



Summary of Position paper

NZFSA Paper No 02/06



Te Pou Oranga Kai O Aotearoa

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A copy of this document can be found at www.nzfsa.govt.nz



1 Introduction

This Paper provides a summary of key changes proposed in the Domestic Food Review (DFR). It does not provide an explanation of the changes nor does it discuss the submissions made on earlier discussion papers. This information is in a more detailed Position Paper which is available on the NZFSA website (www.nzfsa.govt.nz/policy-law/projects/domestic-food-review/index.htm) or by calling 0800 NZFSA1 (0800 693 721). This summary is also available on the same website.

NZFSA is reviewing government involvement in the New Zealand food sector. We need a food regulatory programme¹ across the entire New Zealand food industry that delivers safe and suitable food in New Zealand.

Submissions

After public consultation on this summary paper and the Position Paper and review of submissions, a summary of issues raised will be put on the NZFSA website. NZFSA will then provide recommendations to the Government.

NZFSA is particularly looking for submissions on the proposals in this Paper and their impact on industry.

Submissions are sought from interested people and organisations.

The closing date for submissions is 28 April 2006.

Submissions should be sent to:

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c/o Policy Group
New Zealand Food Safety Authority
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WELLINGTON*

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All submissions are subject to the Official Information Act 1982, which specifies that information is to be available unless there are grounds for withholding it. If you wish your submission or any part of it to be withheld, please indicate the grounds in the Official Information Act that apply. NZFSA will take your request into account when determining whether or not to release information. Please note that any decision by NZFSA to withhold information is reviewable by the Ombudsman.

¹ the overarching food programme in New Zealand for which NZFSA is accountable, and within which decisions on the type of involvement (regulatory and non-regulatory) are made

2 Context

Issue – why is a review needed?

NZFSA has to do certain things as New Zealand's main food regulator. We are required, among other things, to administer all national food-related law and food safety and suitability matters. NZFSA also has to deliver on two closely related areas:

- reducing sickness from food bugs (foodborne illness) in New Zealand, and
- providing a complete food programme for New Zealand.

In doing this Review, NZFSA has identified two broad groups of problems facing the New Zealand food sector:

- continuing high reported sickness from foodborne illness and a rise in sickness in some areas, and
- mismatch and gaps across the various food laws in New Zealand.

The Glossary of Terms is in Appendix 1.

Scope

The Review covers government involvement in all aspects of the safety and suitability of food produced, processed, manufactured, transported and traded in New Zealand. It covers all food sold in New Zealand, whatever its source and however it reached the point of sale.

The Review covers all imported food because at the point when food enters New Zealand it comes under New Zealand law. NZFSA has done a separate review of imported food but the outcomes of the Imported Food Review may be dealt with together with the outcomes of this Review.

This Review does not cover:

- the safety and suitability of non-food products (suitability mostly relates to food labelling)
- other government involvement such as taxation, building codes, local government by-laws, fair trading laws, etc
- export requirements² (noting that product for export is often also sold in New Zealand, and that export processes are often combined with domestic processes)
- produce for a person's own use, such as recreational hunting, fishing, or seafood collection and home-killed meats (including further processing of such products).

Key principles for future government involvement

In working out how to address the two broad groups of problems facing New Zealand, a number of Key Principles are proposed.

Principle 1: Government involvement and imposed compliance costs to the food sector will be minimised, consistent with Government policies and the need for food to be safe and suitable.

Principle 2: The New Zealand food regulatory model will be based on application of the current 'Regulatory Model' (see figure 1 later in this section).

Principle 3: Any government involvement and regulatory controls will be risk-based and science-based as far as possible.

Principle 4: 'Persons' will take responsibility for producing safe and suitable food.

Principle 5: Regulatory requirements will be applied consistently and equitably across sectors and groups (the regulatory response will be used reasonably and fairly when identified as the appropriate option).

Principle 6: The food regulatory programme will be seamless and coherent.

Principle 7: Trade and commerce in food and food-related products will be facilitated.

² Food produced in New Zealand for export (that at no stage enters the New Zealand food supply) will not fall within the ambit of the Domestic Food Review. It is important to note however that food produced in New Zealand for export generally must meet the same standards of safety and suitability as apply to New Zealand Food.

Government involvement in the food sector

This section sets out the key matters around government involvement in food safety and suitability which are:

- options for government involvement
- how the decision on government involvement is made
- how we intend to regulate.

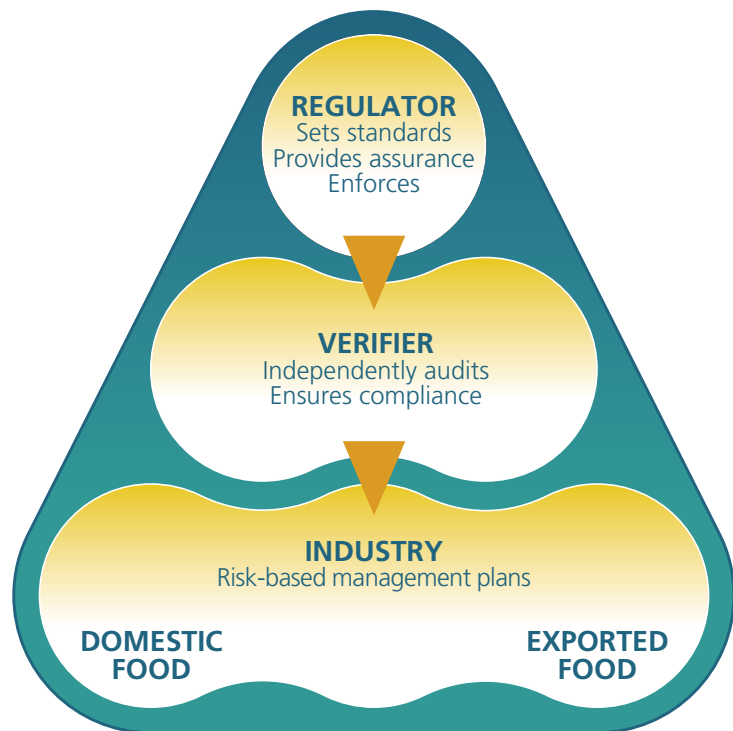
Options for government involvement

There are a number of options for government involvement in food safety and suitability issues. These options include: no response needed, a non-regulatory response or a regulatory response. This paper focuses on the non-regulatory and regulatory responses proposed to address food safety and suitability requirements.

Where Government decides involvement is justified, there are a range of things it can do such as: education and guidance, setting standards, prescribing requirements, requiring risk-based management plans and mandating broader national and regional programmes.

Making the decision on government involvement

The Government's decision on involvement is based on the key principles, the risk-management framework and the Government's Code of Good Regulatory Practice. The risk-management framework is a scientific, risk-based approach to government involvement in food safety used to ensure that any involvement is reasonable. The Government's Code of Good Regulatory Practice requires five matters to be considered in making laws: efficiency, effectiveness, transparency, clarity and equity.



THE NEW ZEALAND FOOD SAFETY REGULATORY MODEL

Figure 1: Regulatory Model

How we intend to regulate – the three tier 'Regulatory Model'

Figure 1: Regulatory Model

The three tier 'Regulatory Model' (see Figure 1 above) currently provides the basis for government involvement in the food sector and food laws. It comprises three key players:

- the Regulator (government) – NZFSA, Public Health Units and Territorial Authorities
- the verifier – any agency approved to undertake external verification (audit) activities, including the NZFSA Verification Agency
- the 'person' – any individual or organisation involved in a food business.

In the model, NZFSA as the main regulator is responsible for food control in New Zealand and for making sure food laws and the overall food programme works. NZFSA sets the rules and provides tools to help the programme work.

This model is the Government's preferred approach, on the basis that the rule maker (regulator) and verification or audit are separate but closely related activities. Verifiers do their jobs on behalf of the rule maker and the verifier's first obligation or responsibility is to the rule maker and not to industry. This means there is the right separation between the verifier and industry, good standards and management of any conflict of interest.

3 Food Control Plans/Guidance

Issue

The range of food laws in New Zealand currently requires 'persons' to manage food safety and suitability in different ways. In some cases this means there is no set way to show how people should manage food safety and suitability. In other cases there are too many rules.

Principles

The following four principles are proposed to guide decisions on whether to make rules and the sort of rules to make (Food Control Plans) or whether to provide Guidance.

Food Control Plan Principle 1:

All 'persons' will have and implement a documented Food Control Plan unless agreed alternative mechanisms are in place.

Food Control Plan Principle 2:

Food Control Plans will cover all relevant safety and suitability issues.

Food Control Plan Principle 3:

Food Control Plans will be based on Good Operating Practice, covering both safety and suitability, and on Hazard Analysis Critical Control Point (HACCP) principles for food safety related to the process and intended use of the product.

Food Control Plan Principle 4:

Alternative methods to meet requirements set in law may be used where equivalent control of hazards, safety and suitability issues can be demonstrated to the regulator's satisfaction.

Food Control Plans/Guidance

All 'persons' will be required to have either a Food Control Plan or Guidance if they are not already covered by a national programme. National Programmes³ (also known as regulated control schemes) are developed where it is more practicable for the risks to be managed as part of a National Programme rather than by an individual business.

NZFSA will decide the detail on who must have a Food Control Plan and who will have Guidance. Food Control Plans will be either custom-made or 'off-the-peg'. New requirements regarding Food Control Plans or Guidance are likely to be phased in over a period of at least five years.

Custom-made Food Control Plans

Many businesses that would need to have a custom-made Food Control Plan already have a programme that is pretty much the same as a Plan. Such programmes will be called Food Control Plans for a set time so that the change to Plans is smooth. Any minor differences can be made as part of the regular review cycle (ie, at re-registration).

Off-the-peg Food Control Plans

In general, off-the-peg Plans will be for businesses that are currently registered under the Food Hygiene Regulations. Off-the-peg Plans will be provided at no cost by NZFSA. **An example of what an off-the-peg template for some corner dairy activities might look like is provided in Appendix 2.**

Some businesses may need some changes to an off-the-peg Plan. For example, corner dairies are likely to use off-the-peg Plans, but an individual dairy might need some changes for any part of their business that is really different or not covered by the off-the-peg Plan.

Guidance

Guidance is suitable for very small food selling operations:

- that have a small area of impact – that is, they serve or sell food to a small number of people
- that are at the lower end of the food safety risk scale
- that are involved with community and/or fundraising activities (eg, charitable organisations) and
- where they operate irregularly or in a minimal⁴ way.

An example of what Guidance may look like for a barbecue fundraiser is provided in Appendix 3.

4 Applying Proposed New Rules

Summary of Proposal

A number of steps are proposed to apply Food Control Plans. These include:

- developing Codes of Practice to set out basic standards
- checking each Plan to make sure it will work for the business
- registering each Plan before it is put into use
- verifying/auditing that each Plan is being used properly in the right business.

It is proposed that verification/audit (needed to check whether or not the food business is using a plan and meeting standards) may be done by third parties (ie, non-government businesses), and by Territorial Authorities (ie, local government) who must be accredited to international or similar standards and registered in New Zealand.

The above steps will not apply to Guidance which will be provided by Territorial Authorities. Territorial Authorities may continue to choose the option of implementing a permit system in order to deliver food safety information to people running certain events.

Codes of practice

Codes of Practice⁵ for Food Control Plans:

- will set out best ways of making food safe and suitable for a specific food industry
- will list the rules for that industry
- may have sample or template Plans in them to help food businesses manage the risks relevant to them.

If an NZFSA-approved Code of Practice contains a template Plan, the template will be treated as an approved off-the-peg Plan and will not be required to be checked by others before being sent for registration.

5 Government roles, responsibilities and structures

Issue

There are a number of problems with the current arrangements that spread across local and central government and across Public Health Units. These include:

- inconsistent compliance, registration and inspection
- variation and range of local food bylaw requirements across Territorial Authorities
- overlap between some local bylaws with national law
- limited compliance tools
- a lack of defined roles and responsibilities for parts of Government
- NZFSA's involvement in developing Codes of Practice varies across sectors and
- no clear guidance on the level of involvement of NZFSA.

Proposal

It is proposed that the current three government groups involved in food law in New Zealand remain involved, but the roles and responsibilities be made clearer.

NZFSA and Public Health Units will better match their work especially in relation to making sure rules are met. Territorial Authorities are to provide a single point of contact for new food businesses.

The proposal is aimed at improving accountability and reporting while keeping local government involved; providing a more focused role for Public Health Units, who would work more closely with NZFSA; and improving communication.

Custom-made Food Control Plan	<ul style="list-style-type: none"> • an evaluator will check the plan and the business premises • registration will be needed • verification will be needed over time
Off-the-peg Food Control Plan	<ul style="list-style-type: none"> • NZFSA will make sure 'off-the-peg' Plans meet the rules • registration will be needed • verification will be needed over time

Food Control Plans

As noted there will be two types of Food Control Plans requiring different things.

An **evaluation (if needed)** is to check whether a custom-made Plan meets the rules and is best for a particular business. The evaluator will usually check the Plan at the place where the food is going to be prepared. The business will pay for this. An evaluation checks the following things in the Plan:

- all the information needed is there
- covers good operating practice
- covers HACCP principles
- identifies and manages the risks of the particular food business.

Registration is needed to check whether or not the:

- Food Control Plan contains all the parts and information needed
- holder of the plan (usually the business owner) is a 'fit and proper person'.

The business will continue to pay for registration.

Verification is needed to check whether or not the food business is using the Plan. These checks will be aimed at encouraging the production of safe and suitable food and will be paid for by the business.

This table shows when evaluation, registration and verification checks are needed.

Guidance

Guidance will consist of information and guidance for managing food safety and suitability by very small food sellers/providers. Guidance will be available from Territorial Authorities in accordance with Territorial Authority procedures. To encourage national consistency NZFSA will develop and put 'model' Guidance on its website. Responsibility for these very small food activities will rest exclusively with Territorial Authorities. Territorial

Authorities will have the flexibility of devising ways to deliver Guidance. This means that the current practice will continue whereby Territorial Authorities have the option of operating a permit system in order to deliver food safety information to people running events such as barbecue fundraisers and food stalls. Territorial Authorities would also continue to determine any associated permit costs.

Guidance	<ul style="list-style-type: none"> • NZFSA will develop Guidance at a national level and post it on the NZFSA website. • Territorial Authorities will provide Guidance to food operations
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3 National Programmes are initiated and developed by regulation. For example, the existing Animal Products (Regulated Control Scheme-Contaminant Monitoring and Surveillance) Regulations 2004

4 Minimal is defined as: less than 10 days (in total) per annum at any location having no storage of food on site of the event between days of operation

5 Other Codes of Practice already in place will have different things in them, depending on the purpose of the Code of Practice and the law it currently sits under. The Codes of Practice described here are those that may be put in place AFTER this Review. Existing Codes of Practice may need updating over time.

6 Other approvals

Issue

An approval is made by government (that is NZFSA, Territorial Authorities, and Public Health Units) that something (ie, compound, document, equipment, person, premises or system other than Food Control Plans and Guidance) has met all the rules and laws needed.

Approvals are not currently done consistently.

Proposal

It is proposed that approvals are done consistently for everything that needs approval, and that they will be managed by NZFSA. This will mean:

- approvals will be needed for certain things (compounds, documents, equipment, persons, premises and systems)
- approvals will be made for a set time; may be subject to conditions; may be given up, suspended or taken away with proper cause; will be charged for; and may be subject to review and appeal
- approval systems will be published to show what items have been approved.

7 Education and training

Issue

The right education and training are seen as crucial to make sure food is safe and suitable in New Zealand.

Proposal

Training will build on basic food safety and suitability education taught in schools and delivered to New Zealanders in the home through public education campaigns and programmes.

NZFSA will encourage voluntary training schemes for people involved in the preparation, processing, storage and handling of food.

Competencies or particular skills will be needed by some individuals and businesses. New Zealand Qualifications Authority qualifications may meet these needs in some cases.

Education and training in the food sector

The following approach should apply to education and training for those in the food sector:

- the best way to manage food safety issues in the home is through public education, in schools and special campaigns
- any training needed for people in the food sector will match the food safety risks of the business
- any training needed should be tailored to need rather than 'one size fits all'
- training will cover the parts of Food Control Plans where needed
- people in the 'voluntary sector' who are involved in the sale of food will not all be required to be trained but key people in the sector will need to be trained so that they can share the skills
- where the law says training must occur, this will, in general, be skills based.

8 Cost recovery

Issue

A key principle of the Review is that all 'persons' will take responsibility for producing safe and suitable food. Cost recovery can help with this change.

Framework for cost recovery

It is proposed that the costs of the food-safety programme should be recovered within Treasury and Audit Office guidelines for charging by government.

Where possible:

- government will pay for services that are mainly 'public goods'
- services that industry benefit from will be paid for by industry
- payments to government can be through industry levies, one-off fees or charges (following consultation), or fees based on hourly rates or on a formula. The payments may be the actual or 'best guess' cost
- Territorial Authorities are to be free to set their own charges.

9 Checking performance

Issue

The performance of any part of the food programme⁶ needs to be checked to see if what Government wants is actually happening so that any improvements that are needed can be made.

Five-step checklist for performance

NZFSA proposes the following five-steps for checking the performance of the New Zealand food programme:

- set the targets
- measure the starting point in each target area
- set things to be measured, and put in place checking to gather data
- look at the data and check progress in the changes wanted
- act on the results (eg, review the food programme and make any changes as needed).

10 Compliance and sanctions

Issue

Overall, NZFSA aims to contain things that go wrong, make sure changes are made where needed and try to stop things going wrong in the future. The Government requires more tools to be available to help contain or stop things from going wrong.

Proposal

This Paper proposes:

- checklists are developed to guide those in Government who manage compliance and sanctions
- awareness campaigns are held to help businesses understand changes to food safety rules
- that a range of tools be available to government to help contain or stop things going wrong.

Basis for tools

The following elements are proposed as relevant to the tools and criteria for compliance and sanctions.

- tools to contain or stop things going wrong need to be consistent across the food sector
- business people need to understand the laws that they must meet
- the tools for government will be the best available
- the seriousness of anything that goes wrong needs to be measured to make sure the right action is taken about it.

11 Next steps

Time for submissions etc.

This Summary Paper is intended to be available to the public for 10-12 weeks. During that time, NZFSA will hold a series of workshops around the country on the issues. Following that any written and oral submissions received will be summarised and provided on the NZFSA website as well as provided to all submitters making written submissions.

The submissions will also be considered and a final package prepared for Government. Recommendations on all elements in the package are expected to be made to Government in the third quarter of 2006. Drafting on any changes to laws needed is expected to commence in the latter part of 2006.

⁶ The overarching food programme in New Zealand for which NZFSA is accountable, and within which decisions on the type of involvement (regulatory and non-regulatory) are made

Appendix 1: Glossary of Terms

Glossary of Terms

accreditation	provided by a body of international standing, established to perform assessments of agencies and organisations against an international standard and additional secondary criteria/standards (if any) set by the regulator, for a particular function, and may be applied to a specific category
Code of Practice	a document reflecting acceptable industry-agreed practice, and providing information on ways of meeting regulatory requirements that are appropriate to the purpose and scope of the code
evaluation	an assessment of a Food Control Plan that is independent of the 'person' responsible for the Plan, to determine compliance with regulatory requirements and appropriateness for the operation to which the Plan is to apply; involves review of documentation and, in some cases, review of operations or observation of practice; when undertaken by a party other than the regulator, that individual or agency must be recognised by the regulator as competent
external verifier	an entity recognised by the regulator to undertake external verification activities on behalf of the regulator, and is independent of the 'person' whose Food Control Plan is being verified
food	<p>means any thing or article, whether processed, semi-processed or raw, which is intended for human consumption and includes drink, chewing gum and any substance which enters into or is used in the composition, manufacture, preparation and preservation, of any food or drink but does not include cosmetics or tobacco, or substances used only as medicines and drugs</p> <p>includes: bottled water, primary produce eg, live shellfish, fruit on a tree, water used in manufacture of a food, chewing gum, by-products of animals if they go into food</p> <p>may include: live animals and plants (depending on intent)</p> <p>excludes: cookware and related products eg, pie dish, packaging (except for edible packaging)</p>
Food Control Plan (FCP)	a management plan that covers safety and suitability and that is proposed to supersede (and be the collective term for) all current food safety management plans; the intention is that in future every 'person' will be covered by a Food Control Plan unless exempted. A food control plan is always science-based and will be risk-based to the extent practicable
food hygiene	all conditions and measures necessary to ensure the safety and suitability of food at all stages of the food chain
food programme or food regulatory programme	the overarching food programme in New Zealand for which the New Zealand Food Safety Authority is accountable, and within which decisions on the type of involvement (regulatory and non-regulatory) are made
food safety	all aspects of food hygiene that contribute to the production, processing, distribution, storage and sale of safe food
Good Handling Practice (GHP)	all practices regarding the conditions and measures necessary to ensure the safety and suitability of food at all stages of the food chain
Good Operating Practice (GOP)	<p>all GHP components plus components of Good Agricultural Practice (GAP)/Good Manufacturing Practice (GMP) that affect safety and suitability appropriate to the 'person's operation'</p> <p>GOP does not include purely commercial GMP components or GAP components that don't affect suitability and/or safety</p>

Guidance (also known as Food Handler Guidance)	guidance material covering necessary steps to deliver safe and suitable food; intended to be used where education has been determined as the most appropriate approach to delivering safety and suitability
Hazard	a biological, chemical or physical agent in, or condition of, food with the potential to cause an adverse health effect.
Hazard Analysis and Critical Control Point (HACCP)	a system which identifies, evaluates and controls hazards which are significant for food safety
intended purpose	of a food is the purpose stated or a purpose that could reasonably be presumed to be intended, having regard to its nature, packaging and identification
national programmes	the whole of New Zealand or regional programmes developed to apply consistently to a sector or group because of the need to involve core government (for example, where access to property is necessary) or for cost-effectiveness reasons (for example, national sampling programmes)
'persons'	all food producers, processors, operators, businesses, sellers and importers
registration	official process whereby the regulator approves a Food Control Plan as satisfactorily meeting the legal requirements
regulatory model	the current government approach to regulating the food chain; comprises the regulator (primarily but not exclusively NZFSA), the external verifier and the 'person' involved
regulatory requirement	any mandatory requirement set by the regulator for the management of food safety and suitability. May be either set in law or enabled by law
safe	produced by applying all food safety requirements appropriate to its intended end use
seamless	without legislative or operational duplication or gaps in the New Zealand food regulatory programme
science-based	decisions, standards and actions that are based on objective and verifiable information on all relevant hazards
suitability	product attributes that include aesthetic characteristics or defects, composition and labelling, that are not related to food safety
template (as for a Food Control Plan)	a 'form' Food Control Plan in whole or in part, that includes Good Operating Practice and regulatory requirements and is used to assist a 'person' to develop their Food Control Plan; may consist of a simple form and checklist that refers the operator to the Good Operating Practice components within the Code of Practice
verification	the application of methods, procedures, tests and other checks to confirm: compliance of the Food Control Plan to the legislation and compliance of the operation to the documented Food Control Plan and the applicability of the Food Control Plan to the operation

Appendix 2: Example of an off-the-peg Food Control Plan

The New Zealand Food Safety Authority plans to make templates available to help certain food sectors implement Food Control Plans (FCPs). Templates are an example of off-the-peg FCPs, and will vary in style and design depending on the food business covered.

Food rules are to be covered in templates in plain English.

Corner dairy template

This template is for a typical retail business selling many different food items, such as a corner dairy or mini-mart. The template is designed so that it can meet the needs of the individual store. Throughout the template are:

- common requirements (tailored as necessary)
- activity-specific procedures (where relevant to the business)
- record-keeping requirements.

Common requirements

The template includes a number of elements that will apply to all corner dairies and will be common to every FCP based on the template. These sections can be identified on the contents page, eg Figure 1.

Common requirements will include contact details such as name and address of the operator, and common procedures such as cleaning and sanitation and pest control, eg Figure 2.

All corner dairy FCPs that are based on the template will also include some common procedures, such as hand hygiene, but they can be changed to meet the needs of specific practices used (eg by selecting one of the options listed for hand drying).

Specific procedures

The template also contains specific procedures that would only be included if the store carries out those activities (eg Figure 3, Making Sandwiches).

The diary (record keeping)

The diary would include 'must have' opening and closing checks and tick boxes to show that tasks have been completed. It is expected that details will be recorded when problems are identified, including what was done to fix the problem and to ensure that any affected food was managed in the right way. There are simple daily, weekly and fortnightly checks. There is also a four-weekly review to ensure procedures are working well.

Implementing the template

The store operator works through each section of the template and makes sure it covers all aspects of the business. It may be necessary to make some changes or add some extra information. If significant changes or additions are made they will need to be sent to the local Territorial Authority or to a third-party for evaluation.

To implement the FCP, the store operator:

- fills in the blanks or tick boxes to show the activities in the store; removes any sheets that do not apply to the store; identifies any activities not covered by the template, and writes them on the blank sheets provided
- registers the FCP with the relevant Territorial Authority

Once the FCP is registered, the operator:

- makes sure that everyone who works in the shop is trained and is familiar with the FCP
- follows the procedures in the FCP, including recording the required information in the diary.

Fig 1: Corner Dairy Food Control Plan Template:

Draft Table of Contents

Section 1: Common Requirements

- Contact Details
- Document Control
- Training and Supervision
- Purchasing and Receiving Goods
- Storage
- Using a Thermometer
- Recalls and Customer Complaints
- Pest Control
- Maintenance and Shop Design
- Breakdown and Corrective Action
- Water Supply
- Hand Hygiene
- Personal Hygiene and Sickness
- Cleaning and Sanitising

Section 2: Specific Procedures (cross out those that are not relevant)

- Hard Scoop Ice Cream
- Soft Serve Ice Cream
- Milkshakes
- Making Sandwiches
- Buying in Sandwiches
- Pie Warmer foods
- Cakes, Slices and Loose Sweets
- Fruit and Vegetables

Section 3: The Diary (record keeping)

- Using the Diary
- Weekly Diary

Corner Dairy Name: _____
Food Control Plan

(Version 1) 01/05/06
Page: 1 of __

Fig 2: Example of a specific procedure

Pest Control

Action	Why?
<p>Remove conditions that might attract pests, and prevent pests from entering premises.</p> <p>Take action when pests are found.</p>	<ul style="list-style-type: none"> • Pests such as mice, rats, cockroaches and flies carry germs that can cause illness if the germs come into contact with food. • Customers are less likely to buy food from our shop if they see evidence of pests. • Pests can damage stock.

How to do this

Remove things that attract pests:

- Rubbish: Keep bins covered and remove rubbish regularly.
- Cleaning: Follow the cleaning schedule; clear and clean as you go (eg clean up spills straight away).
- Food Storage: Store opened foods in pest-proof containers.

Keep pests out!

- Gaps and holes – seal any gaps and holes that could allow pest entry (eg under doors, around pipes).
- Maintenance – follow maintenance schedule (ensure it includes things like fixing holes in fly screens etc).
- Incoming goods – follow incoming goods procedure (check to make sure pests are not inside the packaging).

Keep a look out for pest activity

- Check the premises once a month.

Write it down

Write down any sightings of pests or pest activity and what action you have taken to fix the problem.

If there is no evidence of any pests when you do your checks, note this down.

What if it goes wrong?

If you see pests or evidence of pest activity (eg droppings or damaged goods):

- Throw out any food that looks like it has been damaged by pests.
- Clean the affected areas.
- Clean and sanitise areas where unwrapped food is prepared or handled.
- Eliminate the pests and ensure that access routes are removed.

If insecticides or other chemicals are used, take care to first remove all food before treatment. Clean food-contact surfaces (eg benches) to remove the chemical before using them again.

In the case of a severe infestation, or an infestation of cockroaches, a pest-control company should be called in.

Fig 3: Example of a specific procedure

Making sandwiches

Action	Why?
Hygienically making sandwiches and filled rolls.	<ul style="list-style-type: none"> • Sandwiches/filled rolls may become contaminated with harmful germs from our hands or equipment when we make them. • Customers may contaminate sandwiches/rolls on display with germs. • Harmful germs can also grow if food is displayed at room temperature for too long

How to do this

Storage of filling ingredients

- Follow storage instructions on label.
- Store perishable ingredients (such as meats, sprouts, cheese, cut vegetables) below 4°C in the fridge.
- Keep raw ingredients (eg uncooked meat, bacon and unwashed vegetables) separate from cooked or ready-to-eat foods. Cover foods, store cooked and ready-to-eat foods above raw foods in the fridge.
- Fillings that are prepared in bulk should be labelled with the date prepared and refrigerated. These must be thrown out if not used within two days. Do not top up the container with fresher ingredients.

Making sandwiches/rolls

- Use clean, sanitised surfaces and equipment when making sandwiches/rolls (see Cleaning and Sanitising procedure).
- Wash hands and wear appropriate clothing (see Hand Hygiene and Personal Hygiene and Sickness procedure)
- Wash salad ingredients (eg lettuce, tomatoes and parsley).
- Ensure perishable ingredients are used and returned to the fridge (below 4°C) as soon as possible and within 2 hours.

Display

- Display below 4°C, or
- Display at room temp for no longer than two hours (then throw away or chill to 4°C and sell from the fridge).

Tick the method used

- Time written on stickers on wrapping
- Coloured stickers on wrapping indicating time on display.
- One item displayed; customers served product from fridge; display item thrown away
- Picture of item or menu list with item stored in fridge
- Other (please detail here):

- Products should be individually wrapped or clean tongs provided for customers or staff to use (see Cleaning and Sanitising procedure for tongs).
- All our food on display must be covered to protect it from flies, customers sneezing, and other contamination.

What if it goes wrong?

If fridge temperature is warmer than 4°C see Breakdown and Corrective Actions procedure.

Appendix 3: Barbecue fundraiser (sample educational pamphlet)

Important information for a safe and successful barbecue fundraiser

How to have a safe barbecue fundraiser

Temperature control

The bugs that commonly cause food poisoning grow rapidly between 4°C and 60°C. This is the 'temperature danger zone'.

- Keep raw meat, chicken or seafood in a cold chilly bin, (below 4°C), when transporting and storing it until you are ready to cook.
- Keep meat, chicken or seafood and onion hot, (above 60°C), by leaving them on the hotplate until you are ready to serve.

Cook food thoroughly

Raw or poorly cooked food can contain bugs that cause food poisoning. These bugs are killed through correct cooking.

- Cook meat until cooked through to the centre. (There should be no pink left inside the meat). When cooking chicken ensure that it is white in the middle and there is no hint of pink.

Prevent bugs spreading

Harmful bugs can be spread if raw foods (like meat or unprepared onions) touch cooked foods. This is dangerous because the ready-to-eat foods will be eaten without any further cooking to kill the bugs.

- Separate raw foods from the bread and cooked food.
- Use separate utensils and hands to handle cooked and raw foods.

Personal Hygiene

People and pets also carry bugs. If you are not careful, the bugs can spread to food and make people sick.

- Always wash and dry your hands thoroughly before touching food, after going to the toilet, taking a break, changing tasks or touching pets or other animals.
- No one who has flu or cold-like symptoms or has had diarrhoea or vomiting within 24 hours of the event should help.
- Do not allow anyone with lesions on exposed skin (hands, face, neck or scalp) to help.

Hand washing facilities

Where a hand washing basin is not easily accessible:

- A supply of warm water in a Thermos® (minimum one litre) should be used with a bucket, soap and disposable towels. This should be used to remove visible dirt and food from hands.
- A commercial hand sanitiser or spray pump (minimum half litre) containing a 10% solution of isopropyl alcohol is an excellent addition to clean hands.

Leftovers

Cooked food that has not been sold at the end of the event must be thrown out.

Know your ingredients

For customers that have a food allergy, knowing whether an ingredient is in the food they eat can make the difference between life and death.

If asked, you should be able to tell a customer what the ingredients are in the food you serve.

This information can be found out from your suppliers, or from the labels on the packaging.

Barbecue safety

Think about the health and safety of both those helping and members of the public.

- Use a gas barbecue (ie, not charcoal).
- Ensure gas bottles are safely secured.
- Have a fire blanket or extinguisher easily accessible.
- Make sure that the public are protected from hot surfaces that could burn.
- Arrange the working area so that there is sufficient room for those helping.
- Site the barbecue fundraiser in a location that will not impede pedestrian flow, or result in a traffic hazard.



Clean



Cook



Cover



Chill

