### Chapter 4:

**How to develop an RMP for an Egg Packhouse**

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</table>
4.1 Introduction

This Chapter gives an example of each RMP component for a packhouse.

Most of the examples should be self-explanatory but if you find that they are not clear enough go to the corresponding section in Chapter 2 for further information on each component.

Forms have been provided in the appendices for the egg producer to copy and fill out to document their own RMP. Alternative formats that contain similar information are also acceptable.

Once you understand each example you should copy the corresponding form in Appendix D and use the example to guide you to fill out the form. Remember that where your operation differs from the example you should change it so that it accurately reflects what you do. The mandatory requirements must always be included in your RMP.

There may be times when you will need to write up things in more detail than is shown in the example. We have tried to make this clear in the appropriate places.

Start your RMP by filling out the title page on Appendix D section 1.
### 4.2 Management Authorities and Responsibilities

For theory refer to 2.2

For blank forms refer to appendix D section 2

<table>
<thead>
<tr>
<th>Business Name:</th>
<th>Henrietta’s Egg Company Ltd</th>
</tr>
</thead>
<tbody>
<tr>
<td>Business Operator’s Full Legal Name¹:</td>
<td>Henrietta Eggnott</td>
</tr>
<tr>
<td>Business Identifier²:</td>
<td>Henegg1</td>
</tr>
<tr>
<td>Business Address:</td>
<td>29 Henry St, Henryville</td>
</tr>
<tr>
<td>Postal Address (If different from the business address):</td>
<td>PO Box 111 Henryville</td>
</tr>
<tr>
<td>Registered Company Address (If different from the business address):</td>
<td>N/A</td>
</tr>
<tr>
<td>Email Address:</td>
<td><a href="mailto:Henrietta@eggs.co.nz">Henrietta@eggs.co.nz</a></td>
</tr>
<tr>
<td>Phone Number</td>
<td>(01) 01010101</td>
</tr>
<tr>
<td>Fax Number</td>
<td>(01) 01010100</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Person responsible for:</th>
<th>Name or title</th>
<th>Training received</th>
</tr>
</thead>
<tbody>
<tr>
<td>Day to day management of RMP</td>
<td>Henrietta Eggnott</td>
<td>Egg Producer’s Federation approved HACCP course, 3 day, 14-16/2/2000</td>
</tr>
<tr>
<td>Deputy for Day to Day Manager of RMP</td>
<td>Henry Eggnott</td>
<td>Egg Producer’s Federation approved HACCP course, 3 day, 14-16/2/2000</td>
</tr>
</tbody>
</table>

¹ For a company this is just the company name, otherwise put in the Partnership name or name of the Sole Trader.

² Business Identifier must not be the same as an exporter ID operating from the same premises;
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.
### 4.3 Scope of the risk management programme

For theory refer to 2.3

For blank forms refer to appendix D section 3

<table>
<thead>
<tr>
<th>Business Name:</th>
<th>Henrietta’s Egg Company Ltd</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of Premises:</td>
<td>Egg Packhouse</td>
</tr>
<tr>
<td>Name of Animal Material:</td>
<td>Shell Eggs</td>
</tr>
<tr>
<td>Name of Animal Products:</td>
<td>A grade shell eggs</td>
</tr>
<tr>
<td></td>
<td>Commercial eggs</td>
</tr>
<tr>
<td></td>
<td>Cracked eggs</td>
</tr>
<tr>
<td></td>
<td>Downgraded eggs</td>
</tr>
<tr>
<td>Location:</td>
<td>Grading Facility:</td>
</tr>
<tr>
<td></td>
<td>29 Henry Street, Henryville</td>
</tr>
<tr>
<td></td>
<td>Physical Boundaries – See site map on next page.</td>
</tr>
<tr>
<td>Start of RMP:</td>
<td>Receipt of eggs at grading facility</td>
</tr>
<tr>
<td>Processes:</td>
<td>Egg Storage</td>
</tr>
<tr>
<td></td>
<td>Egg Grading / Candling</td>
</tr>
<tr>
<td></td>
<td>Egg Packing</td>
</tr>
<tr>
<td></td>
<td>Egg Storage</td>
</tr>
<tr>
<td></td>
<td>Transportation to Market</td>
</tr>
<tr>
<td>End of RMP:</td>
<td>Arrival at wholesale or retail sale or secondary processing</td>
</tr>
<tr>
<td>Risk Factors Covered³:</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>

For each risk management programme the egg producer must describe the physical boundaries of the programme. An example of how this can be done is given on the following page.

³ For any risk factors that are not covered this should be stated and a brief justification made.
Example of one way to show Physical Boundaries:

All items inside the dark line (which represents the land boundaries) are included in the risk management programme except the garden shed - see shaded building.
# 4.4 Product description and intended purpose

<table>
<thead>
<tr>
<th>Product Name*:</th>
<th>A Grade Shell Eggs</th>
<th>Commercial Eggs</th>
<th>Cracked Eggs</th>
<th>Downgraded Eggs (Go to waste so not further considered in the RMP)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Product Description:</strong></td>
<td>Clean No visible cracks No internal defects</td>
<td>Clean No visible cracks May have minor defects</td>
<td>Clean With visible cracks but intact membrane May have minor defects</td>
<td>Does not meet requirements of other grades.</td>
</tr>
<tr>
<td><strong>Intended Uses:</strong></td>
<td>To be sold for any purpose.</td>
<td>To be sold for catering or further processing.</td>
<td>To be sold only for further processing (pasteurisation or equivalent) or for animal food.</td>
<td>To be dumped.</td>
</tr>
<tr>
<td><strong>Intended Consumer:</strong></td>
<td>Human consumption – general public</td>
<td>Human consumption - general public</td>
<td>Human consumption - general public or Animal consumption</td>
<td>N/a. (Not suitable for human or animal consumption).</td>
</tr>
<tr>
<td><strong>Shelf Life from Date of Lay:</strong></td>
<td>35 days</td>
<td>35 days</td>
<td>14 days</td>
<td>N/a</td>
</tr>
<tr>
<td><strong>Labelling Instructions:</strong></td>
<td>Refrigeration guidelines</td>
<td>Refrigeration guidelines</td>
<td>Refrigeration guidelines</td>
<td>Labelled as “downgraded”</td>
</tr>
<tr>
<td><strong>Packaging:</strong></td>
<td>New cartons/trays Washed, sanitised, reused plastic trays Pallet wrap Pallets</td>
<td>New cartons/trays Washed, sanitised, reused plastic trays Pallet wrap Pallets</td>
<td>New cartons/trays Washed, sanitised, reused plastic trays Pallet wrap Pallets</td>
<td>Kept in bucket until dumping.</td>
</tr>
<tr>
<td><strong>Where it is to be Sold:</strong></td>
<td>Retail sale Wholesale Secondary processors Food Service</td>
<td>Retail sale Wholesale Secondary processors Food Service</td>
<td>Further processors</td>
<td>N/a</td>
</tr>
<tr>
<td><strong>Storage and Distribution Conditions:</strong></td>
<td>Refrigeration at or below 15°C</td>
<td>Refrigeration at or below 15°C</td>
<td>Refrigeration at or below 6°C⁶</td>
<td>N/a</td>
</tr>
</tbody>
</table>

* Above products are examples only. Some egg producers will have different products.

⁵ This process should be validated to demonstrate effective control of pathogens.

⁶ This temperature is based on current industry practice as identified by the Egg Producers Federation Working Group members. Egg producers may need to set different temperatures depending on the further processor’s ability to reduce pathogens to acceptable levels.
### 4.5 Product outcomes for all eggs except downgraded eggs

#### 4.5.1 Hazards to Human Health

<table>
<thead>
<tr>
<th>Hazard or other risk factor</th>
<th>Aim of RMP</th>
<th>Example Product outcomes</th>
<th>Key Control Measures</th>
<th>Response if outcome not met</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biological: B1 &amp; B2: Salmonella and other enteric pathogens.</td>
<td>Minimise Salmonella and other enteric pathogens. Meet Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 107.</td>
<td>A Grade Eggs: Salmonella not detected in 25g from a weekly composite sample of A grade shell eggs.</td>
<td>• Dirty eggs and visibly cracked eggs are separated from these eggs. • Storage and transportation temperature not higher than 15°C.</td>
<td>• Increase test frequency. Divert eggs from known positive flocks to further processing with a bactericidal control point. • Rework eggs that are still on site to meet requirements. • Review refrigeration systems. • Notify Laying Farm of issues that may relate to them. • Review packhouse RMP. • Retrain staff.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Commercial Eggs: Salmonella level – not yet defined.</td>
<td>• Visibly cracked eggs are separated from these eggs. • No dry cleaning of eggs. • All dirty eggs and floor eggs to be washed in accordance with the ICMSF guidelines on pageC-51 of Appendix C: Technical Annex. • Storage and transportation temperature not higher than 15°C.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Cracked Eggs: Salmonella level – not yet defined.</td>
<td>• All eggs that do not have an intact membrane are separated from these eggs. • All eggs with cracks visible on candling but intact membranes are labelled for further processing or animal consumption. • Storage and transportation temperature not higher than 6°C.</td>
<td></td>
</tr>
</tbody>
</table>

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7 No product outcomes are necessary for downgraded eggs as these eggs are dumped at the packhouse and will not be used for human or animal consumption.

8 Where it is not expected that a risk factor is to be measured within the RMP (as indicated by an approved Code of Practice or regulatory requirements), the operator may put “level not yet defined” for the outcome so long as key control measures are identified. Nevertheless, individual operators are encouraged to measure this risk factor and set a level for a product outcome where possible.

9 Not all of these example control measures will suit all operations.
### Chemical: C3 & C4: Chemical residues.
- **Minimise chemical residues in eggs.**
- **All eggs:** No chemical residues over Maximum Residue Limits\(^{13}\).
- **Key Control Measures:**
  - Approved chemicals used in accordance with instructions.
- **Response if outcome not met:**
  - Dump affected eggs.
  - Review RMP.
  - Retrain staff.

### Physical: None identified
- **Example Product outcomes:** N/a
- **Key Control Measures:**
  - N/a
- **Response if outcome not met:**
  - N/a

### 4.5.2 Hazards to Animal Health

<table>
<thead>
<tr>
<th>Hazard or other risk factor</th>
<th>Aim of RMP</th>
<th>Example Product outcomes</th>
<th>Key Control Measures(^{12})</th>
<th>Response if outcomes not met</th>
</tr>
</thead>
</table>
| **Biological:** B1 & B2: Salmonella and other enteric pathogens. | Minimise Salmonella and other enteric pathogens. | **Cracked Eggs:** Salmonella level – not yet defined. | • All eggs that do not have an intact membrane are separated from these eggs.  
• All eggs with cracks visible on candling but intact membranes are labelled for further processing or animal consumption.  
• Storage and transportation temperature not higher than 6°C. | • Rework eggs that are still on site to meet requirements.  
• Review refrigeration systems.  
• Notify Laying Farm of issues that may relate to them.  
• Review packhouse RMP.  
• Retrain staff. |
| **Chemical:** C3 & C4: Chemical residues. | Minimise chemical residues in eggs. | **All eggs:** No chemical residues over Maximum Residue Limits\(^{13}\). | No eggs supplied from hens on medication and during withholding period. | • Dump affected eggs.  
• Review RMP.  
• Retrain staff. |

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\(^{10}\) This is not currently measured although controls are in place. NZFSA and the Egg Producers Federation are discussing setting up a monitoring programme.

\(^{11}\) Where it is not expected that a risk factor is to be measured within the RMP (as indicated by an approved Code of Practice or regulatory requirements), the operator may put “level not yet defined” for the outcome so long as key control measures are identified. Nevertheless, individual operators are encouraged to measure this risk factor and set a level for a product outcome where possible.

\(^{12}\) Not all of these example control measures will suit all operations. E.g. those operations with automatic collection may not be able to separate eggs as implied here.

\(^{13}\) This is not currently measured although controls are in place. NZFSA and the Egg Producers Federation are discussing setting up a monitoring programme.
### 4.5.3 Risks to Wholesomeness

<table>
<thead>
<tr>
<th>Hazard or other risk factor</th>
<th>Aim of RMP</th>
<th>Example Product outcomes</th>
<th>Key Control Measures</th>
<th>Response if outcome not met</th>
</tr>
</thead>
</table>
| W1: Blood or Meat spots     | Meet Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 107, (1) (c) and (d). | Less than 0.1% eggs have defect. | • Defective eggs are removed at candling. | • Recandle eggs  
• Dump affected eggs.  
• Review RMP.  
• Retrain staff. |
| W2: Watery whites           | To minimise defective eggs. | Less than 0.1% eggs have defect. | • All eggs processed at packhouse as soon as possible after receipt.  
• Transportation and storage temperature not higher than 15°C. | • Improve stock rotation.  
• Fix refrigeration.  
• Retrain staff. |
| W3: Roundworms in eggs      | To minimise defective eggs. | Less than 0.1% eggs have roundworms. | • Uncontrolled in this RMP. Controlled on farm. | • Dump eggs  
• Notify laying farm |
| W4: Off odours and flavours | To minimise defective eggs. | Less than 0.1% eggs have defect. | • All eggs processed at packhouse as soon as possible after receipt.  
• Transportation and storage temperature not higher than 15°C. | • Improve stock rotation.  
• Fix refrigeration.  
• Retrain staff. |
| W5: Rotten eggs             | To minimise defective eggs. | Less than 0.1% eggs have defect. | • All eggs processed at packhouse as soon as possible after receipt.  
• Transportation and storage temperature not higher than 15°C. | • Improve stock rotation.  
• Fix refrigeration.  
• Retrain staff. |

14 Not all of these example control measures will suit all operations. E.g. those operations with automatic collection may not be able to separate eggs as implied here.
<table>
<thead>
<tr>
<th>Hazard or other risk factor</th>
<th>Aim of RMP</th>
<th>Example Product outcomes</th>
<th>Key Control Measures</th>
<th>Response if outcome not met</th>
</tr>
</thead>
<tbody>
<tr>
<td>W6: Pink or iridescent whites</td>
<td>To minimise defective eggs.</td>
<td>Less than 0.1% eggs have defect.</td>
<td>• All eggs processed at packhouse as soon as possible after receipt. • Transportation and storage temperature not higher than 15°C.</td>
<td>• Improve stock rotation. • Fix refrigeration. • Retrain staff.</td>
</tr>
<tr>
<td>W7: Eggs older than use by date</td>
<td>To minimise defective eggs.</td>
<td>Less than 0.1% eggs have defect.</td>
<td>• All eggs processed at packhouse as soon as possible after receipt. • Transportation and storage temperature not higher than 15°C.</td>
<td>• Improve stock rotation. • Fix refrigeration. • Retrain staff.</td>
</tr>
<tr>
<td>W8: Soft shells</td>
<td>To minimise defective eggs.</td>
<td>Less than 0.1% eggs have defect.</td>
<td>• Defective eggs are removed at candling.</td>
<td>• Send eggs to further process, pet food, animal feed or dump as appropriate. • Notify layer farm.</td>
</tr>
<tr>
<td>W9: Mouldy eggs</td>
<td>To eliminate defective eggs.</td>
<td>Less than 0.1% eggs have defect.</td>
<td>• Cleaning of storage rooms / chillers.</td>
<td>• Retrain staff. • Clean storage / chillers with approved mould preventative chemical.</td>
</tr>
</tbody>
</table>
## 4.5.4 Risks From False or Misleading Labelling

<table>
<thead>
<tr>
<th>Hazard or other risk factor</th>
<th>Aim of RMP</th>
<th>Example Product outcomes</th>
<th>Key Control Measures&lt;sup&gt;15&lt;/sup&gt;</th>
<th>Response if outcome not met</th>
</tr>
</thead>
<tbody>
<tr>
<td>L1: Incorrect claims for free range, barn, caged or organic eggs</td>
<td>To minimise incorrect labelling</td>
<td>All eggs must be true to label on packs, outers or units leaving the packhouse. All labelling of transportation outers must comply with Specification 32 of the Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000.</td>
<td>• Each proof of a new label / carton checked for accuracy prior to order. • Each batch of labels / cartons checked for accuracy on receipt. • Labels / cartons checked at start up and on change over of each layer farm/shed. • 100% traceability and segregation from layer shed to packed eggs or only one type of egg accepted at each packhouse.</td>
<td>• Relabel affected eggs or dump them. • Review RMP. • Retrain staff.</td>
</tr>
</tbody>
</table>

L2: Incorrect date marking

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

<sup>15</sup> Not all of these example control measures will suit all operations. E.g. those operations with automatic collection may not be able to separate eggs as implied here.
4.6 Process description

For theory refer to 2.6

For blank forms refer to appendix D section 6

Inputs

Process Steps

Outputs

Clean shell eggs
Dirty eggs and / or Floor eggs and
Eggs with Size/ Shape Abnormalities or Minor Defects

Forklift /cart / truck or Conveyor
Storage trolleys Labels
Chemicals Water
Dirty eggs

5. Storage and transfer to Grading

6. Sorting

7. Washing/ Drying / Oiling

8. Candling

9. Grading / Weighing

10. Packing

11. Egg Storage / Loadout

Downgraded eggs (broken, leaking, very dirty)
Commercial eggs Cracked eggs Downgraded eggs
Shell eggs for human consumption
4.7 Analysis / Control of Hazards and Other Risk Factors From Inputs

The following inputs are considered below:
- Eggs
- Processing Aids
- Product Contact Packaging

4.7.1 Eggs

4.7.1.1 Hazards and other risk factors

B1 = Salmonella Species
B2 = Other enteric bacteria
B3 = *Staphylococcus* / *Streptococcus* species
B4 = *Listeria monocytogenes*
C1 = Residues from animal remedies e.g. antibiotics
C2 = Residues from chemicals used in shed cleaning and fumigation
W1 = Blood or meat spots
W2 = Watery whites
W3 = Roundworms in eggs
W4 = Off odours and flavours
W5 = Rotten eggs
W6 = Pink or iridescent egg whites.
W7 = Eggs that are older than their use by date.
W8 = Soft shells.
W9 = Mouldy eggs
L1 = Incorrect Claims
L2 = Incorrect Date

4.7.1.2 Supplier Requirements

**Regulatory Requirements**

1. Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 106: 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.
Regulatory Requirements

2. Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 107: 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.

3. Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 107: Any primary processing of eggs intended to be traded in the shell that compromises the integrity of the shell, must be minimised.

Operator-defined Requirements

4. The following eggs must be rejected at the farm and not delivered to the packhouse:
   • Very dirty eggs (soiled area over the size of 20 cent coin), and
   • Visibly cracked eggs.

5. The following categories of eggs must be collected, kept and delivered in separate containers:
   • Good eggs
   • Floor eggs or slightly soiled eggs
   • Eggs that are unusual shapes or sizes or have minor defects.

6. Each egg collection and delivery unit shall be labelled with:
   • Farm
   • Shed
   • Date of Lay
   • Egg grade (as above)
   • Egg type (caged, barn, free range or organic).

4.7.1.3 Procedures

The following control measures are the responsibility of the Packhouse Supervisor:

<table>
<thead>
<tr>
<th>Step</th>
<th>Control Measure</th>
<th>Monitoring</th>
<th>Corrective Action</th>
<th>Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Order eggs</td>
<td>Supplier to give declaration that layer hens were kept under a Whole Flock Health Scheme and all eggs meet requirements for requirements 2-6 above.</td>
<td>Check supplier’s declarations with each delivery.</td>
<td>Do not pack eggs without declaration. Return to supplier.</td>
<td>Supplier declarations.</td>
</tr>
<tr>
<td>3. Store eggs</td>
<td>Cracked eggs at 6°C or less. All other eggs at 15°C or less.</td>
<td>N/a</td>
<td>Correct problem. Retrain staff.</td>
<td></td>
</tr>
</tbody>
</table>

4.7.1.4 Operator verification

The Packhouse Manager shall check and sign the records for 10% of the egg deliveries. Any problems shall be noted on the relevant record with the details of the corrective action taken.

4.7.1.5 Records

An example of a suitable supplier declaration is given in Appendix E of this manual.
4.7.2 Processing Aids / Other Inputs

Wash water chemicals  Oil for sealing shell

4.7.2.1 Hazards

C3 = Residues from chemicals used in egg washing
C4 = Residues from chemicals used in egg oiling

4.7.2.2 Supplier Requirements

**Regulatory Requirements**

1. Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 17: The identity and purity of additives, processing aids, vitamins, minerals, and other added nutrients must comply with —
   - the current Australian Food Standards Code 1992, Standard A11 “Specifications for identity and purity of food additives, processing aids, vitamins, minerals and other added nutrients”; or
   - regulation 245(6) of the Food Regulations 1984 (SR 1984/262) (which relates to identity and purity of additives).

**Operator-defined Requirements**

2. Chemicals used for egg washing or oiling are to be food grade.

4.7.2.3 Procedures

The following control measures are the responsibility of the Packhouse Supervisor:

<table>
<thead>
<tr>
<th>Step</th>
<th>Control Measure</th>
<th>Monitoring</th>
<th>Corrective Action</th>
<th>Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Order chemicals</td>
<td>All chemicals are approved for their intended use as per the above Food Regulations.</td>
<td>Check supplier’s evidence of chemical approval.</td>
<td>Do not use unapproved chemicals. Return to supplier.</td>
<td>Approved supplier list.</td>
</tr>
<tr>
<td>2. Receive chemicals</td>
<td>Confirm that chemical clearly labelled and matches that ordered.</td>
<td>Visual inspection on arrival.</td>
<td>Do not use unapproved chemicals. Return to supplier.</td>
<td>Inwards goods docket.</td>
</tr>
<tr>
<td>Step</td>
<td>Control Measure</td>
<td>Monitoring</td>
<td>Corrective Action</td>
<td>Records</td>
</tr>
<tr>
<td>------</td>
<td>-----------------</td>
<td>------------</td>
<td>-------------------</td>
<td>---------</td>
</tr>
<tr>
<td>4.  Use chemicals</td>
<td>Use correct approved chemical for intended use, in accordance with manufacturer’s instructions.</td>
<td>Record all chemicals used, date, what it was used for, quantity used and any dilutions.</td>
<td>Get expert advice if necessary.</td>
<td>Chemical Use Record.</td>
</tr>
<tr>
<td>5. Unused chemical returned to storage</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4.7.2.4 Operator verification

After each delivery of chemicals the Packhouse Manager shall check and sign the records. Any problems shall be noted on the relevant record with the details of the corrective action taken.

4.7.2.5 Records

An example of a suitable supplier declaration is given in Appendix E of this manual.
4.7.3 Product Contact Packaging

Labels  Egg collection trays  Egg cartons  Egg trays  Shrink wrap

4.7.3.1 Hazards or other risk factors

L1 = Incorrect Claims

4.7.3.2 Supplier Requirements

Regulatory Requirements

1. Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 30: The composition and, the conditions of use of packaging must —
   (a) comply with the requirements specified in the current US Code of Federal Regulations, Title 21, Parts 170–199 (21 CFR 170–199), which applies equally to coatings and linings of containers and cartons where these are the direct product contact surface; or
   (b) comply with the requirements specified in the current "Australian Standard for Plastics Materials for Food Contact Use, Australian Standard AS2070–1999"; or
   (c) be determined by the operator to be suitable for use, based on an analysis of hazards and other risk factors from the packaging.

2. If compliance with the above requirement is achieved through meeting subclause (1)(a) or (b), the risk management programme must state the full reference to the regulation, part, section or standard with which the packaging complies.

Supplier Requirements

3. No claims shall be printed on product contact packaging unless this has been specifically ordered.

4. Wording on any claims must be as specified in the order.

5. Product contact packaging shall not be recycled.

4.7.3.3 Procedures

The following control measures are the responsibility of the Packhouse Supervisor:

<table>
<thead>
<tr>
<th>Step</th>
<th>Control Measure</th>
<th>Monitoring</th>
<th>Corrective Action</th>
<th>Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Order</td>
<td>All printing on packaging to be specified in the order.</td>
<td>Check proof or example prior to placing order.</td>
<td>Do not use packaging with false claims. Return to supplier.</td>
<td>Purchase order</td>
</tr>
<tr>
<td>packaging</td>
<td>All packaging to conform to requirement 1 above.</td>
<td>Check prior to order.</td>
<td>Do not use packaging which does not meet requirement. Return to supplier.</td>
<td>Purchase order</td>
</tr>
<tr>
<td>2. Receive</td>
<td>Confirm that any claims match order.</td>
<td>Visual inspection on arrival.</td>
<td>Do not use packaging with false claims. Return to supplier.</td>
<td>Inwards goods</td>
</tr>
<tr>
<td>packaging</td>
<td></td>
<td></td>
<td></td>
<td>docket.</td>
</tr>
<tr>
<td>4. Use</td>
<td>Confirm that any claims match product.</td>
<td>Visual inspection before use.</td>
<td>Do not use incorrect packaging.</td>
<td></td>
</tr>
<tr>
<td>packaging</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
4.7.3.4 Operator verification

After each delivery of chemicals the Packhouse Manager shall check and sign the records. Any problems shall be noted on the relevant record with the details of the corrective action taken.

4.7.3.5 Records

An example of a suitable supplier declaration is given in Appendix E of this manual.
4.8 Analysis / Control of Hazards and Other Risk Factors From Other Sources

For theory refer to 2.8

For forms refer to appendix D section 8

4.8.1 Chemicals:

4.8.1.1 Scope

Chemicals used for cleaning, sanitation, fumigation, pest control, and lubricants; and any other chemicals used within the packhouse.

4.8.1.2 Requirements for the Operator

**Regulatory Requirements**


**Operator-defined Requirements**

2. The access, handling and use of chemical compounds shall be under the supervision of trained personnel.

3. Chemical compounds shall only be used according to the directions of the manufacturer and subject to the conditions of the authorisation.

4.8.1.3 Process flow diagram

<table>
<thead>
<tr>
<th>Inputs</th>
<th>Process steps</th>
<th>Outputs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chemicals</td>
<td>1. Order chemicals</td>
<td>Empty containers</td>
</tr>
<tr>
<td></td>
<td>2. Receipt of chemicals</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3. Storage</td>
<td></td>
</tr>
<tr>
<td></td>
<td>4. Use chemicals</td>
<td></td>
</tr>
<tr>
<td></td>
<td>5. Unused chemical returned to storage</td>
<td></td>
</tr>
<tr>
<td></td>
<td>6. Disposal of empty containers</td>
<td></td>
</tr>
</tbody>
</table>
4.8.1.4 Identify and Analyse Hazards and Other Risk Factors, and Determine CCPs

<table>
<thead>
<tr>
<th>Hazard or Risk Factor</th>
<th>Current Control measures, e.g. GHP / GMP CCPs</th>
<th>Is there a relevant measurable requirement (See 4.8.1.2)?</th>
<th>If yes, go to Q2. If no, not a CCP. Go to next hazard or risk factor.</th>
<th>If yes, go to Q3. If no, not a CCP. Go to next hazard or risk factor.</th>
<th>If no, go to Q4. If yes set up CCP to meet measurable requirements and also go to Q4.</th>
<th>If yes, redesign / establish GMP/GHP to meet remaining requirements. If no, and no CCPs list as uncontrolled. Consider at process analysis.</th>
</tr>
</thead>
<tbody>
<tr>
<td>C2 Residues from chemicals used in shed cleaning, fumigation etc</td>
<td>None(^{16})</td>
<td>Yes – Appropriate use of approved chemicals</td>
<td>Yes</td>
<td>Yes</td>
<td>CCP 1: Order chemicals. CCP 2: Use Chemicals</td>
<td>No.</td>
</tr>
</tbody>
</table>

4.8.1.5 Critical limit determination

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>1</td>
<td>Order chemicals</td>
<td>All chemicals are approved for their intended use as per NZFSA Manual 15 <a href="http://www.nzfsa.govt.nz/animalproducts/legislation/notices/m15-chem-schedule-all.pdf">http://www.nzfsa.govt.nz/animalproducts/legislation/notices/m15-chem-schedule-all.pdf</a></td>
</tr>
<tr>
<td>2</td>
<td>Use chemicals</td>
<td>Use correct approved chemical for intended use, in accordance with manufacturer’s instructions.</td>
</tr>
</tbody>
</table>

4.8.1.6 Procedures

The following control measures are the responsibility of the Packhouse Supervisor:

<table>
<thead>
<tr>
<th>Step</th>
<th>CCP or General Control</th>
<th>Critical Limit or General Criteria</th>
<th>Monitoring</th>
<th>Corrective Action</th>
<th>Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Order chemicals</td>
<td>CCP 1</td>
<td>All chemicals are approved for intended use as per Manual 15.</td>
<td>Check supplier’s evidence of chemical approval.</td>
<td>Do not use unapproved chemicals. Return to supplier.</td>
<td>Approved supplier list.</td>
</tr>
<tr>
<td>2. Receive chemicals</td>
<td>GC</td>
<td>Confirm that chemical clearly labelled and matches that ordered.</td>
<td>Visual inspection on arrival.</td>
<td>Do not use unapproved chemicals. Return to supplier.</td>
<td>Inwards goods docket.</td>
</tr>
</tbody>
</table>

\(^{16}\) If Henrietta had good control measures already in place, (e.g. Only purchasing approved chemicals, and using them in accordance with manufacturer’s instructions) then the answers to the questions would be different and a CCP would not be identified.
### Step 3: Storage

<table>
<thead>
<tr>
<th>CCP or General Control</th>
<th>Critical Limit or General Criteria</th>
<th>Monitoring</th>
<th>Corrective Action</th>
<th>Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>GC</td>
<td>Store in accordance with Manufacturer’s instructions.</td>
<td>N/a</td>
<td>Correct problem. Retrain staff.</td>
<td>Back of Chemical Use Record.</td>
</tr>
</tbody>
</table>

### Step 4: Use Chemicals

<table>
<thead>
<tr>
<th>CCP</th>
<th>Critical Limit or General Criteria</th>
<th>Monitoring</th>
<th>Corrective Action</th>
<th>Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>CCP 2</td>
<td>Use correct approved chemical for intended use, in accordance with manufacturer’s instructions.</td>
<td>Record all chemicals used, date, what it was used for, quantity used and any dilutions.</td>
<td>Get expert advice if necessary.</td>
<td>Chemical Use Record.</td>
</tr>
</tbody>
</table>

### Step 5: Unused Chemical Returned to Storage

#### 4.8.1.7 Operator verification

Once a month the Packhouse Manager shall check and sign the inwards goods dockets for chemicals received that month and the Chemical Use Record. Any problems shall be noted on the relevant record with the details of the corrective action taken.

### Step 6: Disposal of Empty Containers

<table>
<thead>
<tr>
<th>CCP</th>
<th>Critical Limit or General Criteria</th>
<th>Monitoring</th>
<th>Corrective Action</th>
<th>Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>GC</td>
<td>Dispose in accordance with manufacturer’s instructions. Do not reuse containers for other things.</td>
<td>N/a</td>
<td>Correct problem. Retrain staff.</td>
<td>Back of Chemical Use Record.</td>
</tr>
</tbody>
</table>

#### 4.8.1.8 Records

An example of a Chemical Use Record is given in Appendix E.
4.8.2 Pests

4.8.2.1 Scope

Includes pest control for all areas appropriate to the RMP, (including the production of animal product for animal consumption where relevant). It includes all relevant external and internal environs (stores, amenities and any other support areas).

Rodents    Insects    Birds    Cats/dogs    Stoats / Ferrets

4.8.2.2 Requirements for the Operator

**Regulatory Requirements**

   (1) All specified persons must establish and carry out effective procedures to--
   (a) ensure appropriate and adequate maintenance, cleaning, and sanitation of processing premises, places, facilities, essential services, and equipment (including conveyances); and
   (b) manage waste; and
   (c) control pests.

2. Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 21: Approved maintenance compounds (pesticides) to be labelled with the name or names of the maintenance compound as so approved, or as they appear in the list of approved maintenance compounds contained in NZFSA Manual 15

**Operator-defined Requirements**

3. Pests must be excluded from the premises to the extent practicable.

4. Ongoing monitoring for infestation must occur. Where an infestation is detected it must be dealt with in a timely and effective manner.

5. Good hygienic practice must be used to avoid creating an environment conducive to pests.

6. Chemical, physical or biological measures used to minimise the access of pests to the product must not present a hazard. Where chemicals are used for this purpose, only approved chemicals as listed in NZFSA Manual 15 [http://www.nzfsa.govt.nz/animalproducts/legislation/notices/m15-chem-schedule-all.pdf](http://www.nzfsa.govt.nz/animalproducts/legislation/notices/m15-chem-schedule-all.pdf) may be used where there is potential to contaminate the product. Directions and conditions for use must be followed.

7. Pest management system must be documented and records maintained.

8. All pesticides on a premises shall be listed in an inventory.

9. The access, handling and use of pesticides shall be under the supervision of trained personnel.

10. Pesticides shall only be used according to the directions of the manufacturer and subject to the conditions of the authorisation.

11. All practical steps shall be taken to ensure vermin cannot gain entry to packhouses.

12. There shall be a documented effective pest control system in place. Vermin includes any pests that may carry disease such as insects, rodents, wild birds and animals.

4.8.2.3 Process flow diagram

For chemical pesticides, refer to earlier example.
### 4.8.2.4 Identify and Analyse Hazards and Other Risk Factors

<table>
<thead>
<tr>
<th>Sources of hazards</th>
<th>Hazards reasonably likely to occur with each source</th>
<th>Current Control measures</th>
<th>Is there a relevant measurable requirement?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chemicals used for pest control</td>
<td>C2: Unapproved chemical residues</td>
<td>Only purchase approved chemicals. Comply with conditions of approval and manufacturer’s instructions for use.</td>
<td>Yes = See 4.8.1</td>
</tr>
<tr>
<td>Flies, cockroaches and other insects</td>
<td>B1: Salmonella and B2: Other enteric bacteria</td>
<td>External environs: Ground maintenance, e.g. foliage, grass</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Waste control</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Internal environs: Self closing doors</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Housekeeping programme</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Screens (windows/doors)</td>
<td></td>
</tr>
<tr>
<td>Rats and mice</td>
<td>B1: Salmonella and B2: Other enteric bacteria</td>
<td>External environs: Waste control</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Drain traps</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Bait stations (rodenticide)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Internal environs:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Bait boxes</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Drain traps</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Housekeeping programme</td>
<td></td>
</tr>
<tr>
<td>Birds</td>
<td>B1: Salmonella and B2: Other enteric bacteria</td>
<td>External environs: Bird deterrents (noise makers, foliage removal)</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Waste management</td>
<td></td>
</tr>
<tr>
<td>Cats, dogs, stoats and ferrets</td>
<td>B1: Salmonella and B2: Other enteric bacteria</td>
<td>External environs:</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Fencing</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Traps</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Waste management</td>
<td></td>
</tr>
</tbody>
</table>

#### 4.8.2.5 CCP Determination

There are no CCPs for the non-measurable requirements.

The CCP determination for measurable requirements for pest control chemicals has already been covered in 4.8.1.5.

#### 4.8.2.6 Determine Critical Limits

Not applicable as the only CCPs associated with chemical control has already been covered in 4.8.1.6.

For non-CCPs establish general criteria for control for current control measures.
Physical Controls

The following physical controls are used to prevent entry of pests into packhouses and associated buildings:

- self closing doors,
- drain screens,
- insect screens,
- wild bird deterrents (e.g. scarecrows, use of nylon lines to prevent landing on roosting areas).

These controls shall be kept in place year round, even when packhouses are empty.

All storage facilities shall be pest proof and waterproof.

Potable water storage facilities shall be pest proof. i.e. all tanks shall be enclosed with lids on.

Housekeeping / Maintenance

The area immediately surrounding the packhouse shall be kept free of trees, long grass, and any other rubbish or debris that may attract or provide cover for pests.

All animals (eg cats and dogs) shall be denied access to any part of packhouses or associated buildings.

Waste shall be enclosed in bins until removal.

Any egg breakages shall be cleaned up as soon as they are noticed.

Pesticide System

Appropriate measures shall be taken to control pests around the packhouse. This includes:

- Use of bait stations (they must be protected from access by hens). See site diagram showing their unique numbers and locations.
- Use of sticky fly-paper to capture insects.
- Use of insecticides – only when necessary.
- Use of a registered pest controller to regularly (weekly, fortnightly or monthly depending on performance) check the bait stations and take appropriate corrective action. Name of Pest Control Company = No Flies No Me Ltd. A copy of the company’s Registration Certification is kept in the Approved Supplier File.
- Records shall show all pest control activities, dates, chemicals used, quantities, any evidence of pest activity and any corrective action taken.
All items inside the dark line (which represents the land boundaries) are included in the risk management programme except the garden shed - see shaded building.
Monitoring

The Packhouse Supervisor shall do a weekly inspection of the internal and external environment to check on the effectiveness of the physical controls and the housekeeping / maintenance system. Pest Control Record 2 shall be filled out for each inspection.

The monitoring of the pesticide system shall be done by the Pest Controller. Pest Control Record 1 shall be filled out each time monitoring is done.

Corrective Action

When the monitoring finds problems with the controls appropriate corrective action shall be taken. This may include fixing the physical controls, increasing housekeeping frequencies, retraining staff, increasing inspection frequency, increasing pest control points, changing pest control chemicals etc.

4.8.2.7 Records

The Pest Control record forms mentioned above can be found in Appendix E of this Code Of Practice.

4.8.2.8 Operator verification

Once a month the Packhouse Manager shall check and sign the records for that month. Any problems shall be noted on the relevant record with the details of the corrective action taken.
4.8.3 Internal environs, facilities and equipment inside the packhouse

4.8.3.1 Scope

Includes the design, construction, maintenance, housekeeping and cleaning of the packhouse (premises and equipment) appropriate to the RMP:
- storage areas,
- egg sorting, washing, drying, grading areas,
- packing areas and
- any other support areas.

4.8.3.2 Requirements for the Operator

### Regulatory Requirements

1. **Animal Products Regulations 2000, 10: Requirements for premises, places, facilities, equipment, and essential services**—All specified persons must ensure that the premises, places, facilities, equipment, and essential services for which they are responsible in relation to the processing of animal material or animal product are—
   (a) designed, constructed, and located to enable suitability of the animal material to be maintained, and the fitness for intended purpose of the animal product to be achieved and maintained, having regard to--
      (i) the animal material or animal product to be processed; and
      (ii) the nature of the processes involved; and
      (iii) the range of the animal products to be produced; and
   (b) operated to minimise and manage the exposure of animal material or animal product or associated things to risk factors, having regard to--
      (i) the animal material or animal product to be processed; and
      (ii) the operational capability and capacity of the premises or place, facilities, equipment, and essential services; and
      (iii) the range of animal products to be produced.

2. **Animal Products Regulations 2000, 11: Hygiene Of Processing Environment**—
   (1) All specified persons must establish and carry out effective procedures to--
      (a) ensure appropriate and adequate maintenance, cleaning, and sanitation of processing premises, places, facilities, essential services, and equipment (including conveyances); and
      (b) manage waste; and
      (c) control pests.

3. **Animal Products Regulations 2000, 16 Packaging requirements for animal material and product**—All risk management programme operators, operators of animal material depots, and other categories of person specified in specifications for the purposes of this regulation must ensure that any packaging materials (including reusable packaging and inner and outer packaging of any kind) used for animal material, animal product, and associated things are designed, made, stored, and used in a manner that--
   (a) maintains the status of the animal material as suitable for use in processing; and
   (b) maintains the status of the animal product as fit for its intended purpose; and
   (c) minimises contamination of the animal material or animal product.
### Regulatory Requirements

4. **Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 5: Design and construction**

   (1) Any material or exposed internal surface finish used in the building, manufacture, or maintenance of facilities, equipment, or internal structures, that may affect the suitability for processing of animal material (other than live mammals or live birds), or the fitness for intended purpose of animal product, must —
   
   a. be impervious, non-absorbent, and free from depressions, pits, cracks, and crevices that may harbour contaminants; and
   
   b. be easily cleaned and sanitised; and
   
   c. be unaffected by any corrosive substance with which it is likely to come into contact, to the extent necessary to ensure that it will not harbour contaminants and is not a source of contamination; and
   
   d. be durable, resistant to fracture, and capable of withstanding repeated exposure to normal cleaning and sanitising; and
   
   e. in the case of surfaces (other than those used for walking or standing on during operations), be smooth and minimise the accumulation of condensation; and
   
   f. in the case of materials lining the walls, floors, and ceilings, be of a colour that does not disguise contaminants having regard to the lighting arrangements.

   (2) The facilities, equipment, and internal structures, that may affect the suitability for processing of animal material or the fitness for intended purpose of animal product, must be of sanitary design.

5. **Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 6: Facilities and equipment etc**

   (2) Cleaning and sanitation facilities, and equipment, must be provided to ensure that the hygiene of personnel, equipment and premises or place can be maintained so that the suitability for processing of animal material and the fitness for intended purpose of the animal product is not adversely affected.

6. **Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 19: Management of animal material or animal product not for human consumption**

   (1) Equipment or storage areas used to store or contain animal material that is not suitable for processing or animal product that is not fit for human consumption, but is suitable or fit for some other purpose, must —
   
   a. be clearly identified; and
   
   b. not be a source of contamination to other animal material or animal product that is intended for human consumption.

   (2) Animal material or animal product that is not suitable for processing or not fit for human consumption but is suitable or fit for some other purpose, must be kept under controlled conditions until adequately identified in a manner that will ensure that it will not be mistakenly or fraudulently released as suitable for processing or fit for human consumption.

7. **Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 6: Temperature controlled rooms and equipment must be operated within their design capability and capacity, and must consistently deliver any temperature as required by this notice or as specified in the risk management programme (as the case may require).**

8. **Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 6: Cleaning and sanitation facilities, and equipment, must be provided to ensure that the hygiene of personnel, equipment and premises or place can be maintained so that the suitability for processing of animal material and the fitness for intended purpose of the animal product is not adversely affected.**

9. **Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 7: Lighting must be of a sufficient intensity and quality to enable satisfactory performance of all operations which might affect the suitability for processing of animal material or the fitness for intended purpose of animal product.**

10. **Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 21: All containers of approved maintenance compounds must be labelled with the name or names of the maintenance compound as so approved, or as they appear in the list of approved maintenance compounds contained in NZFSA Manual 15 [http://www.nzfsa.govt.nz/animalproducts/legislation/notices/m15-chem-schedule-all.pdf](http://www.nzfsa.govt.nz/animalproducts/legislation/notices/m15-chem-schedule-all.pdf) may be used where there is potential to contaminate the product. Directions and conditions for use must be followed.**
Regulatory Requirements

(1) For the purposes of this clause waste includes animal material and animal product which has been assessed by an examiner who meets the competency requirements of clause 25(1)(a), or an animal product officer, and has been adjudged unsuitable or unfit for any purpose, and is awaiting disposal.
(2) Equipment, and storage areas, used to store or contain waste must —
(a) be clearly identified; and
(b) not be a source of contamination to other animal material or animal product.
(3) Waste must be kept under controlled conditions until adequately identified in a manner that will ensure that it will not be mistakenly or fraudulently released as suitable for processing or fit for human consumption.
(4) Waste must be disposed of by a method that ensures that it will not become a source of contamination to other animal material or animal product.

Operator-defined Requirements

12. Visual assessment of the internal environment (walls, ceilings, floors, drains, entrances etc.) shall verify the effectiveness of the cleaning programme
13. All cleaning chemicals to be approved and to be used as per Approvals Manual / manufacturers requirements.
14. All maintenance compounds to be approved and to be used as per Approvals Manual / manufacturers requirements.
15. Maintenance activities and actions taken to correct sanitary defects shall be carried out so that contamination is minimal

4.8.3.3 Process flow diagram

For chemicals refer to 4.8.1.3.

4.8.3.4 Identify and Analyse Hazards and Other Risk Factors

<table>
<thead>
<tr>
<th>Sources of hazards</th>
<th>Hazards reasonably likely to occur with each source</th>
<th>Current Control measures</th>
<th>Is there a relevant measurable requirement?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Introduction / spread of hazards from contaminated</td>
<td>B1: Salmonella species and B2: Enteric bacteria</td>
<td>Cleaning and sanitation of all tools, equipment, trolleys, trays</td>
<td>No</td>
</tr>
<tr>
<td>Tools, equipment, trolleys / trays, Forklifts</td>
<td></td>
<td>and forklifts prior to bringing into packhouse from outside.</td>
<td></td>
</tr>
<tr>
<td>Introduction / spread of hazards from dirty surfaces</td>
<td>B1: Salmonella species and B2: Enteric bacteria</td>
<td>Regular cleaning and sanitation of all surfaces inside packhouse</td>
<td>No17</td>
</tr>
<tr>
<td>Introduction / spread of hazards from waste / rubbish</td>
<td>B1: Salmonella species and B2: Enteric bacteria</td>
<td>Daily removal and disposal of reject eggs.</td>
<td>No</td>
</tr>
<tr>
<td>Cleaning chemicals</td>
<td>C2: Unapproved chemical residues</td>
<td>Only purchase approved chemicals. Comply with conditions of approval and manufacturer's instructions for use.</td>
<td>Yes = See 4.8.1</td>
</tr>
</tbody>
</table>

17 Some operators may use hygiene swabs to test for microbiological indicator organisms or protein deposits as a check on the effectiveness of their cleaning. In this case they should add a new operator defined spec to the previous table and answer yes here.
4.8.3.5 CCP determination

There are no CCPs for the non-measurable requirements. The only measurable requirements relate to chemical hazards that have already been addressed. See 4.8.1.5.

4.8.3.6 Critical limit determination

See 4.8.1.6 for chemicals.

Criteria for Packhouse Facilities

All egg grading, storage, and processing facilities, shall be constructed of appropriate materials that can be easily cleaned and sanitised.

Appropriate facilities, equipment and essential services must be provided to facilitate the hygienic performance of all operations, and minimise product contamination and deterioration.

Handwashing facilities shall be available. ‘Wash your hands’ signs should be displayed above sinks and sanitising stations.

All site and building entrances should be clearly marked to deter unauthorised entry.

Documented cleaning and sanitising programs shall be in place for egg packhouse facilities and equipment.

The sanitary design and layout of the premises, facilities and equipment (including conveyances) must be based on an assessment of the hazards likely to be associated with the product, and must:

- use materials that are suitable for purpose
- allow adequate space to facilitate the hygienic performance of all operations that may affect the fitness for intended purpose of the product.
- minimise the entrance and harbourage or accumulation of contaminants or pests.
- facilitate people movement and access in a manner that minimises the potential for contamination of the product.
- utilise separation by distance and/or physical barriers, where appropriate, to ensure contamination of the product is minimised.

Premises, facilities and equipment (including conveyances) must be maintained in an appropriate state of hygiene and repair to ensure that:

- residues and deposits that may contaminate the product are minimised,
- cleaning and/or sanitation procedures can be performed effectively;
- facilities and equipment can function as intended;
- product does not become contaminated (e.g. from pests, metal shards, flaking plaster, and debris).

Maintenance, cleaning and/or sanitation activities must not result in contamination of the product.

Waste management systems must ensure that all waste is handled consistent with good hygienic practise at all times, including when the premises is operating at full capacity.

Waste must not be allowed to accumulate where it has the potential to contaminate product.

Equipment/containers and storage areas used to store or contain waste must be identifiable.

Waste materials that are to be further processed (into another product) must be handled in a manner that will ensure that it remains fit for intended purpose.
4.8.3.7 Procedures

The following control measures are the responsibility of the Packhouse Supervisor:

<table>
<thead>
<tr>
<th>Area</th>
<th>General Control</th>
<th>Monitoring</th>
<th>Corrective Action</th>
<th>Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Packhouse design and construction</td>
<td>See Criteria on previous pages</td>
<td>Check that all new Packhouse conform to the criteria prior to eggs being received.</td>
<td>Fix shed to meet criteria.</td>
<td>Use Criteria on previous pages and tick off each one checked. Add cover sheet with date, pack-house name, signature of person doing check, etc</td>
</tr>
<tr>
<td>3. Packhouse housekeeping and cleaning</td>
<td>Packhouse shall be cleaned and sanitised regularly so that any equipment that contacts the eggs is visibly clean.</td>
<td>Monthly packhouse inspection.</td>
<td>Correct problem. Retrain staff.</td>
<td>Monthly packhouse inspection record.</td>
</tr>
<tr>
<td>7. Tools / Equipment</td>
<td>Clean and sanitise all tools, equipment, trolleys, trays and forklifts prior to bringing into packhouse from outside.</td>
<td>Visual inspection before entry into packhouse.</td>
<td>Reclean.</td>
<td>Daily Packhouse Record</td>
</tr>
<tr>
<td>8. Waste disposal</td>
<td>Remove and dispose of reject eggs daily.</td>
<td>N/a</td>
<td>Retrain staff.</td>
<td>Daily Packhouse Record</td>
</tr>
<tr>
<td></td>
<td>All rubbish and liquid waste shall be disposed of in an approved manner.</td>
<td>Monthly packhouse inspection</td>
<td>Correct problem. Retrain staff.</td>
<td>Monthly Packhouse Inspection Record</td>
</tr>
</tbody>
</table>

**Cleaning Policy**

- All new product contact equipment is to be designed for easy cleaning.
- All new product contact equipment to be cleaned before use.
- Tools and equipment used outside the packhouse are not to be used inside the packhouse unless they have been cleaned and sanitised first.
- All waste and rubbish to be removed from packhouse and put in covered containers.
Control System

There is a documented cleaning system for the packhouse, including:

- Cleaning frequencies for all product contact equipment.
- Cleaning instructions for all product contact equipment:
  
  Dismantle (where necessary)
  
  Remove waste
  
  Rinse
  
  Clean with hot water and approved detergent
  
  Rinse
  
  Reassemble
  
  Sanitise with approved sanitiser
  
  Final rinse (if required for that sanitiser).

- Cleaning frequencies and instructions for other areas inside the packhouse are also on the walls (including store rooms, chillers, freezers, retail room, processing room, amenities, and any other rooms included in the RMP), e.g. floors, ceilings, walls, drains, etc.

- A summary of how cleaning equipment is maintained in a hygienic state:
  
  ➜ Equipment to be made of non-porous materials, or replaced regularly.
  
  ➜ Equipment to be cleaned and sanitised regularly. Cloths to be boiled, or soaked in a mixture of one teaspoon of chlorine bleach in a litre of water.
  
  ➜ Cleaning equipment used in areas with known food safety hazards, e.g. toilets, are to be labelled and colour coded and not used to clean product contact surfaces.

Other Controls

To minimise physical contamination from metal, check equipment is in good condition before use.

There are documented repairs and maintenance policies including:

- All building alterations and equipment maintenance must be done so that any areas where product is exposed are protected from hazards introduced by this work. Once the work is completed the affected areas are to be cleaned effectively.

- All building alterations are to meet the requirements of the Animal Products Regulations and Specifications.

- The risk management programme will be updated or amended depending on the significance of the alterations.

4.8.3.8 Records

Examples of the records can be found in Appendix E of this Code of Practice.

4.8.3.9 Operator verification

Once a month the Packhouse Manager shall check and sign the records for that month. Any problems shall be noted on the relevant record with the details of the corrective action taken.
4.8.4 Personnel

4.8.4.1 Scope

Hygiene management for all people (managers, staff, visitors and contractors e.g. maintenance workers, cleaners etc) in all areas appropriate to the RMP. It includes external and internal environs (egg receipt, storage, sorting, washing, grading, packing areas, stores, amenities and any other support areas).

Manager  Staff  Repairmen / Visitors  Customers

4.8.4.2 Requirements for the Operator

Regulatory Requirements

1. Animal Products Regulations 2000, 12: Hygiene of persons whose presence or actions may result in contamination of animal material or animal product--
   All risk management programme operators, persons who transport animal material or animal product from the place or premises of a primary processor, and other categories of person specified in specifications for the purposes of this regulation must ensure that persons, including visitors, whose presence or actions, at any premises or place where animal material or product is processed, may result in contamination of animal material or animal product--
   (a) wear appropriate protective clothing, where necessary; and
   (b) follow an appropriate personal hygiene routine; and
   (c) behave in such a manner as may be necessary or desirable to minimise contamination to animal material, animal product, and associated things.

2. Animal Products Regulations 2000, 13: Persons infected by or carriers of disease or illness to be excluded from working areas or from handling animal material or product--
   All specified persons must ensure that persons, including visitors, who are known to be, or suspected of being, infected by or a carrier of a disease or illness of public health concern (including a notifiable infectious disease listed in section A of Part 1 of the First Schedule of the Health Act 1956) that is likely to be transmitted through animal material, animal product, or associated things are precluded from--
   (a) working in areas where animal material or animal product is processed, if that may result in contamination of animal product; or
   (b) handling animal material, animal product, or associated things that may result in contamination of animal product.

3. Animal Products (Specifications for Products Intended For Human Consumption) Notice 2000: 23 Health:
   (1). The operator must take reasonable measures to ensure that a person (including any visitor or contractor) who is—
   (a) infected with, or a carrier of, an infectious disease in a communicable form as described in Section A, Part 1, of the First Schedule of the Health Act 1956; or
   (b) suffering from acute respiratory infection; or
   (c) suffering from boils, sores, infected wounds, or any other condition that cannot be adequately protected from becoming a source of contamination — does not work as a product handler or enter an area where he or she may adversely affect the suitability for processing of animal material or the fitness for intended purpose of animal product.
**Regulatory Requirements**

(2). A product handler, or any other person who may affect the suitability for processing of animal material or fitness for intended purpose of animal product, after suffering from an illness described in subclause (1)(a) or (b), must provide a certificate from a registered medical practitioner confirming that the person is no longer likely to contaminate the animal material or animal product, prior to resumption of work in that role.

(3). A product handler, or any other person who may affect the suitability for processing of animal material or fitness for intended purpose of animal product, who suffers from a condition described in subclause (1)(c) must, before resuming work, be assessed by a suitably skilled person, nominated by the operator to confirm that the condition is no longer likely to contaminate the animal material or animal product, or that the handler or other person is adequately protected from being a source of contamination.

**Operator-Defined Requirements**

4. Minimise contamination of animal product by hazards originating from personnel, contractors, and visitors

4.8.4.3 Process flow diagram

N/a

4.8.4.4 Identify and Analyse Hazards and Other Risk Factors and determine CCPs.

There are no CCPs for the hazards with non-measurable requirements as shown in the table:

<table>
<thead>
<tr>
<th>Sources of hazards</th>
<th>Hazards reasonably likely to occur with each source</th>
<th>Current Control measures</th>
<th>Is there a relevant measurable requirement?</th>
</tr>
</thead>
</table>
| People carrying pathogens in gut | B1: Salmonella species  
B2: Enteric bacteria | Handwashing and sanitising programme. Hygiene training. People with diarrhoea excluded from working in food contact areas for 24 hours after problem clears up. | No                                         |
| People carrying pathogens up nose | B3: *Staphylococcus aureus* | Hygiene training Handwashing and sanitising programme | No                                         |
| Contaminated clothing / footwear | B1: Salmonella species  
B2: Enteric bacteria  
B3: *Staphylococcus aureus* | Laundry procedures Protective clothing programme Boot wash facilities Foot baths | No                                         |
| Person with exposed boils / sores | B3: *Staphylococcus aureus* | Use of impervious gloves or covers OR Keeping personnel that fit the criteria in specification 23 (1) away from product. Assessment as required by specification 23 (3). | No                                         |

There are no CCPs for hazards with non-measurable requirements shown in the above table.

The CCP determination for the measurable requirements is shown in the following table.
4.8.4.5  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>3</td>
<td>Personnel who find out they have infectious disease to notify Manager. Get medical Certificate.</td>
<td>Infected personnel to be kept away from egg contact duties. Medical Certificate stating clearance to return to work to be viewed by Management prior to return to working in egg contact areas.</td>
</tr>
</tbody>
</table>

Policy

Personnel shall be trained on:
- personal hygiene as it relates to food handling,
- requirement to notify manager if they find out they have an infectious disease as described in 4.8.4.2.

This training shall be documented.

Staff shall wear suitable clean outer protective clothing and footwear for tasks within the packhouse. Staff engaged in outside duties shall not engage in grading room duties unless footwear and outer clothing has been changed, and hands washed/ sanitised.

Staff engaged in egg processing duties shall wear suitable outer protective clothing and a hair cover, and shall remove all jewellery.

Outer protective clothing shall be laundered and sanitised to minimise contamination from soiled clothing. This usually means that laundering is done on a daily basis.

Staff shall not keep domestic poultry or other avian species at home.

---

If Henrietta had good control measures already in place, (e.g. Send ill staff to Doctor; obtain medical clearance before allowing return to work as food handler) then the answers to the questions would be different and a CCP would not be identified.
Policy

Food and drink and their containers are not allowed inside the processing areas. Food and drink shall be consumed in a designated area away from such areas.

There shall be no smoking in any of the buildings. A designated smoking/rest area away from these sections is acceptable, provided there is adequate ventilation.

Personnel shall wash or sanitise their hands:
- Upon entering any production or packaging areas
- After handling eggs or egg products
- Before handling food packaging
- After completing a messy function and/or handling waste.
- After visiting the toilet

Any visitor to the premises must be under supervision and must adhere to the requirements of the areas visited.

4.8.4.6 Procedures

<table>
<thead>
<tr>
<th>Hazard</th>
<th>General Control</th>
<th>Monitoring</th>
<th>Corrective Action</th>
<th>Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>People carrying pathogens in gut</td>
<td>All staff to wash hands prior to handling eggs.</td>
<td>Supervisor to check when in area.</td>
<td>Retrain staff. Warn repeat offenders.</td>
<td>Daily Packhouse Record.</td>
</tr>
<tr>
<td>People with diarrhoea excluded from working with eggs for 24 hours after problem clears up.</td>
<td>N/a</td>
<td></td>
<td>Retrain staff.</td>
<td>Daily Packhouse Record.</td>
</tr>
<tr>
<td>People carrying pathogens up nose</td>
<td>All staff to wash hands prior to handling eggs.</td>
<td>Supervisor to check when in area.</td>
<td>Retrain staff. Warn repeat offenders.</td>
<td>Daily Packhouse Record.</td>
</tr>
<tr>
<td>Contaminated footwear</td>
<td>All people to use footbaths before entering barns. Sanitising footbaths to be changed daily or when soiled.</td>
<td>Supervisor to check when in area.</td>
<td>Retrain staff. Warn repeat offenders.</td>
<td>Daily Packhouse Record.</td>
</tr>
<tr>
<td>B3: Contaminated clothing</td>
<td>Clean protective clothing to be worn when handling eggs.</td>
<td>Supervisor to check when in area.</td>
<td>Retrain staff. Warn repeat offenders.</td>
<td>Daily Packhouse Record.</td>
</tr>
<tr>
<td>B3: Food handler carrying infectious disease</td>
<td>Medical Certificate stating clearance to return to work to be viewed by Manager prior to return to working in egg contact areas.</td>
<td>Manager to check.</td>
<td>Staff to work in other area or be sent home. Retrain staff. Warn repeat offenders.</td>
<td>Daily Packhouse Record.</td>
</tr>
<tr>
<td>B3: Person with exposed boils / sores</td>
<td>Cover with of impervious gloves or covers.</td>
<td>Supervisor to check covering.</td>
<td>Retrain staff. Warn repeat offenders.</td>
<td>Daily Packhouse Record.</td>
</tr>
</tbody>
</table>

4.8.4.7 Records

The record forms can be found in Appendix E of this Code Of Practice.

4.8.4.8 Operator verification

Once a month the Packhouse Manager shall check and sign the records for that month. Any problems shall be noted on the relevant record with the details of the corrective action taken.
4.8.5 Identification and Control of Risk Factors From Other Sources – Water

<table>
<thead>
<tr>
<th>Town Supply</th>
<th>Bore / Well Water</th>
<th>River Water</th>
<th>Roof Water</th>
<th>Ponds</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image1.png" alt="Image" /></td>
<td><img src="image2.png" alt="Image" /></td>
<td><img src="image3.png" alt="Image" /></td>
<td><img src="image4.png" alt="Image" /></td>
<td><img src="image5.png" alt="Image" /></td>
</tr>
</tbody>
</table>

**Water Supplier:** Henrietta’s Egg Company Ltd

**Water source:** Surface water (stream)

**Water potability option:** Schedule 1. Refer to 4.8.4.1 for details.

**Water Management Plan**
Refer to 4.8.4.2 for details.

**Water Reticulation Plan**
Refer to 4.8.4.3 for details.

**Records**
Approved Supplier file in Manager’s office has a completed “Assessment of Water Supply Status Checklist” from Schedule 1.

---

**Table 1: Quality of Potable Water**

<table>
<thead>
<tr>
<th>Measurement</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>faecal coliforms</em></td>
<td>must not be detectable in any 100 ml sample</td>
</tr>
<tr>
<td>Chlorine (when chlorinated)</td>
<td>not less than 0.2mg/l (ppm) free available chlorine with a minimum of 20 minutes contact time</td>
</tr>
<tr>
<td>pH (when chlorinated)</td>
<td>6.5 to 8</td>
</tr>
<tr>
<td>Turbidity</td>
<td>Should not routinely exceed 1 NTU, must not exceed 5 NTU</td>
</tr>
</tbody>
</table>
### Part 1: SUPPLIER DETAILS

<table>
<thead>
<tr>
<th>Name of Operator:</th>
<th>Type of Operation:</th>
<th>Premises Address:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Henrietta’s Egg Company Ltd</td>
<td>Egg Laying Farm</td>
<td>29 Henry St, Henryville</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Postal Address:</th>
<th>Phone Number:</th>
<th>Fax Number:</th>
<th>Email Address:</th>
</tr>
</thead>
<tbody>
<tr>
<td>PO Box 111 Henryville</td>
<td>(01) 01010101</td>
<td>(01) 01010100</td>
<td><a href="mailto:Henrietta@eggs.co.nz">Henrietta@eggs.co.nz</a></td>
</tr>
</tbody>
</table>

### Part 2: WATER SOURCE

Water Source – Indicate all sources intended to be used.

- Secure groundwater (not under the influence of surface water) – Go to Part 3
- Surface water (e.g. spring, well, river, stream, dam, lake, reservoir) – Go to Part 4
- Roof water – Go to Part 5

### Part 4: SURFACE WATER

(e.g. Spring, Shallow Well, Dam, Lake, Reservoir, Stream)

1. Management

   (i) Describe the water source e.g. spring, well, stream, river, dam, reservoir etc. including name where appropriate.

      Stream

      (ii) Describe the soil type in the area of the water source e.g. coarse shingle, fine silt, clay etc.

   Coarse shingle

   (iii) Has a microbiological test been done on this source within the last month? Yes ☐ No ☐

   (iv) Does the water satisfy the criteria in Table 1: Quality of Potable Water (See table on page 3-19, except for criteria relating to chlorine and pH)? ☐ ☐?

   Name the laboratory which did the test: _____________________
### 2. Criteria

**(i) Are any of the following within 50 metres of the water source?**

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Offal pit / soak hole</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Animal effluent</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Sumps</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Feed pad</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Fuel tanks</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Timber treatment facility</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Septic tank / long-drop toilet</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Stock yards</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Land disposal site/refuse pit</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Silage stack</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Chemical preparation/storage</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Pesticide residues</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

**(ii) Are there any known water quality problems (e.g. bacterial contamination, turbidity, corrosiveness, sediment, colour, smell, taste)?**

*(If Yes, specify)*

*No*

**(iii) Do any of the following factors present risks to the quality of the water?**

<table>
<thead>
<tr>
<th>Factor</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spray drift</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Nearby factories</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Mining operations</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

*(If Yes, specify what activity and how far away)*

### 3. Intake and storage

**(i) Is any visible matter drawn up in the intake from the water source?**

Yes   No

**(ii) Are holding tanks used?**

Yes   No

**(iii) If Yes, are these tanks capable of holding more than or less than 1 days supply of water? (please circle answer)**

More Less

**(iv) Is the outlet of the holding tank above or level with the base of the tank? (please circle answer)**

Above Level
4. Additional criteria for flowing water only i.e. rivers, streams, springs etc.

(i) Is there a plan for when the river/stream etc. floods?

(ii) Is effluent discharged less than 2 km upstream of the water intake?

If Yes, state source: _____________________________

(iii) If Yes, is effluent discharged less than 4 hours before water is taken from the source?

(iv) Do farmed animals have access to within 10m of the water intake?

(v) Is industrial or urban stormwater discharged to the source water upstream of the intake?

5. Additional criteria for enclosed surface waters only i.e. dams, lakes, reservoirs etc.

(i) Is the water accessible to farmed animals?

(ii) Is effluent discharged into the dam/lake/reservoir?

(iii) Is industrial or urban stormwater discharged into the dam/lake/reservoir?

6. Analysis

- If the answers to the questions in section 1 are YES and to all questions in sections 2, 3, 4 & 5 are NO, then the water may be considered satisfactory.  
  
  *Section 2 had a YES answer – Silage stack within 50 m.*

- If the answer to any question in section 1 is NO, then a microbiological test must be obtained and, where necessary, a corrective action plan must be designed and included in the water management plan to ensure the water meets the criteria in Table 1: Quality of Potable Water.

- If the answer to any question in section 2 is YES, then appropriate action must be taken to ensure potential hazards to human health are identified and, where necessary, a corrective action plan is designed and included in the water management plan to ensure the hazard(s) of concern is/are minimised.  
  
  *Section 2 had a YES answer – Silage stack within 50 m. Silage stack has now been moved further away.*

- In relation to section 3, if visible debris is drawn up in the water intake at any time and if the holding tank capacity is such that water could settle for at least 24 hours before use and the water outlet from the tank is above the base of the tank so that debris can settle, then the facility may be considered satisfactory. If the facility is not considered satisfactory then a corrective action plan must be designed and included in the water management plan.

- If the answer to any question in sections 4 or 5 is YES, then appropriate action must be taken to ensure potential hazards to human health are identified and, where necessary, a corrective action plan is designed and included in the water management plan to ensure the hazard(s) of concern is/are minimised.
4.8.5.2  Water Management Plan:

Why was your water unsatisfactory? (Get this from your earlier answers)

| Stream water = unsecured source.  
| Silage stack too close. |

Is there a biological, chemical or physical hazard associated with this problem? If so what? (See next table for ideas).

<table>
<thead>
<tr>
<th>Hazards</th>
<th>Examples</th>
</tr>
</thead>
</table>
| Biological hazards | Harmful bacteria from the gut of humans, animals and birds.  
| E.coli  
| Salmonella species  
| Parasites | Giardia  
| Cryptosporidium  
| Chemical hazards | Chemical residues  
| Pesticides, herbicides, fumigants  
| Heavy Metals | Mercury, cadmium, copper, lead, zinc, selenium, arsenic, chromium, manganese, antimony  
| Physical hazards | N/a  

What will you do to correct or control this problem/hazard?  
Consider removing the problem where possible or treatment e.g. chlorination, filtration.  
You may need to ask for expert advice on this.

| Have moved the silage stack. |

---

19 These hazards are summarised from those identified in MAF’s generic model for potable water, May 1997.
What water testing will you do? How often? What criteria must it meet?

<table>
<thead>
<tr>
<th>Measurement</th>
<th>Secure water Criteria</th>
<th>Secure water Test frequency</th>
<th>Unsecure Water Test frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>faecal coliforms</td>
<td>Must not be detectable in any 100 ml sample</td>
<td>Nil</td>
<td>1 test every month</td>
</tr>
<tr>
<td>Chlorine (when chlorinated)</td>
<td>Not less than 0.2mg/l (ppm) free available chlorine with a minimum of 20 minutes contact time</td>
<td>Nil</td>
<td>1 test every month</td>
</tr>
<tr>
<td>pH (when chlorinated)</td>
<td>6.5 to 8</td>
<td>Nil</td>
<td>1 test per month</td>
</tr>
<tr>
<td>Turbidity</td>
<td>Should not routinely exceed 1 NTU, must not exceed 5 NTU</td>
<td>Nil</td>
<td>daily</td>
</tr>
</tbody>
</table>

What will you do if any of these criteria are not met? Consider extra treatment, further testing, alternative supply etc. You may need to ask an expert for help.

- Coli – further treatment – set up chlorination system.
- Chlorine and pH (if chlorinated due to coli problem) – increase testing frequency so problems detected earlier.
- Turbidity – ask for expert help.

What lab does the micro tests? Lab X

Secret St

Henryville

Are they MILAB accredited? If so ask for letter confirming this. If not, find another lab which is. Yes

Who are the water samplers and were they trained by the lab to take samples properly? Henrietta and Henry Eggnott

---

20 MILAB is a laboratory accreditation programme run by NZFSA. See NZFSA web site: [www.nzfsa.govt.nz/animalproducts/milab/index.htm](http://www.nzfsa.govt.nz/animalproducts/milab/index.htm) or contact Programme Manager, Monitoring and Review for details (04, 4632500).
Who does the pH, chlorine and turbidity tests? Have they been trained?

- **pH**: Henrietta and Henry Eggnott (both trained)
- **Chlorine**: Henrietta and Henry Eggnott (both trained)
- **Turbidity**: Henrietta and Henry Eggnott (both trained)

What equipment/test kit/method is used for these tests? How is any equipment calibrated to make sure it is accurate (Refer to the manufacturer’s instructions or supplier for details).

- **pH**: pH meter calibrated and used in accordance with manufacturer’s instructions.
- **Chlorine**: Lovibond comparator test used in accordance with manufacturer’s instructions.
- **Turbidity**: Nephilometer, Method SMWW 2130A

What test records do you have: for pH, chlorine and turbidity tests?

- **Micro**: Lab report
- **pH**: See Record 3
- **Chlorine**: See Record 3
- **Turbidity**: See Record 3

Note: If water is supplied by the operator, and the operator fails to comply with any of the requirements of the water management plan (shown on last 3 pages), 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.
### 4.8.5.3 Water Reticulation Plan

Do you have a plan of the water pipes and tanks on your premises?

<table>
<thead>
<tr>
<th>Yes – refer to plan on wall of packhouse manager’s office.</th>
</tr>
</thead>
</table>

Do you have more than one standard of water on your premises, e.g. potable water, and non-potable water – perhaps for fire fighting?

<table>
<thead>
<tr>
<th>No</th>
</tr>
</thead>
</table>

Do you have dead ends in your potable water pipes where water can stagnate?

<table>
<thead>
<tr>
<th>No</th>
</tr>
</thead>
</table>

Are your pipes in good condition, i.e. not rusting, not damaged?

<table>
<thead>
<tr>
<th>Yes</th>
</tr>
</thead>
</table>

If any of the above change what will you do?

<table>
<thead>
<tr>
<th>One or more of the following as appropriate:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Increase water testing,</td>
</tr>
<tr>
<td>• Replace pipes, or otherwise fix the problem,</td>
</tr>
<tr>
<td>• Treat water before point of use.</td>
</tr>
</tbody>
</table>

Note: These questions have been asked to ensure that the quality of the water coming in is maintained. Further identification and analysis of hazards and other risk factors is not required.
# Analysis / Control of Hazards and Other Risk Factors From the Process

## 4.9.1 Analyse hazards and other risk factors at each process step

Refer back to 4.6 to get the process steps and their associated inputs. Enter these into the first two columns in the following table. Then refer to 4.7 for the hazards and risk factors related to each input. Enter these into the third column in the following table. When answering questions 1-3 consider the “unacceptable level” as that defined in the product outcomes set in 4.5.

<table>
<thead>
<tr>
<th>Process step</th>
<th>Input Name</th>
<th>Hazard or other risk factor associated with input</th>
<th>Hazards and other risk factors from process step, and potential impact of process step on existing hazards and other risk factors</th>
<th>Justify answer. If no not a CCP, Go to Q4. If yes, go to Q2.</th>
<th>If no go to Q3. If yes, this step is a CCP. Go to Q4.</th>
<th>If yes, assign the previous step as a CCP. Go to Q4.</th>
<th>If no, and no CCP, list as uncontrolled. If yes, redesign / establish general controls to meet outcomes.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>5. Storage and transfer to grading</strong></td>
<td>Eggs</td>
<td>B1, B2, B3, B4, C1, C2, W1-W9, L1, L2</td>
<td>No – Already controlled. See 4.8.1.</td>
<td>Q1. Could the risk factor be present in or on the eggs at unacceptable levels at this step?</td>
<td>Q2. Is there a control measure at this step that would prevent unacceptable levels of the risk factor or reduce it to acceptable levels?</td>
<td>Q3. Is there a control measure available at a previous step?</td>
<td>Q4. Are there any other non-measurable controls?</td>
</tr>
<tr>
<td>Trolleys / Labels</td>
<td>B1: Salmonella species B2: Enteric bacteria</td>
<td>No – already controlled. See 3.9.3.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>No</td>
</tr>
</tbody>
</table>
### Chapter 4: Example RMP for an Egg Packhouse

<table>
<thead>
<tr>
<th>Process step</th>
<th>Input Name</th>
<th>Hazard or other risk factor associated with input</th>
<th>Hazards and other risk factors from process step, and potential impact of process step on existing hazards and other risk factors</th>
<th>Justify answer.</th>
<th>Q2. Is there a control measure at this step that would prevent unacceptable levels of the risk factor or reduce it to acceptable levels?</th>
<th>Q3. Is there a control measure available at a previous step?</th>
<th>Q4: Are there any other non-measurable controls?</th>
</tr>
</thead>
<tbody>
<tr>
<td>6. Sorting</td>
<td>B1: Salmonella species &lt;br&gt; B2: Enteric bacteria &lt;br&gt; W5: Rotten eggs &lt;br&gt; W6: Pink egg whites</td>
<td>Yes</td>
<td>Yes – CCP 4 = Removal of soiled and cracked eggs reduces the amount of contaminated eggs.</td>
<td>Yes</td>
<td>If no go to Q3. If yes, this step is a CCP. Go to Q4.</td>
<td>If yes, assign the previous step as a CCP. Go to Q4.</td>
<td>If no, not a CCP, go to Q4.</td>
</tr>
<tr>
<td></td>
<td>L1: Incorrect claims</td>
<td>If eggs from different sheds get mixed up then claims may be incorrect.</td>
<td>Yes</td>
<td>Yes – CCPL1 – 21 = Process only one shed at a time OR process only one type of egg at the packhouse.</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7a. Washing</td>
<td>Chemicals in rinse water.</td>
<td>No – already controlled – See 4.8.2.</td>
<td>No</td>
<td>No</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>C3: Residues from chemicals used in egg washing.</td>
<td>B1: Salmonella species and B2: Enteric bacteria on outside of shell can get into shell is washing damages it.</td>
<td>Yes</td>
<td>Yes – CCP 5= Proper egg washing procedures as per ICMSF guidelines.</td>
<td>No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

21 The numbering of CCPs for “other risk factors” has been coded by adding an “L” or “W” after “CCP”. i.e. Labelling = CCPL, and Wholesomeness = CCPW.
| 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, this step is a CCP. Go to Q4. | If no go to Q3. | If yes, assign the previous step as a CCP. Go to Q4. | If no, not a CCP, go to Q4. | If no, and no CCPs list as uncontrolled. If yes, redesign / establish general controls to meet outcomes. |
|-------------|------------|-------------------------------------------------|-------------------------------------------------------------------------------------------------|----------------|-------------------|----------------------------------------|----------------|----------------------------------------|----------------------------------------|
| 7b. Drying  |            |                                                 |                                                                                                 |                |                   |                                        |                |                                        |                                        |
| 7c. Oiling  | Food grade oil | C3: Residues from chemicals used in egg oiling. | No – already controlled – See 4.8.2.                                                            | No             |                   |                                        |                |                                        |                                        |
| 8. Candling |            | B1: Salmonella species and B2: Enteric bacteria on outside of shell can be reduced by removal of defective eggs. | Yes – previous controls are not a guarantee of removal | Yes – CCP6 - Candling can allow detection and removal of minor cracks, pin holes etc that will reduce number of contaminated eggs. |                      |                                        |                |                                        | No                                     |
|             |            | W1: Blood or meat spots W3: Roundworms          | Yes – not detectable prior to this.                                                               | Yes – CCPW1 – candling can allow detection and removal of these eggs. |                      |                                        |                |                                        | No                                     |
| 9. Grading/Weighing |            | Egg breakage can redistribute any pathogens to other eggs. | Yes                                                                                         |                      |                                        |                                        |                |                                        | Yes, immediate clean up of broken eggs to minimise cross contamination. |
### Chapter 4: Example RMP for an Egg Packhouse

<table>
<thead>
<tr>
<th>Process step</th>
<th>Input Name</th>
<th>Hazard or other risk factor associated with input</th>
<th>Hazards and other risk factors from process step, and potential impact of process step on existing hazards and other risk factors</th>
<th>Justify answer. If no not a CCP. Go to Q4. If yes, go to Q2.</th>
<th>Q2. Is there a control measure at this step that would prevent unacceptable levels of the risk factor or reduce it to acceptable levels?</th>
<th>Q3. Is there a control measure available at a previous step?</th>
<th>Q4. Are there any other non-measurable controls?</th>
</tr>
</thead>
<tbody>
<tr>
<td>10. Packing</td>
<td>Packaging</td>
<td>L1: Incorrect claims</td>
<td></td>
<td>Yes – CCPL2 – check that claims on packaging matches product at each shed changeover.</td>
<td>If no go to Q3. If yes, this step is a CCP. Go to Q4.</td>
<td>If yes, assign the previous step as a CCP. Go to Q4.</td>
<td>If no, and no CCPs list as uncontrolled. If yes, redesign / establish general controls to meet outcomes.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>L2: Incorrect dates</td>
<td></td>
<td>Yes</td>
<td>If no go to Q3. If yes, this step is a CCP. Go to Q4.</td>
<td>If yes, assign the previous step as a CCP. Go to Q4.</td>
<td>If no, and no CCPs list as uncontrolled. If yes, redesign / establish general controls to meet outcomes.</td>
</tr>
<tr>
<td>11. Egg Storage / Loadout</td>
<td>B1, B2, W5, W6</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>B1, B2, W5, W6</td>
<td>Yes, storage at or below 15°C minimises bacterial growth and steady temperature minimises mould formation.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### 4.9.2 Determine Critical Limits

Determine critical limits for each CCP (see table below). The table summarises monitoring and corrective action of CCPs and other general controls. Not all CCPs identified in this Code Of Practice will be applicable to all operations. Some operations may have additional CCPs.

<table>
<thead>
<tr>
<th>CCP or General Control</th>
<th>Process Step</th>
<th>Hazard ID</th>
<th>Critical Limit or Process Criteria</th>
<th>Monitoring</th>
<th>Corrective Action (Includes retraining staff as necessary)</th>
<th>Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Control</td>
<td>5. Storage / Transfer to grading</td>
<td>B1, B2, W5, W6</td>
<td>Store cracked eggs at or below 6°C. Store other eggs at or below 15°C.</td>
<td>Daily check</td>
<td>Get engineer to check refrigeration.</td>
<td>Daily Packhouse Record</td>
</tr>
<tr>
<td>CCP 4</td>
<td>6. Sorting</td>
<td>B1, B2, W5, W6</td>
<td>All eggs with total soiling greater than a defined surface area(^\text{22}) to be washed. All visually cracked eggs removed from A Grade Shell Eggs.</td>
<td>Continuous</td>
<td>Re-sort eggs. Send soiled eggs for washing or further processing or animal consumption as appropriate. Send cracked eggs for further processing or animal consumption as appropriate.</td>
<td>Daily Packhouse Record</td>
</tr>
<tr>
<td>CCP L1</td>
<td></td>
<td>L1</td>
<td>Process only one shed at a time OR process only one type of egg at the packhouse.</td>
<td>Check at change over</td>
<td>Re-sort eggs.</td>
<td>Daily Packhouse Record</td>
</tr>
<tr>
<td>CCP 6</td>
<td>8. Candling</td>
<td>B1 and B2</td>
<td>Removal of all visible cracks and pin holes.</td>
<td>Daily check of a sample of candled eggs</td>
<td>Recandle eggs since last check.</td>
<td>Daily Packhouse Record</td>
</tr>
<tr>
<td>CCP W1</td>
<td></td>
<td>W1, W3</td>
<td>Removal of all eggs with blood or meat spots and roundworms.</td>
<td>Daily check of a sample of candled eggs</td>
<td>Recandle eggs since last check. Notify layer farm.</td>
<td>Daily Packhouse Record</td>
</tr>
</tbody>
</table>

\(^{22}\) To be set by egg producer. To define the surface area use an actual size e.g. 1 square cm, or refer to something of known size, e.g. 5 or 10 cent coin (as appropriate).

\(^{23}\) Some egg producers may choose to reject very dirty eggs rather than to wash them. This would also be a CCP.
<table>
<thead>
<tr>
<th>CCP or General Control</th>
<th>Process Step</th>
<th>Hazard ID</th>
<th>Critical Limit or Process Criteria</th>
<th>Monitoring</th>
<th>Corrective Action (Includes retraining staff as necessary)</th>
<th>Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Control</td>
<td>9. Grading</td>
<td>B1, B2</td>
<td>Immediate clean up of broken eggs to minimise cross contamination.</td>
<td>Check every hour.</td>
<td>Check equipment set up.</td>
<td>Daily Packhouse Record</td>
</tr>
<tr>
<td>CCP L2</td>
<td>10. Packing</td>
<td>L1</td>
<td>All claims on packaging matches product at each shed changeover.</td>
<td>Daily check.</td>
<td>Re-sort eggs or use packaging with no claims.</td>
<td>Daily Packhouse Record</td>
</tr>
<tr>
<td>CCP L3</td>
<td></td>
<td>L2</td>
<td>All dates on packaging matches product at each shed changeover.</td>
<td>Daily check.</td>
<td>Redate the packs.</td>
<td>Daily Packhouse Record</td>
</tr>
<tr>
<td>General Control</td>
<td>11. Egg storage and loadout</td>
<td>B1, B2, W5, W6</td>
<td>Store eggs at or below 15°C.</td>
<td>Daily check</td>
<td>Get engineer to check refrigeration.</td>
<td>Daily Packhouse Record</td>
</tr>
</tbody>
</table>

Note:

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

Each product outcome and CCP must be validated to show that it can be achieved on an ongoing basis. This will require the collection and analysis of relevant data, e.g. production and control records. For more information on validation refer to 2.16.1 and 4.16.
General Controls – Step 5 = Storage and Transfer to Grading

There shall be clear, physical, and labelled segregation of eggs from each shed or flock at all times, to enable traceability on a per flock or shed basis. All containers of eggs shall be clearly identified with the name of egg producer, flock (ie shed), and date of lay.

Eggs produced from caged hens shall be kept clearly separate from eggs produced by hens from free range and barn systems at all times.

Eggs shall be transported to the grading room, or stored in cool rooms operated at or below 6°C (cracked eggs) or 15°C (other eggs), within 2 hours of collection. Cool-room temperature checks shall be made twice daily.

Eggs stored in cool-rooms on the farm shall be taken to an off-farm grading facility after a maximum of 4 days, and subsequently graded. Date of collection shall be recorded.

Eggs shall be transported in clean enclosed vehicles and maintained below 15°C when transported to any off-farm grading or processing facility.

A cleaning program shall be in place for all vehicles, trolleys, trays, belts, conveyors etc used to transport eggs to the grading room.

General Controls – Step 6 = Sorting

Dirty, cracked, or broken eggs where detected shall be removed from the collection system prior to grading. In automated systems where eggs are directly conveyed to the grader, a pre-candling station may be required to remove dirty, cracked, or broken eggs.

General Controls – Step 7 = Washing / Drying / Oiling (Optional)

Appropriate egg washing / drying and oiling procedures in accordance with the ICMSF recommendations given on page C-51 of Appendix C: Technical Annex shall be documented.

Dirty eggs may be cleaned by dry buffing provided the egg shell cuticle is not damaged.

Manual wet cleaning or wiping of eggs is not permissible.

General Controls – Step 8 = Candling

(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.
General Controls – Step 9 = Grading / Weighing

Minimum egg weights shall be in accordance with the next table.

Calibration and measuring equipment suitability

(1) Measuring equipment, such as scales, thermometers, pH meters, and flow meters (whether stand alone or forming part of a piece of equipment), that is used to provide critical measurements, must —
   (a) have the accuracy, precision, and conditions of use appropriate to the task performed; and
   (b) be calibrated against a reference standard showing traceability of calibration to a national or international standard of measurement (where available), or (if no such standard exists) be calibrated on a basis that is documented in, or incorporated by reference into, the risk management programme; and
   (c) be uniquely identified to enable traceability of the calibrations and to identify calibration status.

(2) Minimum frequencies of calibration must be specified in the risk management programme for each piece of measuring equipment used to provide critical measurements, or used as reference standards, taking into consideration the following (as appropriate) —
   (a) the stability of the piece of equipment; and
   (b) the nature of the measurement; and
   (c) the manufacturer’s instructions.

(3) Safeguards must be in place to prevent unauthorised adjustments to the calibration of the measuring equipment, including movement of the equipment where this may invalidate the calibration.

Minimum egg weights shall be:

<table>
<thead>
<tr>
<th></th>
<th>Jumbo</th>
<th>Large 7</th>
<th>Standard 6</th>
<th>Mixed Grade</th>
<th>Medium 5</th>
<th>Pullet 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>g/egg</td>
<td>68</td>
<td>62</td>
<td>53</td>
<td>44</td>
<td>35</td>
<td></td>
</tr>
<tr>
<td>g/doz</td>
<td>816</td>
<td>744</td>
<td>636</td>
<td>582</td>
<td>528</td>
<td>420</td>
</tr>
</tbody>
</table>

General Controls – Step 10 = Packing

All packaging for saleable eggs shall be clean, intact, and preferably unused.

Packaging materials must;
- adequately protect the product;
- be free from substances that may contaminate the product;
- be protected during handling, transport, storage and use; and
- be adequately cleaned and sanitised between use if reused.

All eggs and associated packaging shall be kept from direct contact with the floor at all times (e.g. stack the cartons on pallets). This enables stock rotation, easy cleaning of the store, and reduces damage, soiling, and deterioration of product packaging.

Labelling must comply with the New Zealand Food Regulations 1984, the Australian Food Standards Code 1992 or other relevant legislation applicable to the product.

Product must be truthfully labelled.
**General Controls – Step 10 = Packing**

**Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 30: Packaging**

1. The composition and where appropriate, the conditions of use of packaging must —
   a. comply with the requirements specified in the current US Code of Federal Regulations, Title 21, Parts 170–199 (21 CFR 170–199), which applies equally to coatings and linings of containers and cartons where these are the direct product contact surface; or
   b. comply with the requirements specified in the current "Australian Standard for Plastics Materials for Food Contact Use, Australian Standard AS2070–1999"; or
   c. be determined by the operator to be suitable for use, based on an analysis of hazards and other risk factors from the packaging.

2. If compliance with this specification is achieved through meeting the requirements of subclause (1)(a) or (b), the risk management programme must state the full reference to the regulation, part, section or standard with which the packaging complies.

A ‘best before’ date of 35 days maximum shall be fixed to the packaging, including trays, at grading. The ‘best before’ date is from the date of lay.

All dates and batch codes shall be clear and legible. No forward packing/dating is allowed. A strict stock rotation regime shall be exercised at all times.

Batch codes shall be affixed to packaging, including trays, at grading for traceability and/or recall purposes. Ideally, the batch code will enable eggs to be traced back to a specific flock or shed on a given day. This may be achieved simply by keeping eggs from each flock or shed separate at grading, and printing the producer and/or flock identification number with the ‘best before’ date (eg 02/03/98-KJ7)

**General Controls – Step 11 = Egg Storage / Loadout**

**Animal Products Regulations 2000, 14: Required measuring equipment to be calibrated and function as intended--**

1. All specified persons must ensure that measuring equipment that is used to carry out a critical measurement is properly calibrated and functions as intended.

2. In this regulation, "critical measurement" means a parameter identified as critical in any--
   a. specifications or regulated control scheme; or
   b. risk management programme, being a parameter of the nature of the parameters referred to in section 17(3)(c) of the Act in relation to points at which hazards of significance occur.

This means that temperature monitoring equipment is to be calibrated.

**Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 28: Calibration and measuring equipment suitability**

1. Measuring equipment, such as scales, thermometers, pH meters, and flow meters (whether stand alone or forming part of a piece of equipment), that is used to provide critical measurements, must —
   a. have the accuracy, precision, and conditions of use appropriate to the task performed; and
   b. be calibrated against a reference standard showing traceability of calibration to a national or international standard of measurement (where available), or (if no such standard exists) be calibrated on a basis that is documented in, or incorporated by reference into, the risk management programme; and
   c. be uniquely identified to enable traceability of the calibrations and to identify calibration status.
General Controls – Step 11 – Egg Storage / Loadout

(2) Minimum frequencies of calibration must be specified in the risk management programme for each piece of measuring equipment used to provide critical measurements, or used as reference standards, taking into consideration the following (as appropriate) —
   (a) the stability of the piece of equipment; and
   (b) the nature of the measurement; and
   (c) the manufacturer’s instructions.

(3) Safeguards must be in place to prevent unauthorised adjustments to the calibration of the measuring equipment, including movement of the equipment where this may invalidate the calibration.

Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000, 6: Facilities and equipment etc

(1) Temperature controlled rooms and equipment must be operated within their design capability and capacity, and must consistently deliver any temperature as required by this notice or as specified in the risk management programme (as the case may require).

Following grading, eggs shall be stored in clean, vermin proof cool rooms operated below 15°C until distribution. Twice daily cool room temperature checks shall be documented.

(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).

(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.

DELIVERY OF EGGS TO THE RETAIL MARKET:

Eggs shall be transported in clean enclosed temperature controlled vehicles. Eggs shall be maintained below 15°C.

No other foodstuffs or goods which are likely to impart “foreign odours” to the eggs shall be transported in vehicles carrying eggs.

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

Once a month the Packhouse Manager shall check and sign the records for that month. Any problems shall be noted on the relevant record with the details of the corrective action taken.

Testing for Salmonella shall be undertaken on a composite egg sample, at least weekly. The composite sample should include one egg per day from each flock as per a documented sampling plan. All testing for Salmonella shall be undertaken by a MILAB accredited laboratory.

Any Salmonella-positive samples returned from these tests shall be serotyped, and a thorough cleaning program shall be undertaken as per the documented response procedure. The response procedure should include a trace-back mechanism to determine the source flock. If S. enteritidis PT 4 serotype is returned at any time the egg producer shall inform the Regulatory Authority and EPF, and shall recall eggs from affected flocks. Eggs or egg product from affected flocks shall not be offered for sale. The affected flocks shall be quarantined, and if confirmatory tests are returned, immediate depopulation should follow.

4.9.4 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 all 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.

4.9.4.1 Records

The record forms can be found in Appendix E of this Code Of Practice.
4.10 Operational authorities and responsibilities

The following responsibilities and authorities should be allocated for the risk management programme:

<table>
<thead>
<tr>
<th>Person responsible for:</th>
<th>Name or title *24</th>
<th>Training received</th>
</tr>
</thead>
<tbody>
<tr>
<td>CCP1 - 6</td>
<td>Joe Eggbert / Jane Eggbert / Jim Eggleton</td>
<td>On job training by Henrietta Eggnot, 17/18/2/2000</td>
</tr>
<tr>
<td>CCPL1 - 3</td>
<td>Joe Eggbert / Jane Eggbert / Jim Eggleton</td>
<td>On job training by Henrietta Eggnot, 17/18/2/2000</td>
</tr>
<tr>
<td>CCPW1</td>
<td>Joe Eggbert / Jane Eggbert / Jim Eggleton</td>
<td>On job training by Henrietta Eggnot, 17/18/2/2000</td>
</tr>
<tr>
<td>Monitoring</td>
<td>Henry Eggnot</td>
<td>On job training by Henrietta Eggnot, 17/18/2/2000</td>
</tr>
<tr>
<td>Corrective action</td>
<td>Henry Eggnot</td>
<td>On job training by Henrietta Eggnot, 17/18/2/2000</td>
</tr>
<tr>
<td>Operator Verification</td>
<td>Henrietta Eggnot</td>
<td>EPF approved HACCP course, 3 day, 14-16/2/2000</td>
</tr>
</tbody>
</table>

Detailed training records are kept in the Packhouse Manager’s Office. Records that can be used for this are given in Appendix E.

---

*24 If the person is likely to change it is more sensible to put the title or designation so that this section won’t need updating.
4.11 Generic corrective action procedure

When to use it:
When non-complying animal material or animal product is produced -
• using a process or associated thing that deviates from the risk management programme; or
• not in compliance with the outcomes documented in the risk management programme; or
• where an unforeseen hazard or other risk factor arises; and
• when a specific corrective action has not been complied with or has not been identified in the risk management programme.

Inventory control
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).

Procedure
The suitably skilled person shall:
• review the relevant processing records, animal material or animal product, to identify any potential risk factors.
• make a decision regarding the suitability for processing of the animal material, or the fitness for intended purpose of the animal product, and
• ensure the appropriate disposition is carried out.

Reporting
The suitably skilled person must complete and sign a full report on the management of the non-compliance, including details of -
• 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
• the identification of the affected animal material or animal product; and
• any additional processing of the animal material or animal product; and
• the analyses made to reach the final decision; and
• the decision on the disposition of the animal material or animal product; and
• confirmation that the disposition of animal material or animal product has been carried out; and
• any actions taken to prevent recurrence of the non-compliance.

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

Verification
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.

An alternative to including this procedure in the RMP is to just cross reference to Specifications 12 and 13 of the Animal Products (Risk Management Programme Specifications) Notice 2000.
### 4.12 Recall Procedure

#### Responsibility / Authority:
- Henrietta Eggnot is totally responsible for the control of any recalls and has the authority to co-opt staff members from normal duties to participate in recall activities. In Henrietta’s absence the second in charge shall assume these authorities and responsibilities until Henrietta is available.

#### Identification and traceability:
- All eggs shall be traceable from the laying farm and shed to the grading facility\(^{26}\).
- At the grading facility the person feeding the grader shall record each change of laying farms and/or shed and the time that the change occurred. All packed eggs shall be labelled with the pack date and time.

#### Risk assessment and decision on whether or not to recall.
- Henrietta has the authority to decide whether or not a recall is necessary. This will depend on her assessment of the risk to customers/consumers. She may choose to consult with relevant regulatory authorities or food safety experts prior to making this decision.
- The Director-General of MAF must be notified if any recall goes ahead.

#### Communication and documentation
- All recall communications are to be approved by Henrietta Eggnot. No one else is to contact ANYONE outside of the company with respect to the recall without her knowledge and agreement. Media statements are only to be made by Henrietta.
- Henrietta shall keep a diary of all communications including the date, time, contact person, summary of discussion, agreed actions, due dates etc.
- To speed up communication most urgent correspondence will be done by phone. All correspondence must be confirmed in writing.
- All records relevant to the recall shall be collected and filed by Henrietta in a “Recall File”.

#### Product Recovery / Disposition
- Henrietta Eggnot is responsible for discovering how much suspect product is subject to recall and monitoring the progress on locating this product. A product recovery tree shall be used to record these details.
- Henrietta is also responsible for deciding on the disposition of any recalled product. This may be by dumping, further processing, regrading etc as appropriate.

#### Corrective / preventive action
- Once the suspect product has been located and dealt with, the cause of the problem shall be investigated and appropriate actions taken to prevent a recurrence of the problem.

#### Review of recall effectiveness
- Once all of the above steps have been completed Henrietta shall involve all relevant people in a review of the recall. This shall consider how well each of the steps were performed and what improvements could be made. A final report shall be compiled. If necessary a copy of this shall be sent to relevant regulatory authorities and/or customers to inform them of the outcome of the recall.

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\(^{26}\) Some egg producers may wish to be able to trace eggs back to specific flocks or sheds within a farm. This is basically a commercial decision. The better the traceability the smaller any recall is likely to be if there is a problem.
### 4.13 Operator Verification

<table>
<thead>
<tr>
<th>Validation:</th>
<th>Henrietta Eggnot has partially validated this RMP. Refer to 4.16 for further information.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Routine Verification:</td>
<td>Routine operator verification of each RMP component has already been described in the documentation of each component.</td>
</tr>
</tbody>
</table>
| Audit: | In addition to the above verification activities, once a month the Packhouse Manager shall select an RMP component and shall audit it to ensure that it is implemented effectively. The audit shall check that:  
  - staff understand the requirements and are following procedures correctly,  
  - monitoring and appropriate corrective action is occurring, and  
  - records are being correctly and accurately filled out.  
  
Each time a component is audited the Packhouse Manager shall write a brief report outlining the component audited, findings and any corrective action taken as a result of the findings. These reports will be filed in the Packhouse Manager’s filing cabinet.  

The Manager shall sign the records for that month. Any problems shall be noted on the relevant record with the details of the corrective action taken. |
| Ongoing Review: | The Packhouse Manager shall also review the whole RMP:  
  - at least once a year, and  
  - when the operation changes and  
  - when problems arise.  

If necessary the Manager shall ensure that the RMP is updated; or amended, revalidated, re-evaluated and re-registered. |
4.14 External verification

Policy on Verifier’s Rights

Henrietta’s Egg Company Ltd is committed to the implementation and maintenance of its risk management programme and will ensure that its risk management programme is verified by an accredited verifier at the frequency stipulated by NZFSA. The accredited verifier shall 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.

Signed by: Henrietta Eggnot

Date:

A letter from the nominated verifying agency is attached confirming their willingness to carry out verification of the RMP. (Egg producer is to attach the letter here).

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27 An alternative to including this procedure in the RMP is to just cross reference to Specification 15 of the Animal Products (Risk Management Programme Specifications) Notice 2000.
4.15 Documentation and record-keeping

### Document Control System

<table>
<thead>
<tr>
<th>RMP Documents</th>
<th>All RMP documents:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>- are typed,</td>
</tr>
<tr>
<td></td>
<td>- are listed on the RMP document list, (See next page)</td>
</tr>
<tr>
<td></td>
<td>- have a date and version on each page,</td>
</tr>
<tr>
<td></td>
<td>- are authorised before issue by the Operator of the RMP by signing the RMP document list after it has been updated to reflect the changes.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Availability</th>
<th>The registered RMP and all reference material relating to it must be readily accessible to:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>- all those who have responsibilities under the RMP. This is achieved by having a copy of the RMP at the following distribution points:</td>
</tr>
<tr>
<td></td>
<td>- Packhouse Manager’s Office</td>
</tr>
<tr>
<td></td>
<td>- Staffroom.</td>
</tr>
<tr>
<td></td>
<td>- accredited persons, animal product officers and the Director-General or persons authorised by the Director-General, within two working days of any request.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Updates and Amendments</th>
<th>Whenever one or more page(s) of a document is changed:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>- the date and version number of the each altered page shall be updated,</td>
</tr>
<tr>
<td></td>
<td>- a line shall be placed in the margin to show where the changes have been made,</td>
</tr>
<tr>
<td></td>
<td>- details of the page, date and version number shall be recorded on the RMP document list,</td>
</tr>
<tr>
<td></td>
<td>- the updated RMP document list shall be authorised by the RMP Operator,</td>
</tr>
<tr>
<td></td>
<td>- if the change constitutes an amendment to the RMP as defined in Section 25 of the Animal Products Act it shall be validated, evaluated and registered prior to implementing the change,</td>
</tr>
<tr>
<td></td>
<td>- on implementation of the change, all copies of the relevant pages of the RMP shall be replaced as soon as possible.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Obsolete Documents</th>
<th>All obsolete documents or parts of documents are removed as soon as practicable from all distribution points (which are listed under availability heading above).</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>One hard copy of any obsolete part of the RMP is archived for 4 years and made available to accredited persons, animal product officers and the Director-General and persons authorised by the Director-General, as required.</td>
</tr>
</tbody>
</table>

For theory refer to 2.15

For blank forms refer to appendix D section 15

For blank forms refer to appendix D section 15
### 4.15.2 List of documents making up the RMP

<table>
<thead>
<tr>
<th>RMP component</th>
<th>Programme / Document Name</th>
<th>Version / Issue</th>
<th>Date</th>
<th>Reference (to pages / sections etc)</th>
<th>Viewed by Evaluator</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title Page</td>
<td>P-RMP-1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Management Authorities and Responsibilities</td>
<td>P-RMP-2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scope of RMP</td>
<td>P-RMP-3</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Product Description and Intended Purpose</td>
<td>P-RMP-4</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Product Outcomes</td>
<td>P-RMP-5</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Process description</td>
<td>P-RMP-6</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identification, Analysis and Control of Hazards and Other Risks Factors from Inputs</td>
<td>P-RMP-7</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identification, Analysis and Control of Hazards and Other Risks Factors from Other Sources</td>
<td>P-RMP-8</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identification, Analysis and Control of Hazards and Other Risks Factors from The Process</td>
<td>P-RMP-9</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Operational Authorities and Responsibilities</td>
<td>P-RMP-10</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Generic Corrective Action Procedure</td>
<td>P-RMP-11</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Recall Procedure</td>
<td>P-RMP-12</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Operator Verification</td>
<td>P-RMP-13</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>External Verification</td>
<td>P-RMP-14</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Documentation and Record-Keeping</td>
<td>P-RMP-15</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Validation Protocol</td>
<td>P-RMP-16</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Signed by **Henrietta Eggnott** (Operator) Signed by **(Evaluator)**

Operator’s name in full: Henrietta Eggnott Evaluator’s name in full

Date: 10/9/01 Date:

---

28 The numbers given in this column have been chosen to represent the Packhouse’s RMP (P-RMP) with a number for each different section or RMP component. Alternative numbering systems are equally acceptable.
## 4.15.3 Record Control System

<table>
<thead>
<tr>
<th>RMP Records</th>
<th>Records shall be kept to demonstrate compliance to the RMP. This includes monitoring, corrective action and operator verification records for CCPs and other controls.</th>
</tr>
</thead>
</table>
| Details to be recorded | All RMP records must be legible and must include the following details:  
  • date and time of observation; and  
  • subject and description of observation; and  
  • any corrective action undertaken; and  
  • means to identify the observer and any person who undertook corrective action; and  
  • any other information required under the risk management programme as applicable.  
  
  Electronic records must show the person who entered the data on them unless access to them is password protected.  
  
  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. |
| Availability | All RMP records must be readily accessible and made 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. |
| Archiving | All RMP records will be stored for at least 4 years as follows:  
  • Manual records in cardboard box files in the Packhouse Manager’s office.  
  • Electronic records on clearly labelled floppy disks in a disk storage unit in the Packhouse Manager’s office. |
4.16 Validation Protocol

Henrietta Eggnott has checked that the RMP documentation is complete. Refer to Validation Report (see Appendix E).

The following protocol explains how product outcomes will be validated by demonstrating that:

a) each Product Outcome is achieved on a consistent basis.
b) each CCP achieves or contributes to the achievement of the relevant Product Outcome:
c) other controls meet regulatory requirements or contribute to the achievement of the relevant Product Outcome.

Product Disposition: All eggs produced during the validation period will be either processed or rejected according to the documented procedures in this RMP.

4.16.1 Hazards to Human Health

<table>
<thead>
<tr>
<th>Hazard or other risk factor</th>
<th>Example Product outcomes</th>
<th>Key Control Measures</th>
<th>Proposed Validation</th>
</tr>
</thead>
<tbody>
<tr>
<td>B1 &amp; B2: Salmonella and other enteric pathogens.</td>
<td>A Grade Eggs: Salmonella not detected in 25g from a weekly composite sample of A grade shell eggs.</td>
<td>• As below</td>
<td>At least 1 weekly composite sample tested for Salmonella and all results are not detected. (This minimal amount of testing is only acceptable if ongoing verification includes weekly Salmonella testing).</td>
</tr>
</tbody>
</table>
|                                             | Check that eggs are visibly clean.                                                        | CCP 4 Sorting        | Demonstration of procedure. Records of performance:  
                                                                                                           • Historical performance for existing operations  
                                                                                                           • Actual performance for new operations. |
|                                             | Wash dirty eggs and floor eggs                                                            | CCP 5 Washing of Very Dirty Eggs | Demonstration of procedure. Records of performance:  
                                                                                                           • Historical performance for existing operations  
                                                                                                           • Actual performance for new operations. |
|                                             | Transportation and storage temperature no higher than 15°C.                              | GC Temperature checks | Records of temperatures of transport and storage facilities (receipt and dispatch):  
                                                                                                           • Historical performance for existing operations  
                                                                                                           • Actual performance for new operations. |

29 Not all of these example control measures will suit all operations. E.g. those operations with automatic collection may not be able to separate eggs as implied here.
<table>
<thead>
<tr>
<th>Hazard or other risk factor</th>
<th>Example Product outcomes</th>
<th>Key Control Measures&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Proposed Validation</th>
</tr>
</thead>
</table>
| B1 & B2: Salmonella and other enteric pathogens. | Check that eggs are not visibly cracked. | CCP 4 Sorting | Demonstration of procedure. Records of performance:  
- Historical performance for existing operations  
- Actual performance for new operations. |
| No dry cleaning of eggs. | N/a | N/a | |
| Immediate clean up of broken eggs | GC Grading area | Demonstration of procedure. | |
| Other controls | CCP 3 Personnel with infectious diseases to get medical clearance before handling product | Training records show that employees and managers have had awareness training for these requirements. Check that there is a procedure for recording medical clearances received. | |
| C3 and C4: Residues from egg washing and egg oiling chemicals | No chemical residues over MRLs. | CCP 1 Order Chemicals | One check that all chemicals currently on site or on order have appropriate approval under NZFSA Manual 15  
|  |  | CCP 2 Use Chemicals | One check that the correct chemical is used in the correct area (as per NZFSA approval) and in accordance with the manufacturer’s instructions, e.g. amount, contact time, method of application. |
### 4.16.2 Risks to Wholesomeness

<table>
<thead>
<tr>
<th>Hazard or other risk factor</th>
<th>Example Product outcomes</th>
<th>Key Control Measures</th>
<th>Proposed Validation</th>
</tr>
</thead>
</table>
| W1: Blood or meat spots     | Less than 0.1% eggs have defect. | CCPW1 Candling | Records of performance:  
  • Historical performance for existing operations  
  • Actual performance for new operations. |
| W3: Roundworms              | Less than 0.1% eggs have each defect. | CCPW1 Candling | Records of performance:  
  • Historical performance for existing operations  
  • Actual performance for new operations. |
| W2: Watery whites           | Less than 0.1% eggs have each defect. | GC Temperature checks  
  GC Stock Rotation | Records of storage and transportation temperatures:  
  • Historical performance for existing operations  
  • Actual performance for new operations.  
  Records of performance:  
  • Historical performance for existing operations  
  • Actual performance for new operations. |
| W6: Pink or iridescent whites | None | GC Temperature checks | Temperature records as above. |
| W5: Rotten eggs             | None | GC Temperature checks | Temperature records as above. |
| W7: Eggs older than use by date | None | GC Temperature checks | Temperature records as above. |
| W4: Off odours and flavours | None | GC Temperature checks | Temperature records as above. |

30 Not all of these example control measures will suit all operations. E.g. those operations with automatic collection may not be able to separate eggs as implied here.
4.16.3 Risks from False or Misleading Labelling

<table>
<thead>
<tr>
<th>Hazard or other risk factor</th>
<th>Example Product outcomes</th>
<th>Key Control Measures</th>
<th>Proposed Validation</th>
</tr>
</thead>
<tbody>
<tr>
<td>L1: Incorrect claims for free range, barn, caged or organic eggs</td>
<td>All eggs must be true to label.</td>
<td>CCP L1 Sorting check of claims on labels</td>
<td>For each claim type: do one check on how different sheds are identified at egg sorting.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>CCP L2 Packing</td>
<td>For each claim type: do one check that label claims made accurately reflect the egg production system. Show how labels with different types of claims are controlled so that they are applied to the correct eggs.</td>
</tr>
</tbody>
</table>
| L2: Incorrect date marking  | All eggs must be true to label. | CCP L2 Dates on Labels | Where dating is applied show how use by dates are determined and relate this to actual egg collection and delivery frequency.  
- Demonstrate accuracy of dates on one day’s production. |

31 Not all of these example control measures will suit all operations. E.g. those operations with automatic collection may not be able to separate eggs as implied here.