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MAF Food: Dairy & Plants

Circular number 70
Dairy Industry Regulations 1990

D205.1 Independent Verification Programme

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205.1	31 January 2002	Promulgated by Circular number 70	Director, MAF Food: Dairy & Plants	

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Issue of Circular and Implementation

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, number 70, containing 'MAF Standard D205.1, "Independent Verification Programme"', is issued in accordance with that regulation 59.

This Circular, number 70, takes effect on 31 January 2002.

This Standard will apply to all new Product Safety Programmes (PSPs) from the date of issue by Circular. Existing PSPs approved under the previous regulatory requirements will need to comply with this Standard 12 months from the date of issue. Amendments to currently approved PSPs to incorporate the requirements of this Standard will require validation prior to evaluation by MAF/TPA and approval by MAF.



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

31 January 2002

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

Foreword

The *Dairy Industry Act 1952* and the *Dairy Industry Regulations 1990* apply to all those manufacturing dairy products in New Zealand. MAF is responsible for administering this legislation. Independent checks are used to provide confidence in the regulatory systems.

The Independent Verification Programme (IVP) is the cornerstone that:

- verifies the integrity of the sampling, sample handling, testing and decision making processes which are integral parts of the Product Safety Programme;
- enables MAF to provide assurances about the integrity of the regulatory system to other competent authorities; and
- supports the implicit assurances given to domestic consumers.

The MAF Standard on independent verification was developed to:

- outline regulatory requirements specified in New Zealand dairy legislation to confirm the operation of the New Zealand regulatory system;
- describe acceptable criteria (means for satisfying MAF that the outcomes are being achieved); and
- outline relevant importing country requirements.

Specifically, this Standard sets out the outcomes that are specified in the *Dairy Industry Act 1952* and *Dairy Industry Regulations 1990* relating to confirmation of the successful delivery of the New Zealand dairy industry regulatory system.

The acceptable criteria outlined in Appendix One of this Standard were developed in consultation with industry:

- to establish clear rules for judging whether or not a proposed PSP is satisfactory; and
- to assist parties to achieve the outcomes described in the Standard.

Dairy product manufacturers may offer proposals to MAF for alternate criteria that deliver the outcomes described in this 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. A guide to the information required in these proposals and the procedures used by MAF to assess proposals can be obtained from MAF Food.

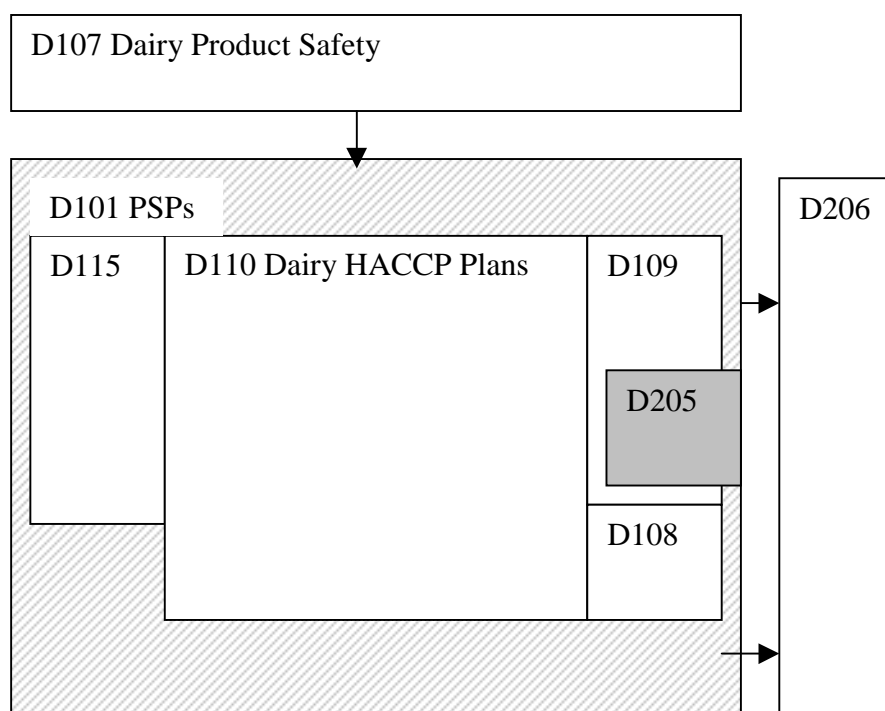
Appendix Two of this Standard outlines importing country requirements relating to official assurances provided by MAF concerning verification of the New Zealand dairy industry regulatory system.

Preface

CONTEXT

The MAF Standard for the independent verification programme (D205) is a component of a Product Safety Programme. The independent verification programme links to the HACCP Plan. When developing the verification section of a HACCP Plan, the sampling and testing that is required as part of the independent verification programme should also be considered.

A diagram of the relationships between the various MAF Standards is provided below:



RESOURCES

The following standards must be read in conjunction with this Standard:

- MAF Standard D101, “Product Safety Programmes”
- MAF Standard D107, “Dairy Product Safety”
- MAF Standard D108, “Non-conforming Dairy Produce”
- MAF Standard D109, “Dairy Product Conformance”
- MAF Standard D110, “Dairy HACCP Plans”
- MAF Standard D115, “Raw Milk Acceptance”
- MAF Standard D206, “Dairy Sanitary and Related Export Certification”
- MAF Standard D301, “MAF-Approved Dairy Test Methods”.

The following documents are useful resources:

- “Guideline for Independent Verification Programmes”, provided as Annex A of this Standard.

EFFECTIVE CHANGES

This Standard will introduce the following changes to the previously existing situation:

- All manufacturers of dairy products will be required to have an independent verification programme approved as part of their Product Safety Programme.
- Manufacturers currently operating audit sampling programmes will be required to replace those programmes with an independent verification programme.
- The accountable person is responsible for development, implementation and maintenance of the independent verification programme.
- Independent samplers are provided by officially recognised bodies, which include Third Party Agencies (TPAs), recognised service providers (RSPs) and MAF-registered laboratories.
- The independent verification programme is verified as part of the PSP assessment by MAF Compliance and Investigation Group (CIG)/TPA.

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MAF Standard D205.1, “Independent Verification Programme”

1. SCOPE

This Standard contains the outcomes for the independent verification of information generated by manufacturers’ Product Safety Programmes (PSPs) to confirm product conformance.

This Standard applies to all products manufactured in accordance with a PSP.

All dairy product manufacturers and officially recognised bodies providing independent verification programme services must comply with the outcomes described in section 3 of this Standard.

2. DEFINITIONS

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).

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

Independent – Free of conflict of interest and not involving an employee relationship with the manufacturing company.

Lot – A quantity of dairy produce manufactured during a discrete period of time, not normally exceeding 24 hours, in one continuous process.

Officially recognised body – An organisation that has been recognised by MAF as being competent to provide services to the dairy industry in specified categories. Includes third party agencies, recognised service providers and MAF-registered laboratories.

Packing system – One or more packing lines that share a common principle of operation and sampling, and utilise the same staff for routine sampling.

Routine sampling and testing – The sampling and testing defined in the Product Safety Programme that is undertaken by a manufacturer to verify that finished product is safe and truthfully labelled.

3. OUTCOME

All manufacturers have as part of their PSP, a formally approved independent verification programme that provides independent sampling and testing of product to confirm the integrity of the New Zealand dairy industry regulatory systems in accordance with regulations 6(2)b and 58 of the *Dairy Industry Regulations 1990*.

3.1 Approvals generally

The Director-General shall not approve a product safety programme in respect of the manufacture or storage of milk or cream unless satisfied that the programme provides for:

- the keeping of records;
- the availability for inspection of those records in such a manner and to such an extent; and
- such inspection of those records

as to enable it to be readily ascertained whether or not the programme has been and is being complied with.

3.2 Production of records and test results

Where an approved Product Safety Programme, or the *Dairy Industry Regulations 1990*, requires the keeping of particular records or the making of particular tests an Inspector, or any person authorised by the Director-General for the purpose, may direct the person in control of the records or the results of the tests to produce them for inspection.

4. VERIFICATION

Verification of compliance with this Standard is undertaken by MAF CIG or a MAF-approved TPA as part of a PSP assessment.

4.1 Compliance

The manufacturer is compliant with the outcomes described in section 3 of this Standard if:

- the means to deliver the outcomes described in section 3 of this Standard are documented in a MAF-approved PSP; and
- the party operates in accordance with that MAF-approved PSP.

Parties operating in compliance with the outcomes described in section 3 of this Standard and a MAF-approved PSP are entitled to:

- produce milk or cream intended for the manufacture of dairy products;
- transport or store dairy produce; and/or
- manufacture, transport, or store dairy products for sale and/or export.

4.2 Non-compliance

Non-compliance with the outcomes described in section 3 of this Standard constitutes an offence under regulation 49 of the *Dairy Industry Regulations 1990*.

The manufacturer is non-compliant if one or more of the criteria for assessing compliance is not met.

If a manufacturer does not operate in accordance with the outcomes described in this Standard:

- an Order may be issued by a MAF Inspector to remedy any defects;
- export certification and/or use of any MAF marks may be suspended;
- approval of the PSP may be withdrawn; and/or
- prosecution for offences may occur.

Appendix One: Acceptable Criteria

Following are criteria for independent verification programmes by which a manufacturer may be judged to satisfactorily achieve the outcomes described in section 3 of this Standard. A Product Safety Programme (PSP) that includes procedures for ensuring that each of these criteria is satisfied and meets all other relevant PSP requirements will be approved by MAF.

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. A guide to the information required in these proposals and the procedures used by MAF to assess proposals can be obtained from MAF Food.

1. INDEPENDENT VERIFICATION PROGRAMME COVERAGE

Independent verification programmes (IVPs) include all test parameters used for testing dairy products' conformance with:

- *Dairy Industry Act 1952*;
- *Dairy Industry Regulations 1990*;
- MAF Standards;
- Australia New Zealand Food Standards Code/*New Zealand Food Regulations 1984*; or
- official assurances provided by MAF.

The sampling and testing programme includes all of the above parameters for all products manufactured in the plant within each 6-month period.

2. RESPONSIBILITIES

The accountable person is responsible for:

- establishing the IVP including the sampling and testing programme and the calculation of IVP limits;
- contracting a officially recognised body to provide an independent sampler;
- contracting an independent MAF-registered Category 1 laboratory;
- ensuring the IVP is evaluated as part of the PSP;
- analysing the results, keeping records and initiating corrective action/follow-up;
- submission of the PSP for re-evaluation if there is a change of officially recognised body; and
- ensuring that the sampling programme remains relevant and reflects product mix and risks to product safety.

Commentary

A change of officially recognised body is a significant change. A change of sampler, provided the same officially recognised body provides them, is not a significant change.

The TPA/MAF CIG is responsible for:

- evaluating the IVP as part of the PSP and determining the suitability of the proposed sampling and testing programme, including proposed tests, frequency and sampling regime;
- recommending approval of the IVP as part of the PSP;
- verification of the IVP during PSP verifications to ensure that it is delivering the required outcomes;
- receipt of results from the independent MAF-registered Category 1 laboratory; and
- identifying product safety issues and ensuring product safety problems are managed in accordance with MAF Standard D108, “Non-conforming Dairy Produce”.

The independent sampler is responsible for:

- maintaining documented procedures for sample taking;
- taking samples in accordance with the independent sampling and testing programme;
- sealing and labelling samples to ensure integrity is maintained;
- dispatching samples to the independent MAF-registered Category 1 laboratory; and
- ensuring that sample integrity is maintained during transport.

The MAF-registered Category 1 independent laboratory is responsible for:

- receiving samples and confirming receipt together with maintenance of integrity;
- testing samples using test methods approved in accordance with MAF Standard D301, “MAF-Approved Dairy Test Methods”.
- simultaneously forwarding results to both the TPA/MAF CIG and the accountable person; and
- assisting in follow-up testing, if required.

3. CRITERIA FOR INDEPENDENT VERIFICATION PROGRAMMES

3.1 Product sampling and testing programme

The accountable person prepares an IVP for sampling and testing that is evaluated and verified as part of the PSP.

The minimum criteria for the IVP sampling programme are:

- Only specifications/product types may be specified. The manufacturing date, the lot number and/or specific unit numbers within a lot are not to be specified.
- Sampling is to be carried out randomly (based on IVP design) on a monthly basis.
- The product safety tests to be included are all parameters outlined in MAF Standard D107, but excluding those parameters that form part of a National Chemical Contaminants Programme e.g. radionuclides.
- Each month a minimum of two product safety tests and one standard of identity test (as outlined in MAF Standard D103) are carried out on each sample taken that month.
- All required tests to be carried out at least once over each six months period.

Commentary

The required tests are those tests that are defined in the PSP. A PSP will not be approved if it does not define the required tests. This means that all tests for all product groups must be covered over a period of 6 months but the programme should not be based on product groupings.

- A maximum of two samples are to be taken from any one lot; and
- The minimum number of samples taken each month is determined using Table A1.1 below based on:
 - the average lot size per packing system; and
 - and the number of lots per month per packing system.

Table A1.1 Minimum number of IVP samples to be taken each month from each packing system

Average lot size per packing system	Number of lots/month/packing system				
	1-5	6-10	11-15	16-20	21+
0-25 kg	1	1	1	1	1
25-500 kg	1	1	2	2	2
500-1000 kg	1	2	2	3	3
1-5 tonne	1	2	3	3	4
5-20 tonne	1	2	3	4	4
20-100 tonne	1	2	3	4	5
100+ tonne	2	3	4	5	5

Note: when there is no production through the packing system, no sampling or testing is required.

Commentary

- A. *Annex A provides examples of sampling and testing programmes for different manufacturing situations.*
- B. *Those manufacturers who only supply products to New Zealand and Australia or whose primary production is not dairy products may apply for an alternative IVP plan. A form for these applications is attached to Annex A.*

3.2 Independent sampler

An independent sampler provided by an officially recognised body takes all independent verification programme samples in accordance with the verification sampling and testing programme.

An independent sampler is either:

- an individual approved in accordance with MAF Standard D501, “Technical Competence of Approved Individuals”; or
- a person who meets the following minimum requirements:
 - is not an employee of the manufacturer and is free of any conflict of interest; and
 - has satisfactorily completed a NZQA-approved training course or has equivalent experience in correct sampling techniques such as those documented in IDF Standard 50C:1995, “Milk and Milk Products Guidance on Sampling”.

Commentary

In the situation where the routine sampler is provided by an independent organisation, the same organisation can provide an independent sampler for this programme provided they are not the same person who undertakes routine sampling.

4. INDEPENDENT VERIFICATION PROGRAMME PROCESS

An overview of the IVP process is provided as Figure A1.1.

4.1 Sampling

The independent sampler takes samples of finished product in accordance with the IVP sampling and testing programme as follows:

- the sampler selects, using their own discretion, the actual lot to be sampled; and
- samples are taken from previously unopened final packages. Where appropriate, to protect the integrity of the sample, final packages may be dispatched as discrete samples, e.g. ice cream, liquid milk, consumer packs of butter and cheese. For bulk fill lines, e.g. AMF and bulk milk powder, sampling may be carried out during packing.

4.2 Sample handling

The IVP samples are handled as follows:

- The sampler secures the samples in a manner that ensures sample integrity.
- The consolidated samples and associated documentation are dispatched to the independent laboratory by the sampler in a manner that maintains sample integrity.
- The independent laboratory receives the sample, and records the information necessary to demonstrate the sample security has been maintained during dispatch and transport.

4.3 Sample analysis

The independent laboratory analyses the samples using MAF-approved test methods.

4.4 Handling of results, follow-up and reporting

The independent laboratory reports the results to the MAF CIG/TPA and the accountable person, simultaneously.

4.4.1 MAF CIG/TPA

On receipt of the IVP test results, the MAF CIG/TPA analyses the results as follows.

Any product safety results in excess of the limits in MAF Standard D107, “Dairy Product Safety” are brought to the attention of the accountable person. If not already done so, the accountable person ensures that all implicated product is managed in accordance with MAF Standard D108, “Non-conforming Dairy Produce”.

A flow diagram is provided as Figure A1.2.

Figure A1.1 Overview of the IVP process

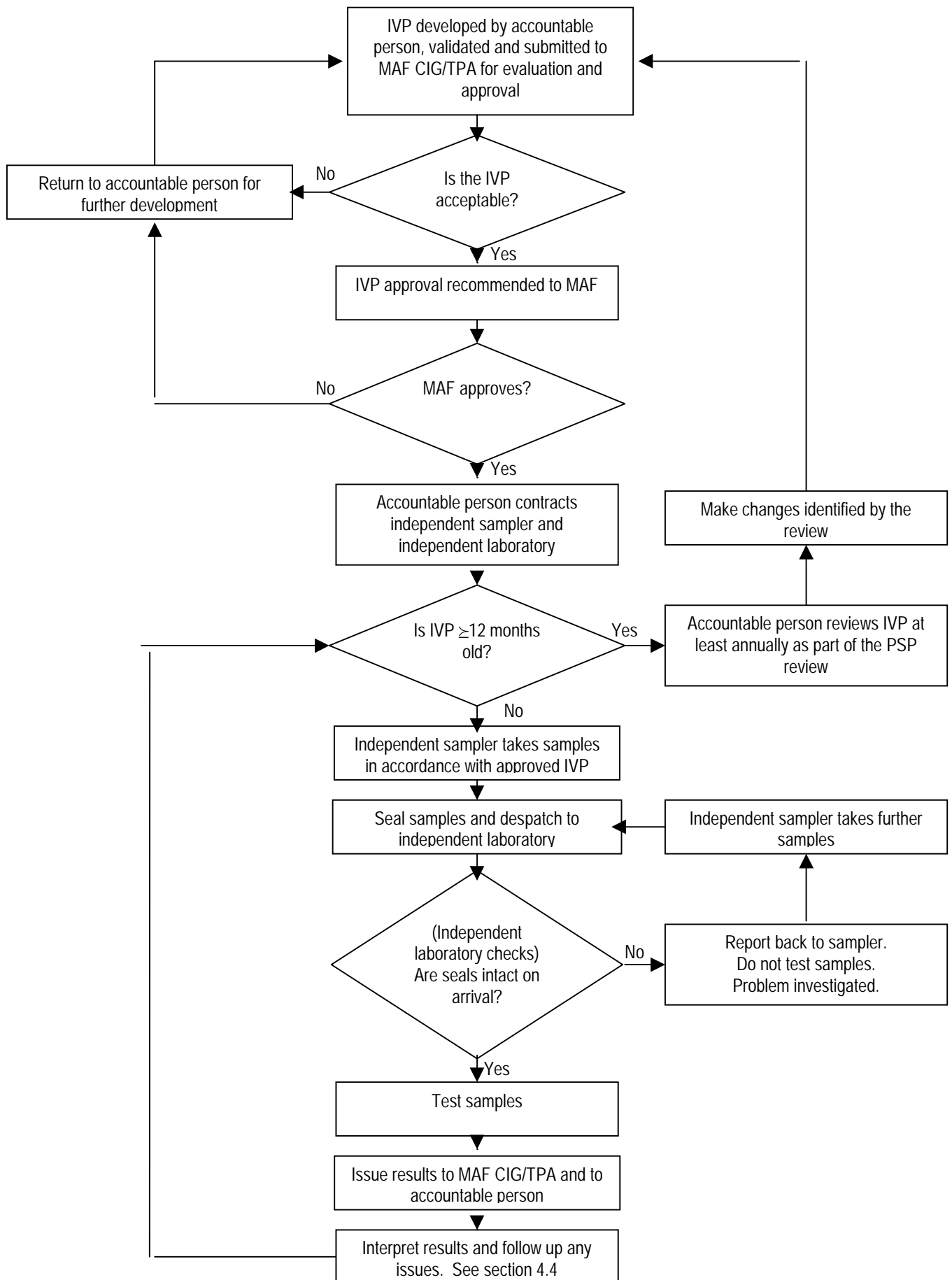
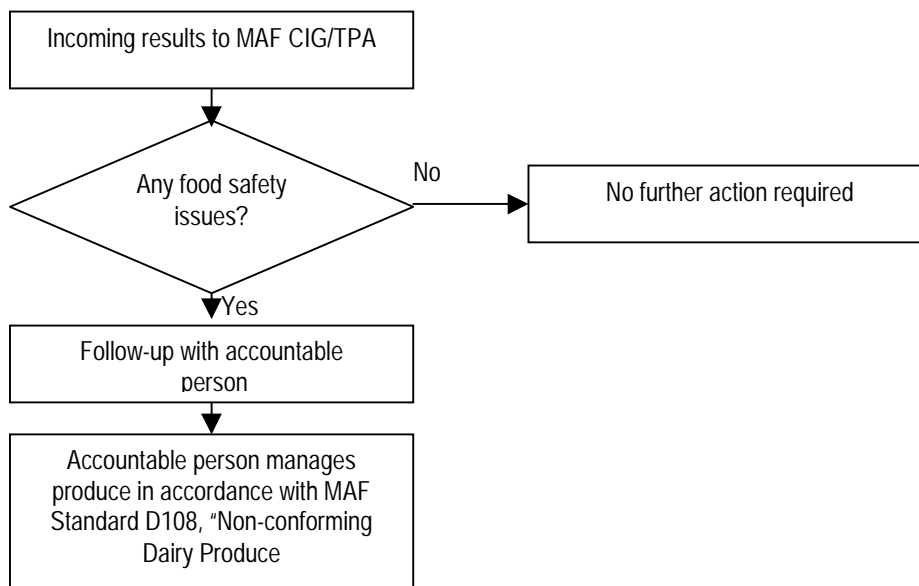


Figure A1.2 Actions taken by MAF CIG/TPA on receipt of test results



4.4.2 Accountable person

On receipt of the IVP test results, the accountable person, or their delegate, analyses the results as follows:

- The results relating to product safety are compared with the limits in MAF Standard D107, “Dairy Product Safety”. The results relating to standard of identity are compared with the standard of identity limits specified in the PSP for that product. Where this comparison identifies any results in excess of the product safety [or standard of identity] limits, the accountable person ensures that, if not already done so, all implicated product is managed in accordance with MAF Standard D108, “Non-conforming Dairy Produce”.

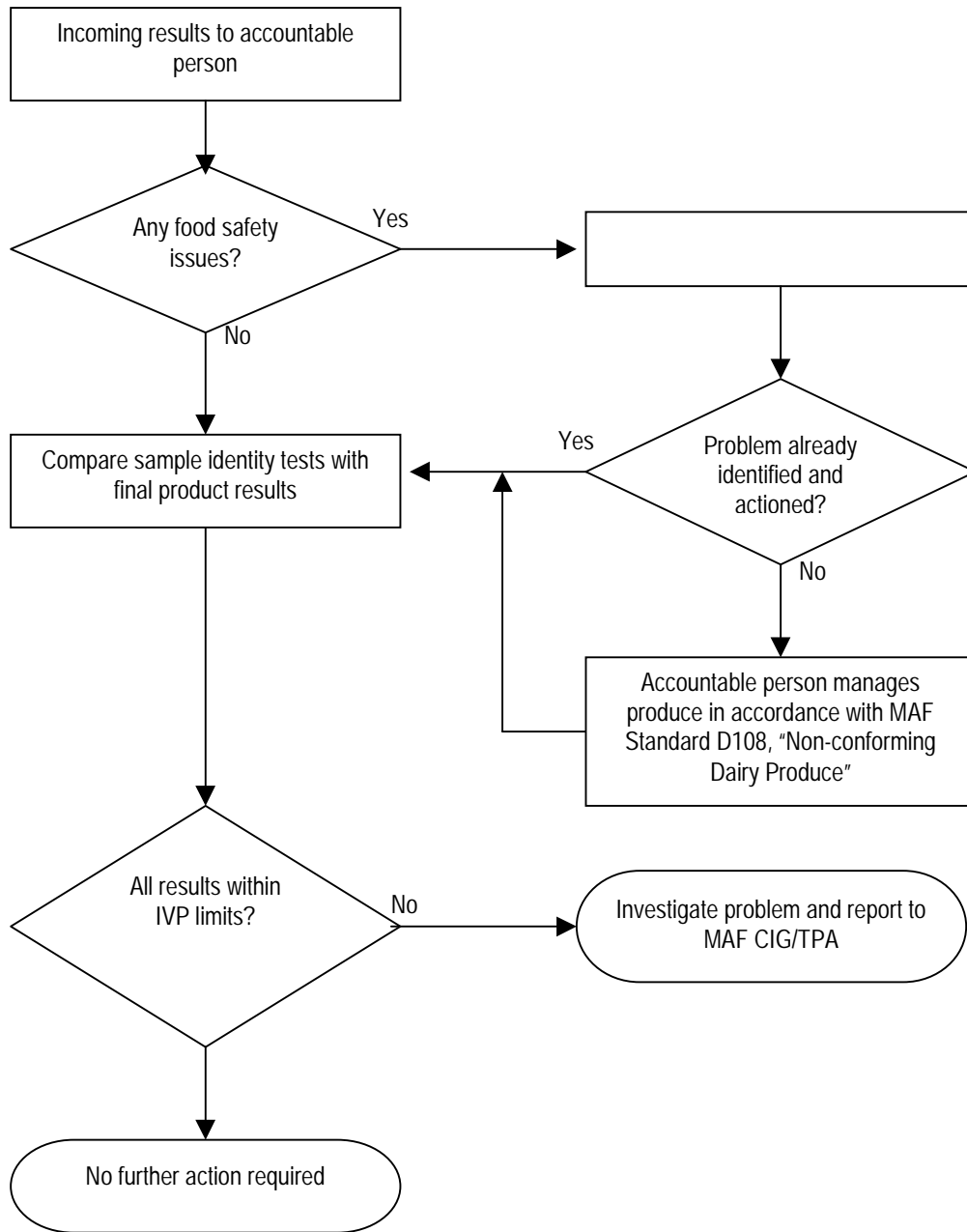
Commentary

The ‘standard of identity’ phrase has been included in square brackets pending the review of MAF Standards D107 and D109 and the definitions of non-compliance and critical non-compliance. The phrase will be either confirmed or removed once that review is completed.

- The manufacturer’s routine results and the IVP results for the same manufacturing lot are compared. Where there is a discrepancy between the results that exceed the IVP reproducibility limits, the accountable person initiates investigation and corrective actions and reports the outcome in the regular report to MAF CIG/TPA in accordance with MAF Standard D102, “Product Safety Programme Requirements”. MAF CIG/TPA may request additional sampling as part of the follow up action.

A flow diagram is provided as Figure A1.3.

Figure A1.3 Actions taken by the accountable person on receipt of test results



5. RECORDS

5.1 Manufacturer

The manufacturer keeps records of all aspects of the IVP, including:

- the information used to determine the IVP reproducibility limits;
- the IVP test results and the routine test results for all product sampled by the programme;
- the analyses of the results by the accountable person or their delegate;
- reports of investigations of discrepant results and corrective actions;
- the IVP samplers' training experience and assessments and their freedom from conflict of interest; and
- the sampling and testing programme as planned and delivered.

5.2 MAF CIG/TPAs

The MAF CIG/TPA keeps records of the independent verification programme, including:

- the sampling and testing programme as planned and delivered;
- the information demonstrating that sample integrity has been maintained from sampling to reporting of analytical results;
- the IVP results and manufacturer's routine results for the products sampled;
- the reporting of product safety violations from the accountable person; and
- any investigations and corrective actions undertaken that are associated with the operation of the IVP.

ANNEX A: GUIDELINE FOR INDEPENDENT VERIFICATION PROGRAMME

1 Product sampling and testing programme

The purpose of MAF Standard D205, “Independent Verification Programme” is to provide an independent check on the **process** of **sampling, testing, and decision-making**. It is not the intention that all products are sampled, or that all individual packing lines are sampled from on a monthly basis. The definition of a packing system addresses this last point.

In preparing a sampling programme the accountable person should give consideration to the following:

- product range covered by the Product Safety Programme;
- frequency of production of each product type;
- typical manufactured lot size;
- risk to food safety given by the nature of the product and the process by which it is manufactured;
- history of problems on site or in a particular process;
- practical constraints in taking a sample.

The PSP needs to include justification for the selection of samples and the frequency at which they are taken. (e.g. the independent sampler may be required to take a variety of product samples based on the product mix ratio for the given month or they may always take the same number of samples from each product type. In either case the accountable person will need to ensure the minimum criteria in D205 are met).

The programme must allow for the independent sampler to use their own discretion in selecting the actual lot for sampling. The sampling programme can only specify what specifications/product types may be sampled, not the actual day of production or specific lot number, or specific unit number within a manufactured lot.

2 Product safety testing requirements

The product safety testing required shall be that defined in MAF Standard D107, excluding those tests covered by a national programme (e.g. residues, radionuclides).

Within a six-month period all product safety testing is to be carried out on samples taken from each packing system, with a minimum of 2 product safety tests carried out on each sample. Sampling must be carried out at a frequency not less than monthly.

Example

Below is an example applied to Packing System A, which processes 50 manufactured lots of salted butter per month. Lot sizes are within the range of 5-20 tonne, so the minimum number of samples to be taken from this packing system is 4 (refer D205 acceptable criteria).

A minimum of 2 product safety tests are required per sample, so the accountable person has developed a testing plan as shown below:

Packing System A – Sample number and tests selected						
Product Safety Parameter (as per D107)	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
Product Safety Test a	1,2,3,4				1,2,3,4	
Product Safety Test b	1,2,3,4					1,2,3,4
Product Safety Test c		1,2,3,4				1,2,3,4
Product Safety Test d		1,2,3,4				
Product Safety Test e			1,2,3,4			
Product Safety Test f			1,2,3,4			
Product Safety Test g				1,2,3,4		
Product Safety Test h				1,2,3,4		
Product Safety Test i					1,2,3,4	

In the table above all 4 samples from Packing System A (as denoted by sample numbers 1,2,3,4) will be tested for parameters a and b in Month 1, parameters c and d in Month 2, and so on.

Alternatively, the accountable person may choose to cover a greater range of tests but not submit all samples for each test, as shown below:

Packing System A – Sample number and tests selected						
Product Safety Parameter (as per D107)	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
Product Safety Test a	1	-	4	4	3	3
Product Safety Test b	1	1	-	4	4	3
Product Safety Test c	2	1	1	-	4	4
Product Safety Test d	2	2	1	1	-	4
Product Safety Test e	3	2	2	1	1	-
Product Safety Test f	3	3	2	2	1	1
Product Safety Test g	4	3	3	2	2	1
Product Safety Test h	4	4	3	3	2	2
Product Safety Test i	-	4	4	3	3	2

In this case, for Month 1, sample 1 will be tested for parameters a and b, sample 2 will be tested for parameters c and d, and so on.

Note that the independent sampler has ultimate discretion in determining which product samples get submitted against each product safety parameter.

Most manufacturers will already use an independent MAF-registered Category 1 laboratory for the routine determination of some of the above parameters, e.g. *Salmonella* and *Listeria*. However this situation does not provide grounds for such parameters to be exempt from the IVP as the routine sampling has not been carried out independently, and the results are not being forwarded to the MAF CIG/TPA.

3. Standard of identity testing requirements

The definition of standard of identity is:

“A standard that defines the meaning of a term or designation used to describe a product. Such a standard typically includes the name of the product, its definition, and essential composition and quality factors.”

The minimum requirement of D205 is that each sample taken from a packing system must be tested for 1 standard of identity parameter. However, if a product is not required to satisfy any component of the above definition, then no standard of identity testing is required when that product is sampled.

The accountable person must recognise that different product types packed on the same packing system may vary in their standard of identity testing requirements. In preparing each packing system sampling programme the accountable person will need to ensure that all standard of identity testing required on all products packed within the six-month period are covered within that same period.

Example

Following on from the butter example above, the manufacturer is required to have a minimum of 1 standard of identity test carried out on each of the 4 samples. The accountable person has developed the following sampling plan:

Packing System A – Sample number and tests selected						
Standard of Identity Parameter (as per D103)	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
Moisture	1,2,3,4			1,2,3,4		
Salt		1,2,3,4			1,2,3,4	
Fat			1,2,3,4			1,2,3,4

In the table above all 4 samples from Packing System A are tested for moisture in Month 1, salt in Month 2, and so on.

Alternatively, the sampling plan could cover all 3 standard of identity tests, as shown below:

Packing System A – Sample number and tests selected						
Standard of Identity Parameter (as per D103)	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
Moisture	1,2	4	3	1	4	2,3
Salt	3	1,2	4	2,3	1	4
Fat	4	3	1,2	4	2,3	1

4. Organisations supplying independent samplers

Contracting one of the following organisations for the purposes of sampling should satisfy the requirements for independence:

- TPA;
- RSP;
- MAF-registered laboratory; or
- Health Protection Officer (restricted to Public Health Unit).

This list is not exhaustive; other persons/organisations may also be suitable.

5 Security of samples

To ensure the integrity of the samples the independent sampler will either:

- Supervise the transfer of samples into the custody of a courier/independent lab; or
- Secure samples in such a way as to preclude tampering prior to collection by a courier/independent lab. This could be by locking samples in a box, for which the key is only held by the independent sampler and independent laboratory, or by using a tamper evident seal. In either case the independent lab should notify the independent sampler upon receipt of the samples and confirm the integrity of the samples.

6. Correlation of data – trending

The samples taken by the independent sampler will not be the same as those taken by the manufacturer, so the results obtained for some parameters will vary. The degree of variability will depend upon the inherent variability of the product, test error, and reproducibility between labs. There is no requirement within D205 for the manufacturer to test duplicate (split) samples to those submitted by the independent sampler. If a manufacturer chooses to do this, then the IVP comparison limits set should reflect this (i.e. be tighter in most cases).

The accountable person will need to establish IVP limits for each parameter, taking into account the aforementioned contributing factors. Initially the accountable person may set arbitrary (though realistic) limits, then review these when sufficient data has been collected. The setting and review of these limits will be examined by the MAF CIG/TPA during evaluation and verification of the PSP.

When the independent lab results are returned the accountable person will compare these results to the routine results. Where results for a particular parameter do not agree within the IVP limits, the accountable person shall investigate and put in place corrective actions to overcome such discrepancies.

Where the manufacturer does not have routine results on the same lot of product with which to compare to the IVP results, then they should use results from the manufactured lot(s) with the nearest manufacture date to the IVP sampled lot.

Both sets of results should be assessed to see if there is a consistent bias or trend apparent. Where this occurs the accountable person should determine the cause and whether or not the product/process is in danger of exceeding product safety or standard of identity limits.

7. Reporting

7.1 Critical non-compliance

A critical non-compliance exists where an independent laboratory result exceeds product safety [or standard of identity limits], and the affected non-conforming product has not previously been reported to the MAF CIG/TPA.

Commentary

The 'standard of identity' phrase has been included in square brackets pending the review of MAF Standards D107 and D109 and the definitions of non-compliance and critical non-compliance. The phrase will be either confirmed or removed once that review is completed.

If a critical non-compliance does exist, then the accountable person shall report to the MAF CIG/TPA in accordance with MAF Standard D102, "Product Safety Programme Reporting Requirements".

7.2 Monthly reporting

The accountable person shall report on the IVP as part of the PSP reporting requirements. It is expected that the content of this report shall include:

- IVP exception reports generated in the reporting period, including follow-up activities and findings made since the exception was originally reported.
- IVP exception report corrective actions still unresolved.
- Commentary on the comparison of results from the independent lab and those of the manufacturer, such as:
 - incidents where independent laboratory versus manufacturer's results exceed IVP comparison limits and what corrective actions are being taken to bring about a resolution;
 - bias and trends in both sets of results;
 - problems encountered in running the programme, resolving discrepancies, etc.

8. Applications for alternative criteria

Those factories who only supply to New Zealand and Australia may use the following form to submit an alternative IVP plan:

**ANNEX B: APPLICATION FOR ALTERNATIVE CRITERIA
TO MAF STANDARD D205, “INDEPENDENT VERIFICATION PROGRAMME”**

Refer to the Standard and guidelines when completing this application.

Company and factory name:		
Address:		
MAF premises registration no:		
PSP no:		
Number of staff:		
Products manufactured: List all products manufactured, including non dairy products, if applicable.		
Number of months per year that dairy products are manufactured:		
Volume of product produced, kg/month	Dairy:	Non Dairy:
Volume of product produced, kg/year	Dairy:	Total:
Range of lot sizes: Include largest and smallest lot sizes.		
Proposed testing plan for independent verification programme: Include your reasons/justification for the proposed testing plan here. If there is insufficient space, attach on separate page(s).		
Proposed frequency of testing:		
Proposed independent sampler:		
Attach any further information that is necessary to support this application.		
Complete:		
Name:		
Date:	Signature:	
Phone:	Address:	
Fax:	Email:	
Send this application and supporting information to: The Director, MAF Food: Dairy and Plant Products, PO Box 2526, Wellington		

Appendix Two: Importing Country Requirements

It is the responsibility of exporters to identify and comply with all importing country requirements; non-compliance is at their commercial risk.

Importing country requirements, which have been officially confirmed, can be obtained from the Dairy and Plant Products Group of MAF or its website (www.maf.govt.nz/Dairy).

Where MAF provides official assurances to competent authorities of importing countries, the statements to which MAF attests must be verifiable. Relevant requirements are described in MAF Standard D206, “Dairy Sanitary and Related Export Certification”.