



Evaluation of template or model food control plan:

GLOBALGAP

04 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

GLOBALGAP has been requested for approval as an official model or template Food Control Plan under Section 40 of the Food Act 2014.

GLOBALGAP sets out procedures for managing hazards in an Integrated Farm Assurance scheme that includes horticultural production.

GLOBALGAP operators are covered by the horticultural sector in Food Act 2014. This sector includes food businesses that grow, harvest, sort, grade, and undertake minimal processing of horticultural produce.

Evaluation Conclusion (Summary)

The GLOBALGAP scheme, if followed as written, is sufficient to adequately control the relevant food safety hazards.

Several matters have been raised for MPI chief executive consideration. To require users of the scheme to:

1. In circumstances where growers are registered for GLOBALG.A.P certification using parallel production and/or ownership, areas of production covered by the Food Act must meet the same compliance criteria as when parallel production/ownership is not being practised.
2. Comply with the requirements of the Joint Food Code of Food Standards Australia New Zealand (the Code), where labelling of produce is required.
3. 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.
4. Harmonize the requirements for keeping records with the MPI requirement of four years.
5. Have all production sites (as defined by GLOBALG.A.P - General Regulations – Part 1 - Annex I.4 – Definitions GR V5.1 July 17) verified during the first verification.

The evaluator recommends that MPI's chief executive approves GLOBALGAP as a template or model FCP under section 40 of the Food Act 2014 on condition that growers using scheme to meet Food Act 2014 requirements must apply the plan to all crops produced for sale in New Zealand.



GLOBALGAP Evaluation Report

Ref: FR15 Regs for custom plan evaluation	Evaluation criteria	Evaluation findings – GLOBALGAP.
10(3)(a)	Name of evaluator	Christopher Kasonde
10(3)(b)	Name of food business	GLOBALGAP
10(3)(c)	Name of operator of food business	Any person participating in the GLOBALGAP programme.
10(3)(d)	Type of food to which the procedure applies	All crops being produced for sale in New Zealand. 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.
10(3)(e)	Description of practices and activities carried out	A summary of practices carried out under the Food Control Plan is provided in GLOBALGAP Scope. Activities include: <ul style="list-style-type: none">• Food safety,• Protection of the environment,• Occupational health and safety and welfare of employees,• Animal welfare The activities are managed using the following principles: <ul style="list-style-type: none">• Good Agricultural Practice (GAP)• Good Hygiene Practice (GHP)• Good Manufacturing Practice (GMP)• Hazard Analysis and Critical Control Point (HACCP)• Quality Management System

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10(3)(f)	List of documents assessed	<ul style="list-style-type: none"> • Benchmarking of GLOBALG.A.P and the Food Act 2014 (Dated - 27. 03. 2018). • GLOBALGAP General Regulation – Part 1: General Requirements (English Version 5.1). • Integrated Farm Assurance: All Farm Base - Crops Base - Fruit and Vegetables; Control points and compliance criteria (English Version 5.1).
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	<p>(i) Identification of all hazards and other factors that are reasonably likely to occur or arise under S. 42(g):</p> <p>Yes – GLOBALGAP identifies sources of significant food safety hazards on a production site (inclusive of rented land, structures and equipment) as Site (susceptibility to flooding or presence of long term residual agrochemicals such as fertilizers, herbicides, pesticides, etc. or residues from</p>



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	requirements of the Act)	<p>industrial or military use), Staff (hygiene), Water, Animals (inclusive of birds and reptiles) and manures, and Equipment (not adequately cleaned and /or maintained).</p> <p>However, the scheme did not provide sufficient information about the following:</p> <ol style="list-style-type: none">1. Taking adequate measures to assess and confirm that inputs (materials and services) from suppliers, or otherwise sourced by the food business operator, are safe and suitable, if making non-certified products.2. Where applicable, the labelling of produce complies with the requirements of the Joint Food Code of Food Standards Australia New Zealand (the Code).3. 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.4. Keeping records for four years.5. Verifying all sites in the first year, if business is registered as a multisite business. <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 evaluator comments above: (The identified areas do not align with requirements of Food Regulations 2015).</p> <p><i>It is recommended that:</i></p>

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		<ol style="list-style-type: none"> 1. <i>When making non-certified products, the same procedures for sourcing inputs (materials and services) from suppliers, be followed as when making certified products.</i> 2. <i>Where applicable, the labelling of produce complies with the requirements of the Joint Food Code of Food Standards Australia New Zealand (the Code).</i> 3. <i>MPI have access to registration data for operators using GLOBALGAP to meet the requirements of Food Act 2014. At a minimum MPI can start with producer name, Physical or electronic address, name of verifier or verification agency, scope of the operations (e.g. product and processes). This information must be made available on the public register as required by law.</i> 4. <i>MPI be notified as soon as possible, if a decision is made to recall food or the operator's verification agency or verifier be notified, if there is any breach of the food control plan that could result in food not being safe or suitable.</i> 5. <i>Records be kept for 4 years so as to meet requirement of Food Act 2014.</i> 6. <i>If a business is registered as a multisite businesses, all sites verified at their first verification. (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 the above evaluator comments.</p> <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>



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		Yes - where they equate to those used for validating the process.
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).</p> <p>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	GLOBALGAP as a template or model is valid.
10(2)(b)	What conditions does the evaluator recommend to be imposed on the registration of the plan?	Growers using GLOBAL GAP to meet Food Act 2014 requirements must apply the plan to all crops produced for sale in New Zealand.
112-113 or 115-116	ISO requirements	N/A
11(2)(a)-(c)	Endorsement	<p>I state that the GLOBALGAP template or model 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	<i>Chris Kasonde</i> 04/04/2018