



Analysis of Submissions: Proposed amendments to the Risk Management Programme (RMP) Template for Harvesting, Candling or Packing Eggs

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Date: 28 November 2019

MPI has received 3 submissions on the proposal document(s). These submissions have been analysed in the following table. As a result of the consultation process, and where appropriate based on the analysis below, amendments have been made to the specification. MPI would like to thank those parties who have taken the opportunity to comment on the proposal(s).

General comments:

Egg Producer Federation (EPF) supports this.

Submission Analysis:

Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
5. Scope of the RMP				
		No longer has an option for “Surplus eggs from breeder farm” under the packhouse operation. Our breeder farm annexes where all eggs are graded, sorted and packed would not be to the same std as an egg for HC packhouse.		‘Surplus eggs from breeder farm’ option has been added back in.
		For Other (specify) on page 6, can they do transport without the need to be evaluated? I can see on page 10 that yes they can do transport.		Added clarification on when this box needs to be ticked.
Additional products and/or processes		Page 7: for the yes answer, if they use the MPI guidance for further processing of eggs, do they need to submit it as another RMP? Can they submit the two as one		They can include additional processes into the RMP but it needs to be evaluated by a recognised RMP evaluator.



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		RMP registration? Like we do for the dairy products templates?		The explanation has been reworded to reflect this.
9. Process Description				
		Now has dedicated areas for tasks, the tasks listed under the Packhouse section covers areas we complete either on the farm or at the hatchery, there is not one dedicated area. This may be something we complete as is and explain at time of the audit.		Yes, complete as is and explain your processes to the verifier at the time of audit.
Supporting Systems				
B. Personnel Competencies and Training – Records Section				
		<p>“Competency & training records are maintained and kept up-to-date by day to day manager, and, training records reviewed yearly by day to day manager”.</p> <p>Our day to day managers are either our hatchery managers and/or the regional breeder manager, training records are completed and reviewed by the farm managers for each individual farm and by the hatchery manager for their own staff. To make this work for us we need to be able to have “designated responsible persons” i.e. on farm managers. If possible a wording change to account for this situation would be required.</p>		<p>Definition for ‘day-to-day manager of the RMP’ has been added.</p> <p>Added clarification that the day-to-day manager can appoint persons in charge, but they still have the overall responsibility of the RMP.</p>
F. Design, Construction and Maintenance of Facilities and Equipment – Repairs and Maintenance				
Point 5		“The day to day manager will be notified of situations(s) requiring unscheduled		See response to section B.



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		maintenance” – this is a highly impractical requirement when dealing with day to day managers who are not on farm and there are 7 – 10 farms in a region. The farm managers fix all issues as soon as practical and already record the issue in the repairs and maintenance log. Any critical issue is immediately raised with the regional breeder manager.		
Point 6		Unscheduled maintenance is performed by a “suitably skilled person”. What defines a suitably skilled person? Or are they saying this is dependent on what the problem is?		Definition for suitably skilled person has been added.
G. Potable Water – Reticulation Management Plan for all Water Sources				
Point 3		Water used for processing room is observed to have unusual colour, sediment or smell the day to day manager will seek advice. Again this would need to have ability to have a designated responsible persons as issues dealt with on farm then if critical breeder manager notified.		See response to section B.
Non-complying Water		Non – Complying Water – if only talking about water used to wash eggs we would need an option to not comply as we do not wash our eggs either on farm or at the hatchery. If required for all operations e.g. hygiene and drinking water then again who is classed as “Suitably Skilled Person”		If eggs are not washed then this should be documented in the process description section. See response to section B.



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		for assessment of eggs affected by non-compliant water.		
H. Cleaning and Sanitation – Cleaning of Packhouse and Equipment				
Point 1a		Pre operational check before start up. Would be an overkill for a breeder farm whose main purpose is supply of hatching eggs with a sideline of eggs for pulping. Again we do not run traditional packhouses. Belts are inspected at time of cleaning		This section is applicable to a packhouse, not to a breeder farm.
Point 4		Cleaning equipment is cleaned and Sanitised daily – understandable for a dedicated pack house supplying 100% HC eggs or a processing plant but would prove to be highly impractical for breeder annexes with mainly concrete floors which are dry swept throughout the day and sprayed with Sanitiser.		This section is applicable to packhouse, not to breeder farm.
P. Non-Complying Product and Recall				
		We would need understanding that any mock recalls and associated mass balances would be conducted out of the Hatcheries as they are the central point for all eggs to pulping.		Eggs from breeder farm can still be involved in a recall if it is the source. It would be good practice to include breeder farms in mock recalls from time to time, so people know what to do if a recall does happen.

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		This covers our points of concern, the other changes can all be dealt without too much trouble. As discussed this current proposal feels very much like someone has looked at a food manufactures RMP and decided that it looks like a good idea and gone slightly overboard, and has not considered that there are other manufactures from the traditional packhouses who do not fall neatly into the box.		Noted.