



Evaluation of template or model food
control plan
British Retail Consortium (BRC)
For Horticultural Operators

14 May 2018



Introduction

Section 40 of the Food Act 2014 provides that the Ministry for Primary Industries' (MPI) chief executive can approve a template or model Food Control Plan (FCP) developed outside of MPI.

This allows food businesses or commercial operations to:

- Develop a food control plan and have it approved so that each business using the plan does not need to submit their plan for individual evaluation.
- Make adjustments to the MPI templates to include multi-site or multi-business specific procedures or practices, or to reflect common language/terminology used in the business and have those changes approved.

Context for this Evaluation

An increase in the demand for recognition of private standards by food businesses has steered MPI to evaluate British Retail Consortium (BRC) as a model Food Control Plan under Section 40 of the Food Act 2014.

The BRC standard sets out procedures for managing hazards in a food manufacturing setting. Minimal processing of horticultural produce is covered under the horticultural sector in Food Act 2014. Packhouse operators can use the BRC standard to achieve certification for their processing operations. **This evaluation applies only to horticultural operators involved in packhouse and/or coldstore activities.**

Evaluation Conclusion (Summary)

The BRC standard (a model), if followed as written, is sufficient to adequately control the relevant food safety hazards.

Several matters have been raised for MPI chief executive consideration. Users of the BRC standard (or model), will be required to:

1. Notify MPI as soon as possible if a decision is made to recall food, and notify verifier/verification agency in the event of a breach of the food control plan that could result in food not being safe or suitable.
2. Harmonise the requirements for keeping records to the MPI criteria of four years.
3. Have all sites verified at their first verification if the businesses is registered as multisite business.

The evaluator recommends that MPI's chief executive approves the BRC standard as a template or model FCP for horticultural operators under section 40 of the Food Act 2014.



British Retail Consortium (BRC) Report

Ref: FR15 Regs for custom plan evaluation	Evaluation criteria	Evaluation findings – British Retail Consortium (BRC)
10(3)(a)	Name of evaluator	Christopher Kasonde
10(3)(b)	Name of food business	British Retail Consortium (BRC).
10(3)(c)	Name of operator of food business	Any horticultural producer participating in the BRC programme.
10(3)(d)	Type of food to which the procedure applies	<p>All horticultural products being processed at a packhouse in New Zealand.</p> <p>These products are covered under Schedule 2 Part 5 "Horticultural sector". Food businesses under this sector can grow, harvest, sort, grade, and undertake minimal processing of horticultural produce.</p>
10(3)(e)	Description of practices and activities carried out	<p>A summary of practices carried out under the Food Control Plan is provided in Scope of the Global Standard for Food Safety. Packhouse operations, include:</p> <ul style="list-style-type: none">• Receiving• Storing• Packing, and• Distribution <p>The activities are managed using the following principles. Demonstration of commitment by senior management to achieve requirements of the Standard, including development of:</p> <ul style="list-style-type: none">• Prerequisite programmes• Hazard Analysis and Critical Control Point (HACCP) plan• Quality Management System

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10(3)(f)	List of documents assessed	<ul style="list-style-type: none"> • BRC Global Standard for Food Safety (with disclaimer) January, 2015 – Issue 7. • Guidelines on satisfying Auditor Competence for the BRC Global Standard Food Safety - F015 dated 19/02/2016. • BRC Global Standard for Food Safety – Auditor Checklist – F034a dated 27/04/2015.
10(3)(g)	The name and address of the place assessed on site	N/A (Evaluation did not include an on-site assessment).
10(3)(h)	Places exempted from on-site assessment	N/A
10(3)(i)	Technical expert/s who provided information used in the evaluation process	N/A
10(3)(j)	Copies of the technical expert's reports	N/A
10(3)(k)	Information about the competency of the technical experts	N/A
10(3)(l)	Evaluator's views and reasons on Reg 9(1)(a) requirements (does the plan meet the applicable	(i) Identification of all hazards and other factors that are reasonably likely to occur or arise under S. 42(g):



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	requirements of the Act)	<p>Yes – BRC requires food businesses undergoing production, manufacturing and distribution of food products to identify and control significant hazards. Consideration during hazard analysis is given to the following:</p> <ul style="list-style-type: none">• Likelihood of the hazard to occur.• Severity of the effects on consumer safety.• Vulnerability of those exposed.• Survival and multiplication of micro-organisms of specific concern to the product.• Presence or production of toxins, chemicals or foreign bodies.• Contamination of raw materials, intermediate/semi-processed product, or finished product. <p>Where elimination of the hazard is not practical, BRC requires justification for acceptable levels of hazard in the finished product to be determined and documented. In addition, operators of food businesses are to ensure that the:</p> <ul style="list-style-type: none">• Processing environment minimises risk of product contamination.• Compositional and safety standards including good manufacturing practices meet product specifications as required by law.• Suppliers are competent to produce specified products and are using legal requirements for meeting their process controls.• Suppliers are verified for competency to supply required inputs, where practical.• Risk assessment programmes for product examination are established and maintained.• Customer complaints are monitored and acted upon. <p>However, the manual did not provide sufficient information about the following:</p> <ol style="list-style-type: none">1. Type of registration information that must be provided to the registration authority.

Ref: FR15 Regs for custom plan evaluation	Evaluation criteria	Evaluation findings – British Retail Consortium (BRC)
		<p>2. Procedures to be taken, if a decision is made to recall food or if there is any breach of the food control plan that could result in food not being safe or suitable.</p> <p>3. Keeping records for four years.</p> <p>4. Verifying all sites in the first year, if business is registered as a multisite business.</p> <p>(ii) the validation information set out in the plan demonstrates as required by regulation 7(2) that:</p> <p>(a) the procedures and activities set out in the FCP will enable safe and suitable food to be traded:</p> <p>Yes – but subject to above evaluator comments: (The identified areas do not align with requirements of Food Regulations 2015).</p> <p><i>It is recommended that users of the BRC standard (or model) be required to:</i></p> <ul style="list-style-type: none"> • <i>Provide registration information to MPI as the registration authority.</i> • <i>Notify MPI as soon as possible, if a decision is made to recall food or notify the operator's verification agency or verifier, if there is any breach of the food control plan that could result in food not being safe or suitable.</i> • <i>Keep records for 4 years so as to meet requirement of Food Act 2014.</i> • <i>Have all sites verified at their first verification, if the business is registered as a multisite businesses. (NP1 operators may only get one verification as required by Act).</i> <p>(b) practices carried out will enable safe and suitable food to be traded:</p> <p>Yes – but subject to recommendations above.</p>



New Zealand Food Safety

Ministry for Primary Industries

Manatū Ahu Matua

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		<p>(c) the facilities, equipment and essential services used in relation to those procedures, practices, and activities will enable safe and suitable food to be traded:</p> <p>Yes - where they equate to those used for validating the process.</p>
10(3)(l)	Evaluator's views and reasons on Reg 9(1)(b) requirements	<p>Is the information believed to be accurate?</p> <p>Information is believed to be accurate.</p> <p>Any other information provided to the evaluator for assessment under 9(1)(a)?</p> <p>N/A</p>
10(2)(a)	Statement of Validity	<p>I state that the plan is valid in terms of s.41 of the Act (it is in writing and acceptable form). I state that the plan is valid in terms of s42 of the Act (has all FCP Contents required by that section and FR15 reg 6).</p>
10(2)(a)	Statement of Validity	<p>BRC operators' manual is valid.</p>
10(2)(b)	What conditions does the evaluator recommend to be imposed on the registration of the plan?	<p>N/A</p>
112-113 or 115-116	ISO requirements	<p>N/A</p>
11(2)(a)-(c)	Endorsement	<p>I state that the manual is assessed by me as the Evaluator.</p> <p>I state that this evaluation report is as prepared by me as the Evaluator.</p>
11(2)(a)-(c)	Signed and dated	<p><i>Chris Kasonde 14/05/2018</i></p>

