New Zealand Food Safety
Haumaru Kai Aotearoa

How evaluation and verification work for custom food control plans

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Establishing your custom food control plan

A custom food control plan (cFCP) must be written but can be in any form you like as long as it meets the requirements or rules of the Food Act. There are many resources on the MPI website for guidance on creating a cFCP and can be found here: www.mpi.govt.nz/food-business/running-a-food-business/food-control-plans/custom-food-control-plans/create-a-custom-food-control-plan/.

Once you have developed your cFCP, it must be checked by a MPI recognised evaluator (see What is evaluation? below) before it can be registered and you can sell food. When your cFCP is registered and you are operating, a MPI registered verifier (see What is verification? below) will come and check that you are following your plan, meeting applicable rules and producing safe and suitable food. The initial verification usually happens within 3 months of registration, then occurs at regular intervals.

As the business operator, you need to cover the cost of these services. A list of available recognised evaluators and verifiers can be found here: mpi.my.site.com/PublicRegisterRecognitions/s/. The evaluator and verifier will both check they have the necessary knowledge, skills and experience to undertake this work for you, they may decide it is necessary to involve a technical expert to provide input on specific aspects of your operation.

What is evaluation?

Evaluation is a pre-operational check of your cFCP to ensure that if the plan is followed it will allow you to make safe and suitable food. It ensures that the plan has identified all the food safety hazards, and controls to manage these, that might occur with the processes you want to use and/or associated with the food you will make.

There are two parts to evaluation. You will need to send your plan and any relevant documents to the evaluator for a desktop review and then have an on-site assessment at your business premises (unless exempted). Generally, an evaluator only needs to visit your site once.

You can apply for an exemption to on-site evaluation assessment. If you think this might be appropriate for one of all of your sites you can email MPI.Approvals@mpi.govt.nz to discuss this.

During their assessment the evaluator:

- assesses the adequacy of your cFCP to ensure that it will deliver safe and suitable food; and
- checks that the entire scope of your operations is covered (for example physical boundaries, types of products and processes, and so on); and
- checks that your facilities and equipment are suitable, and match up with the processes described in the plan; and

- determines any if validation (see What is validation? below) of your process(es) is appropriate; and
- checks all the hazards associated with the products and processes have been correctly identified and addressed.

During the evaluation process, the evaluator might raise some issues or point out changes that need to be made to your plan so it meets the rules. The evaluator will advise you whether these need to be addressed before you apply for registration or if they can be fixed after registration (and the verifier can check those as part of the verification process).

What is validation?

Validation is providing evidence that your cFCP, or specific process within your cFCP, will consistently allow you to produce safe and suitable food. It can be very simple (for example providing references to internationally accepted processes or peer reviewed scientific papers) or, for high-risk processes that might require running trials, data collection and data analysis. High risk processes include low acid food canning (for example baked beans) and aseptic processing and packaging (for example UHT oat milk).

For further information on validation, you can check resources on the MPI website: www.mpi.govt.nz/dmsdocument/23059/direct/.

Sometimes you may be able to provide validation information/data during evaluation. Alternatively, your evaluator may require a validation protocol (a procedure detailing trials, data collection and analysis) that must be completed and signed off by them before your plan can be fully registered – they will discuss this with you.

Evaluation report

Your evaluator will produce a tailored report for you of their assessment and may make recommendations for parts of your plan to be improved to meet MPI rules. You then submit this report along with your application to register your cFCP with MPI. MPI will determine if any of the evaluator's recommendations will need to be conditions for you to address prior to registration.

It your evaluator determines your cFCP is incompletely validated, they can submit an interim report to MPI so we can begin the registration process. You will need to complete validation prior to registration, or shortly thereafter if you provide a protocol or procedure on how you will achieve this. Any subsequent completion of validation will need to be submitted to your evaluator to complete the evaluation process, and they will provide MPI with a completed supplementary report.

Once MPI have approved your registration for a cFCP you may then produce and sell food, meeting any conditions that MPI has imposed as a condition of registration.

Once you are registered and producing food, you will then need to be verified (checked) by an MPI recognised verifier.

What is verification?

Verification is the process of confirming that you are implementing your cFCP as intended and are producing safe and suitable food. It is a reality check to see that the theory is being put into practice.

Your verifier will check records, observe practices, and assess compliance with your documented procedures. Verification is undertaken at your business and needs to happen on a regular basis at a frequency determined by MPI rules following registration.

Specifically, a verifier will assess the implementation of your plan, including:

- observing food handling and hygiene practices; and
- reviewing records and logs for accuracy and completeness; and
- confirming that corrective actions are taken when issues arise.

Conclusion

In summary, evaluation focuses on the suitability of the c;FCP itself before MPI registration, while verification ensures that the plan is being followed correctly in practice after registration. An example of the distinction between them is:

1. an evaluator will check that your business has a procedure for labelling food.
2. a verifier will check that:
    - your business is following the procedure; and
    - that the labels have accurate descriptions of contents, nutritional claims, use-by dates, etc.

Together the processes ensure that the food you make is safe and suitable and that you are complying with the applicable rules.

Please note: For ongoing changes to your documented cFCP, please refer to the guidance on the MPI website: www.mpi.govt.nz/food-business/running-a-food-business/food-control-plans/custom-food-control-plans/change-your-custom-food-control-plan/.

