooling and milk storage requirements;
 - iii) have the procedures that are required to be in place at the farm dairy and that these procedures are followed;
 - iv) are able to provide the records that they are required to keep;
 - v) meet the requirements applicable to animal health, animal treatments, preparation for milking, premises and equipment hygiene, water supply, and the management of medicines, chemicals and effluent;
 - vi) ensure milk harvesters are suitably trained; and
 - vii) meet their duties as set out in the [Animal Product \(Dairy\) Regulations 2005](#).
- (2) Farm dairy assessors will also assess whether farm dairy operators are meeting any additional obligations that apply to them under the applicable RMP. These requirements may be set out in milk supply contracts, handbooks or similar written communications. If the RMP applies additional requirements for farm dairy assessment, for example through a protocol referenced under the RMP, then the farm dairy assessor needs to be aware of these requirements and assess whether they are met.
- (3) Unlike farm dairy verification, farm dairy assessment is limited to on-farm activities and does not include review of all requirements set out in the RMP, nor the activities specific to the RMP operator. However, in some cases the farm dairy assessor will undertake activities under the RMP that help to determine suitability at the farm dairy, for example water sampling and water clarity testing. RMP operators are still required to complete operator verification for those RMP elements not covered by the farm dairy assessment and to ensure all required categories of farm dairy assessment are completed.
- (4) Farm dairy assessors may also assess other criteria stipulated by the dairy company. Unless specifically included under the RMP these assessment activities do not form part of the required farm dairy assessment and are out of scope for verification.

6.2 Confirming Farm Dairy Assessor Competency

- (1) As of October 2018, farm dairy assessments must be undertaken by individuals recognised by MPI as outlined under Part 3 of the RA&P Notice.
- (2) With the accreditation scheme in place farm dairy verifiers are no longer required to confirm the competence of the farm dairy assessors as part of the farm dairy RMP verification.
- (3) Recognised farm dairy assessment organisations are responsible for ensuring that farm dairy assessors under their management are suitably trained, competent and recognised by MPI. To confirm competence, farm dairy assessors are expected to be able to:
 - a) correctly identify and rate deficiencies;
 - b) determine appropriate corrective actions and timeframes for completion;
 - c) seek information without the use of leading questions;
 - d) show an understanding of milking machine function; and
 - e) show an understanding of the regulatory requirements for the design and operation of farm dairies.
- (4) For a new farm dairy assessor, the expectation is that the organisation managing the assessor will ensure that sufficient farm dairy assessments are performed under the supervision of a recognised farm dairy assessor for the new assessor to establish competency. In doing so, a range of farm dairy designs are expected to be covered and the assessor should be able to correctly identify and rate a

range of deficiencies across the various elements covered by the assessment. Likewise, assessors intending to assess farm dairies that milk minor species must be familiar with the relevant differences in design and milking activities in order to satisfy clause 3.5(1)h) of the RA&P Notice.

- (5) Once training has been completed the farm dairy assessor must be confirmed as competent in accordance with the RA&P Notice, and an application can be made for recognition. A farm dairy assessor may only undertake unsupervised assessments once recognition has been confirmed by MPI.
- (6) Periodic re-assessment is expected for recognised farm dairy assessors under clause 3.12 of the RA&P Notice and the on-farm component will typically cover 2-3 farm dairies as a minimum.
- (7) Each recognised farm dairy assessment organisation is required to have procedures for ensuring calibration and consistency across farm dairy assessors, and are required to participate in MPI calibration workshops. Recognised farm dairy assessment organisations with more than two farm dairy assessors, are expected to review farm dairy assessment findings in order to assess consistency of performance. The purpose is to identify trends and possible bias on the part of individuals that may not be evident during peer review.
- (8) Recognised farm dairy assessment organisations are expected to investigate significant variations in assessment performance by individual assessors, to determine whether further training or supervision is required. Significant variations in assessment findings can indicate the need for further training, but may also be due to other factors such as the general age and state of repair of the farm dairies within the farm dairy assessor's catchment, or the ability of the RMP operator to apply the RMP effectively.