Operator Verification

A Guideline for the Seafood Industry

New Zealand Seafood Standards Council

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1. Purpose

This resource aims to provide guidance for seafood operators to assist them to meet the requirements of the Animal Products regulatory framework.

2. Scope

This resource is specifically tailored to provide guidance to seafood premises operating under a Risk Management Programme (RMP), but is also relevant for those operating an Operator System under the Limited Processing Fishing Vessel Regulated Control Scheme (RCS).

3. Background

As an industry exporting to approximately 110 individual countries, managing compliance can be a complex task. However it is extremely important that it is effectively managed. To do this, seafood operators need to ensure that they create a food safety and a compliance culture throughout all aspects of their business and at all levels from top to bottom, and ensure their operations are sufficiently resourced by people with the necessary skills.

An operator verification system is required by the legislation and is defined in the Animal Products (Risk Management Programme) Specifications. However when implemented effectively operator verification can provide additional benefits over and above meeting the requirements of the legislation, such as, identifying issues before they become major concerns or expensive mistakes, reducing final product testing, and supporting product quality claims.

Effective operator verification systems that ensure good performance also have the added benefit of less frequent external verification. The Ministry for Primary Industries (MPI) Performance Based Verification (PVB) system, allows the frequency of external verification to be based on performance. In addition the confirmation of compliance is the basis on which official assurances are given and certification provided.

4. Regulatory Requirements

The following regulatory requirements apply with respect to operator verification:

4.1 The Animal Products Act – Section 4

Animal Products Act Section 4 Interpretations:

Verification (external) includes the on-going checks carried out by recognised persons to determine whether –

(a) Operations that are subject to a risk management programme or a regulated control scheme are in compliance with the requirements of the programme or the scheme or of this Act

(b) Animal material or products for whose export an official assurance is required have been produced or processed in a way that meets the requirements for the official assurance

4.2 Risk Management Programme Specifications

The following specifications provide a definition of operator verification and the legislative requirements associated with it.

RMP Spec 4 Interpretation: Operator Verification —

means the application of methods, procedures, tests and other checks by a risk management programme operator to confirm the on-going -

(a) compliance of the risk management programme with the legislative requirements; and
(b) compliance of the operations with the risk management programme; and
(c) applicability of the risk management programme to the operation;

RMP Spec 16 Operator Verification

(1) A risk management programme must specify an operator verification system including -

(a) the activities to be performed in relation to the risk management programme, and their frequency; and
(b) any actions to be taken when all or part of the risk management programme is not effective; and
(c) any recording and reporting requirements

(2) A risk management programme must contain a mechanism for ensuring that, wherever possible, persons carrying out operator verification are independent of the activities being verified.

4.3 Limited Processing Fishing Vessels

The following requirements for limited processing fishing vessels are included in the Animal Products (Regulated Control Scheme – Limited Processing Fishing Vessels) Regulations 2001 and in the Regulated Control Scheme for Limited Processing Vessels: Operator Guidelines.

RCS Regulations Clause 39 Documented Systems

The operator documented system must -

1. specify the procedures for operator verification to determine that the requirements of the scheme have been met.

RCS Operator Guidelines Clause 2.7 Operator Verification of the Documented Systems

2.7.2 On-going operator verification

On-going operator verification activities may include but are not limited to:

- internal audits
- calibration checks
- review of monitoring records
- tests
- review of non-conformance and corrective action records

5. The Compliance System

All operators are required to demonstrate that their system, whether it is an RMP or an Operator System for a limited processing vessel, complies with the various Animal Products legislation.

To confirm compliance, operators must implement a system that is designed to gather sufficient evidence to determine that their operation meets the legislative requirements, is implemented as documented and achieves the intended outcomes.

Under an RMP or an Operator System for a limited processing vessel, this evidence is gathered through both routine monitoring and dedicated operator verification activities. These two aspects, while separate, combine to form the overall Compliance System.

5.1 Routine Monitoring

Routine monitoring is the day to day checks to determine if you are complying with your RMP (or RCS Operator System for limited processing vessels) and supporting systems, to identify the issues or problems and the corrective action that needs to be taken, and to provide an auditable record that demonstrates this. Examples of routine monitoring include:

- pre-operational checks
- daily/weekly checks
- process monitoring
- routine temperature checks of product, refrigeration facilities, etc
- other supporting programme checks such as
    - cleaning & sanitation checks
    - vermin checks
    - water monitoring
    - repairs and maintenance checks

Routine monitoring and the action to take when issues are identified are usually documented as part of the supporting system that it applies to and do not need to be documented as part of the operator verification programme.

See Appendix 1 for more detail on the types of checks that are included as part of routine monitoring.

5.2 Operator Verification Activities

Operator verification is not routine monitoring, validation or external verification. Operator verification are dedicated activities designed to gather the objective evidence you need to answer the following questions:

- Does your RMP documentation include all of the aspects that the legislation requires, i.e. have you documented everything you need to?
- Does your RMP documentation include all of the relevant company procedures?
- Do you do what you say you are doing in practice?
- Does it work - is what you are doing in practice, effective?

In other words, does your system comply?

The operator verification programme must be documented and it must include:

- the persons/positions responsible
- the activities that will be undertaken
- the frequency that those activities are undertaken
- the procedures for determining the corrective action to be taken and taking the corrective action to deal with non-compliance
- the records that need to be completed
- any reporting requirements

5.2.1 Gathering Objective Evidence

Objective evidence is factual evidence. It can be is historic (found in records) or current (observed or found in real time) and can be positive (i.e. identifies compliance) or negative (i.e. identifies deficiencies).

Operator verification evidence can be gathered by:

- Reviewing the documented system/s
- Reviewing records
- Conducting reality checks
- Interviewing staff

Reviewing the documented system

The purpose of a documented system review is to confirm:

- The documented programme includes all of and meets, the legislative requirements
- The documented programme includes all of the relevant company procedures

Reviewing the Records

The purpose of a record review is to confirm:

- The check sheets and records are complete, have been completed within the time-frame/frequency documented, and are accurate in terms of the information they provide
- Any issues identified have associated corrective action documented and that corrective action is appropriate and relevant for the issue
- If root-cause was identified, was preventative action taken (where relevant)
- Are any trends or recurring problems that indicate the system is not working

Conducting Reality Checks

The purpose of a reality check is to confirm that what happens in reality matches what is documented, it requires observations of things in practice and includes confirming:

- That what has been documented has been implemented
- The performance of the staff is compliant with documented operating procedures (i.e. they are following all of the required rules and procedures)
- The processing operation is compliant with documented parameters (processing activities, process flows, times, temperatures, product is being processed the way in which your system describes, etc.)
- The status of the premises, internal and external environment, facilities and equipment is compliant or matches what has been identified through routine monitoring
- Deficiencies/issues found during routine monitoring and previous audits (both company and MPI verification audits), have been followed up and rectified within the appropriate timeframe or are target dated appropriately;
- The records match what actually happens (or happened) in reality

Interviewing staff
The purpose of talking with staff is to confirm:

- That they have the appropriate knowledge of procedures, are aware of the requirements and understand their role and relevant responsibilities

5.2.2 Making a Decision

Once you have gathered the evidence, you need to review it and determine whether or not the system is appropriate and effective, does it confirm compliance or not? To do this you need to consider:

- Has the system delivered the required outcomes historically?
- Does the system continue to deliver the required outcomes?
- Were there any deficiencies found that compromise the ability of the system to deliver the required outcomes?
- Does the system identify deficiencies, allow for and take appropriate corrective and preventive action?

There are other supporting activities that also generate information that can be used to assist in making a decision, these include things like:

- Product testing
- Other physical product checks
- Environmental or hygiene swabs
- Equipment calibration
- Number and type of customer complaints

For example, if your operator verification activities have generated evidence that indicates the system is in compliance, but your product returns high microbiological results, then something is clearly not right, and further investigation is required to determine the root-cause of the issue.

Indications that the system or parts of it are not working effectively may include:

- a series or trend of non-compliance found during routine monitoring or operator verification activities
- out of specification product test results
- customer complaints
- failed external verification audit
- market rejections

Based on the evidence gathered and consideration of the above, you need to determine if the system is appropriate and effective or whether improvements are needed.

5.2.3 Dealing with Issues and Issue Resolution Follow-up

Obviously when issues are identified during operator verification, corrective action needs to be taken to fix the issue but often there is an underlying root-cause and if this is not rectified, the issue will reoccur. Preventative action is therefore often required and this is about identifying the root-cause and taking appropriate action to remedy it.

Operator verification should provide for follow-up checks or increased surveillance to ensure that once an issue is fixed, it doesn't reoccur. Not following up on previously identified issues or allowing them to become reoccurring issues is the biggest cause of unacceptable audit outcomes, in the performance based verification system.

When ongoing or recurring non-compliances do occur, the following needs to happen:

- investigate to determine possible root-causes of non-compliance
- take appropriate corrective actions to regain control and prevent further recurrence of the problem;
- make changes to the system or the relevant supporting system/programme if necessary
- increase surveillance of the system
- always seek further advice and assistance if needed

Determining the root-cause

Not all issues will be as a result of a systemic issue or have an underlying root-cause. On many occasions, something simply goes wrong or simply breaks, corrective action is taken, the issue is rectified and it never occurs again.

However other issues are often associated with a root-cause, or alternatively a number of smaller things going wrong at the same time that contributes to the root cause, and while corrective action can be taken to fix the initial issue, unless the root-cause is identified and preventative action taken, the issue will reoccur. For example:

Routine monitoring identifies that the chiller drain wasn't cleaned to an acceptable standard as part of the weekly check. Corrective action is taken (i.e. re-cleaning the area) and the issue is fixed. However on review of further records, it is identified that this issue reoccurs on a semi-regular basis, and it is clear that there is an underlying cause and further action must be taken to identify what that is and implement preventative action.

In order to determine the root-cause, the first place to start in this scenario would be to conduct a review of the cleaning and sanitation of the chiller, to do this you would:

1. Undertake a review of the documented procedures for cleaning the chiller, which finds:

The procedures for cleaning and sanitising the chiller are documented and includes:

- the appropriate procedures from the Code of Practice for Seafood Processing
- relevant company procedures

The cleaning and sanitation procedures are clearly written and identifies appropriate responsibilities.

2. Complete a Review of the Records, which finds:

Cleaning and sanitation checks undertaken as part of the weekly routine monitoring records indicate that:

- checks are completed as per the programme each week and signed by the relevant checker
- the issue of 'chiller drain wasn't cleaned properly' is found on a semi-regular basis over the previous two months, appropriate corrective action is recorded – i.e. that the area is cleaned and re-checked.

3. Conduct a Reality Check, which finds:

Observation of the chiller cleaning indicated that:

- In general the chiller cleaning procedures are being followed as per the programme (as documented), using correct method and chemicals, with the exception of one relatively new staff member who is cleaning the drain and doesn't apply the sanitation chemical and only rinses with water.

It is clear at this point that the particular new staff member has not been adequately trained in the chiller cleaning procedure or is not fully aware of the standard required.

Therefore the root-cause is inadequate training and the preventative action is that the staff member receives further training and the supervisor is to increase the supervision until they are satisfied that the staff member has the full understanding of the standard required. Subsequent checks and a review of the training procedure are also required by the person responsible for operator verification to confirm that the preventative action has been effective.

There are also some occasions where the root-cause is not so obvious or alternatively a number of smaller things go wrong at the same time that contribute to the root cause, and further investigation is required, consider this scenario as an example of how to approach an issue where the root-cause is not immediately obvious:

In this scenario, the product being processed is required to be heated until it reaches a core temperature of 70 °C as part of the identified critical limits and as part of routine verification is tested on a monthly basis for microbiological levels, which for the past two months it hasn't met:

First consider the obvious:

1. The critical limits were not met; or
2. There is a post-heating processing contamination issue/s; or
3. The cleaning and sanitation programme was not effective

You should always start with the obvious.

1. The processing records must be reviewed to determine if there has been a loss of control. Subsequent review of the processing records determines that the time/temperature checks have been completed correctly, the critical limits have been met and there has been no recorded loss of control.

2. Further observation of the process does not identify any obvious sources of post heat contamination.

3. On completion of a full review of the cleaning and sanitation programme, all evidence found indicates the documented cleaning programme is implemented as documented and is effective. The records match what actually happens in reality, staff have a good understanding of the procedures and the standard required. The supervisor understands their role and the associated responsibility.

At this point is it necessary to consider the other supporting activities such as:

- The water supply – is that a source of contamination? Review the reticulation system, the results of testing?
- Check the calibration of temperature probes – is the temperature probe used for reading the critical limits accurate?
- Other activities that may have an impact, such as has there been any maintenance recently, new staff, changes in the raw material, etc.

The answer in this scenario was that the calibration of the temperature probe had been missed and when it was subsequently checked, it was found to be out by over 5 °C and therefore while it was reading 70°C, the product was only achieving 65°C. Root-cause identified!

Alternatively, often what happens is the perfect storm – a whole lot of little things slip, which by themselves wouldn't cause a problem but when enough of the controls change then there is a failure. For example, in a smoked fish product, fish came from a different source with a slightly higher microbiological loading than normal, the final salt content was slightly reduced, the pH of the

wash was slightly too high as the pH monitor was not calibrated. While individually these slight changes in parameters would not in their own right cause an issue, when they occur at the same time they all add up to mean that the product does not achieve its stated shelf life, and potentially becomes unsafe.

It is therefore important that operator verification does not just take things at face value.

5.2.4 Frequency of Operator Verification Activities

The frequency of operator verification activities will always vary and should be set at a frequency appropriate to the operation. In considering frequencies, the following needs to be taken into account:

- risk profile of the products and processes
- size of the company
- overall complexity of the operation
- experience and stability of the staff

Small business or business carrying out production of low risk products

A small business processing a low-risk product, with relatively stable management staff, are likely to require operator verification on a less frequent basis, for example activities could be set at:

- Record reviews for each system– conducted 6 monthly to annually
- Reality checks of each system– conducted 6 monthly to annually
- Full RMP Reviews – annual

Medium to large business or business carrying out production of high risk products

Medium to large businesses or businesses processing high risk products are likely to require far more frequent operator verification activities, for example:

- Record reviews for each system– conducted weekly to monthly
- Record reviews for critical records could even be more frequent, such as daily
- Reality checks of each system – conducted 1-2 monthly
- Individual system reviews, conducted 1-2 monthly so that RMP is reviewed annually

When setting frequencies for operator verification activities, it is better to start with a higher frequency and make an allowance for this to be reviewed over time, in terms of what might trigger a reduction in frequency or alternatively an increase:

Activity	**Consider continuing or potentially extending the frequency**	**Consider increasing the frequency**
Operator verification activities	Evidence indicates the system continues to remain effective	Evidence indicates that the system doesn't comply
Performance at external audits	Continuation of acceptable audits	Receiving unacceptable
Staff and management	Staff are experienced and workforce relatively stable	Continually changing staff and changes in staff with responsibilities, should always be monitored to see what impact that has
The operation itself	Remain relatively consistent with little variation or change	Is variable or changes frequently

5.2.5 Recording and Reporting

The operator verification programme needs to provide for recording and reporting as appropriate.

All operator verification activities, the results and any action taken must be recorded. This includes any escalation of response of any reoccurring issues. The system should also allow for any reporting requirement as appropriate, this may be more important in larger companies where the responsibility for operator verification may not necessarily be with senior management.

5.2.6 External Verification

Preparing for external verification should be considered as part of the operator verification system. If you are well prepared then you are more likely to have an acceptable outcome at external verification. As part of this you should:

- Confirm that all issues identified at the previous external verification have been resolved or are target dated for resolution within an appropriate timeframe, and at the entry meeting with the external verifier, it is a good idea to:
    - Provide a record of or be able to explain what action was taken to resolve the identified issues at the previous verification
    - Provide a record of or be able to explain any significant changes that have occurred to the RMP, supporting systems, personnel or processes since the last external verification
    - Provide a record of or be able to explain any process failures, identify any product that hasn't achieved the intended outcomes, or failures in supporting systems
    - Provide a record of or be able to explain any significant operator verification findings that are being managed
    - Provide a record of or be able to explain any major maintenance or other structural work that is planned or in progress

Failure to identify and deal with non-compliances is one of the leading causes of unacceptable audit outcomes at external verification, and good preparation is important to ensure that things are not missed.

5.2.7 Responsibilities and Competencies

In terms of Operator Verification, seafood operators need to ensure they have the following in place:

- A documented Operator Verification Programme tailored to suit their operation
- Designated person/s responsible for the Operator Verification Programme
- Appropriately skilled people carrying out operator verification activities

Duties, Responsibilities and Competencies

Effective operator verification leads to effective compliance. It is very important that the staff undertaking the various roles are competent, have the right knowledge and skills to do the job and well aware of the responsibilities the role holds. This includes those staff responsible for routine monitoring and operator verification activities. The following outlines the minimum competencies expected:

Routine Monitoring

Staff responsible for routine monitoring need to:

- Know the requirements and procedures for the routine monitoring they are undertaking
- Know the standard, including any limits the system and/or legislation requires and be able to determine whether something is satisfactory or not
- Understand the responsibilities associated with undertaking those checks

- Have good communication (speaking and writing) skills

Unit standards that may be relevant:
15653 Describe and complete the monitoring of an individual system in a seafood operation

Operator Verification Activities
Staff responsible for operator verification activities need to:

- Understand the standard required for operations, processes and systems for which they are undertaking operator verification activities
- Understand the regulations and notices associated with the systems for which they are undertaking operator verification activities
- Understand the responsibilities associated with operator verification
- Have good auditing skills
- Have good communication and report writing skills and be able to effectively record operator verification activities
- Know who to report to if serious non-compliances that need immediate action are identified (or be able to action themselves)
- Know how to escalate activities if issues not resolved

Some recommended relevant unit standards are:
15654 Supervise the compliance system in a seafood operation
21979 Explain and carry out an audit of a documented system in a seafood operation

Please note, the unit standards outlined above are not mandatory.

Appendix 1: Routine Monitoring of Supporting Systems

The following provides a guide to the types of checks that may be carried out, particularly in respect of supporting systems. However, each operator will need to tailor their checks to suit their operation, the risk profile of the product being processed and structure of their RMP.

Supporting systems will usually include the following topics, either individually or in combinations:

- Design & Construction and Repair and Maintenance of Premises
- Calibration
- Water & Ice
- Cleaning & Sanitation
- Personal Health & Hygiene
- Control of Chemicals
- Pest Control
- Training & Competency of Personnel
- Reception
- Ingredients & Additives
- Packaging & Containers
- Managing the Risk of Contamination & other Process Controls
- Labelling
- Refrigeration & Storage
- Transport
- Recall
- Traceability & Inventory

Pre-operational Checks

Pre-operational checks are extremely important and need to be conducted by trained personnel with the right skills (see section 5.2.5 for recommended competencies). The purpose of a pre-operation check is to determine if the premise, equipment, and facilities that could impact on the safety of the product are in a suitable condition before processing commences, while the specific checks will vary from operation to operation, the pre-op check will usually include confirming things such as:

- The plant, equipment and all product contact surfaces are visually clean
- Hand-washing facilities are operational and have sufficient hand-soap and paper towels
- Any sanitising solutions required are made up and at the correct strength
- Staff are wearing the correct and clean protective clothing
- Any aprons or gloves used are clean
- The refrigeration facilities (chiller, freezer etc.) are operating correctly and at the required temperature
- Sampling

Design and Construction and Repairs and Maintenance of Premises

Premises need to be designed, constructed and maintained in a manner that is suitable for processing product that is fit for its intended purpose. Routine checks need to be carried out to confirm this, and while these will always need to be tailored to the operation, they will usually include checking for things such as:

- Product contact surfaces - are impervious, non-absorbent, free draining and free from pits, cracks and crevices that may harbour contaminants
- Other surfaces such as , walls, ceilings, floors are free of cracks, holes, flaking paint

- Plant, equipment and fittings are in good condition, not damaged
- Smooth welds
- No evidence of rust issues
- Water reticulation system is in good condition, no leaks
- Hoses are clean in good condition, no damage or leaks, stored off the floor
- Adequate ventilation, no condensation

Calibration
Any equipment used to measure critical measurements must be checked to confirm its accuracy. While this will normally be completed on an annual basis, some equipment used for critical measurements may be required to be checked more frequently. You must have a procedure that identified the frequency of calibration for each piece of equipment used to measure critical measurements.

Water & Ice
The type of checks needed to be carried out depend on the water supply and any treatment you may or may not undertake. If you are supplied by your local town supply, then it is likely that you don't carry out any further treatment on site. However regular checks should be carried out including:

- Water – visual check of odour, colour etc. as an indicator of any major issues
- Water analysis – regardless of the water supply used, all land-based premises should conduct a monthly microbiological test for faecal coliforms/*E.coli* at point-of-use
- Reticulation system – check for integrity of the system, any leaks or damage

In addition to the above, if you do treat the water supply then you will need to complete the relevant tests associated with the treatment, such as chlorine, pH, turbidity, UV operation, etc. in accordance with your water management plan.

Cleaning & Sanitation
The purpose of a pre-operation check is to determine if the premises, equipment, and facilities that could impact on the safety of the product are in a suitable condition before processing commences. However there are other checks that should be carried out to confirm the cleaning and sanitation programme is effective, such as:

- Cleaning and sanitation procedures required at break times are being followed and are effective
- Chemicals are being used correctly – correct application, concentration & contact time etc.
- Cleaning equipment is being used correctly
- All other support areas (i.e. amenities, stores and storage areas, etc.) are clean
- The 'end of process' cleaning and sanitation is carried out as per the programme and is effective

Personal Health & Hygiene
Regular checks need to be carried out to ensure the staff are following good personal hygiene and using hygienic work practice and are meeting the requirements for health. Some of these checks will be carried out at pre-op but others will need to be done during processing. The types of things to check are:

- Wearing the correct, clean protective clothing and equipment
- Following hygiene routines when entering the processing areas and during processing
- Using hand washing and sanitation practices
- Using hygienic work practices and behaviours

Control of Chemicals (Approved Maintenance Compounds)
Chemicals need to be managed to ensure they are used effective and do not become a source of contamination themselves. Routine checks will be undertaken at various frequencies but will include things such as:

- Chemicals are approved for their intended use
- Chemicals are labelled and stored correctly
- Chemicals used correctly, according to manufacturer's instructions

Pest Control
Checks need to be undertaken to ensure that pests are being managed so that there is no risk of contamination, while the types and frequency of checks will depend on the operation, the following should be considered:

- Checks for signs of vermin/pest activity
- Checks of the integrity of vermin/pest proofing measures (doors, windows, screens, seals etc.)
- Checks of the bait stations and other eradication measures

Training & Competency of Personnel
Checks need to be undertaken on a regular basis to ensure all staff are using the correct procedures relevant to the position they hold and that they are carrying out their role competently on a regularly basis – this is likely to be part of personal hygiene and other related checks, such as CCP monitoring.

Reception
Generally checks are made to confirm product is fit for its intended purpose on arrival, while the specific checks will depend on the type of product and the form it is received in, this will usually include:

- That product has been subject to appropriate temperature control or if it is a live product, that the product is alive and in good condition
- That it has been handled and transported in a suitable manner to minimise deterioration and has been protected from contamination
- That there are no signs of contamination from physical (foreign matter) hazards, chemical hazards or microbial contaminants
- That the product has appropriate labelling or identification
- If the product is intended to be eligible for export:
    - If it has been stored at a depot prior to receiving, the depot is listed with MPI
    - Other market eligibility criteria is met

In addition there are specific checks required for those received bivalve molluscan shellfish, farmed fish and any imported product.

Ingredients & Additives
Prior to the purchasing or use of additives or processing aids, the identity and purity needs to be confirmed it meets the Food Standards Code. This information is usually obtained from your supplier. Other regular checks should include:

- Checks on arrival to make sure they have been transported appropriately, are not damaged and no signs of contamination
- Checks before use to make sure there is no damage, it is clean and no signs of contamination and is within its shelf-life date if appropriate
- Checks to ensure they are handled and used correctly, and according to manufactures instructions

Packaging & Containers

Contact packaging and containers need to be suitable for food use and need to be supplied with a guarantee that confirms they meet the appropriate legislation, e.g. US FDA regulations, Title 21, Parts 170-199. Other regular checks should include:

- Checks on arrival to make sure they have been transported appropriately, are not damaged and no signs of contamination
- Checks that is it stored correctly and protected from contamination
- Checks before use to make sure there is no damage, it is clean and no signs of contamination

Managing the Risk of Contamination & other Process Controls

Regular checks need to be undertaken to ensure that the risk of contamination is minimised. The types of checks will depend on the products being processed but will include things such as:

- The containment or control of, water, waste and equipment, the movement of people and equipment, hygienic processing procedures and use of designated areas (as relevant)
- If producing ready-to-eat product, checks on the controls to prevent contamination between raw and processed product will also be required including confirming compliance to Part 15 of the Animal Products (Specification for Product intended for Human Consumption) Notice and Standard 1.6.1 of the Food Standards Code.

Labelling

Checks should be designed and implemented to ensure all product is labelled to meet the requirements of the legislation, Food Standards Code and the destination market.

Refrigeration and Storage of Product

Checks need to be undertaken to ensure that products are being stored correctly and at the appropriate temperature for the product type. This will normally include checks to confirm:

- The refrigeration facilities (chillers, freezers etc.) are operating within set parameters
- Products are being stored at temperatures that ensure they meet any dispatch criteria

Transport

Product needs to be transported in a manner that will ensure the product is maintained so that it is fit for purpose and checks need to be undertaken to confirm this, while the specific checks will depend on the product being transported, they will normally include:

- Prior to loading, checks to confirm the vehicle is clean and appropriate, and that the product itself meets any required temperature criteria
- Checks to confirm the vehicle is suitable to maintain any required temperature criteria
- Depending on the transport situation, the vehicle or transport operator may also need to be registered by MPI.

Product Recall, Traceability and Inventory

While these supporting systems are more administrative in nature or only used if necessary, checks should be implemented to test their effectiveness in the case of recall and traceability (e.g. trace back exercises or mock recalls) and in the case of inventory, the system is accurate and all product is able to be accounted for.