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**PROPOSED 'FOOD CONTROL PLANS' AS THE TOOL OF CHOICE
IN THE NEW ZEALAND FOOD REGULATORY REGIME**
(Prepared by New Zealand)

Introduction

One of the difficulties faced by food regulators world wide is the application of risk-based management programmes across a broad range of food industries and businesses when they range from very large to very, very small. The challenge in particular has been in application in the small to medium sized businesses. New Zealand is no exception. Our experience suggests that while HACCP is a good discipline in a risk-based environment, the concepts are not necessarily simple, especially for operators of small businesses.

The New Zealand Food Safety Authority is exploring many ways of addressing this issue but two in particular are discussed in this paper:

- the application of 'food control plans' based on 'good operating practice' and HACCP as necessary; and
- the development of 'off-the-shelf' templates and codes of practice to reduce cost and facilitate implementation.

Context

New Zealand has been operating risk-based management plans over the last 10 years in many primary production and processing sectors. Hazard Analysis and Critical Control Point (HACCP) implementation in particular has been promoted over this period. While HACCP is still a voluntary option for the domestic food sector, it has been mandated in much of the export food sector for some time. A key driver in pursuing risk-based management plans has been to ensure food producers take responsibility for selling safe and suitable food.

Even so, after 10 years the number of plans in place is small in relation to the total estimated number of food businesses – around 3,000 plans compared with over 32,000 businesses. Continuing at this pace we could be looking at between 50-100 years to have all businesses applying risk-based food safety practices.

A number of factors contribute to the slow pace of uptake of plans, not the least the skills and costs required to develop them, and the complexity of the development of the final product. There has been growth in New Zealand in the number of consultants offering services and at times these services have been far in excess of what business needs warrant. There has also been a reluctance by businesses to take on responsibility for safe food if someone else (government) is willing to carry this burden.

Changing the emphasis in risk-based management plans

For many existing risk-based management plans in New Zealand, the need for base programmes or 'prerequisite programmes' has been explicit and mandatory. In other plans, it has been expected but not explicit.

The scope of base or prerequisite programmes generally covers the bulk of good agricultural practice, good manufacturing practice or good hygienic practice. These have tended either to form the building blocks for HACCP systems or to have been subsumed into a description of 'HACCP'. In the latter case, the result can be a plethora of 'critical control points' which are not so much critical points as points requiring particular control attention or specific action such as recording.

New Zealand is now proposing that risk-based management plans, called food control plans, should start with identifying the 'good operating practice'. 'Good operating practice is intended to encompass good agricultural, good manufacturing and/or good hygienic practice. Only then would HACCP and the prospect of critical control points be considered in the development of plans and that in the future critical control points would generally be identified and set by the regulator. An example of such a critical control point would cover any thermal process that has a specific "kill" step within it such as pasteurization or retorting. The intention is to refocus on the basics necessary for the production of safe food with the expectation that there may be very few critical control points once the basics have been addressed.

The real key to broader application of risk-based management plans (and HACCP) is the simplicity of plans and the role of the regulator.

The content of the proposed food control plans will all require a description of the scope covered by the Plan, including a description of the product(s) and process(es). It will also contain a description of who is finally responsible for effective implementation of the food control plan, and who is responsible for monitoring, taking corrective action, and internal verification activities (including any reporting requirements).

A food control plan should include all the 'good operating practice' activities that are appropriate for the particular segment of the food chain covered. For food hygiene, these activities are summarised in the Codex General Principles of Food Hygiene. A selection of prospective 'good operating practice' activities is listed in Annex A. In addition, application of HACCP principles will always result in hazard identification and analysis and in some cases may result in critical control points.

Risk-based management programmes currently being implemented by the New Zealand export sector (e.g. animal products, seafood and dairy) already encompass the two step process envisaged for food control plans, i.e. good operating practice followed by application of HACCP principles as appropriate. The extent of the programmes and the tools available for developing and applying them is, however, different to that envisaged for food control plans.

In order to ensure a more rational approach in future, the New Zealand Food Safety Authority, as the regulator in this area, is expecting to provide templates and other guidelines for food control plans that will cover the needs of some 20-25,000 businesses. The balance will either already have plans in place or, because of size or the use of proprietary processes for example, will be developing individual plans covering their specific businesses.

Food control plan templates will generally be presented as part of, or supported by, codes of practice for particular food sectors, with HACCP elements and any regulatory requirements clearly identified. Food control plan templates might already be available within a food sector or may well exist in complimentary form in another country (and which might be adapted for New Zealand business).

The type of tool produced will vary depending on the level of understanding of a particular food sector; e.g. for egg production, a simple template has already been developed. HACCP principles have been applied in developing the template, and small to medium sized business operators will not need to repeat this step.

The template approach works well for simple product/process combinations such as egg collection and packing. For other food industries with a diverse range of products, a more sophisticated approach is evolving with codes of practice or generic risk management programme models including good operating practice and examples of application of HACCP principles that reflect national practice. Technical support material and resource manuals complement these tools by providing relevant scientific information on the different hazards, their prevalence, the effects of key process steps and the results of relevant risk assessment work where available.

A programme of work in New Zealand and within a risk management framework is ongoing for the risk assessment of selected food commodity/hazard combinations. For this, NZFSA must interpret its own or relevant overseas risk assessment data on an ongoing basis, and validate any risk-based parameters and other performance parameters it wants to use.

Current status of developments

New Zealand has not commenced broad application of the above approach. Discussion papers proposing that food control plans be the tool of choice for food safety management in the future were released publicly on 22 September. Depending on submissions, developments are expected to continue throughout 2005.

Technical liaison nationally and internationally, continues to play an important role in refining the direction. Due consideration of recent initiatives from the Codex Committee on Food Hygiene (CCFH) is important going forward.

Finally, the progression of the domestic food review in New Zealand will inevitably consolidate NZFSA's approach further and help prioritise future work based on specific hazard/food commodities and consideration of all types of food and the entire food chain from production to consumption.

References

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**Food Control Plans
Prospective 'Good Operating Practice' Activities to be Covered**

In addition to a description of the product(s) and process(es) covered by a food control plan, depending on the business, the plan could also cover any of the following:

- primary production (environmental hygiene, handling, storage, cleaning, maintenance and personnel hygiene and transport)
- processing – design and facilities – location, equipment, facilities, premises
- control of operation – incoming material requirements, control of food hazards, water, management and supervision, records, recall procedures
- processing – maintenance and sanitation – cleaning programmes, pest control, waste management, monitoring
- processing – personal hygiene – health status, illness and injuries, personal cleanliness, visitors
- transportation – use and maintenance
- product information and consumer choice – lot identification, labelling, consumer education
- training – programmes, responsibilities and refreshers