

**Ministry of Agriculture and Forestry
P O Box 2526, Wellington, New Zealand**

MAF Food: Dairy & Plants

Circular no. 49

Dairy Industry Regulations 1990

***Performance Measurement of Dairy
Manufacturers***

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Issue of Circular

Regulation 59 of the *Dairy Industry Regulations 1990* allows the Director-General of the Ministry of Agriculture and Forestry to issue Circulars setting out criteria for matters which must be approved by, or done to the satisfaction of, the Director-General, pursuant to the *Dairy Industry Regulations 1990*.

This Circular, no. 49, containing 'MAF Standard D201.1, "Performance Measurement of Dairy Manufacturers,"' is issued in accordance with that regulation 59.

This Circular, no. 49, takes effect on 23 December 1999.



Tim Knox
Director, Dairy and Plant Products Group
MAF Food Assurance Authority

23/12/99

(Signed under authority delegated by the Director-General of MAF, pursuant to regulation 59 of the Dairy Industry Regulations 1990.)

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1 Background

Under the Optimal Regulatory Model (ORM) system, the Product Safety Programmes (PSPs) of dairy manufacturers are assessed by Third Party Agencies (TPAs). The ORM system introduces performance-based assessment of manufacturers.

The MAF Standard for Performance Measurement of Manufacturers was developed to:

- outline the requirements for linking the assessment of manufacturers operating under the ORM system to their performance in complying with regulatory requirements, and
- describe the acceptable criteria (means for satisfying MAF that the requirements have been achieved).

2 Summary

This Standard specifies requirements linking the level of assessment of dairy manufacturers operating under the ORM system to their demonstrated compliance with regulatory requirements.

Appendix One outlines acceptable criteria for demonstrating that the outcomes in the Standard are achieved, including the following.

- Manufacturers being assigned to one of three categories: Reduced, Standard/Entry, or Increased Assessment.
- The assessment category determining the frequency/intensity of TPA assessment of PSPs and HACCP plans and the frequency of regular reporting.
- Manufacturers commencing in the Standard/Entry Assessment category unless there is a risk to food safety. In these cases, MAF assigns manufacturers to the Increased Assessment category.
- MAF reviewing the category to which a manufacturer is assigned when receiving a recommendation from the manufacturer's TPA, a report of a critical non-compliance, the PSP for reapproval or a request for a review from a manufacturer or another party.
- Moving to a category with a decreased level of assessment, requires the manufacturer to demonstrate compliance appropriate to the new category.

Proposals for alternative criteria will be approved by MAF, provided it can be demonstrated to MAF's satisfaction that the required outcomes will be achieved.

Appendix Two provides the recommendation for reclassification of a dairy manufacturer operating under the *Dairy Industry Regulations 1990*.

3 Outcome

Manufacturers are assessed by TPAs at a frequency and intensity based on their demonstrated compliance with regulations 4, 5, 6, 9, 10 and 13, 14, 15, 17 of the *Dairy Industry Regulations 1990*.

4 Effective changes

This Standard will introduce the following changes from the previously existing situation.

- For manufacturers who remain in the existing regulatory system, there will be no changes.
- For manufacturers who move to the ORM system, performance-based assessment will be introduced. When manufacturers demonstrate regulatory compliance, there is the opportunity for reducing the frequency and intensity of TPA assessment. Manufacturers who consistently fail to meet regulatory requirements or have inadequate systems are assessed by the TPA at an increased frequency and MAF may intervene directly.

5 Implementation

This Standard will apply from the date of its issue by Circular. It will apply to those dairy manufacturers who have moved to the ORM system.

6 Effect on compliance costs

Assessment frequency has a significant financial impact for manufacturers. Manufacturers classified in the top category for compliance will have reduced TPA assessment and reporting requirements, resulting in reduced costs.

Manufacturers classified in the bottom category will have increased scrutiny and assessment. Manufacturers in this category will consequently incur increased costs due to increased use of TPA services. In addition, MAF may intervene and the manufacturer will be charged directly for this activity.

MAF Standard D201.1, “Performance Measurement of Dairy Manufacturers”

1.0 SCOPE

This Standard contains the outcomes for the performance-based assessment of dairy manufacturers by Third Party Agencies (TPAs). All dairy manufacturers operating under the Optimal Regulatory Model (ORM) system and their TPAs must comply with this Standard.

2.0 PURPOSE

This Standard sets out the outcomes that are specified in the *Dairy Industry Regulations 1990* relating to the performance-based assessment of dairy manufacturers by TPAs.

The acceptable criteria outlined in Appendix One of this Standard were developed in consultation with industry to establish clear rules for judging to which category a dairy manufacturer should be assigned, and to assist parties to achieve the outcomes described in the Standard. Proposals for alternative criteria will be approved by MAF, provided it can be demonstrated to MAF’s satisfaction that the required outcomes will be achieved.

Appendix Two of this Standard is the form for providing a recommendation for reclassification of a dairy manufacturer operating in the ORM system.

3.0 OUTCOME

Dairy manufacturers operating in the ORM system are assessed by TPAs at a frequency and intensity based on their demonstrated compliance with regulations 4, 6, 9, 10 and 13, 15, 17, and 21 of the *Dairy Industry Regulations 1990*.

4.0 INTERRELATED REQUIREMENTS

The following Standards and regulations must be read in conjunction with this Standard.

- MAF Standard D101, “Product Safety Programmes.” Dairy and Plant Products Group, Food Assurance Authority, New Zealand Ministry of Agriculture and Forestry.
- MAF Standard D102, “Product Safety Programme Reporting Requirements.” Dairy and Plant Products Group, Food Assurance Authority, New Zealand Ministry of Agriculture and Forestry.
- MAF Standard D202, “Registration of Dairy Premises.” Dairy and Plant Products Group, Food Assurance Authority, New Zealand Ministry of Agriculture and Forestry.

- MAF Standard D503, “Third Party Agencies’ Responsibilities.” Dairy and Plant Products Group, Food Assurance Authority, New Zealand Ministry of Agriculture and Forestry.

5.0 ADDITIONAL RESOURCES

The following document is a useful resource.

- *Dairy Products Safe and True.* Dairy and Plant Products Group, Food Assurance Authority, New Zealand Ministry of Agriculture and Forestry, 1999. World Wide Web address: www.maf.govt.nz/Dairy/

6.0 DEFINITIONS

These definitions must be read in conjunction with the interpretations in the *Dairy Industry Act 1952* and the *Dairy Industry Regulations 1990*.

MAF Food: Dairy & Plant Products Group definitions of terms can be found in their “Glossary of Terms,” available on the Dairy & Plants website (www.maf.govt.nz/Dairy/).

Accountable person – A person named in a MAF-approved PSP who is responsible for all operations covered by the PSP, and for ensuring that those operations comply with regulatory requirements.

Approval – Written confirmation from MAF pursuant to the *Dairy Industrial Regulations 1990* where action or participation is dependent on the Director-General of MAF’s formal acceptance or permission.

Assessment – Systematic examination of an individual, organisation, plan, programme, or system against regulatory requirements.

Corrective action – Action taken to rectify, eliminate the causes of, and prevent recurrence of any problem/failure/non-compliance identified in a plan, procedure, process, product, programme, or system.

Critical non-compliance – An action, event or omission which may result in:

- failure of dairy produce to comply with regulatory requirements;
- failure to follow the lawful direction of an Inspector;
- an alleged offence against the *Dairy Industry Act 1952* or *Dairy Industry Regulations 1990*;
- a critical situation;
- failure of a critical control point within a MAF-approved programme or plan;
- failure to identify when dairy produce is non-conforming;
- failure to stop a non-compliance;
- failure to keep accurate and complete records;
- failure to provide accurate, complete, and timely reports;
- failure to dispose of non-conforming dairy produce in compliance with regulatory requirements;
- failure to prevent recurrence of a non-compliance; and/or
- failure to rectify a non-compliance within the specified timeframe.

Critical situation – Any situation which, in the professional judgement of the Inspector, places public health, animal welfare, market access, official assurances, national good, or MAF's credibility at risk, or where an offence is suspected.

Dairy manufacturer – Operator of a manufacturing unit processing dairy produce (dairy factory).

Evaluation – Assessment of an individual, plan, programme, or system to determine compliance with regulatory requirements. This will involve review of documentation and, in some cases, review of operations or observation of practice. It is undertaken by a competent individual contracted to an impartial agency (e.g. TPA or National Assessor, MAF Compliance Group).

HACCP – Hazard Analysis and Critical Control Point system adopted by the Codex Alimentarius Commission. HACCP is a systematic identification of hazards and the measures for their control to ensure the safety of food. It focuses on prevention rather than end-product testing.

MAF Compliance - The Compliance and Investigation Group of MAF Food, reporting to the Director, Compliance and Investigation Group.

MAF Food – The Food Assurance Authority of the Ministry of Agriculture and Forestry.

MAF Food: Dairy & Plants – The Dairy and Plant Products Group of MAF Food, reporting to the Director, Dairy & Plant Products.

Non-compliance – Any failure to comply with regulatory requirements.

Non-conforming – In relation to dairy produce, any that is suspected or known not to meet regulatory requirements.

Product Safety Programme (PSP) - A programme of conditions, processes, procedures, measures, and standards to be complied with, performed, undertaken, taken, or met in relation to:

- (a) any process or activity related to dairy produce, ingredients used in the manufacture of dairy products, or both; and
 - (b) sampling, examination, inspection, and testing, or any of those actions, relating to any such process or activity; and
 - (c) the recording and inspection(by persons with qualifications and experience approved by the Director-General for the purpose) of information relating to any such action;
- and (without limiting the generality of the foregoing) may include conditions, processes, procedures, measures, or standards relating to the production, manufacture, storage, or transport of dairy produce.

Registration – The official process whereby MAF formally confirms approval by the Director-General pursuant to the *Dairy Industry Regulations 1990*. Applies to individuals, organisations, laboratories and premises; includes adding those to its records, and other administrative aspects.

Safe – In relation to any dairy product, “safe” means satisfactory, fit for human consumption, and not having in it or on it any pathogenic organisms

- (a) that are present in an amount that makes the product harmful or injurious to the health of the people who may eat or drink it; or
- (b) that
 - (i) are not present in an amount that makes the product harmful or injurious to the health of the people who may eat or drink it; but
 - (ii) by virtue of their ability to reproduce, to produce toxins, or both, make the product potentially harmful or injurious to the health of the people who may eat or drink it.

In relation to any dairy produce that is not a dairy product, “safe” means satisfactory, and fit for the manufacture of dairy products.

Season – The “dairy year”: period from 1 June through to 31 May in the following year.

Third Party Agency (TPA) – Organisation approved by MAF to carry out evaluation and/or verification services.

Validation – Assessment of a plan, programme or system to ascertain that it is complete, is being implemented as documented, and is delivering the expected outcomes. It is undertaken by the owner of the plan, programme or system.

Verification – Application of methods, procedures, tests and other checks, in addition to monitoring, to determine compliance with MAF-approved plans, programmes and systems, and to confirm the ongoing applicability of those.

7.0 REQUIREMENTS

The performance of all dairy manufacturers operating in the ORM system must be assessed by their TPA at the frequency specified by MAF.

The following performance standards must be assessed:

- registration of premises,
- approval and validation of the PSP,
- evaluation status of PSP components,
- status of the PSP HACCP plan,
- verification of compliance with the PSP,
- complete, accurate, and timely reporting, and
- management of critical non-compliances.

8.0 VERIFICATION

Verification of compliance with this Standard is undertaken by a MAF-approved TPA during the on-site assessment of the Product Safety Programme. The frequency and intensity of assessment is defined by MAF, based on the assessment category to which the manufacturer is assigned and their performance.

8.1 Criteria

The criteria for assessing compliance with this Standard is as follows:

- The means to deliver the requirements of this Standard are documented in a MAF-approved PSP.
- The party operates in accordance with that MAF-approved PSP.

8.2 Decision

The manufacturer is non-compliant if an appropriate level of compliance cannot be demonstrated in one or more areas.

8.3 Result

When a manufacturer demonstrates an appropriate level of compliance for a category with decreased levels of assessment, the TPA recommends to MAF that the manufacturer be assigned to that category.

When a manufacturer does not demonstrate in all areas a level of compliance an appropriate to the category to which they are assigned, the TPA recommends to MAF that the manufacturer be assigned to a category with increased levels of assessment.

Based on recommendations by TPAs, MAF will assign manufacturers to a category and advise the accountable person. The accountable person must implement performance-based assessments at the frequencies instructed by MAF.

9.0 VERSION CONTROL

Version	Date	Status	By	Approved
201.1	23 December 1999	Promulgated by Circular no. 49	Director, MAF Food: Dairy & Plants	

This copy may not be the most recent version of this document. It was current at the date in the footer of each page of the document. It is recommended that anyone intending to use this document should contact MAF Food: Dairy & Plants or check its website (www.maf.govt.nz/Dairy/) to confirm that this is the current version.

Appendix One

ACCEPTABLE CRITERIA

Following are criteria by which a dairy manufacturer operating in the ORM system may be judged to satisfactorily achieve the requirements described in section 7 of this Standard. Those dairy manufacturers will be assigned by MAF to an assessment frequency category according to the following criteria.

Proposals for alternative criteria will be accepted by MAF, providing it can be demonstrated to MAF's satisfaction that the required outcomes will be achieved. A guide to the information required for these proposals and the procedures used by MAF to assess proposals can be obtained from MAF Food.

1.0 Performance assessment categories

Each manufacturer operating under the ORM regulatory system is assigned to one of the following performance assessment categories based on their demonstrated compliance with regulatory requirements:

- Reduced Assessment category,
- Standard/Entry Assessment category, or
- Increased Assessment category.

1.1 Reduced Assessment category

Manufacturers in the reduced assessment category demonstrate that:

- there is at least a two year history of compliance with regulatory requirements;
- there is timely, accurate and complete communication with the contracted TPA;
- critical non-compliances are managed appropriately, with risk analysis and actions taken to eliminate the risk of potential non-compliances; and
- all non-conforming produce is disposed of in accordance with regulatory requirements.

1.2 Standard/Entry Assessment category

Manufacturers in the standard/entry assessment category demonstrate that:

- there is compliance with regulatory requirements;
- there is timely, accurate and complete reporting to the contracted TPA;
- critical non-compliances are identified and managed in accordance with regulatory requirements; and
- all non-conforming produce is disposed of in accordance with regulatory requirements.

1.3 Increased Assessment category

Any dairy manufacturer who:

- consistently fails to meet regulatory requirements,
- provides inadequate or late reports, and/or
- does not have sufficient control mechanisms in place to give confidence that product is being produced in a consistently safe manner,

is assigned to the Increased Frequency category.

2.0 Entry classification

When a manufacturer is accepted into the ORM system, MAF reviews the manufacturer's demonstrated compliance. Where the manufacturer demonstrates an appropriate level of compliance, they are assigned to the Standard/Entry Assessment category. If the manufacturer fails to demonstrate compliance in any one or more areas, they are assigned to Increased Assessment category.

MAF advises the accountable person of the category to which they have been assigned the frequency of assessments and the date of effect.

3.0 Demonstration of compliance

The manufacturer demonstrates continuous compliance at the level appropriate to the category to which they are assigned. Refer to Table A1.1 below for the criteria used to determine compliance. Failure in any area to comply at the level appropriate to the category or the inability to demonstrate appropriate compliance results in reclassification to a category with higher levels of assessment (refer to section 5.0 below).

Table A1.1 *Criteria for the demonstration of a level of compliance appropriate to each performance assessment category*

Area	Reduced Assessment	Standard/Entry Assessment	Increased Assessment
Premises	All premises registered by MAF for two (2) or more seasons and all significant changes approved by MAF prior to the change.	All premises registered by MAF and all significant changes have been approved by MAF.	Conditional registration of premises by MAF.
Product Safety Programme	The PSP is approved by MAF, is current and validated by the manufacturer.	The PSP is approved by MAF, is current and validated.	<ul style="list-style-type: none"> a. The PSP is deficient, or b. the PSP is not fully implemented, or c. the PSP is not current, or d. the PSP requires evaluation or approval, or e. the PSP is in the process of evaluation or approval.
PSP components e.g. Pasteuriser, Pathogen Management Plan, Pest Management Plan.	<ul style="list-style-type: none"> • All components validated by manufacturer and evaluated, and • No critical non-compliances identified during evaluation. 	<ul style="list-style-type: none"> • All components validated and evaluated, and • no critical non-compliances identified during evaluation. 	<ul style="list-style-type: none"> a. One or more component evaluations required, or b. one or more critical non-compliances identified during evaluation.
PSP HACCP plan	<ul style="list-style-type: none"> • Internally validated, and • Evaluated and operational as part of PSP. 	<ul style="list-style-type: none"> • Internally or externally validated, and • evaluated but non-compliance pending action, or plan under development 	No evaluated PSP HACCP plan in place.
Verification of compliance with PSP	Compliance with PSP demonstrated for two seasons.	Isolated non-compliance with PSP, corrected as required by TPA.	<ul style="list-style-type: none"> a. Regular or persistent non-compliances with PSP, or b. failure to complete corrective action required by TPA.

Area	Reduced Assessment	Standard/Entry Assessment	Increased Assessment
Reporting	<ul style="list-style-type: none"> • Regular and exception reports complete, accurate and on time for at least two seasons, and • Proactively advises the TPA of any non-compliances identified & corrected. 	<ul style="list-style-type: none"> a. Regular and exception reports complete, accurate and on time for at least one season, or b. regular reports occasionally incomplete or late and exception reports are complete accurate and on time. 	<ul style="list-style-type: none"> a. Regular or exception reports contain incomplete information or factual errors or are persistently late; or b. exceptions are not reported.
Management of critical non-compliances	<ul style="list-style-type: none"> • Critical non-compliances identified, and • full traceback completed to identify root causes, and • corrective actions completed in a timely manner, and • full analysis of the risk to the operation from this type of non-compliance completed, and • actions taken to eliminate the risk of potential non-compliances or monitoring systems implemented to identify potential non-compliance in the operation. 	Critical non-compliances identified and managed in accordance with MAF requirements.	<ul style="list-style-type: none"> a. Critical non-compliances not identified, or b. Critical non-compliances are identified and inadequately managed.
Disposition of non-conforming produce	All non-conforming produce disposed of in accordance with MAF Standards.	All non-conforming produce disposed of in accordance with MAF Standards.	Non-conforming produce not disposed of in accordance with MAF Standards.

4.0 Assessment requirements

The accountable person ensures that the assessments required for the performance assessment category to which they have been assigned are undertaken as specified.

The assessment requirements for each performance assessment category are specified in Table A1.2 below.

Table A1.2 Assessment requirements for each performance assessment category

Assessment	Performance Assessment Category		
	Reduced Assessment Category:	Standard/Entry Assessment Category	Increased Frequency Category
PSP verification	Full verification of the PSP is required every two years; A surveillance verification of the PSP is required in the alternate year.	Full verification of the PSP is required on an annual basis	Full verification of the PSP is required at least every six months. The frequency is defined by MAF and is dependent on the degree of non-compliance and risk. MAF may increase the frequency of TPA assessment at its own discretion or on the recommendation of the TPA. In addition, MAF may also directly monitor the manufacturer and charge for these activities
PSP HACCP plans	Dairy manufacturers with PSP HACCP plans must have them verified at the same frequency as the PSP	Dairy manufacturers with PSP HACCP plans must have them verified at the same frequency as the PSP	Dairy manufacturers with PSP HACCP plans must have them verified at the same frequency as the PSP
Regular reporting	Quarterly	Monthly	Monthly or more frequently as specified by MAF

5.0 Reclassification

5.1 Initiation of a review

MAF initiates a review of the category to which a manufacturer is assigned on receipt of any of the following communications.

5.1.1 TPA recommendation for reclassification to a category with decreased levels of assessment

When, as a result of verifications, the TPA is satisfied that the manufacturer demonstrates compliance appropriate to the recommended reclassification category, they must submit a recommendation to MAF for reclassification. TPA recommendations for reclassification are made using the form provided in Appendix Two.

5.1.2 TPA recommendation for reclassification to a category with increased levels of assessment

The TPA submits a recommendation to MAF to reclassify the manufacturer when:

- as a result of an assessment, the TPA identifies that the manufacturer fails to demonstrate compliance with any one or more of the criteria for the category to which they are assigned; or
- the manufacturer demands, requests, suggests, or pressures the TPA to censor or falsify an assessment report.

TPA recommendations for reclassification are made using the form provided in Appendix Two.

5.1.3 Report of a critical non-compliance

A report of a critical non-compliance by a manufacturer provided by the TPA in accordance with the reporting requirements specified in MAF Standards D102, “PSP Reporting Requirements” and D503, “TPAs’ Responsibilities”.

5.1.4 Reapproval of PSPs

A PSP for reapproval in accordance with MAF Standard D101, “Product Safety Programmes”.

5.1.5 Request for review by the dairy manufacturer

A request by a dairy manufacturer for MAF to review the category to which they are assigned. A manufacturer may request a review by notifying MAF in writing, setting out reasons for seeking the review. A copy of the request is sent by the manufacturer to the manufacturer’s contracted TPA.

5.1.6 Request for review by another party

A request by any party for MAF to review the category to which a dairy manufacturer has been assigned. Any party may request a review by notifying MAF in writing, setting out reasons for seeking the review. Copies of the request must be sent by the party to the manufacturer and the manufacturer's contracted TPA.

5.2 Review

MAF reviews the category to which a manufacturer is assigned and, where appropriate, assigns a new category.

This review considers all the available information including any case that has been provided in writing. MAF may, for the purposes of the review, undertake or commission an independent assessment of the manufacturer's PSP. This assessment may be at the manufacturer's expense where the manufacturer has requested the review.

5.3 Outcome

MAF advises the accountable person of the outcome, either:

- advising the category to which they have been assigned, the frequency of assessments, and the date of effect; or
- confirming the existing category if there is no change of classification.

Appendix Two

RECOMMENDATION FOR RECLASSIFICATION OF A DAIRY MANUFACTURER OPERATING UNDER THE *DAIRY INDUSTRY REGULATIONS 1990*

Dairy manufacturer:

Accountable person:

Street address:

Postal address:

Telephone number:

Fax number:

Current category: (Please circle current category)

**Reduced
Assessment**

**Standard/Entry
Assessment**

**Increased
Assessment**

Date assigned to current category:

Recommended category: (Please circle recommended category)

**Reduced
Assessment**

**Standard/Entry
Assessment**

**Increased
Assessment**

Recommended date for reclassification:

Describe current performance by ticking the appropriate boxes in the table below:

Area	Reduced Assessment	Standard/Entry Assessment	Increased Assessment
Premises	All premises registered by MAF for two (2) or more seasons and all significant changes approved by MAF prior to the change.	All premises registered by MAF and all significant changes have been approved by MAF.	Conditional registration of premises by MAF.
Product Safety Programme	The PSP is approved by MAF, is current and validated by the manufacturer.	The PSP is approved by MAF, is current and validated.	<ul style="list-style-type: none"> a. The PSP is deficient, or b. the PSP is not fully implemented, or c. the PSP is not current, or d. the PSP requires evaluation or approval, or e. the PSP is in the process of evaluation or approval.
PSP components i.e. Pasteurisers Pathogen surveillance Pest management	<ul style="list-style-type: none"> • All components validated by manufacturer and evaluated, and • no critical non-compliances identified during evaluation. 	<ul style="list-style-type: none"> • All components validated and evaluated, and • no critical non-compliances identified during evaluation. 	<ul style="list-style-type: none"> a. One or more component evaluations required, or b. one or more critical non-compliances identified during evaluation.
PSP HACCP plan	<ul style="list-style-type: none"> • Internally validated, and • evaluated and operational as part of PSP. 	<ul style="list-style-type: none"> • Internally or externally validated, and • evaluated but non-compliance pending action, or plan under development. 	No evaluated PSP HACCP plan in place.
Verification of compliance with PSP	Compliance with PSP demonstrated for two seasons.	Isolated non-compliance with PSP, corrected as required by TPA.	<ul style="list-style-type: none"> a. Regular or persistent non-compliances with PSP, or b. failure to complete corrective action required by TPA.

Area	Reduced Assessment	Standard/Entry Assessment	Increased Assessment
Reporting	<ul style="list-style-type: none"> • Regular and exception reports complete, accurate and on time for at least two seasons, and • proactively advises the TPA of any non-compliances identified & corrected. 	<ul style="list-style-type: none"> a. Regular and exception reports complete, accurate and on time for at least one season, or b. regular reports occasionally incomplete or late and exception reports are complete accurate and on time. 	<ul style="list-style-type: none"> a. Regular or exception reports contain incomplete information or factual errors or are persistently late; or b. exceptions are not reported.
Management of critical non-compliances	<ul style="list-style-type: none"> • Critical non-compliances identified, and • full traceback completed to identify root causes, and • corrective actions completed in a timely manner, and • full analysis of the risk to the operation from this type of non-compliance completed, and • actions taken to eliminate the risk of potential non-compliances or monitoring systems implemented to identify potential non-compliance in the operation. 	Critical non-compliances identified and managed according with MAF requirements.	<ul style="list-style-type: none"> a. Critical non-compliances not identified, or b. critical non-compliances are identified and inadequately managed
Disposition of non-conforming produce	All non-conforming produce disposed of in accordance with MAF Standards.	All non-conforming produce disposed of in accordance with MAF Standards.	Non-conforming produce not disposed of in accordance with MAF Standards.

Information to be considered by MAF in the review: (Please attach reports or any other relevant information)

TPA:

Contact person:

Signed: _____.

Date:

Send to: Director
 MAF Food: Dairy & Plants
 PO Box 2526
 Wellington