



Discussion Document on review of the Risk Management Programme (RMP) Template for Harvesting, Candling or Packing Eggs

Purpose

To review the Risk Management Programme (RMP) Template for Harvesting, Candling or Packing Eggs under the Animal Products Act 1999 (APA).

Background

The aim of this review is to update to current legislative requirements in the template and transfer it into the new 'Know, Do, Show and Reference' format. The revised format clearly sets out what the operators need to know, what they need to do, records they need to show to their verifier and a reference section on the relevant regulatory requirements.

Proposed changes in the Animal Products Notice: Specification for Products Intended for Human Consumption

The revised RMP template reflect current legislative requirements. However, as the [Animal Products Notice: Specifications for Products Intended for Human Consumption](https://www.mpi.govt.nz/news-and-resources/consultations/proposed-animal-products-notice-specifications-for-products-intended-for-human-consumption/) is undergoing a review, there are pending changes in the notice that are not yet reflected in this RMP template. If these changes go through, they will be updated in the RMP template after public consultation. Some of the pending changes include packaging requirements and Part 20 on avian eggs. You can refer to the consultation webpage for the proposed changes: <https://www.mpi.govt.nz/news-and-resources/consultations/proposed-animal-products-notice-specifications-for-products-intended-for-human-consumption/>.

Summary of changes to the RMP template

A complete list of changes of proposed amendments to the RMP template for Harvesting Candling or Packing Eggs can be found on the consultation webpage. The following list is a summary of the changes:

1. The RMP template is published as a pdf file for the public consultation. The final version will be a pdf file with editable fields which operators can fill in and provide an electronic signature.
2. Updated the shelf life of clean, uncracked table eggs to 35 days at room temperature following the publication of the [Egg Surface survival and internalisation by New Zealand egg-associated *Salmonella* isolates as affected by storage temperature](#) science report.
3. Operators will need to conduct mock recalls as a result of new requirements.
4. Cleaning schedules are moved to the [RMP Operator Resource Toolkit](#) so it can easily be updated as required.
5. Addition of 'Mass Balance Audit Calculations' as one way of showing traceability requirements.
6. A new supporting system section on Transport.
7. A process flow diagram has been added into the HACCP section of the template.

Other documents

MPI has developed a Guidance Document: Egg Pulping for RMPs or FCPs. The document is aimed to assist operators to meet the requirements for egg pulping and to reduce the evaluation step when



registering their RMP or a custom FCP under the Food Act 2014 by providing a basis to develop their own procedures. You can find the guide on the consultation webpage for RMP template for Harvesting, Candling or Packing Eggs.

Eggs sector specific forms have been developed and will be added into the [RMP Operator Resource Toolkit](#). This includes the 'Mass Balance Audit Check sheet'.

What happens next?

All submissions will be considered once the consultation has closed. A summary of submissions and analysis will be sent to all submitters and posted on the MPI website in due course.

Operators who are currently using the previous version of the RMP template will need to change to the new template by the time of their first verification audit after publication.

If there are no changes to the processes and/or products, the operator will need to submit to MPI the updated RMP template and a letter from the verifier confirming there are no changes to processes and products as a result of the revised template. MPI Approvals will file the new RMP template. There will be no fee charged as the template will not need to be re-assessed.