New Zealand Food Safety
Ministry for Primary Industries
Manatū Ahu Matua

Practice Note 16:
Multi-site Business and Multi-business Food Control Plans

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Introduction

Requirements for the verification of multi-site food businesses (and multi-business food control plans) are set under Regulation 96 of the Food Regulations 2015 (the Regulations).

The Regulations require an initial verification of all sites that belong to a multi-site food business or a multi-business food control plan (FCP) and any new sites that are added to the registration [Reg 96 (1)]. However, for subsequent verifications the Regulations allow verifiers (or verification agencies) to apply the outcome of 1 or more sites to all the sites in the registration. This effectively permits a sampling-based approach to subsequent verifications of multi-site business [Reg 96 (2)] or multi-business FCPs [Reg 96 (3)].

Applying a sampling-based approach is at the verifier's discretion and is not a requirement. New Zealand Food Safety (NZFS) supports the use of a sampling-based approach as a means to minimise the cost to businesses when performing functions under the Food Act 2014 (the Act) [s16 (1) (d)]. However the primary requirement of the same section [s16 (1) (a)] is ensuring safety and suitability of food. It is important to strike a balance.

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In the interest of fairness to businesses, verifiers and verification agencies it is also important a consistent approach to sampling multi-site businesses is used.

When verifying multi-site food businesses and multi-business FCPs (collectively referred to as "multi-site businesses" in this guide) we suggest you consider:

- Is sampling appropriate?
- The selection of a sample of sites
- Is a head office verification appropriate?
- Calculating and reporting the verification outcome

Is sampling appropriate?

What type of verification is due? (initial or subsequent verification):

All new sites must undergo an initial verification [Reg 96(1)]. The outcome from a multi-site verification cannot be applied to a new site unless an initial verification has been completed.

Is the scope of operations of sites similar, allowing the same systems and processes applied across all sites?

If the scope of operations (e.g. the trading operations, types of products, intended consumer etc.) are very different across the sites, a sampling approach may not be appropriate. For example:

- A group of rest-homes where some homes provide cooked meals and meals-on-wheels type services, while others just provide cooked meals. Multi-site sampling would be acceptable.
- A group is composed of quite different types of operation. For example if some of the sites are food retail only, some provide takeaway-type food service, and others are eat-in restaurants and/or hospitality venues, the group should not be considered for multi-site sampling.

Selecting a sample of sites

There are two major steps to consider when selecting a sample of sites for a multi-site verification. If multiple agencies will be involved performing the site verifications, any sampling plan, responsibilities and approach to the determination of verification outcomes and should be agreed across the agencies – this includes responsibility for head office verification, where appropriate.

Step 1: How many sites should be selected?

The following must be considered:

- scope and complexity of the operation;
- risk profile of the products and services;
- variation of operations across the different sites;
- geographical location, which can impact staff levels and competency;
- head office management and control across the sites.

If a head office verification is required (see **Step 2, Is a head office verification required?**), this will be in addition to the number of other sites.

Recommended proportion of sites by risk-based measure

The table below outlines the recommended minimum proportion of sites to be selected for verification for multi-site registrations, based on the applicable risk-based measure (RBM).

Note: After a successful initial verification, National Programme Level 1 (NP1) sites do not require scheduled verification and are therefore not suitable for inclusion in a sampling approach.

Risk base measure (RBM)	Total number of sites	Proportion to verify*	Example
NP2 and 3	2 or more	33%	For 3 sites, verify 1 For 5 sites, verify 2 For 10 sites, verify 4 For 20 sites, verify 7
Template FCP	2 or more sites	50%	For 3 sites verify 2
Custom FCP	2 or more sites	66%	For 7 sites, verify 5

*Fractions should be rounded up. For example 50% of 9 sites = 4.5, therefore 5 sites are selected for verification, or 33% of 10 sites = 3.33, therefore 4 sites are selected for verification.

Number of verification rounds per complete multi-site cycle

NZFS expect that over time, all the sites under the multi-site registration will be verified. When all sites have been verified at least once, the multi-site verification "cycle" (MVC) will be completed. This will happen after a series of different verification "rounds".

The number of rounds required should depending on the risk-based measure. We consider that:

- for NPs this is within three rounds i.e. each site is verified not less than once every 6 years at NP3, and not less than once every 9 years at NP2; and
- for FCPs this is within two rounds i.e. each site is verified not less than once every 3 years.

The final verification round should include all sites that have not been verified previously in the MVC and should also include additional sites depending on the selection criteria and outcomes from earlier verification cycles e.g. if any sites received unacceptable outcomes at their last verification or have changed significantly since the last verification round they must also be included (see below). This may increase the number of sites that need to be included in the final round of the MVC.

If, at any stage during the MVC, the outcome of a verification round results in an increase in verification frequency (lower step), the verification agency may either:

- stop the sampling programme and verify all remaining sites by the end of the current verification round; or
- continue the single sampling programme, but change the verification round timeline to reflect a new (lower step) rate.

Step 2: Selecting the sites to include in the verification round

We would recommend using random sampling in conjunction with a risk profile assessment to select the sites. The risk profile (see below) determines which sites must be included in any round, but random sampling, where each site has an equal probability of being chosen, is applied to select the remaining sites.

Risk profile selection should consider:

- the complexity and risk level of activities being performed;
- the level of compliance of a site at their last verification (acceptable or unacceptable);
- any significant changes at any sites (e.g. new people in key roles, changes in scope, processes or procedures at a site); and
- any enforcement action at a site.

It is important to use an effective and consistent approach across all sites. How well an approach works also depends on:

- how well individuals understand their roles;
- relationship management; and
- how processes and systems are communicated and applied.

Is a head office verification required?

Some multi-site businesses will operate under a model where all sites are run quite independently and each make their own decisions, organise their own services, contractors (if any), etc.

Others will operate under a “centralised support” model where support for the individual sites is organised from a head office location. Centralised services might include:

- development of food safety systems which apply across all sites;
- supplier specification requirements and audits (as well as negotiating contracts with auditors);
- training organisations;
- pest control operators,
- maintenance engineers;
- cleaners, etc.

One objective of centralised control from head office is to help ensure an effective and consistent approach is taken across all sites. The effectiveness depends on several factors, including:

- how well all those involved with food safety within the business understand their roles;
- relationships, and interfaces; and
- how processes and systems are developed, communicated, implemented, monitored and reviewed.

As a verifier, you will seek assurance that any centralised controls are effective at each site. Usually, you can gauge how central food systems work in practice by requested operators "show and tell" how the system works for them. For this reason, if you verify a store in Invercargill, you do not necessarily need to visit the Auckland central support team. As part of this assurance the verifier must have a system in place to identify trends. This is so issues with the systems can be identified and raised with the head office. This help address issues at a system level rather than repeatedly at individual sites.

A head office verification should be included if they provide centralised support relating to food safety. This could include providing sites with training, procuring pest control or organising cleaning and rubbish removal services. In these cases, head office verification is valuable to assess if the operator is meeting requirements to "adequately implement and resource" aspects of food safety across the business [Food Act s50].

If a multi-site business operates under a "centralised support" model relating to food safety, we expect head office systems to be verified for the first three verification rounds. After this they are only required if systemic problems are identified during subsequent individual site verifications.

Case study: Subsequent verification of multi-site early childhood education business

Background

The business is a chain of 17 early childhood education (ECE) centres across the North and South Islands. The head office is based in Christchurch. They provide food service to pre-school children in a centre-based service setting. The business is registered with MPI under NP2.

The business provides daily cooked lunches and afternoon snacks. The meals include meat, egg and dairy products. The service also caters for special dietary requirements, such as nut allergies and gluten free meals.

The each site has a day-to-day manager. The head office manages centralised contracts for cleaning, waste disposal and pest control. Head office is also responsible for:

- Staff training and development.
- Maintaining food safety systems as a whole.
- Monitoring site performance, including overseeing corrective actions if any result from verifications.

Processes are documented in an Operations Manual and are the same at every ECE.

The initial verifications showed cleaning procedures were excellent. This was demonstrated by the cleanliness of food processing areas and the general premises. A total 15 of the 17 sites received acceptable outcomes.

Overall, the chefs have a good understanding of allergen risks. Procedures are in place to ensure that allergens are controlled. Leftover food is disposed of at the end of each day.

One site performed extremely well in most of the topics verified.

A second site began operating a week before the initial verification - some procedures were poorly implemented. This site still received an acceptable outcome. Two sites received unacceptable outcomes. Both were placed on a six-month verification frequency.

Head office advises two sites have employed new chefs since the initial verification. This includes the site that had just opened before the initial verification.

Determining the number of sites to be sampled

Guidance suggests that for an NP business if total number of sites ≥10, 33% of sites should be sampled.

33% of 17 = 5.6, rounded up = 6, so number of sites to be selected in sample = 6, plus head office as this site has a significant role in food safety.

Sites were selected as follows:

- Number of sites with unacceptable outcome at the previous verification = 2
- Number of sites with new staff (with potential impact on food safety) = 2
- One site displayed difficulty implanting procedures at last verification (now has new chef) – already selected
- High performing site from last verification
- One other site selected at random
- Head office to be verified
- Total number of sites selected = 6 out of 17, plus head office

Sites selected: Blue text = selected

1. Head office initial verification acceptable
2. Initial verification acceptable, excellence performance
3. Initial verification acceptable (not selected)
4. Initial verification acceptable (not selected)
5. Initial verification acceptable (not selected)
6. Initial verification acceptable, although some procedures not well implemented, new chef
7. Initial verification acceptable, new chef recently employed
8. Initial verification acceptable (not selected)
9. Initial verification acceptable
10. Initial verification unacceptable
11. Initial verification acceptable (not selected)
12. Initial verification acceptable (not selected)
13. Initial verification unacceptable
14. Initial verification acceptable (not selected)
15. Initial verification acceptable (not selected)
16. Initial verification acceptable (not selected)
17. Initial verification acceptable (not selected)

Sample plan for subsequent MVCs

To avoid excessive intervals between verification of individual sites, we suggest that the same (or similar allowing for some risk profile changes) sampling plan is repeated for each verification cycle. This should mean that the maximum interval between verifications for FCP businesses is 3 years, for NP3 businesses 6 years, or NP2 9 years.

Determining multi-site verification outcomes

The outcome of a multi-site verification should be based on the verification results from the sampled sites.

When all sampled sites have the same outcome, determining the overall result is straightforward. For example, if all sampled sites achieved acceptable outcomes, the multi-site verification outcome will also be acceptable.

However, when outcomes vary across sampled sites, determining the overall result requires professional judgment (based on overall impressions, internal verification findings at the individual sites, confidence in head office management etc.). In such cases, the multi-site verification outcome may be:

Acceptable – even if some sites were assessed as unacceptable. For example, one (or some) individual site is not performing (procedures are not implemented or applied inconsistently), but most sites are acceptable.

Unacceptable – the majority of sites in the sample gave unacceptable outcomes even if some were acceptable. Alternatively, most sites were acceptable, but major systemic or management issues were identified at one or more of the other sites.

When reaching a decision in such situations, verifiers should apply their professional judgement, and consider the following:

- Is there a systemic problem with implementing all/any procedures of the businesses? Is the problem at individual site level, or a result of pressure or poor resourcing, or lack of support from head office?
- Is there a problem with implementing aspects of the business that are arranged by the head office?
- Is there a problem in applying procedures at individual site level (e.g., an operator not performing, or procedures are poorly or inconsistently applied)?

Reviewing ongoing verification reports is important to identify if there are systemic issues across the business or centralised services managed by the head office. If this is the case, a head office verification may be required.

If you do notice systemic issues across the sites, or the head office verification shows issues with centralised support functions, as well as raising the appropriate corrective actions we request you report these finding to New Zealand Food Safety [via food.compliance@mpi.govt.nz].

Determining verification frequency

Variation in verification frequency is performance-based and determined in accordance with the principles set out in the Regulations [Reg 84]. This means that the frequency of verification reflects the level of compliance observed during the multi-site verification.

NZFS recommends adhering to current guidelines in Determining Verification Frequency [PDF]. The Regulations [Reg 96] allows the frequency of verification to vary between individual sites within the same multi-site business registration. However, variation in verification frequency may create challenges in sample selection for multi-site verification. For that reason, it may be more practical in the sample selection to align the frequency of verification across the whole business. If the verifier assesses the risk profile and compliance performance of all sites to be materially equivalent, the verifier may determine that a single verification frequency is applied across all sites.

Any decision to depart from the stepped adjustment model as per guidance must be based on risk. Verifiers should document their decisions and include the rationale for treating the sites as being of equivalent verification confidence.

If there is an overall unacceptable outcome, verification frequency must be increased for all sites not selected to be included in the verification round.

- Increase verification frequency by one step for sites not visited.
- Verification frequency can increase by more than one step for poor performing sites that achieved unacceptable outcomes.

Verification frequency for multi-site businesses that have "opted up" to FCP

The Act allows businesses to "opt up" to operate under a FCP [Act s26] if this is not the risk-based measure that would "naturally" apply. The Regulations [Reg 101] however, say that these businesses are still verified at their "natural" verification frequency (e.g. a NP2 business electing to operate under an FCP is still verified at the NP2 frequencies). For multi-site businesses opting up to operate under an FCP, this still applies (e.g. for NP businesses opting up to FCP, the verification frequency would still be calculated at the applicable NP frequencies).

Recording multi-site verification outcomes on Titiro

As with other verifications, the outcomes from a multi-site verifications must be reported to Titiro. This has been updated to allow the recording of multi-site verification outcomes and head office verifications where these have been carried out.

Sites selected as part of multi-site verification round

Follow the usual process to enter site verification record. The verification frequency is assigned as per the above guidance. Close the verification record if there are no outstanding issues.

Sites that are not selected for the verification round

Each site will be automatically assigned a verification frequency in Titiro when an RBM multi-site verification record is created for the business. The system will create individual site multi-site verification records for each site that was not visited. The verification frequency is calculated based on the site's previous verification frequency and the multi-site verification decision outcome.

As a rule, Titiro will decrease / increase a site's verification frequency by one step. The site's verification frequency can be edited if the site's verification frequency is to be increased / decreased by more than one step.

Determining due date for next sample verification

The date for when a multi-site verification outcome for the subsequent sampling round is due will be determined based on the average verification frequency across all sites included in the multi site sampling program, with the average rounded down to the nearest whole number (step) where required. The multi-site verification decision date for the most recent sampling round is used as the reference date. This date is reported in Titiro as the Verification Date on the RBM multi-site verification record.

Example:
Verification Date recorded on RBM multi-site verification record = 1 May 2026

The multi-site business has 11 active sites. The verification frequencies from their most recent verifications are:

- Step 5 x 6 sites
- Step 4 x 4 sites
- Step 3 x 1 site

Average of verification frequencies (step) = ((5x6) + (4x4) + (3x1))/11
= 4.5
= 4 (Rounded down) (step)

Sampling Due Date = 1 May 2026 + 12 months (Step 4)
= 1 May 2027

Resources

1. Food Regulations 2015, legislation.govt.nz/secondary-legislation/pco-drafted/2015/310/en/latest/DLM6684211
2. Food Act 2014, legislation.govt.nz/act/public/2014/32/en/2018-03-02/DLM2995811
3. Determining Verification Frequency, learn.mpi.govt.nz/pluginfile.php/8948/mod_resource/content/2/Determining%20Verification%20Frequency.pdf

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