Chapter 2: How to develop an RMP

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2.1 Introduction

2.1.1 How to use this Code of Practice

This Code Of Practice has been organised in a manner to help egg producers to develop RMPs:

- Chapter 2: How to develop an RMP
  - This chapter lists the components that must be in an RMP (refer to 2.1.2) and then briefly covers relevant theory and requirements for each of these components.

- Chapter 3: Example RMP for a Laying Farm
  - This chapter gives examples of each component as it applies to a layer farm RMP.

- Chapter 4: Example RMP for a Grading Facility / Packhouse
  - This chapter gives examples of each component as it applies to a packhouse RMP.

- Appendices
  - These appendices give definitions, abbreviations and technical information to help egg producers understand requirements. Contains blank forms and records that the egg producer can use when developing their RMP (if they haven’t already got something suitable).

The diagram on the next page shows the interrelationship between various sections in the Code of Practice. It may be easier to understand each component by looking at the theory, example and blank forms together.
### 2.1.2 RMP Components

The following components must be included in an RMP:

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<th>Theory</th>
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<th>Packhouse example</th>
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<td>- Hazards to human health</td>
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<tr>
<td>- Hazards to animal health</td>
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<tr>
<td>- Risks to wholesomeness</td>
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<tr>
<td>- Risks from false or misleading labelling</td>
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<tr>
<td>Process / operation description</td>
<td>2.6</td>
<td>3.6</td>
<td>4.6</td>
<td>D6</td>
<td></td>
</tr>
<tr>
<td>Identification, Analysis and Control of hazards and other risk factors</td>
<td>2.7</td>
<td>3.7</td>
<td>4.7</td>
<td>D7</td>
<td></td>
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<tr>
<td>from inputs</td>
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</tr>
<tr>
<td>Identification, Analysis and Control of hazards and other risk factors</td>
<td>2.8</td>
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<td>D8</td>
<td>E</td>
</tr>
<tr>
<td>from other sources</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identification, Analysis and Control of hazards and other risk factors</td>
<td>2.9</td>
<td>3.9</td>
<td>4.9</td>
<td>D9</td>
<td>E</td>
</tr>
<tr>
<td>from the process</td>
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<tr>
<td>Operational authorities and responsibilities</td>
<td>2.10</td>
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</tr>
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<td>Generic corrective action procedure</td>
<td>2.11</td>
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<td>4.11</td>
<td>D11</td>
<td></td>
</tr>
<tr>
<td>Recall procedures</td>
<td>2.12</td>
<td>3.12</td>
<td>4.12</td>
<td>D12</td>
<td></td>
</tr>
<tr>
<td>Operator verification</td>
<td>2.13</td>
<td>3.13</td>
<td>4.13</td>
<td>D13</td>
<td></td>
</tr>
<tr>
<td>External verification</td>
<td>2.14</td>
<td>3.14</td>
<td>4.14</td>
<td>D14</td>
<td></td>
</tr>
<tr>
<td>Documentation and record-keeping</td>
<td>2.15</td>
<td>3.15</td>
<td>4.15</td>
<td>D15</td>
<td></td>
</tr>
</tbody>
</table>
2.2 Management Authorities and Responsibilities

The egg producer must document the management authorities and responsibilities for the RMP.

The following table lists the details expected for this RMP component and, where necessary, gives further guidance.

<table>
<thead>
<tr>
<th>Business Name:</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| Business Operator’s Full Legal Name | The legal name of the “Operator” is likely to be the name of:  
- a Company (Note: details must exactly match those registered with The Companies Office),  
- a Partnership, or  
- a Sole Trader. |
| Business Identifier | The business identifier is a code chosen by the egg producer. It:  
- must not be the same as an exporter ID operating from the same premises, and  
- must be a number or a number/letter combination of:  
  - at least 3 and not more than 10 characters;  
  - at least one character as a number;  
  - no leading zeros. |
| Business Address: | |
| Postal Address (If different from the business address): | |
| Registered Company Address (If different from the business address) | For a company this must be the same as the address that is registered with the Companies Office. |
| Email Address: | |
| Phone Number | |
| Fax Number | |
| Day to Day Manager of RMP | Person, position or designation responsible for ensuring that the RMP is implemented as written and for maintaining the RMP in accordance with regulatory requirements. |
| Deputy for Day to Day Manager of RMP | Person, position or designation responsible for covering when day-to-day manager is absent. |

Appropriate training should be given to the following people so that they understand the importance of their role and can carry out their responsibilities effectively:
- the “Operator”,
- the day-to-day manager, and
- the deputy for the day-to-day manager.
2.3 Scope of the risk management programme

The egg producer must document the scope of the RMP and describe its physical boundaries.

Refer to section 1.2 for a description of the difference between primary and secondary processing.

All primary processing operations must be covered by an RMP. It is up to the egg producer whether or not they include any secondary processing in the RMP.

Other processes that are associated with primary processing may also be covered in the RMP. When deciding whether to include these “associated” processes the producer should consider how much interaction there is between them and the primary processing. e.g. if a rearing shed or feedmill was on the same site as the primary process and had common staff who routinely worked in both areas then these would be considered to be associated and should be included in their entirety in the Risk Management Programme. If however they were basically ‘stand alone’ then they can just be treated as inputs into the Risk Management Programme.

Not every egg producer will have all of the processes that are covered in this Code of Practice. They may only have a layer farm and not a packhouse, or vice versa. They may have extra processes and choose to include them in the RMP. It is important that each egg producer makes up their own list of processes included in their own operation.

An egg producer’s RMP may be developed either as a stand-alone programme for each:
- type of animal material or product;
- type of process or operation;
- premises or place;
or as part of a larger RMP relating to one or more materials, products, processes, operations, places or premises.

If the egg producer chooses to group products, processes, operations, places or premises into one programme then some components of the programme may need to be documented more than once to explain any differences, e.g. where hazards vary slightly with each operation. The operator should include different product outcomes for individual premises (but all outcomes must be validated).

An egg producer may have only one RMP or may split their operation into multiple RMPs – but each RMP will need to be validated, evaluated, registered, maintained and externally verified. The egg producer should consider the cost implications as well as the practicalities of maintaining multiple RMPs.

This Code of Practice has been developed with examples of 2 RMPs to cover an egg producer’s operation:
- One for the layer farm(s); and
- One for the packhouse.

If an egg producer chooses to have one RMP for both operations then they can combine the two examples, delete any unnecessary repetition and develop their RMP from there.

1 If an egg producer has other animal products that leave their operation then they will need to meet any requirements under the Animal Products Act for those products, e.g. If end of lay hens are sent for processing into meat products then the egg producer is not the primary processor so doesn’t need an RMP for this operation. Instead, they will be treated as a poultry supplier and must have a Whole Flock Health Scheme and submit Supplier Declarations as required by the Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000.
The following table lists the details expected for this RMP component and, where necessary, gives further guidance.

<table>
<thead>
<tr>
<th>Business Name:</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>The Type Of Premises</strong></td>
<td>This is likely to be one of:</td>
</tr>
<tr>
<td></td>
<td>• A layer farm or farms,</td>
</tr>
<tr>
<td></td>
<td>• A packhouse, or</td>
</tr>
<tr>
<td></td>
<td>• One or more layer farms and packhouse.</td>
</tr>
<tr>
<td><strong>Animal materials</strong></td>
<td>This should include all animal materials going into the RMP</td>
</tr>
<tr>
<td><strong>Animal products</strong></td>
<td>This should include any products coming out of the RMP that are intended for:</td>
</tr>
<tr>
<td></td>
<td>• human consumption and</td>
</tr>
<tr>
<td></td>
<td>• animal consumption.</td>
</tr>
<tr>
<td><strong>Location</strong></td>
<td>For each risk management programme the egg producer must describe the location (address) and the physical boundaries of the RMP.</td>
</tr>
<tr>
<td></td>
<td>If any transport is included in the RMP then the vehicles must be listed within the scope.</td>
</tr>
<tr>
<td><strong>Start of RMP</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Processes</strong></td>
<td></td>
</tr>
<tr>
<td><strong>End of RMP</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Risk Factors Covered</strong></td>
<td>Make it clear which of the following are covered by the RMP and which are not, and if not why:</td>
</tr>
<tr>
<td></td>
<td>• Hazards to Animal Health</td>
</tr>
<tr>
<td></td>
<td>• Hazards to Human Health</td>
</tr>
<tr>
<td></td>
<td>• Risks to Wholesomeness</td>
</tr>
<tr>
<td></td>
<td>• Risks From False or Misleading Labelling</td>
</tr>
</tbody>
</table>

The egg producer must describe the physical boundaries of the programme. This is normally done by using a simple site plan that show the relevant buildings and outside areas. The egg producer then clarifies the areas that are included in the RMP, usually by outlining, highlighting or shading the site plan as appropriate.

**Animal Products (RMP Specification) Notice 2000, Clause:**

5. **Boundaries of a risk management programme** –

(1) The physical boundaries of the place covered by a risk management programme must be specified in that programme.

(2) A risk management programme applies to all animal material, animal product, operations, associated things and other sources of potential risk factors within the physical boundaries of the programme.
2.4 Product description and intended purpose

The egg producer must document the description of each by-product, product or group of products that comes out of the RMP, and is intended for human or animal consumption.

Some operations will have multiple products, e.g. normal shell eggs and floor eggs (not relevant to caged operations). Some operations will only have one product e.g. those with automatic egg collectors where all eggs go straight to grading facility without prior sorting.

Animal Products (RMP Specification) Notice 2000, Clause:
6. Animal material and animal product description

(a) the product name or type and intended purpose (including the intended use and intended consumer) of each animal product or group of similar products, produced under that programme; and

(b) a description of the animal material outputs under that programme.

The following table lists the details expected for this component and where necessary gives further guidance.

<table>
<thead>
<tr>
<th>Mandatory</th>
</tr>
</thead>
<tbody>
<tr>
<td>Product Name</td>
</tr>
<tr>
<td>Product Description</td>
</tr>
<tr>
<td>Intended Use</td>
</tr>
<tr>
<td>Intended Consumer</td>
</tr>
<tr>
<td>Shelf Life</td>
</tr>
<tr>
<td>Labelling</td>
</tr>
<tr>
<td>Packaging</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Optional</th>
</tr>
</thead>
<tbody>
<tr>
<td>Where it is to be sold</td>
</tr>
<tr>
<td>Storage and Transport Conditions</td>
</tr>
</tbody>
</table>

Guidance:
- Characteristics that help to differentiate between the different products
- Whether the product will be sold for use as is, or for further processing or some other end use.
- Human and/ or animal consumption with further details as appropriate .
- How long the product can be held before use and still maintain its safety and wholesomeness.
- e.g. With refrigeration guidelines, Use by date, Size, Claims re free range, barn or organic.
- e.g. retail, wholesale, route trade etc
- Conditions that should be maintained in order to meet the shelf life claimed, e.g. Refrigeration at or below 15°C
2.5 Product outcomes

The egg producer must document the product outcomes for each by-product, product or group of products that comes out of the RMP, and is intended for human or animal consumption.

Products must be fit for their intended purpose as defined in product outcomes for the relevant risk factors.

Fitness for intended purpose = eggs that are:
- safe,
- wholesome, &
- truthfully labelled

Animal Products (RMP Specification) Notice 2000, Clause:
7. Fitness for purpose
(1) For each animal product, or group of similar animal products produced under a risk management programme, the operator must document within the programme, the expected outcomes for fitness for intended purpose, for each of the following risk factors defined in the Act, as applicable -
   (a) risks from hazards to animal or human health; and
   (b) risks from false or misleading labelling; and
   (c) risks to the wholesomeness of animal material or animal product.
(2) For any animal material leaving a risk management programme, the operator must record the expected outcomes for suitability for processing, for the applicable risk factors described in subclause (1) (a)-(c).
(3) Outcomes in relation to animal material and animal product must -
   (a) meet all relevant animal product regulations and specifications, and
   (b) where no regulations or specifications exist, contain adequate justification for the outcomes; and
   (c) be measurable; and
   (d) be appropriate and achievable.
Appendix C: Technical Annex summarises the justification for the risk factors that have been selected to have product outcomes in the examples given in chapters 3 and 4.

Everyone could have a different interpretation of what this means, so the industry has had input into the examples of acceptable product outcomes used in this Code of Practice.

Product outcomes are not necessary for reject eggs as these eggs are dumped at the layer farm and will not be used for human or animal consumption.

Animal Products (RMP Specification) Notice 2000, Clause:
8. Actions when outcomes not met

(1) A risk management programme must describe the actions the operator will take if the outcomes specified in the risk management programme in accordance with clause 7 are not met.

(2) The operator must document in the risk management programme a generic corrective action procedure in accordance with clauses 12 and 13.

The following table lists the details expected for this RMP component and, where necessary, gives further guidance. In the examples in chapters 3 and 4 there is an additional column at the left to sort the hazards into biological, chemical and physical categories.

<table>
<thead>
<tr>
<th>Hazard or other risk factor</th>
<th>Aim of RMP outcomes</th>
<th>Example Product outcomes</th>
<th>Key Control Measures</th>
<th>Response if outcome not met</th>
</tr>
</thead>
<tbody>
<tr>
<td>Only need to include those that are reasonably likely to occur and that can be controlled. There should be information to justify which ones are identified.</td>
<td>e.g. to prevent, minimise or reduce hazard or other risk factor to acceptable levels.</td>
<td>Product outcomes must be developed for each product or product group and must: • meet all relevant animal product regulations and specifications, and • where no regulations or specifications exist, contain adequate justification for the outcomes; and • be measurable; and • be appropriate and achievable. Where it is not practical for a risk factor to be measured within the RMP the operator may put “level not yet defined” for the outcome so long as key control measures are identified.</td>
<td>This covers the Critical Control Points (CCPs) and other controls within the process or supporting systems that make the most difference to the level of hazard or other risk factor that is present in the product.</td>
<td>This should cover: • restoration of control, product disposition (where relevant) and • what will be done to prevent the problem from happening again (including an investigation of why problem happened).</td>
</tr>
</tbody>
</table>

For examples refer to:
3.5 = layer farm
4.5 = packhouse
2.5.1 Product outcomes for hazards to human health

These must cover biological, chemical and physical hazards that can be controlled by the egg producer.

Animal Products Regulation 2000, Clause 6:

Animal product to be free of certain hazards, objects, materials, and substances—
(1) Taking into consideration its intended use, animal product must be free from—
(a) biological, chemical, and physical hazards in amounts that may be directly or indirectly harmful to humans or animals:
(b) extraneous objects, material, and substances of a kind not expected to be in animal product that is prepared or packed for trade in accordance with good trade practices:
(c) animal material in amounts that may be directly or indirectly harmful to humans and animals for which the animal product is intended.

Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000\(^\text{2}\), Clause:

105 Application of clauses 106 and 107
Clauses 106 and 107 apply to operators of primary processing premises who process avian eggs for human consumption.

106 General requirements
The operator must ensure that layer flocks producing eggs for processing are subject to and comply with a whole flock health scheme designed to ensure that hazards associated with eggs which are likely to affect human health are identified and managed in an appropriate manner.

107 Shell eggs
(1) Eggs that are intended to be traded in the shell must —
(a) be visibly clean; and
(b) have no cracks that are visible on candling (or equivalent) unless they have been treated by a process that destroys pathogenic organisms; and
(c) have no evidence of embryo development, or putrefaction, and no significant blood clots; and
(d) not have been incubated; and
(e) be handled and stored under conditions that minimise condensation on the surface of the eggs.

(2) Any primary processing of eggs intended to be traded in the shell that compromises the integrity of the shell, must be minimised.

FSANZ Food Standards Code: Standard 2.2.2: Egg and Egg Products

This Standard provides definitions for egg and egg products. Processing requirements for egg products and requirements relating to the sale of cracked eggs are included in this Standard and Standard 1.6.2.

1 Interpretation In this Code -
egg means the reproductive body in shells obtained from any avian species, the shell being free from visible cracks, faecal matter, soil or other foreign matter.
egg products means the content of egg, as part or whole, in liquid, frozen or dried form.

\(^2\) This is likely to be deleted or to simply refer to the FSANZ Food Standards Code, Standard 2.2.2.
visible cracks includes cracks visible by candling.

2 Processing of egg products

(1) Subject to subclause (2), egg products must be pasteurised or undergo an equivalent treatment so that the egg product meets the microbiological criteria specified in Standard 1.6.1.3

(2) Subclause (1) does not apply to the non-retail sale of egg products used in a food which is pasteurised or undergoes an equivalent treatment so that the egg product used in the food meets the microbiological criteria specified in Standard 1.6.1.

3 Sale of cracked eggs

(1) Cracked eggs must not be made available for retail sale or for catering purposes.
(2) Cracked eggs sold for non-retail must be pasteurised or have undergone an equivalent treatment so that the egg product meets the microbiological criteria specified in Standard 1.6.1.

Editorial Note: Standard 1.2.3 requires unpasteurised egg and egg products to be labelled with an advisory statement that the product is unpasteurised.

2.5.2 Product outcomes for risks to wholesomeness

These must cover problems that customers will find offensive or unexpected in product of that type. It is worth reviewing customer complaints to see what should be included in this category.

2.5.3 Product outcomes for risks from false or misleading labelling

Animal Products Regulation 2000, Clause 8:

Animal product not to be associated with false or misleading representation--
Animal product must not be associated with a false or misleading representation of any kind concerning its--
(a) fitness for intended purpose:
(b) nature:
(c) origin:
(d) composition:
(e) ingredients or other constituents:
(f) proportion of ingredients or other constituents.

Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, Clause:

3 Standard 1.6.1 includes mandatory sampling plans, used to sample lots or consignments of nominated foods or classes of foods, and the criteria for determining when a lot or consignment of food poses a risk to human health and therefore should not be offered for sale, or further used in the preparation of food for sale. The criteria for eggs is given below.

\[ n = \text{the minimum number of sample units which must be examined from a lot of food} \]
\[ c = \text{the maximum allowable number of defective sample units as specified in Column 4 of the Schedule.} \]
\[ m = \text{the acceptable microbiological level in a sample unit.} \]
\[ M = \text{the level when exceeded in one or more samples that would cause the lot to be rejected.} \]

<table>
<thead>
<tr>
<th>Food</th>
<th>Micro-organism</th>
<th>n</th>
<th>c</th>
<th>m</th>
<th>M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pasteurised egg products (or equivalent treatment)</td>
<td>Salmonella/25g</td>
<td>5</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

4 For their own protection, it is strongly recommended that egg producers only sell cracked eggs to those operators that have documented evidence that they have validated their processes to show that they can consistently meet the requirements of Standard 1.6.1.
32 Labelling

(1) Labelling must be provided on transportation outers and must state —
   (a) the animal material or animal product name or description; and
   (b) storage directions, where necessary to maintain the animal material as suitable for
       processing or animal product as fit for intended purpose; and
   (c) lot identification (except that this requirement is optional if the application of lot
       identification to the retail packaging is a mandatory requirement under other
       legislation and that legislation is complied with); and
   (d) in the case of fish or fish product, the scientific name of the fish (as specified in
       Schedule 4 or as approved by the Director-General).

(2) Mandatory labelling must be clear, legible, indelible, and use terms that are commonly
    used in the English language.

(3) In the case of the transportation outers used for the transportation of unpackaged bulk
    materials that cannot practicably be labelled, the information specified in subclause (1)
    may be contained within the accompanying documentation.

(4) The transportation outer of animal material or animal product that is not intended for
    human consumption but has the appearance of, or could be mistaken for, animal material
    or animal product that is intended for human consumption, must be labelled to clearly
    indicate that the animal material or animal product it contains is not intended for human
    consumption.

(5) If the status of an animal material’s suitability for processing, or the fitness for intended
    purpose of the animal product changes, and the animal material or animal product has
    been labelled, this labelling must be amended to reflect the new status prior to its release
    for trade.

The outcomes should also cover the claims that are made on the label with respect to caged,
    barn, free range or organic eggs.

2.5.4 Product outcomes for hazards to animal health

There is currently insufficient information to set scientifically-based product outcomes for
this. Until such information becomes available, these product outcomes may be set based on
process capability, customer requirements or on the product outcomes used for human
health. There must be a product outcome requiring clear labelling of products intended for
animal consumption so that they are not confused with products for human consumption.

2.5.5 Review of product outcomes

All product outcomes should be reviewed after hazard and other risk factor analysis to confirm
that they are appropriate and achievable.

2.5.6 Other outcomes

An egg producer may wish to set other outcomes to meet customer requirements; (e.g. for
supermarkets) and their own business needs. These outcomes are over and above regulatory
requirements. If the egg producer includes them in the RMP they will be subject to validation,
evaluation and verification just like the rest of the RMP. This could cause unnecessary
complexity and added costs so it is recommended that they are not included in the RMP
unless there are other benefits from doing this.
2.6 Process description

The egg producer must document the processes that are included within the scope of the RMP (as described in section 2.2.)

The easiest way to document this is using process a flow diagram. The start and end point of the process may be different to the example given on the next page.

In cases where the egg producer does not cover all of the processes from laying to packing then the RMP only covers the operations that are under the egg producer’s control.

If other operations, e.g. hatcheries, rearing farms and/or feedmills have been incorporated into the RMP then process flow diagrams will also need to be drawn for these operations.

Animal Products (RMP Specification) Notice 2000, Clause:
9. Describing the process or operation

Every process or operation carried out under a risk management programme must be documented by the operator within the programme, including –

(a) any input relevant to the suitability for processing of animal material or fitness for purpose of animal product; and
(b) the main activities in the process or operation; and
(c) all outputs of the risk management programme.

The following table lists the details expected for this component and where necessary gives further guidance.

<table>
<thead>
<tr>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Inputs</strong></td>
</tr>
<tr>
<td>This should include all raw materials (eggs), packaging, processing aids, returned eggs etc.</td>
</tr>
<tr>
<td>NB: The “inputs” shown in the diagram on the next page include other items that impact indirectly on the egg and are more correctly “other sources” of hazards/risk factors. They have however been included in the diagram under “inputs” to show the most likely place where they impact on the process.</td>
</tr>
<tr>
<td><strong>Process steps</strong></td>
</tr>
<tr>
<td>This should include the first step from the defined starting point of the RMP and each subsequent step until the end of the RMP. If there are processes that flow into, or out of, the main process flow, then this should also be shown.</td>
</tr>
<tr>
<td><strong>Outputs</strong></td>
</tr>
<tr>
<td>This should include all products leaving the RMP irrespective of whether they are intended to go to:</td>
</tr>
<tr>
<td>• Another RMP or to secondary processing</td>
</tr>
<tr>
<td>• Human Consumption</td>
</tr>
<tr>
<td>• Animal Consumption</td>
</tr>
<tr>
<td>• Waste</td>
</tr>
</tbody>
</table>

The description is likely to vary with each RMP so the example that is given on the next page will need to be adapted to accurately reflect the egg producer’s actual scope of operations. This has been done in the examples that are referred to below.

For examples refer to:
3.6 = layer farm
4.6 = packhouse
Inputs | Process Steps | Outputs
--- | --- | ---
Cleaning chemicals | 1. Cleanout | Manure / Used litter
Fumigants | | Dead birds
Birds | 2. Bird receipt at laying shed | End of lay birds
Litter | 3. Bird Management | Reject eggs (broken, leaking, very dirty)
Feed | | Downgraded eggs
Water | | (broken, leaking, very dirty)
Nest Box Material | | Commercial eggs
Medication | | Cracked eggs
Egg trays | 4. Egg Collection | Downgraded eggs
Labels | | (broken, leaking, very dirty)
Carts / Pallets | | 
Returned eggs¹ | | 
Forklift / cart / truck or Conveyor | | 
Storage trolleys | | 
Labels | | 
Chemicals | 5. Storage and transfer to Grading | 
Water | | 
Dirty eggs | | 
Oil | | 
8. Candling | | 
Cartons / Trays | 9. Grading / Weighing | Shell eggs for human consumption
Plastic Wrap | | 
Ink / Labels | | 
Pallets | 10. Packing | 
11. Egg Storage / Loadout | | 
¹ If there are any returned eggs or rework, amend diagram to show any extra relevant steps.
2.7 Identification, Analysis and Control of Hazards and Other Risk Factors From Inputs

The egg producer must document:
- the hazards and other risk factors that are reasonably likely to be associated with each input, and
- how each identified hazard or other risk factor is controlled by the RMP.


10. Identification and analysis of hazards
(1) The hazard analysis required under section 17(3) of the Act must be documented in the risk management programme.
(2) Uncontrolled hazards must be clearly documented in the risk management programme.

11. Control of hazards
(1) For all controls, the operator must have documented procedures which will ensure compliance with the appropriate specifications, good hygienic practice and any other requirements described in the risk management programme including:
   (a) any monitoring procedures that are to be applied; and
   (b) any corrective action procedures that will be applied in the event of loss of control, including—
      (i) how control will be restored; and
      (ii) how any affected animal material and animal product will be controlled or disposed of; and
      (iii) any measures to be taken to prevent reoccurrence of the loss of control; and
   (c) any ongoing operator verification procedures.
(2) In addition to subclause (1), the operator must document the following in relation to each identified critical control point within the risk management programme -
   (a) the critical control point, and the justification for its identification; and
   (b) the critical limits to be met and the justification for those limits.

Start by considering the hazards and other risk factors, and the possible controls that have been identified in the Summary tables in Appendix C: Technical Annex, section 13.

For each input, except water, with identified hazards or risk factors go through the analysis in 2.7.1 to 2.7.5. We do not expect people to identify Critical Control Points (CCPs) in association with these inputs.

For water go to 2.7.6.

---

5 This specification also applies to identification and analysis of hazards associated with the process steps and other sources.
2.7.1 Name the Input

e.g. raw material, ingredient, packaging etc.

2.7.2 Document the Relevant Hazards or Other Risk Factors

Refer to Appendix C: Technical Annex, section 13 and select the hazards and other risk factors that are reasonably likely to occur and are relevant to the input. Add in any additional hazards or other risk factors that are associated with the inputs that are specific to your own operation.

2.7.3 Develop Supplier Requirements

It is sensible to get the supplier to eliminate or minimise the hazards and other risk factors as much as possible. Do this by setting requirements that they must meet.

<table>
<thead>
<tr>
<th>Regulatory Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Include any relevant regulatory requirements (from Regulations or Specifications).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Operator-Defined Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Include any relevant requirements of your own. You may get ideas from this Code of Practice.</td>
</tr>
</tbody>
</table>

Discuss these requirements with your supplier and get their agreement to meet them.

2.7.4 Document the Egg Producer’s Procedures to Check the Supplier has Met Above Requirements and to Control Input Until It is Used

Procedures must cover controls, monitoring, corrective action and operator verification in sufficient detail to enable the hazards and other risk factors to be controlled adequately. The following details are recommended.

Monitoring Procedures

- Who is responsible for doing the monitoring;
- What is going to be done;
- How is the monitoring to be carried out;
- When is it to be done, i.e. frequency;
- How the observations are to be recorded.

Corrective action procedures:

- Who is responsible for taking corrective action;
- How control is to be restored;
- If product is involved, how control and disposition of non-conforming product is to be managed;
- What action is to be taken to prevent the problem from happening again;
- What escalating response is available if preventative action fails;
- How the above actions are to be recorded.
Operator verification procedures:

These procedures must cover internal verification of the effectiveness and compliance with above procedures. Document:

- Who is responsible for it
- How it is done
- When it is to be done
- The follow-up action to be taken when non-compliance occurs
- What is to be recorded.

In some cases it may be possible to reduce these details into a table. In other cases more detailed procedures will be required, e.g. for a Whole Flock Health Scheme or a Pest Control System. Common sense should be applied when deciding on the level of detail needed.

2.7.5 Record-keeping

Records are expected for all monitoring, corrective action and operator verification activities. The actual records that contain these details should be identified here.
2.7.6 Identification and Control of Risk Factors From Inputs – Water

The egg producer must document how they meet the Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000 requirements for water.

There are a number of different options available to the operator for controlling water.

---

**The Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, clause 3 states:**

“potable water means water that —

(a) in relation to water supplied by an independent supplier (including a public or private supplier), is of a standard administered by the independent supplier under the Health Act 1956 and any regulations made under that Act; or

(b) in relation to water supplied by the operator solely for the use of the operator (such as bore water, rainwater, surface water, or ground water), —
   (i) is of a standard equivalent to that referred to in paragraph (a), as determined by the operator based on an analysis of hazards and other risk factors; or
   (ii) complies with the requirements in Schedule 1; or

(c) meets the requirements of the current “Meat Division Circulars 86/3/2: Surveillance of Potable Water in Meat and Game Export Premises” issued by the Ministry.”

---

**The Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, clauses 8, 9 and 11 – 14 state:**

**8 Water coming into contact with animal material or animal product**

(1) Water (including ice and steam) that comes into direct contact or indirect contact with animal material or animal product must be potable water, or clean seawater at the point of use.

(2) Despite subclause (1), the operator may use an alternative water quality standard as determined by the operator provided —
   (a) the water quality standard is determined by an analysis of hazards and other risk factors; and
   (b) the suitability for processing of animal material or fitness for intended purpose of animal product is not adversely affected.

(3) Subclauses (1) and (2) do not apply to water used for live animals, or to water used for washing bivalve molluscan shellfish prior to depuration, or for depuration, or for wet storage.

(4) The water used for activities relating to bivalve molluscan shellfish referred to in subclause (3) must comply with the requirements in the shellfish regulated control scheme.

**9 Water not coming into contact with animal material or animal product**

(1) Water that does not come into direct contact or indirect contact with animal material or animal product must meet the requirements of clause 8, or may meet an alternative non-contact water quality standard.

(2) If an alternative non-contact water quality standard is used, the appropriate standard must be determined by the operator —
   (a) by an analysis of hazards and other risk factors; and
   (b) taking into consideration the intended use of the water.
11 Requirement for reticulation management plan
(1) The operator must implement a reticulation management plan for potable water used within a premises or place, (including its use on fishing vessels), where the water is supplied by an independent supplier.
(2) The reticulation management plan must include —
   (a) systems to ensure that reticulation of water throughout the premises or place is not adversely affected and that the intended water quality is delivered at point of use; and
   (b) systems to ensure that there is no unintentional mixing of water of different standards; and
   (c) an action plan with appropriate sanitation procedures to be implemented in the event of non-compliance with the reticulation management plan.

12 Requirement for water management plan
(1) The operator must implement a water management plan for water described in clause 8 if —
   (a) water is supplied by an independent supplier and is subjected to any treatment by the operator; or
   (b) water is supplied by the operator solely for the operator's use; or
   (c) an alternative water quality standard as described in clause 8(2) is used; or
   (d) clean seawater is used in a land based premises or place.
(2) The water management plan must include —
   (a) any additional treatments —
      (i) as required by the operator supplying potable water or using clean seawater in a land based premises or place; or
      (ii) in the case of an alternative water quality standard, as determined through the analysis of hazards and other risk factors; and
   (b) the water quality standard (including criteria) as determined through an analysis of hazards and other risk factors; and
   (c) a water sampling and testing programme; and
   (d) an action plan in the event of non-compliance with the water management plan; and
   (e) the requirements of the reticulation management plan described in clause 11(2).

13 Water analyses
(1) Water analyses used to demonstrate compliance with clause 12 must be performed by a MILAB laboratory registered for the required analyses, or a laboratory with persons who are accredited as signatories for the required analyses.
(2) The operator must ensure that the training of water samplers is undertaken by a laboratory referred to in subclause (1).
(3) Subclause (1) does not apply to chlorine, pH or turbidity measurements, which are performed by a suitably skilled person using documented test methodologies (including calibration procedures) and/or calibrated equipment.

14 Non-complying water
(1) This clause applies only to water to which clause 8 applies.
(2) If potable water supplied by an independent supplier is used, and the independent supplier advises the operator that the water is not fit for drinking without additional treatment, or the operator has reason to believe that the water is not fit for use, and the operator has no other means described in the risk management programme to ensure the water is potable at the point of use, all operations involving that water must cease.
(3) If water used is supplied by the operator, or is of an alternative water quality standard that has been determined under clause 8(2), or is clean seawater used in a land based premises or place, and the operator fails to comply with any of the requirements of the water management plan (including corrective actions), and has no other means described in the risk management programme to ensure the water meets the original standard at the point of use, all operations involving that water must cease.
Under the above specifications:
• any water that contacts the egg must be “potable.
• it is not mandatory for hen’s drinking water to be “potable”.

In contrast the Animal Welfare Code does require hen’s drinking water to be “potable”.

For simplicity in this Code of Practice we have chosen to ensure that all water on the laying farm and at the Packhouse is “potable”.

In summary, the way that an egg producer needs to control water safety depends on whether they have their own supply or if they get water off someone else (e.g. the local Council).

Is your water supplied by someone else?  
No

Do you have your own supply?  
Yes

You must check that the water supplied is potable.

You must have a water management plan to ensure your water is potable.

You can either:
1. Do an analysis of hazards and other risk factors to confirm that the water is of a standard equivalent to that administered by an independent supplier under the Health Act 1956 and any regulations made under that Act; or
2. Comply with Schedule 1 (Refer to Appendix G); or
3. Meet the requirements of the current “Meat Division Circulars 86/3/2 and 86/3/5 (Refer to NZFSA web site).

Yes it is potable

You must have a reticulation management plan.

If you have a combination of supplies you will have to meet the requirements for each one.
Record which potability options you have chosen for each of your water supplies. The following table lists the details expected for this component and where necessary gives further guidance.

<table>
<thead>
<tr>
<th>Water Supplier:</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>e.g.:</td>
</tr>
<tr>
<td></td>
<td>• Independent supplier (local council)</td>
</tr>
<tr>
<td></td>
<td>• egg producer</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Water source:</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Not necessary for independent supplies.</td>
</tr>
<tr>
<td></td>
<td>Record details for any water supplied by egg producer:</td>
</tr>
<tr>
<td></td>
<td>e.g.:</td>
</tr>
<tr>
<td></td>
<td>• secure groundwater (bore)</td>
</tr>
<tr>
<td></td>
<td>• surface water (spring, shallow well, lake, reservoir, stream)</td>
</tr>
<tr>
<td></td>
<td>• roof</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Water potability option:</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>e.g.:</td>
</tr>
<tr>
<td></td>
<td>• Health Act 1956</td>
</tr>
<tr>
<td></td>
<td>• Analysis of hazards and other risk factors</td>
</tr>
<tr>
<td></td>
<td>• Schedule 1</td>
</tr>
<tr>
<td></td>
<td>• Meat Circulars 86/3/2 and 86/3/5</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Water Management Plan</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Where it is necessary to have a water management plan as per Specification 12 on page 2-17 then state how you meet the Specification.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Water Reticulation Plan</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>State how you meet Specification 11 on page 2-17.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Records</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>State where to find the records showing that the chosen potability option has been met.</td>
</tr>
<tr>
<td></td>
<td>e.g. Approved Supplier file in Manager’s office with following details included:</td>
</tr>
<tr>
<td></td>
<td>• Letter from independent supplier confirming they operate under Health Act 1956 – filed in Approved Supplier file.</td>
</tr>
<tr>
<td></td>
<td>• Hazard and other risk factor analysis information.</td>
</tr>
<tr>
<td></td>
<td>• Completed “Assessment of Water Supply Status Checklist” from Schedule 1.</td>
</tr>
<tr>
<td></td>
<td>• Laboratory Test Reports confirming that Meat Circular requirements have been met.</td>
</tr>
</tbody>
</table>
2.8 Analysis / Control of Hazards and Other Risk Factors From Other Sources

The egg producer must identify and document the hazards and other risk factors that are reasonably likely to be associated with sources other than the inputs and the process itself, e.g. with:

- Chemicals;
- Pests;
- Internal environs, facilities and equipment;
- External environs; and.
- Personnel.

The egg producer must document the application of the 7 HACCP principles to determine how to best control the identified hazards (using Critical Control Points (CCPs) or other controls).

The egg producer must document how the other risk factors that have been identified are controlled by the RMP. It is optional to apply the HACCP principles to these other risk factors.

For each source go through the analysis below.

2.8.1 Name the Source

2.8.2 Identify the Scope

Clarify what is included and what is not included in this analysis.

2.8.3 Develop Requirements

**Regulatory Requirements**

Include any relevant regulatory requirements (from Regulations or Specifications).

**Operator-Defined Requirements**

Include any relevant requirements of your own. You may get ideas from this Code of Practice.

2.8.4 Draw Process flow diagram

<table>
<thead>
<tr>
<th>Inputs</th>
<th>Process steps</th>
<th>Outputs</th>
</tr>
</thead>
</table>

*Process flow diagrams are not always appropriate. Their use is optional.*
2.8.5 Identify / Analyse Hazards and Other Risk Factors and Determine CCPs

Refer to Appendix C: Technical Annex, section 13 and select the hazards and other risk factors that are reasonably likely to occur and are relevant to the source. Add any additional hazards or other risk factors that are associated with the input that are specific to your own operation.

Answer the questions in the following table after considering the written evidence (records) of the effectiveness of current controls you have in place (including any CCPs).

There are no CCPs where the relevant requirements are non-measurable.

<table>
<thead>
<tr>
<th>Hazard or Risk Factor reasonably likely to occur with each source</th>
<th>Current Control measures, e.g. GHP / GMP / CCP</th>
<th>Is there a relevant measurable requirement?</th>
<th>Q1: Is hazard reasonably likely to contact product?</th>
<th>Q2: Could the level of hazard exceed the measurable requirement?</th>
<th>Q3: Is there one or more new or improved controls that will achieve the measurable requirement?</th>
<th>Q4: Are there any other controls?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>If yes, go to Q2. If no, not a CCP. Go to next hazard or risk factor.</td>
<td>If yes, go to Q3. If no, not a CCP. Go to next hazard or risk factor.</td>
<td>If no, go to Q4. If yes set up CCP to meet measurable requirement and also go to Q4.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>If yes, go to Q2. If no, not a CCP. Go to next hazard or risk factor.</td>
<td></td>
<td></td>
<td>If yes, redesign / establish GMP/GHP to meet remaining requirements. If no, and no CCPs list as uncontrolled. Consider at process analysis.</td>
</tr>
</tbody>
</table>

2.8.6 Determine Critical Limits

Determine critical limits for each CCP (see table below).

<table>
<thead>
<tr>
<th>CCP No.</th>
<th>CCP</th>
<th>Critical Limits</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

For non-CCPs, establish criteria for controls, where necessary, within the relevant procedures.

It is a good idea to review the operator-defined requirements to ensure that they are still relevant after the analysis has been completed.

---

7 If an egg producer is happy with the analysis in the relevant section of the COP then it is recommended that they just include a cross reference to that section rather than repeating the analysis in their RMP. The section that is cross referenced will become part of their RMP.

8 An extra column may be inserted at the start of the table to further identify the sources of hazards. Where there are no measurable outcomes the 4 right hand columns containing the questions should be deleted as these are related to CCP determination which is irrelevant in this situation. Refer to 3.9.2.4 for an example where these variations have been used.
2.8.7 Document Procedures

Procedures must cover controls, monitoring, corrective action and operator verification in sufficient detail to enable the hazards and other risk factors to be controlled adequately. The following details are recommended.

Monitoring Procedures

- Who is responsible for doing the monitoring;
- What is going to be done;
- How is the monitoring to be carried out;
- When is it to be done, i.e. frequency;
- How the observations are to be recorded.

Corrective action procedures:

Cover the following key points when critical limits are not met at a CCP, or when general control measures are not being complied with:

- Who is responsible for taking corrective action;
- How control is to be restored;
- If product is involved, how control and disposition of non-conforming product is to be managed;
- What action is to be taken to prevent the problem from happening again;
- What escalating response is available if preventative action fails;
- How the above actions are to be recorded.

Operator verification procedures:

These procedures must cover internal verification of the effectiveness and compliance with above procedures. Document:

- Who is responsible for verification
- How it is done
- When it is to be done
- The follow-up action to be taken when non-compliance occurs
- What is to be recorded.

In some cases it may be possible to reduce these details into a table. In other cases more detailed procedures will be required, e.g. for a Whole Flock Health Scheme or a Pest Control System. Common sense should be applied when deciding on the level of detail needed.

2.8.8 Documentation and record-keeping

Documentation is expected for all steps in the application of the HACCP principles, as outlined above. This includes each CCP, where relevant, and all general controls.

Records are expected for all monitoring, corrective action and operator verification activities, both in relation to CCPs and general controls.

Note: some control measures may be repeated in other supporting systems. If this occurs only one set of documentation and records is necessary for each control measure.
2.9 Analysis / Control of Hazards and Other Risk Factors From the Process

The egg producer must identify and document the hazards and other risk factors that are reasonably likely to be associated with the process itself.

The egg producer must document the application of the 7 HACCP principles to determine how to best control the identified hazards (using Critical Control Points (CCPs) or other controls).

The egg producer must document how the other risk factors that have been identified are controlled by the RMP. It is optional to apply the HACCP principles to these other risk factors.

2.9.1 Analyse hazards and other risk factors at each process step

| Process step | Input Name | Hazard or other risk factor associated with input | Hazards and other risk factors from process step, and potential impact of process step on existing hazards and other risk factors | Justify answer. If no not a CCP, Go to Q4. If yes, go to Q2 and Q3. | If no go to Q3. If yes, this step is a CCP. Go to Q4. | If yes, assign the previous step as a CCP. CCP No. If no, and no CCPs list as uncontrolled. If yes, redesign / establish general controls to meet outcomes. | Q1. Could the risk factor be present in or on the eggs at unacceptable levels at this step? | Q2. Is there a control measure at this step that would prevent unacceptable levels of the risk factor or reduce it to acceptable levels? | Q3. Is there a control measure available at a previous step? | Q4: Are there any other non-measurable controls? |
|--------------|------------|-----------------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|___________________________________________|----------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|-----------------------------------------------|-----------------------------------------------|
| 1.           |            |                                               |                                                                 |                                                                                                                |                                                                                                      | For examples refer to: 3.9 = layer farm 4.9 = packhouse                                                                                  |                                                                                       |                                                                                       |                                                                                       |                                                                                       |
2.9.2 Determine Critical Limits

Determine critical limits for each CCP (see table below).

<table>
<thead>
<tr>
<th>CCP No.</th>
<th>CCP</th>
<th>Critical Limits</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

For other controls establish general criteria for control.

General Control Criteria

It is a good idea to review the measurable outcomes to ensure that they are still relevant after the analysis has been completed.

2.9.3 Document Procedures

Procedures must cover controls, monitoring, corrective action and operator verification in sufficient detail to enable the hazards and other risk factors to be controlled adequately. The following details are recommended.

Monitoring Procedures

- Who is responsible for doing the monitoring;
- What is going to be done;
- How is the monitoring to be carried out;
- When is it to be done, i.e. frequency;
- How the observations are to be recorded.

Corrective action procedures:

Cover the following key points when critical limits are not met at a CCP, or when general control measures are not being complied with:

- Who is responsible for taking corrective action;
- How control is to be restored;
- If product is involved, how control and disposition of non-conforming product is to be managed;
- What action is to be taken to prevent the problem from happening again;
- What escalating response is available if preventative action fails;
- How the above actions are to be recorded.

Operator verification procedures:

These procedures must cover internal verification of the effectiveness and compliance with above procedures. Document:

- Who is responsible for verification
- How it is done
- When it is to be done
- The follow-up action to be taken when non-compliance occurs
- What is to be recorded.
In some cases it may be possible to reduce these details into a table. In other cases more detailed procedures will be required, e.g. for a Whole Flock Health Scheme or a Pest Control System. Common sense should be applied when deciding on the level of detail needed.

### 2.9.4 Documentation and record-keeping

**Documentation** is expected for all steps in the application of the HACCP principles, as outlined above. This includes each CCP, where relevant, and all general controls.

**Records** are expected for all monitoring, corrective action and operator verification activities, both in relation to CCPs and general controls.

**Note:** some control measures may be repeated in other supporting systems. If this occurs only one set of documentation and records is necessary for each control measure.
2.10 Operational authorities and responsibilities

The egg producer must document in the RMP, who is responsible for monitoring, corrective action and operator verification activities.

2.10.1 Requirements

Animal Products (RMP Specification) Notice 2000, Clause:
14. Identities of responsible persons

The operator must document in the risk management programme the identity (either by position, designation or name) and responsibilities of all persons responsible for monitoring, corrective action, and operator verification activities.

For examples refer to:
3.10 = layer farm
4.10 = packhouse

2.10.2 Recommendations

It is important that all those who have responsibilities for all or part of the risk management programme understand the importance of their role. Appropriate training and supervision should be provided for each person.

HACCP training is recommended for all egg producers and / or the person in charge of their RMP. NZQA Unit Standards are currently under development for this and should be available shortly.

Specific “on the job” training should be given to those who have responsibilities under the RMP. This should include:

- Brief introduction to the RMP as a whole and what it is for; and
- Familiarisation with relevant parts of the operator’s RMP; and
- Explanation of what their specific responsibilities are and why they are important; and
- When and how to do each task and fill out the associated records; and
- What to do when things go wrong (corrective action).

It is recommended that all training is recorded, no matter how informal it is.
2.11 Generic corrective action procedure

The egg producer must document in the RMP, a procedure for when something unforeseen goes wrong.

For examples refer to:
3.11 = layer farm
4.11 = packhouse

Animal Products (RMP Specification) Notice 2000, Clause:
13. Generic Corrective Action

(1) Non-complying animal material or animal product must be identified and retained separately under inventory control pending a full assessment by a suitably-skilled person (nominated by the egg producer), of the relevant processing records, animal material or animal product, to identify any potential risk factors.

(2) For the purposes of subclause (1), non-complying animal material or animal product means it is produced -
(a) using a process or associated thing that deviates from the risk management programme; or
(b) not in compliance with the outcomes documented in the risk management programme; or
(c) where an unforeseen hazard or other risk factor arises; and
(d) when a specific corrective action has not been complied with or has not been identified in the risk management programme.

(3) The suitably-skilled person must make a decision regarding the suitability for processing of the animal material, or the fitness for intended purpose of the animal product, and based on the assessment, ensure the appropriate disposition is carried out.

(4) The suitably skilled person must complete and sign a full report on the management of the non-compliance, including details of -
(a) the deviation from the risk management programme, and the impact on any hazards or other risk factors present in the animal material or animal product; and
(b) the identification of the affected animal material or animal product; and
(c) any additional processing of the animal material or animal product; and
(d) the analyses made to reach the final decision; and
(e) the decision on the disposition of the animal material or animal product; and
(f) confirmation that the disposition of animal material or animal product has been carried out; and
(g) any actions taken to prevent recurrence of the non-compliance.

(5) The egg producer must provide, as soon as practicable, the report prepared under (4) to MAF’s Director-General or an animal product officer.

(6) The egg producer must bring to the attention of the accredited verifier at the next verification visit, any use of the generic corrective action procedure.
2.12 Recall Procedure

The egg producer must document in the RMP, their procedures for recall of animal product, where it is found to be unfit for intended purpose or not identified or labelled correctly.

There may be times when, despite the use of a risk management programme, non-conforming product is produced. If this is detected and corrected “in house”, the operator is able to manage the situation using the normal non-conformance and corrective action systems. If however, some of the product has got out into the distribution chain or further, then it may be necessary to initiate a product recall to recover the product as quickly as possible, particularly to minimise the risk to human or animal health.

2.12.1 What must be in the recall system?

Animal Products (RMP Specification) Notice 2000, Clause:

26. Recall

The operator must notify the Director-General as soon as practicable when animal product is recalled because it is or may not be fit for its intended purpose.

The procedure should prompt the operator to notify the Director-General (attention Programme Manager Operations, Animal Products Group).

2.12.2 What should be in the recall system?

The following elements should be considered when establishing recall procedures:

- a system to identify and trace all inputs, work-in-progress and final products;
- responsibilities and authorities for recalls;
- risk assessment and decision whether or not to recall;
- communication and documentation;
- product recovery and disposition;
- corrective and preventive action; and
- review of recall effectiveness.

There are a number of guidance documents already available which may assist the operator to develop appropriate recall procedures. These include:

- Recalls – Originally issued by Ministry Of Health as section 15 of their Food Administration Manual. Available from Processed Foods and Retail Sale Group, New Zealand Food Safety Authority, P O Box 2835, Wellington.
- Food Industry Recall Protocol – issued by the Food Standards Australia New Zealand (FSANZ, formerly ANZFA). This is available on the ANZFA web site at http://www.anzfa.gov.au/FoodRecall/.
2.13 Operator Verification

The egg producer must document how they will validate and verify the effectiveness of the RMP.

Operator Verification includes both validation, revalidation and ongoing review and audit. The requirements are shown below.

For examples refer to:
3.13 = layer farm
4.13 = packhouse

Animal Products (RMP Specification) Notice 2000, Clause:
18. Validation
(1) The operator must -
   (a) validate the risk management programme when it is first developed; and
   (b) complete the validation of the registered risk management programme once the collection of data is completed in accordance with the protocol provided in subclause (3)(b); and
   (c) re-validate the risk management programme when it is amended.
(2) The validation and re-validation activities described in subclause (1) must demonstrate -
   (a) the documentation is complete and complies with the requirements of the Act and any relevant animal product regulations and specifications; and
   (b) the risk management programme is capable of achieving its outcomes; and
   (c) that, in the case where an amended risk management programme is implemented, it will consistently deliver the documented outcomes.

Clause (2):
(a) means checking that all RMP components are present and comply with legislation. If the RMP has been based on this Code of Practice this should be correct.
(b) means showing that the product outcomes are practical and reasonable. Again, If the RMP has been based on this Code of Practice this should be correct.
(c) requires the egg producer to collect data to prove that they meet the product outcomes. If it is not possible to complete this prior to registration the egg producer must develop a validation protocol explaining how this will be done after the RMP is registered and what will happen to the eggs produced during the validation period.

Animal Products (RMP Specification) Notice 2000, Clause:
24. Operator verification activities
(1) In addition to the specific validation procedure in clause 18, the operator must document a system in the risk management programme that covers all the components of operator verification including -
   (a) the operator verification activities to be undertaken, their required frequency; and
   (b) any actions to be undertaken when corrective actions are not effective; and
   (c) any actions to be undertaken when the risk management programme is not effective including the generic corrective action procedure; and
   (d) any recording and reporting requirements.
(2) All operator verification activities must be transparent and traceable, and undertaken by suitably skilled persons nominated by the operator.
2.14 External verification

(Sections 17 (4) of the Animal Products Act)

The egg producer must document their provisions for external verification activities and verifiers rights within the RMP.

2.14.1 What must be included in “Provision for Verification Activities and Verifier’s Rights”

For examples refer to:
3.14 = layer farm
4.14 = packhouse

Animal Products (RMP Specification) Notice 2000, Clause:
15. Verifiers’ freedom and access to carry out verification functions

Risk management programmes must include provisions authorising accredited verifiers to have the freedom and access necessary to allow them to carry out verification functions and activities, including -

(a) having access to all parts of the premises or place and facilities within the physical boundaries of or relating to the risk management programme; and

(b) having access to all documentation, records and information relating to, or comprising, the risk management programme (including records held in electronic or other form); and

(c) having freedom to examine all things necessary and open any containers, packages and other associated things to inspect their contents; and

(d) having freedom to identify or mark any animal material, animal product, equipment, package, container or other associated thing; and

(e) having freedom to -

(i) examine and take samples of any animal material, animal product or any other input, substance, or associated thing which has been, is, or may be in contact with, or in the vicinity of, any animal material or animal product; and

(ii) test, or analyse, or arrange for the testing, or analysis of such samples; and

(iii) order retention of raw materials including animal material, ingredients, animal products, packaging or equipment pending testing results and decisions on disposition; and

(f) having authority where there may be significant risk to fitness for intended purpose of animal product or suitability for processing of animal material to detain any animal material and animal products or other relevant things in the event of non-compliance with the risk management programme; and

(g) having authority in cases of significant risk to fitness for intended purpose of animal product or suitability of animal material for processing to intervene and direct a temporary interruption of processing until the cause of the risk has been remedied.

Each egg producer must also get the recognised verifying agency that is willing to be their verifier to provide confirmation of this in writing.
2.15 Documentation and record-keeping

The egg producer must document the RMP and keep records to show that it has been implemented effectively.

2.15.1 Overview

In order to be able to demonstrate that their risk management programme is effective at making eggs fit for their intended purpose an egg producer must:

- PLAN IT
- USE IT
- AND
- PROVE IT

This will mean that the Egg Producer will need to keep 2 types of documentation:

- Documented RMP
- Records

This will mean that the Egg Producer will need to keep 2 types of documentation

2.15.2 What must be documented?

All components of the RMP must be documented in writing\(^9\) and legible.

To check that this has been completed it is a good idea if the egg producer lists the documents that form their RMP. This will highlight the critical paperwork that must be maintained on an ongoing basis. The list will also assist the programme evaluator and verifier to audit your system.

There is flexibility in how the operator wishes to document the risk management programme. Documents such as a Code Of Practice, HACCP plan or other documented procedures may be referred to, in part or in full, rather than included in the same document as the rest of the programme. In such instances any references become part of the risk management programme, which is a legally binding document once registered. Those parts of the document not specifically referenced do not form part of the risk management programme. All documentation relevant to the risk management programme must be available for evaluators, verifiers and regulators, as necessary.

For examples refer to:
3.15 = layer farm
4.15 = packhouse

\(^9\) In writing means printed, typewritten, or otherwise visibly represented, copied, or reproduced, including by fax or email or other electronic means.
2.15.3 What must be in the Document control System?

Animal Products (RMP Specification) Notice 2000, Clause:
16. Documentation and record keeping requirements

(1) Every document or part of a document that forms part of a risk management programme must
   (a) be legible; and
   (b) be dated or marked to identify its version; and
   (c) clearly indicate any changes made to the programme; and
   (d) be identified as comprising part of the programme; and
   (e) be signed, either directly or within the document control system, by the operator or the person shown on the register under section 19(b) of the Act as responsible for the day to day running of the programme; and
   (f) be made available when required to any person with responsibilities under the programme.

(2) The operator must ensure that the registered risk management programme and all reference material relating to the risk management programme is readily accessible, or can be retrieved and made available to accredited persons, animal product officers and the Director-General or persons authorised by the Director-General, within two working days of any request.

(3) The operator must have an effective document control system which includes recording updates and amendments to the registered risk management programme, including updates and amendments to cross-referenced documents and parts of cross-referenced documents that form part of the risk management programme.

(4) In relation to hard copies of a risk management programme under a document control system as required by subclause (3), the operator must ensure that -
   (a) one hard copy of any obsolete programme or obsolete part of a programme is archived in accordance with subclause (5); and
   (b) all obsolete documents or parts of documents are removed as soon as practicable from all distribution points; and
   (c) all relevant parts of the programme are replaced as soon as practicable after -
      (i) any update is made to the programme; and
      (ii) any amendment to the programme is registered under section 25 of the Act.

(5) The operator must retain for 4 years one copy of all obsolete documents from a registered risk management programme and make it available to accredited persons, animal product officers and the Director-General and persons authorised by the Director-General, as required.

“Readily accessible” means that no matter where the documents are stored, they can be mailed, couriered, faxed, emailed or transferred by other means within the time period stated.
2.15.4 What records must be kept?

Animal Products (RMP Specification) Notice 2000, Clause:

17. Monitoring, corrective action and operator verification records

(1) The operator must include record keeping procedures as part of the risk management programme to ensure that all records necessary to demonstrate compliance with the programme are -
   (a) legible; and
   (b) stored in a manner which protects the records from damage, deterioration or loss and ensures that they can be retrieved for at least 4 years; and
   (c) in the case of electronic records, managed to ensure that all data is protected and preserved

(2) Records relating to monitoring, corrective action and operator verification for the risk management programme, must include -
   (a) date and time of observation; and
   (b) subject and description of observation; and
   (c) any corrective action undertaken; and
   (d) means to identify the observer and any person who undertook corrective action; and
   (e) any other information required under the risk management programme as applicable.

(3) Where monitoring and corrective action records for the risk management programme have been subject to operator verification, the signature or unique identifier of the operator verifier must be recorded on those records, or on records generated by the operator verification activities.

(4) The operator must make available to accredited persons, animal product officers, the Director-General and persons authorised by the Director-General, all records relevant to the operator verification, as required.

(5) The operator must as soon as practicable, provide any reports relevant to the operation of the risk management programme to the Director-General, as required.

“Readily accessible” means that no matter where the documents are stored, they can be mailed, couriered, faxed, emailed or transferred by other means within 2 working days.

2.15.4.1 Electronic records

The person(s) entering the data should be identified according to systems developed for the protection of electronic records.
2.16 Registration and Ongoing Management of the RMP

RMP development has already been explained. The other steps to register the RMP and maintain it are shown in the diagram below. Each step is then explained briefly in the following sections of this Code of Practice. For more information refer to NZFSA’s RMP Manual.

Who?

Egg Producer

Egg Producer

Accredited Evaluator

Egg Producer

Egg Producer & Accredited Verifier

Egg Producer or NZFSA

Responsibilities

Development

Validation

Evaluation

Registration

Operation

Verification

Cessation

What?

Write it up

Prove it works

Review it

Application

Final approval

Run it

Check it works

Stop it
2.16.1 Validation

Before getting the RMP evaluated or registered, the egg producer needs to validate it (prove that it works). Refer to section 2.13 for more details.

2.16.2 Evaluation

Once the programme has been validated the egg producer must have it evaluated by an accredited evaluator. These people are listed on NZFSA’s web site www.nzfsa.govt.nz/animalproducts/registers-lists/accredited-persons/index.htm. Otherwise ring NZFSA on 04 4632-500 to get a list of accredited evaluators sent to you. Make sure that you only look at evaluators from the list as there are also verifiers on the same list.

Animal Products (RMP Specification) Notice 2000, Clause:

19. Obtaining an evaluation report

The operator must ensure that the first on-site assessment made in relation to the evaluation, the evaluation report required under section 20(2)(b) of the Act and any supporting reports provided by technical experts or other accredited evaluators were carried out within the last six months prior to the date of application for registration of the risk management programme.

20. Evaluator endorsement of risk management programme

The operator must keep a copy of the risk management programme to which the evaluation report relates, and that copy or the outline documentation (required under clause 21) must be endorsed by the evaluator who signed the report by -

(a) electronic means acceptable to the Director-General; or
(b) initialling or signing each page of the hard copy of the risk management programme or any other means acceptable to the Director-General.

The egg producer must provide the evaluator with all of the documents that make up the RMP. The evaluator will conduct an on site visit and will review your programme to ensure that it is suitable for registration. If satisfied with the RMP, they must provide the egg producer with an evaluation report confirming this and they will endorse (sign) the RMP and the report.

2.16.3 Registration

The egg producer must apply to the Director-General (attention Programme Manager Operations, Animal Products Group), for registration of the RMP on the application form (AP4) before trading from any new operations, and before the end of the transition period for existing operations. The application form will prompt the egg producer to include all of the other information that will be required for registration of the RMP including:

- a copy of an independent evaluation report (no more than 6 months old) on the risk management programme;
- the name of the recognised verifying agency that is willing to verify the registered risk management programme; and
- signed declarations as stated on the application form.

A list of recognised verifying agencies will be available on the NZFSA web site www.nzfsa.govt.nz/animalproducts/ under the heading registers/lists.
All applications are to be accompanied by the prescribed fee. NZFSA will also require the egg producer to pay an assessment charge (calculated on an hourly basis) for the time involved in assessing any of the application.

Animal Products (RMP Specification) Notice 2000, Clause:
21: Documentation to be submitted with application for registration of RMP

(1) The operator must submit either the evaluator-endorsed risk management programme or the evaluator-endorsed outline documentation of the programme to the Director-General with every application for registration of a risk management programme.

2) The minimum outline documentation required to be submitted with an application for registration of a risk management programme is to include the matters required under section 17(1) of the Act, and -

(a) the name, position or designation of the person responsible for the day to day management of the programme, as nominated by the operator of the business; and

(b) the principal categories of processing and animal material; and

(c) the location and type of premises or place, and the physical boundaries of the programme; and

(d) the name of the recognised verifying agency, (or if appropriate in the case of a food safety programme registered as risk management programme under section 34 of the Act, the approved auditor under the Food Act 1981) that has indicated responsibility for the verification function under the programme; and

(e) the range of risk factors addressed; and

(f) the outcomes relating to animal material or animal product; and

(g) the description of each process covered by the programme; and

(h) the generic corrective action procedure; and

(i) the verifiers rights and provisions to enable verification activities to be undertaken; and

(j) the list of documents comprising the programme and their status at the time of registration, including the version and date of issue or other means of identifying their status; and

(k) the document control system.

(3) The operator must ensure that the outline of the risk management programme submitted to the Director-General accurately represents the programme at the time of application for registration.

(4) The operator must advise the Director-General in writing of any updates to the risk management programme since the evaluation report was prepared.

22. Copies required

Any applicant for registration of a risk management programme must provide the Director-General with three hard copies of the risk management programme or the outline documentation of the programme, or one electronic file of the risk management programme or the outline documentation in a form acceptable to the Director-General.

NZFSA recommends that egg producers submit 3 hard copies of the outline as described in clause (2) above.

If the application is found acceptable and a decision is made to register the RMP, the Director-General, will, as soon as practicable:

- notify the operator in writing;
- provide both the operator and the recognised verifying agency with a copy of the registered RMP or the outline of the registered RMP;
- make an appropriate entry on the risk management programme register.
2.16.3.1 Change of registration

The registered RMP applies only to the particular operator and premises or place specified in the programme. Changes will require a new registration process to be completed.

Change of Operator

Where the “operator” or the “operator’s name” is the only change to a registered RMP, then application for registration (AP5), must be accompanied by appropriate declarations as outlined on the form. This includes a further declaration from the new operator that no other component of the RMP has been changed.

The following circumstances also will be treated as involving a change in the operator of a registered RMP, and so require registration of a new RMP:

• a change in the name of a company;
• a change in the (number of) members of a partnership; or
• the death, bankruptcy, receivership, or liquidation of the operator.

Change in day-to-day Manager of a risk management programme

Animal Products (RMP Specification) Notice 2000, Clause:

23. Change in the day-to-day manager of a risk management programme

The operator must notify the Director-General in writing of any change to the name or position or designation of the person responsible for the day-to-day management of the risk management programme as soon as practicable.

The operator must notify the Director-General (attention Programme Manager Operations, Animal Products Group). This change does not require the RMP to be “amended” but the RMP must be updated to reflect the change.

Change in recognised verifying agency

Changes in the recognised verifying agency must be notified in writing to the Director-General (attention Programme Manager Operations, Animal Products Group) within 7 days. This change does not require the RMP to be “amended” but the RMP must be updated to reflect the change.

Change in premises or place

A change in the premises or place where the RMP will be operating is a major change so it will require a new application for registration of the RMP, using application form AP4. This requirement does not apply to mobile operations with RMPs that include systems to control risk factors introduced by a change in location.

2.16.4 Operation of the RMP

The operator of a registered risk management programme has the following duties:

• to ensure that the operations of the animal product business do not contravene the relevant requirements of and under this Act, including the requirements set out in the RMP;
• to ensure that the RMP, is consistent with the requirements of regulations and specifications in force from time to time under this Act;
• to adequately implement and resource all operations under the programme, including provision for the instruction, competency, and supervision of staff to ensure the delivery of animal product that is fit for intended purpose;
• to ensure that all operations under the programme are commensurate with the capability and capacity of the premises or place, facilities, equipment, and staff to deliver animal product that is fit for intended purpose;
• to give relevant accredited persons such freedom and access as will allow them to carry out their functions and activities under this Act, including verification functions and activities;

• to notify the Director-General (attention Programme Manager Operations, Animal Products Group), in advance where practicable, and otherwise as soon as possible, of any change in the operator’s recognised verifying agency; and

Animal Products (RMP Specification) Notice 2000, Clause:

25. New hazards
The operator must notify the Director-General of any emerging, new or exotic biological hazards or new chemical hazards that come to the operator’s notice in relation to the risk management programme as soon as practical after their discovery.

Whenever the Director-General is notified the correspondence should be addressed attention Programme Manager Operations, Animal Products Group.

2.16.5 Amendments to the risk management programme

The operator of a registered RMP must amend it, and apply for registration of the amendment, where any change, event or other matter means that it—

(a) is no longer appropriate, or will no longer be appropriate to the animal material or product, processes, or premises or place covered by the programme; or

(b) Otherwise impacts, or will impact, on the fitness for intended purpose of the animal product concerned or the content of the RMP.

Animal Products (RMP Specification) Notice 2000, Clause:

28 Amendments to the risk management programme

(1) The following amendments require registration in accordance with section 25 of the Act -

(a) major alterations to the processing facilities; and

(b) relocating processing operations to a new physical address (except where this is already permitted under the risk management programme); and

(c) processing animal material or animal product that is not covered by the risk management programme; and

(d) permanently ceasing to process a particular type of animal material or product; and

(e) process modifications that impact on the outcomes for animal material or animal product; and

(f) changes to outcomes or introduction of new outcomes for animal materials or animal products.

(2) The operator must, when making an amendment, consider whether consequential amendments to other components of the risk management programme are necessary.

The registered RMP is a legally binding document. As such, if the operator alters the risk management programme without complying with the requirements for registration of any part that constitutes an amendment, the operator is not in compliance with the Animal Products Act 1999. Depending on the circumstances, this could result in suspension or de-registration of the RMP.

Where an amendment is necessary, “the operator must amend the RMP, and apply for registration of the amendment, before the event where the operator knows of the change in advance, and in all other cases must do so without unreasonable delay.”
Some modifications may or may not fall into the category of an amendment. In such instances the operator should call on an accredited evaluator to make a judgement. The overriding consideration when making the judgement should be the “impact” of the change in relation to the achievement of the current stated product outcomes. If the change means that the current outcomes will not be achieved or need to be altered then the programme must be amended. The operator must retain all documentation relevant to the judgement so that the verifier can check that appropriate decisions have been made.

Registering an amendment is the same as for an RMP but uses application form AP6 (see section 6.2). If the application is found acceptable and a decision is made to register the amendment, the Director-General, will, as soon as practicable:

- notify the operator in writing;
- where the amendment relates to future events or matters, specify the date or occasion on which the amendment will apply;
- provide both the operator and the recognised verifying agency with a copy of the registered amendment;
- make an appropriate entry on the risk management programme register.

2.16.6 Updates of minor amendments to risk management programmes

*(Section 26 of the Animal Products Act)*

If the operator needs to make minor changes to the RMP he or she must decide whether or not they fall into the amendment category described above (where the amendment must be registered). If not, then the operator is responsible for ensuring that the minor amendments to the RMP are documented, identified by the document control system and made available to the verifier.

2.16.7 Review of the risk management programme


**29 Director-General review of the risk management programme**

(1) A standard condition on initial registration is that the risk management programme must be reviewed by the Director-General within 3 years from the date of registration.

(2) After the first review, the Director-General will review the risk management programme, including minor amendments, every three years, or when specified in the conditions of registration by the Director-General.

The operator must apply for registration prior to the expiry of their risk management programme if they want to continue to operate.
2.16.8 Verification activities by an accredited verifier

(Sections 101 and 107 of the Animal Products Act)

Verification involves the ongoing checks that “accredited verifiers” will carry out periodically on a registered risk management programme. A list of recognised agencies and accredited verifiers will be available on the NZFSA web site: www.nzfsa.govt.nz/animalproducts/ under the heading registers and lists.

The accredited verifier, from the recognised agency, is to be contracted by the operator so contractual arrangements regarding payment for verification services are the operator’s responsibility.

2.16.9 Responsibilities of Recognised Agencies and Accredited Verifiers

The verifier is responsible for undertaking all necessary verification activities in accordance with verification specifications issued by NZFSA.

The verifier is expected to review the different components of the registered risk management programme, including production records, to determine that ongoing operational activities comply with the documented programme and that the animal product is fit for its intended purpose.

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**Animal Products (RMP Specification) Notice 2000, Clause:**

27 Responsibilities of Recognised Verifying Agencies and Accredited Verifiers

(1) All external verification activities of an accredited verifier must be transparent and traceable, and the results must be fully recorded and made available to the operator, and, as required, to the Director-General, animal product officer and any other person authorised by the Director-General.

(2) Accredited verifiers must notify the Director-General in writing, as soon as practicable, of all significant issues relating to the risk management programme, including -

(a) when the business is operating outside the registration conditions of the programme; and

(b) when the business is operating outside the scope of the programme; and

(c) any repeated failure by the operator to apply the corrective actions set out in the programme, or as advised by the accredited verifier; and

(d) any significant concern about suitability for processing of animal material or fitness for intended purpose of animal product; and

(e) where the cumulative effect of updates necessitates the registration of an amendment to the risk management programme as provided in section 25 of the Act; and

(f) where the documented system is not effective in delivering the outcomes; and

(g) any interference with, or obstruction of the accredited verifier in carrying out verification activities; and

(h) where the operator has not notified the Director-General of an animal product recall in accordance with clause 26; and

(i) when the verifier is aware that a change of operator of a programme has not been notified to the Director-General as required under section 29 of the Act.

(3) Recognised verification agencies must provide to the Director-General -

(a) reports on specified issues or subjects on demand; and

(b) reports on actions taken with respect to any corrective action request issued to the recognised verifying agency by the Director-General or an animal product officer.
The accredited verifier should notify the operator, in advance wherever possible, of the timing of routine visits. Unannounced visits may be made in cases of poor performance. The frequency of verification will depend on the effectiveness of the registered RMP (i.e. performance-based).

The following performance standards must be assessed at each verification visit:
- registration status of the RMP;
- verification of compliance with the RMP;
- compliance with the Animal Products Act regime;
- completeness, accuracy, and timeliness of recording; and
- management of critical non-compliances (still to be defined).

Export operations will still be subject to a separate “Performance-Based Verification” system.

NZFSA’s Compliance Investigation Group will audit recognised verifying agencies and accredited verifiers to ensure that they are carrying out the verification function effectively.

2.16.10 Who does What?

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<td>• Application for amendments to registered risk management programme.</td>
<td>• Egg Producer</td>
</tr>
<tr>
<td>• Notification of minor amendments to the Director-General (attention Programme Manager Operations, Animal Products Group), as required.</td>
<td>• Egg Producer</td>
</tr>
<tr>
<td>Cessation</td>
<td></td>
</tr>
<tr>
<td>• Surrender of the registration of the risk management programme</td>
<td>• Egg Producer</td>
</tr>
<tr>
<td>• Suspension of registration</td>
<td>• Director-General</td>
</tr>
<tr>
<td>• Deregistration</td>
<td>• Director-General</td>
</tr>
</tbody>
</table>
2.16.11 Costs

The operator is obliged to pay any fee incurred in association with the development, registration and ongoing operation of a risk management programme. Specific fees apply to:

- application for registration of the RMP ($100);
- application to amend the registered RMP ($100);
- application to update the registered RMP ($100);
- application for registration of a food safety programme as a RMP ($100).

NZFSA will also require the operator to pay an assessment charge (calculated on an hourly basis) for the time involved in assessing any of the above applications ($80/hour + GST).

The costs associated with evaluation and verification are the responsibility of the operator who must negotiate rates with their selected service provider.