

DAIRY FOOD SAFETY

FACTORY REQUIREMENTS



Tasmanian Dairy Industry Authority

2015

Table of Contents

| | |
|---|-----------|
| OVERVIEW | 3 |
| Useful Websites | 3 |
| INTRODUCTION | 4 |
| REQUIREMENTS OF A FOOD SAFETY PROGRAMME | 5 |
| 1. MANAGEMENT RESPONSIBILITY | 6 |
| 2. SYSTEM REVIEW | 7 |
| 3. DOCUMENT AND DATA CONTROL | 8 |
| 4. APPROVED SUPPLIER/SOURCING PROGRAMME | 8 |
| 5. TRAINING | 9 |
| 6. PROCESS CONTROL..... | 10 |
| 7. CLEANING AND SANITATION | 11 |
| 8. PEST CONTROL..... | 12 |
| 9. PRODUCT LABELLING AND IDENTIFICATION | 13 |
| 10. CONTROL OF NON-CONFORMING PRODUCT/CORRECTIVE ACTIONS | 14 |
| 11. PRODUCT RECALL AND TRACING PROCEDURES | 15 |
| 12. WATER QUALITY | 16 |
| 13. PREMISES, EQUIPMENT CALIBRATION AND MAINTENANCE | 17 |
| 14. HEALTH AND HYGIENE REQUIREMENTS | 20 |
| 15. PRODUCT SAMPLING AND ANALYSIS | 21 |
| 16. SHELF-LIFE TESTING | 21 |
| 17. CODEX HACCP REQUIREMENTS | 22 |
| Licence Application Flowchart | 29 |

OVERVIEW

Food Standards Australia New Zealand is a statutory authority that works with the Australian, New Zealand, State and territory governments to set **legally enforceable food standards**. Food standards are contained in the Food Standards Code, which is divided into chapters:

- Chapter 1 of the Code contains general food standards that apply to all foods
- Chapter 2 contains compositional standards for particular classes of foods
- Chapters 3 and 4 contain food safety requirements for the production and processing of food, and requirements for premises and vehicles used for food production.

Under Standard 4.2.4, *The Primary Production and Processing Standard for Dairy Products*, defined dairy businesses are required to control the potential food safety hazards associated with their business by developing, documenting and effectively implementing a food safety program. Particular measures to be covered by the food safety program are also specified.

These Requirements have been developed to help licensees and prospective licensees understand the general intent of relevant clauses of Standards 1, 2, 3 and 4.2.4 of the Code.

The Commonwealth Department of Agriculture (DA) *Export Control (Milk and Milk Products) Orders 2005*, also apply to export registered dairy processors.

Some Acts, Regulations and Codes, as amended from time to time, that may affect Tasmanian dairy processors include:-

- *Tasmanian Dairy Industry Act 1994*
- *Food Act 2003*
- *Export Control (Milk and Milk Products) Orders 2005*, published by DAFF
- *Pathogen Management Guidelines* (ANZDAC, June 2010)
- *Guidelines for Food Safety Validation and Verification of Heat Treatment Equipment and processes* (ANZDAC 2007)
- *Food Standards Australia New Zealand Food Standards Code* (2000)
- Relevant parts of the Building Code of Australia including Tas Part H102
- *Building Act 2000* and associated Regulations

Useful Websites

| | |
|--------------------------------------|---|
| Dairy Industry Act 1994 | https://www.legislation.tas.gov.au/view/html/inforce/current/act-1994-036 |
| Food Standards Australia New Zealand | http://www.foodstandards.gov.au/code/Pages/default.aspx |
| Food HACCP | www.foodhaccp.com/indexcopy.html |
| Dairy Australia | https://dairyaustralia.com.au/ |
| Dept of Health & Human Services | http://www.dhhs.tas.gov.au/publichealth/food_safety |
| DA Dairy | http://www.agriculture.gov.au/export/controlled-goods/dairy/operating-registered-establishment/approved-arrangements |
| Dairy Food Safety Victoria | www.dairysafe.vic.gov.au |
| Codex Alimentarius Commission | www.fao.org/docrep/W8088E/w8088e00.htm |
| CoP Gen Principles of Food Hygiene | www.mhlw.go.jp/english/topics/importedfoods/guideline/dl/04.pdf |
| Dept Health, Victoria | http://www.health.vic.gov.au/foodsafety/bus/templates.htm |

INTRODUCTION

The Requirements have been prepared to help new and existing dairy processors develop a food safety management system; to demonstrate their knowledge of their dairy food processing responsibilities, to control food safety hazards and produce safe food. It is based on the principle of prevention, rather than detection, as described in Standard 3.2.1, Food Safety Programs, of the Food Standards Code and the Codex Hazard Analysis and Critical Control Point (HACCP) system, rather than relying on end product testing.

As a licensed dairy processor you must:

1. Demonstrate skills and competencies in food safety, relevant to the duties being undertaken (including HACCP training for at least one person),
2. Develop and implement a TDIA-approved food safety program,
3. Comply with your food safety program,
4. Have a HACCP plan for each separate product line approved by the TDIA **prior** to manufacture (including product trials), and notify the TDIA **prior** to any changes to HACCP plans,
5. Comply with written corrective action requests issued by a TDIA auditor within the stated timeframes in the request,
6. Notify the TDIA of the detection of human pathogenic organisms, or if inhibitory substances exceed the MRL, by fax, phone or email within 2 working days after the initial indication of the result. Written details of such incidents must be provided within 3 working days,
7. Purchase all dairy produce from a licensed farmer or licensed processor,
8. Maintain and make available upon request by the TDIA such records as are necessary to enable the TDIA to audit and verify information provided by you to the TDIA. This includes access to original data held by your testing laboratory,
9. Have your milk and liquid milk products transported by a Food Standards Code compliant milk collection and transportation business, or TDIA licensed vendor/distributor,
10. Notify the TDIA prior to making any significant changes to your program, management personnel, premises, fixtures, fittings and equipment,
11. Notify the TDIA within 14 days of any changes to your dairy farmer supplier data base,
12. Pay the prescribed licence fee, and fees payable on behalf of dairy farmers, in accordance with *Dairy Industry Regulations 2004*

You are advised to check on any external requirements that may apply, for example, you will need to notify your local Council. You may wish to contact the Business Licence Information Service (BLIS) at the Department of Economic Development for more information.

During the planning and budgeting processes – and ongoing throughout the year – you must determine and ensure the availability of financial, physical and human resources necessary to meet your licence conditions and food safety program commitments.

Food safety legislation is forever changing. You must keep up to date with the latest information; changes may have occurred since the compilation of these Requirements.

For further information or assistance please contact:-

| | | |
|-------------------------------|----------------------------------|----------------------------------|
| Don Sandman | Nathan Dick | Carolyn Harris |
| Quality Assurance Manager | Senior Dairy Food Safety Officer | Business Manager |
| Phone 6478 4119 | 6478 4125 | 6478 4100 |
| Mobile 0419 315 805 | 0429 136 252 | 0408 554 001 |
| Don.Sandman@dpiwve.tas.gov.au | Nathan.Dick@dpiwve.tas.gov.au | Carolyn.Harris@dpiwve.tas.gov.au |

REQUIREMENTS OF A FOOD SAFETY PROGRAMME

Consumers expect the food they eat to be safe and suitable. Foodborne illness and injury are at best unpleasant; at worst, they can be fatal. Outbreaks of foodborne illness also damage trade and tourism, and lead to loss of earnings, unemployment and litigation. Tasmania has an enviable reputation for producing world's best dairy products. By producing safe, quality dairy products, you will help protect and enhance Tasmania's well-deserved reputation.

Everyone involved in the dairy food safety chain, including farmers, transporters and processors, has a responsibility to ensure that food is safe and suitable for consumption. We need to protect our reputation by employing rigorous controls on food safety, as outlined in these Requirements.

Standard 3.2.1, Food Safety Programs, clause 3(c) requires a dairy processor to *"set out the food safety program in a written document and retain that document at the food premises."*

Furthermore, clause 5(e) requires the business operator to *"provide for the regular review of the program by the food business to ensure its adequacy."*

The Commonwealth *Electronic Transaction Act 1999* allows records and documents to be kept in an electronic form. If the food safety program is in an electronic form, staff of the business must be able to access it on the premises at all times.

Hazard Analysis Critical Control Point (HACCP) is a systematic, preventive approach to food safety that monitors and manages hazards, rather than relying on finished product inspection.

A *Hazard* is a biological, chemical or physical agent that will cause harm to a consumer; *Risk*, considers the likelihood and severity of a hazard occurring.

A TDIA-approved HACCP Plan must be developed for each individual product line.

Some Food Standards Code provisions, in addition to HACCP include:

1. Management Responsibility
2. System Review – Management and Internal Audit
3. Document and Data Control
4. Approved Supplier/Sourcing Programme
5. Training
6. Process Control
7. Cleaning and Sanitation
8. Pest Control
9. Product labelling, identification and traceability
10. Control of nonconforming product/Corrective Action,
11. Recall procedure.
12. Water Quality
13. Premises and Equipment – installation, calibration and maintenance procedures
14. Health and Hygiene
15. Product Sampling and Analysis
16. Shelf Life Testing
17. Minimum Sampling and Product Testing

1. MANAGEMENT RESPONSIBILITY

Refer to FSANZ Food Standards Code 3.2.1, Food Safety Programs, clause 5,

Details of your business

- business name and licence/registration number,
- name of proprietor(s) (the person(s) or company that owns the business)
- address and contact details of the business.

Nature of your business

A clear outline of the nature or activities of your business, including a description of each product you produce.

Responsible persons

Provide a list of all key personnel (managers and supervisors), their roles and functions in relation to the FSP. This must include the person(s) responsible for the overall implementation and management of the FSP, and alternative delegates.

Such a list ensures that all key roles and functions are covered and that all staff understand their responsibilities. It also provides an indication of the need to review the list should staff leave the business or operations change.

Auditing of the food safety program

Specify how often the food safety program will be audited, by whom (in your business), what will be audited, where the outcome and any corrective action is recorded. See Section 2, System Review.

Quality Policy Statement

The business owner or manager must document and sign a policy stating the business intent about quality and food safety. You must review the policy at least annually.

The policy will describe the company's commitment to continuous improvement, ensure resources are available and staff possess the necessary skills, knowledge and competence to perform their duties and fulfil customer and legal expectations.

This policy must be in a prominent location and understood and implemented by all staff.

List the product(s) and processes covered by the FSP; their start and end points.

Organisation Structure

A current and accurate organisational chart shall be available which identifies all the management and staff positions within your organisation. The chart should show the relationship from top management to all staff who have a responsibility for quality or food safety.

Position Descriptions

The responsibilities and authority of all staff who have a responsibility for quality or food safety must be documented, including alternate delegates.

2. SYSTEM REVIEW

FSANZ Food Standards Code 3.2.1, 3(e), 4(a) 5(e)

Clause 5(e) of Standard 3.2.1 requires the food safety program to **provide for the regular review of the entire food safety programme by the food business to ensure its adequacy.**

A review ensures that your food safety programme is meeting its objective of controlling all potential food safety hazards that are likely to occur at each step of production.

The review may consist of rolling audits scheduled to look at different parts of the FSP over time so that the entire system is audited once or twice per year. The internal audit should include regular housekeeping/Good Manufacturing Practices inspections. These audits should be conducted in a systematic way, with an audit checklist, or calendar, listing the items audited, identification of non-conformances, follow up and close out of non-conformances. **A record of the audit and any corrective actions must be kept.**

The food safety programme must include information about the review of the programme, such as:

Who is responsible for the review

When the review took place

What was reviewed

The outcome must be recorded and

What corrective action, if any, was taken as a result of the review

Internal Audit and Management Review

The review should consider:

- results of all audits,
- follow-up actions from previous management reviews,
- customer feedback,
- status and operation of the food safety system,
- process performance and product conformity,
- status of preventive and corrective actions,
- planned changes that could affect the quality management system, and
- corrective action or recommendations for improvement.

The outcome of the review is to ensure ongoing compliance of the FSP with legislative requirements and safe food outcomes.

Dairy Food Safety Note 26, *Internal Audits – Verification of Food Safety Programmes* is available by visiting the Dairy Food Safety Victoria web site <http://www.dairysafe.vic.gov.au/technical-notes/people-and-programs>

Also visit Dept Health, Victoria, Record Sheet 13.

3. DOCUMENT AND DATA CONTROL

FSANZ Food Standards Code 3.2.1 5(f)

Your food safety programme must **provide for appropriate records to be made and kept, demonstrating action taken in relation to, or in compliance with, the FSP.**

These records must provide sufficient information to show that you are complying with your FSP. Records must be legible and indicate:

- what the record relates to (title)
- where there is more than one page, number of pages.
- who made the record
- the date and issue status
- the result of what is being recorded
- any action taken as a result of the recording such as a corrective action

Document control is important because obsolete information needs to be distinguishable from current information. Otherwise it is possible work could be carried out according to superseded specifications, process controls or methods.

Documents must be made available to staff and at locations where operations essential to the effective functioning of the food safety system are performed.

4. APPROVED SUPPLIER PROGRAM

Food Standards Code 3.2.1, and 3.2.2 5(1 to 4)

The Approved Supplier Program is designed to ensure that all goods and services sourced off site do not introduce any hazards or pose a risk to food safety. Such materials include, but are not limited to, ingredients, raw materials, cleaning chemicals, packaging, water, etc. and services such as transport, storage, calibration, cleaning contractors and pest contractors.

The methods for selecting, evaluating, approving and monitoring an Approved Supplier need to be documented. This could be as simple as a good supply history, sourcing from accredited suppliers; a letter of guarantee (Stat Dec) or Certificate of Analysis, for example.

The procedure must address the following:

- Evidence of the ability of your suppliers to provide the desired service/standards, e.g. FSPs or Certificates of Analysis, as above,
- Methods for selection and approval of suppliers and “emergency suppliers”,
- Methods for removal from the approved programme,
- A list of approved suppliers, their products/services and their status must be maintained.

You need to ensure specifications for all incoming goods and services are agreed between yourself and the supplier, documented and maintained. Temperatures of all potentially hazardous raw materials must be recorded at receipt.

Where incoming goods or services are not meeting specification, corrective actions must be documented and records maintained.

5. SKILLS AND KNOWLEDGE

FSANZ Food Standards Code 3.2.2 (3)

Persons who undertake or supervise food handling operations must have skills in food safety and food hygiene and knowledge of food safety and food hygiene according to their work activities.

You must provide details of how you will provide adequate resources and competent staff to ensure these requirements are met. This includes appropriate training for all staff, with particular emphasis on those responsible for monitoring and controlling Critical Control Points. **TDIA cannot issue a licence to an operator with insufficient skills as this can present a risk to food safety.**

Everyone who handles food needs to know how to do their job safely. Sometimes the best way of attaining this knowledge is to go to a formal course; other options include:

- On-the-job training under a more experienced staff member,
- Recognition of people's experience in food businesses,
- Self instruction using on-line or written material, and
- Running in-house training sessions.

The Responsible Person or Supervisor on site must have received adequate training in HACCP accreditation from a TDIA-approved Registered Training Organisation.

Make sure you attain appropriate nationally recognised competencies designed to meet industry standards, which can be discussed with TDIA to ensure you choose a suitable training programme. As a minimum, you must be able to demonstrate a thorough understanding of HACCP Principles and their application.

You must record the type of training food handlers receive. The Responsible Person or Supervisor on site and those in charge of CCPs must be able to prove that they have particular knowledge about food safety, including knowledge of the principles and application of HACCP, by demonstrating relevant competencies during routine food safety audits.

Even though training has been provided to a staff member, it does not guarantee that he or she will have the appropriate skills and knowledge required for the position. This procedure shall include a review of staff competence as part of the **internal audit programme**.

Records of all training and qualifications and records of competence reviews include:

- Staff training needs
- Details of what training is provided for new employees e.g. induction, hygiene, cleaning
- Refresher training
- Training courses for supervisors and specialist positions eg:
 - Principles of Food safety
 - HACCP awareness
 - Pasteuriser operation
- Instructions, work procedures and food safety induction for all employees
- Details on the frequency of training and how you assess competence of the employee
- How effectiveness of the programme will be evaluated and at what frequency.

6. PROCESS CONTROL

FSANZ Food Standards Code 3.2.2 7(1 - 4) and 3.2.3, cl 12

You must process safe and suitable food.

Clause 15 of Chapter 4.2.4, Processing of milk and dairy products, specifies that the processing of milk and dairy products must include a pasteurisation step, or heat treatment equivalent to pasteurisation, to reduce any pathogenic micro-organisms that may be present in the raw milk to a safe level. For the processing of milk, additional requirements apply, such as being cooled immediately to prevent the growth of microorganisms.

Clause 16 specifies that processing to make cheese must include a pasteurisation step, or equivalent processes to eliminate pathogens 16 (b & c).

Procedures for the validation and verification of heat treatment should be incorporated as an integral part of your food safety programme.

Heat treatment is a Critical Control Point and your food safety programme must document your processing controls, including time, temperature or other specifications, as well as calibration, validation and verification, monitoring, corrective actions and supporting records.

Minimum requirements for the pasteurisation and heat treatment of milk and dairy products are contained in the document *Guidelines for Food Safety Validation and Verification of Heat Treatment Equipment and processes* (ANZDAC 2007), which is available by contacting the TDIA. New or upgraded pasteurisers and new licence applications must meet the requirements of this document.

Any pasteurising equipment must be validated by an appropriately qualified technician to show effectiveness, and the results provided to TDIA with the application for licence.

7. CLEANING AND SANITATION

FSANZ Food Standards Code 3.2.2 19(1, 2), 20(1, 2) and 4.2.4 cl 13

Food processors must maintain food premises, fixtures, fittings and equipment to a high standard of cleanliness and sanitation.

Clean premises and equipment are fundamental to the production of safe, quality food – it is critical for all post-processing contact surfaces and ancillary equipment. A clean surface must look clean, smell clean and feel clean.

Absorbent surfaces permit absorption of food residues and allow for harbourage and growth of microorganisms. Timber is not permitted for this reason. Surfaces that are cracked or poorly finished are difficult to clean and sanitise and allow microbes to colonise. Access of services through walls, if not properly sealed, are hard to clean and allow ingress of microbes and pests.

The cleaning and sanitising programme must be documented and include:

- the cleaning and sanitising procedures for the premises and equipment, be it CIP or manual dismantling and reassembly
- frequency of cleaning
- personnel responsible for each task
- cleaning equipment, chemicals (including concentrations, temperature and flow rates) and method to be used
- records to indicate that cleaning was carried out (for example daily check list)
- corrective actions to be taken and records of these actions when they occur.

Remember the acronym WATCH – **W**ater, **A**ction, **T**ime, **C**oncentration and **H**eat

To ensure the correct concentration of cleaning chemical, suitable measuring equipment must be used. Checks on the strengths of detergent and sanitiser solutions should be scheduled to ensure an effective clean (refer to manufacturer's instructions).

All detergent and sanitiser containers must be adequately labelled. Wear protective equipment.

| Step | Purpose |
|--|--|
| Initial rinse | Remove gross soiling. |
| Cleaning chemical wash (Typically caustic followed by acid or other types of chemicals). Use in accordance with label instructions. | Remove attached soil (often repeated). |
| Rinse | Remove cleaning chemicals. |
| Sanitise. Use in accordance with label instructions. | Reduce microbial load to a safe level. |
| Final Rinse Optional if used must have potable water | Remove sanitiser (unless using no-rinse sanitiser). |
| Allow to drain | Prevent the occurrence/growth of microorganisms between cleaning and re-use. |

Dairy Food Safety Note 4, *Preparing a Cleaning Programme*, is available on the Dairy Food Safety Victoria web site.

Also refer to Dept Health, Victoria, *Cleaning and Sanitising*, and Record 8.2 *Cleaning Schedule*. AS 4726 – 2004 provides detailed criteria for the design, construction and fit out of (retail) food premises. **Equipment washing and sanitising**

8. PEST CONTROL

FSANZ Food Standards Code 3.2.2 19 (1, 2), 20 (1, 2) and 4.2.4 13

You must eradicate and prevent the harbourage of pests. Pest management and control must be continuous and effective.

You must have in place a documented pest management programme which includes a schedule for the application and frequency of treatments.

Effective programmes combine different treatment methods to get the best overall result: preventative methods and control methods.

Preventative methods work by minimising access to food and shelter:

- remove clutter such as grass, obsolete equipment and stacks of pallets.
- make sure that food is tightly sealed.
- make buildings pest-proof.

Control methods work by repelling or killing the pests:

- fly traps and electronic fly killers.
- non-poisonous traps for mice/rats or poisonous baits for mice/rats.

Pest control must not create food safety hazards.

The programme shall also include:

- Bait maps depicting the type and location of treatments.
- Material Safety Data Sheets (MSDS) shall be maintained for any pest control chemical that is being used on site.
- Who is responsible
- Records of monitoring and corrective action shall be maintained
- How often are the baits/control stations serviced, reviewed
- Where an external pest control contractor is used, obtain a copy of the contractor's licence.

Dairy Food Safety Note 6, *Introduction to Pest Control Programmes*, is available on the Dairy Food Safety Victoria web site.

Also refer to Dept Health, Victoria, *Pest Control*.

9. PRODUCT LABELLING AND IDENTIFICATION

FSANZ Food Standards Code Chapter 1.2 and Standard 4.2.4 clause 14

You must include an identification and traceability system as part of your food safety programme.

You must have a procedure that ensures, for all stages of production from receipt through to finished goods, products are clearly identified. This includes raw material receipt, storage, work in progress, rework, final product, on hold product, reject product, quarantined product, returned product, downgraded/damaged stock, stock food, and waste product(s).

Methods used to trace product shall be documented and implemented. You must be able to trace the movement one step backwards (immediate supplier) and one step forward (immediate recipient).

You must check and record the effectiveness of the traceability system at least annually.

Refer to *Overview of Food Labelling, Guide to Food Labelling and other Information Requirements and Food Labels – What Do They Mean?*

<http://www.foodstandards.gov.au/consumer/labelling/documents/Food%20Labels%20Posterfinal%20.pdf> on the FSANZ website.

Part 1.2 *Labelling and other Information Requirements* is available by visiting the FSANZ website. You can also refer to Schedule 7, *Trade Descriptions*, of the Export Control (Milk and Milk Products) Orders.

Your labelling must accurately reflect the contents of the package it is applied to.

You must validate the Nutrition Information Panel by conducting relevant tests at least annually.

10. CONTROL OF NON-CONFORMING PRODUCT/CORRECTIVE ACTIONS

FSANZ Food Standards Code 3.2.1 5(d)

It is necessary to have a procedure to control non-conforming goods and services to prevent out of specification raw materials and ingredients (including packaging) from entering the production process, and out of specification products from entering the distribution chain.

Your **corrective action procedure** must be in addition to the corrective action requirements detailed in the HACCP Audit Table. The purpose of Corrective Action is to identify the root cause of problems and system faults as they occur and to prevent recurrence. Corrective Action must be recorded.

If monitoring finds that the control in place to manage a hazard is either not working or is not being followed, corrective action must be taken. A corrective action generally consists of two stages.

First, immediate action needs to be taken for any product that may now be unsafe or unsuitable because the hazard is not under control. If monitoring shows that the critical limits have not been met, the business will need to follow the corrective action specified in the food safety programme. Such corrective actions may include disposal or reprocessing of the product.

Second, there needs to be an investigation into the probable cause of the 'loss of control' of the hazard so that steps can be taken to make sure this incident does not happen again. Changes may be required to the food safety programme arising from the investigation.

All corrective actions should be documented in the FSP, including who is responsible and a process for escalation when corrective action is not done within the allocated timeframe

Non-conforming product includes raw materials, work in process and finished product that does not meet specification. It also includes equipment that has been found to be non-conforming.

You must document how you will label and identify products and equipment that are rejected or quarantined pending the results of inspection.

The procedures or practices adopted could include some, or all of, the following:-

- The designation of an area for the storage of non-conforming stock. The perimeter could be marked and/or be distinguished with appropriate signage.
- Using stickers or signs that identify the status of the product. Signs such as "**HOLD**" etc. should be sufficient, as long as staff are aware of their significance and adequate records kept.
- Records of disposition of any affected product.

It is recommended that you develop and document a procedure showing how customer complaints will be received, investigated and responded to, and describe the methods used to investigate the complaint. Retain records of customer complaints and their investigation.

The procedure will outline the responsibility for investigating customer complaints, initiating follow up actions and communicating back to the customer how the complaint has been resolved. Procedure should include criteria for the determination of the validity of complaints.

Records of complaints should include corrective actions.

11. PRODUCT RECALL AND TRACING PROCEDURES

It is a legal requirement under Standard 3.2.2, clause 12, and Standard 4.2.4, cl. 14, that a food business engaged in the wholesale supply, manufacture or importation of food must –

- (a) have in place a system to ensure the recall of unsafe food;
- (b) set out this system in a written document and make this document available to an authorised officer upon request; and
- (c) comply with this system when recalling unsafe food.

The *Food Industry Recall Protocol*, 7th Edition, May 2014, published by FSANZ, sets out what should be done, when in the interest of public health and safety, food products should be removed from supply or use by consumers. In addition to this, the Protocol offers an example of a written recall plan, which may be used as a template or illustration of what a working plan needs to entail.

Once the decision to recall a product has been made, there are three primary objectives:

1. stop the distribution and sale of the affected product as soon as possible
2. inform the TDIA, State Recall Action Officer and FSANZ Recall Coordinator (all recalls) and the public (consumer level recalls only) of the problem
3. effectively and efficiently remove potentially unsafe food from distribution and sale

Key steps in conducting a successful recall are:

- obtain and consolidate all necessary information about the food product
- determine the level of recall required
- notify relevant parties, including the TDIA within 24 hrs, confirmed in writing within 72hrs
- retrieve the food product from the market place
- dispose of the food product
- report on the recall, including the action taken to prevent a recurrence of the problem

A traceability system for products and ingredients must be used. The intent is to trace the movement one step backwards and one step forward.

You should be able to provide the following information in order to conduct an effective recall:

- nature of the problem
- brand name and description of the food product, including package size and type of packaging
- use by or best before date
- lot identification (batch or serial number)
- quantity of the batch manufactured and the date and amount released
- quantity of the affected food product that can be accounted for
- distribution within Australia (including a distribution list and the types of premises at which the food is likely to be sold)

It is useful to provide a photo or other image of the food product to help identify it.

A **withdrawal** is action taken to remove food from the supply chain where there is no food safety risk or the food safety risk has not yet been confirmed. You must notify the TDIA of withdrawals within 72hrs of commencing the withdrawal.

If you supply major retailers, they need to be advised and you may wish to complete the Australian Food and Grocery Council's (AFGC) Australia and New Zealand product recall/withdrawal form which is available from the AFGC's website.

12. WATER QUALITY

FSANZ Food Standards Code 3.2.3 4

Water must be sampled and tested in accordance with TDIA-approved frequency.

Your FSP must detail the requirements for sampling, testing and obtaining test results for water.

- Unless otherwise agreed with the TDIA, monthly microbiological testing must be done.
- Physico/Chemical test results, against the Australian Drinking Water Guidelines, can usually be obtained from TasWater annually.

Other events which should automatically trigger testing of water:

- (a) When work has been done on sewage or water piping ,
- (b) When you commission new refrigerators or ice makers or after breakdowns and repairs,
- (c) When there has been flooding or heavy rains which may cause ingress or siphonage,
- (d) When there is obvious discolouration of the water, or it has an offensive odour or oily film.

Procedures should include:

- Rotation of sampling points through all water sources
- How the sample is taken (aseptic sampling techniques),
- Who can take the sample, including the training and approval of sample takers,
- The checks to ensure that sample and results are at the stated frequency,
- Map of the water supply and supply points at the registered establishment,
- Notification to TDIA in the event of failure to comply with the micro.
- System for holding product produced when the water does not comply
- Potable water must not contain any *Escherichia coli* in 100mL

In systems where disinfection is used, evidence of continuous operation is very important in providing assurance of microbial quality. Disinfection is very effective against bacterial pathogens but less so against viruses and enteric protozoa (e.g. *Giardia* and *Cryptosporidium*), where filtration is more effective. The presence of viruses and protozoa can be minimised by protecting water supplies from human and livestock waste.

Standard 3.2.3, Clause 4(1), *Food premises must have an adequate supply of water if water is to be used at the food premises for any of the activities conducted on the food premises.*

An adequate supply of water is defined to mean potable water that is available at a volume, pressure and temperature that is adequate for the purposes for which the water is used.

13. PREMISES, EQUIPMENT, CALIBRATION AND MAINTENANCE

Your premises, facilities, equipment and vehicles must meet the requirements of Standards 3.2.2 and 3.2.3, and clause 13 of 4.2.4 of the Food Standards Code and Schedule 3 of the 'Orders'.

The layout of your premises must minimise opportunities for food contamination. You must ensure that your premises, fixtures, fittings, equipment and transport vehicles are designed and constructed to be effectively cleaned and, where necessary, sanitised.

The premises must be provided with the necessary services of water, waste disposal, light, ventilation, cleaning and personal hygiene facilities, storage space and access to toilets.

Floor

The floor shall be a smooth, durable, free-draining, non-slip surface that is impervious and free from cracks and other defects, easily cleanable and no ponding of water.

You may wish to consult Table 3.1 '*Suitability of Floor Finishes for Food Premises Areas*' of AS 4674:2004 – 'Design, construction and fit-out of food premises'.

Australian Standard (Floors) – AS/NZS 4586:2004 – 'Slip resistance classification of new pedestrian surface materials' is also useful as this provides details on slip resistance for floors.

Please note that floor grading for a floor waste is to be evenly graded (e.g. 1:100) to ensure suitable fall. Depending on the use of the premises there may be other gradients that are applicable e.g. - for wet-down areas. The BCA should be consulted in this instance.

Walls

The walls shall have a surface that is smooth, rigid and durable, impervious and free from cracks and other defects. Walls shall be finished in a light colour (to facilitate cleaning), and if the surface does not consist of a glazed material it shall be painted with washable full gloss paint.

You may wish to consult Table 3.2 '*Suitability of Wall Finishes for Food Premises Areas*' of AS 4674:2004 – Design, construction and fit-out of food premises.

Coving – Floor/Walls

The angles of all walls and floors of the preparation area shall be coved and sealed. This is to be done in such a manner as to prevent moisture through the joints, facilitate cleaning and ensure that accumulation of dirt, grease, etc, does not occur.

You may wish to consult Section 3.1.5 '*Coving*' of AS 4674:2004 – 'Design, construction and fit-out of food premises'.

Ceilings

Ceilings shall consist of a smooth, rigid surface that is free from cracks and other defects.

Ceilings shall be constructed in such a manner that offers the least possible opportunity for the lodgement of dust and shall be finished with light coloured, washable full gloss paint (to facilitate cleaning).

You may wish to consult Table 3.3 '*Suitability of Ceiling Finishes for Food Premises Areas*' of AS 4674:2004 – Design, construction and fit-out of food premises.

Window Sills

Where windows are present, windowsills are to be splayed down at an angle (e.g. - 45°) and not used as a shelf. This facilitates cleaning and prevents the accumulation of dust and other particles. Sills should be at least 300mm above benches, sinks and appliances.

Animals and Pests

Pests must be prevented from entering the premises by providing screens, self-closing doors and other inhibiting mechanisms to all openings, doorways and windows which may be opened e.g - air-curtains, fly-strips or fly-zappers.

It is important to note that precautionary measures must be taken to ensure that pests will not be a problem in a food business.

Lighting

The preparation and storage areas shall be provided with natural or artificial lighting (or both). A minimum light intensity of 200 lux is *recommended*. Artificial lighting is to comply with AS/NZS 1680.1:2006 and AS/NZS1680.2.4:1997.

All lights should be fitted with light diffusers/covers or shatterproof tubes to facilitate cleaning and to prevent contamination of food and the premises should breakage occur.

Ventilation

Adequate natural or mechanical ventilation shall be provided to effectively remove fumes, smoke, steam and vapour from the premise.

Positive pressure ventilation, in accordance with AS/NZS 1668.1:1998 and AS 1668.2-2002, may be provided to remove and prevent the accumulation of excessive heat, steam and moist vapours.

Plinths

All appliances and fixtures that are *not* capable of being easily moved should be installed so that the area underneath the article can be easily cleaned. If this is not possible, they are to be placed on a solid base constructed of smooth, impervious, easily cleanable material (plinth).

It is recommended that plinths be constructed at a minimum of 75mm in height.

Steel legs and frames used for supporting such appliances and fixtures must be non-corrodible and have the ends of tubular steel sealed to prevent vermin and insect access.

Shelving

The surface of all shelving shall be smooth, impervious, non-absorbent, non-corrodible, free from cracks and defects, and capable of being easily cleaned. Shelving for food storage should not be at a level lower than 250mm above the floor.

If the underside of the shelving is absorbent, it is recommended that the surface be sealed so that it meets these requirements.

Supports and Brackets

Sinks, tubs, draining boards, handwash basins, heaters, urns, benches, shelving and similar fittings shall be non-corrodible and supported on approved frames. If hollow pipe is used the ends must be sealed. Timber framing is not permitted.

Handwash Basins

A separate handwash basin is to be provided with a permanent supply of warm running water through a single outlet. A non-hand operated system is preferred (e.g – sensor operated).

Handwash basins should be located and installed so that they are unobstructed, easily accessible and no further than 5m from any food handling activity.

The hand wash basin is to be of a size that allows for the effective washing of hands and arms. A minimum recommended size is 400mm x 500mm off the wall.

Hand sanitiser and a hygienic means to dry hands shall be provided. A receptacle for used paper towels is to be provided.

Services Pipes and Conduits

All service pipes are to be concealed in floors, plinths, walls or ceilings. Where this is not possible, such pipes are to be fixed on brackets so as to provide at least 25mm clearance between the pipe and adjacent vertical surface and 100mm between the pipe and adjacent horizontal surfaces.

Where pipes enter into the wall cavity, gaps must be sealed.

AS 4674 – 2004 Design, construction and fit-out of food premises is *useful for small dairy processors* when read in conjunction with the relevant food safety standards and BCA.

EQUIPMENT CALIBRATION

You must demonstrate that all equipment used to inspect, measure or test the product is reading accurately so that the results of these readings can be relied upon.

Some equipment, such as thermometers and scales must be calibrated against a national or international standard, or a reference standard of known accuracy.

Thermometers can be calibrated against boiling water and ice-water if these approximate the temperatures the thermometer is required to measure when in use.

You must develop a procedure to address products produced between the time an equipment "out-of-calibration" is discovered and the last calibration check.

A **calibration schedule** must include the following:

- Uniquely and indelibly Identify all equipment that requires calibration
- Frequency of calibration.
- Method of calibration
- Determine how accurate the measurements need to be
- A method of identifying equipment that is out of calibration
- Corrective action necessary for product produced whilst equipment was out of calibration
- Who is responsible for undertaking calibration, recording the results of all calibrations, labelling equipment to indicate when it was last calibrated and when recalibration is due.

A **preventive maintenance programme** is a system you have in place to ensure that there is a planned and documented approach to the ongoing maintenance of premises and equipment. This preventative approach reduces the likelihood of equipment failure during manufacturing operations and also minimises contamination of product from faulty or deteriorating structures or equipment.

The maintenance programme should include the following information:

- the maintenance procedures for premises and equipment
- records to indicate that maintenance procedures have been followed
- corrective actions to be taken if maintenance procedures have not been followed
- date maintenance issue was identified
- description of maintenance issue
- date maintenance issue was or will be rectified.

Dairy food safety notes 10, 11 and 24 on **Introduction to Maintenance Programmes, Calibration, and Building Construction Guidelines** are available by visiting DFSV's website.

14. HEALTH AND HYGIENE REQUIREMENTS

Standard 3.2.2, clauses 13, 14, 15, 16, 17 and 18 specifies the health and hygiene requirements of food handlers and food businesses to ensure the safety and suitability of food. The measures must be documented in the FSP under a health and hygiene programme or policy.

Food handlers can be a direct source of contamination if good hygienic practices are not followed or if they are suffering from a foodborne illness and are engaged in food handling activities where there is a reasonable likelihood of contamination. If a food handler knows, or suspects, they may be suffering from a food-borne disease, they must report this to their supervisor, or if a sole operator, take the measures detailed below.

Personal hygiene practices are measures that food handlers take to avoid contaminating milk or dairy products or any food contact surfaces. Contamination could occur from foreign objects, microorganisms or chemicals that are transferred through direct contact with milk or dairy products or as a result of contaminating surfaces that come into contact with the product.

This could include, for example:

- a hand washing policy (for example, how and when hands are to be washed and dried)
- rules regarding clothing, hair and jewellery
- where on the premises eating/smoking is or is not permitted
- avoiding unnecessary contact with the product
- requirements for covering cuts and wounds.

Personnel who have symptoms of foodborne illness, or know that they are suffering from or are carriers of a foodborne disease, must not be involved in activities where there is a reasonable likelihood they could contaminate food. Symptoms of foodborne illness include diarrhoea, vomiting, sore throat with fever, fever or jaundice.

Foodborne diseases that can be transmitted via food contaminated by infected handlers include gastroenteritis, hepatitis A, salmonellosis and campylobacter enteritis.

The procedures to be followed when food handlers involved in food handling activities have symptoms of or are suffering from a foodborne illness should be documented in the food safety programme. This could cover, for example:

- what to do about personnel working if they report that they are unwell
- which illnesses or conditions mean a person is unable to undertake particular activities

Warm water for personal washing

Warm water must be provided for hand washing unless the business has a specific exemption under clause 14 of Standard 3.2.3.

Warm water for personal washing is usually within the range 20°C–40°C. The temperature is not critical provided it is not so hot that it scalds and not so cold that people are reluctant to use it.

15. PRODUCT SAMPLING AND ANALYSIS

You need to identify those with responsibility for sampling, inspecting and testing finished product and identify how you collect samples and test them.

All finished product testing should be undertaken in a competent laboratory. The types of testing, specifications and frequency should be listed in the product specification section of the HACCP plan. You will need to keep records of all tests, whether a product has failed or passed, and what corrective action was taken when the product failed.

Testing costs may be reduced by compositing samples i.e. testing multiple samples as a single sample, provided the test does not become less sensitive by doing this. Don't composite different products which may confuse or give a misleading result. Don't composite more than 5 samples. The lab may be able to composite aseptically to avoid contamination. Adverse results mean that each individual sample will need to be retested.

A hold and release system must be in place to prevent the release or distribution of unsafe food, where practical.

New licensees and new product lines must demonstrate safe food credentials (process verification) by providing finished product test results from 10 consecutive batches.

Additional requirements apply to products manufactured from unpasteurised milk.

Products with post-pasteurising additives must be tested for additional microorganisms.

When a product fails the standards, the product line that failed to meet the standard must be sampled and tested until five consecutive batches meet the standards.

If a pathogen is detected in dairy product, the Pathogen Management Guidelines must be implemented.

16. SHELF-LIFE TESTING AND NUTRITION INFORMATION PANEL

Where products are labelled with "Use by" or "Best-Before Date", a schedule of shelf-life testing (micro and sensory) shall be implemented and carried out on each product annually.

Refer to *A Guide to Calculating the Shelf Life of Foods*, NZMPI, and the Guide to Standard 1.2.5 - *Date Marking of Packaged Food*, on the FSANZ website.

Nutrition Information Panel testing needs to be undertaken to verify the claims made on the label attached to your product. Chemical composition, fat, protein, moisture, salt and pH, as appropriate, must be undertaken at least annually.

17. CODEX HACCP REQUIREMENTS – ALIGNED WITH S 3.2.1, FOOD SAFETY PROGRAMS

The application of HACCP is the central focus of all TDIA-approved food safety programmes. It involves the systematic identification and assessment of hazards and the measures for their control to ensure the safety of dairy food. HACCP is the major tool for the risk analysis of food safety elements in the manufacture of dairy products, focusing on prevention rather than end product testing. Go to www.codexalimentarius.net and Schedule 2 of the Orders.

The following steps of the Codex HACCP Guideline and shall be included as part of this process.

The HACCP Team (Step 1 of Codex HACCP)

Identify and document the members of the HACCP team, who are those with the process skills and knowledge to develop and maintain the HACCP Plan. At least one HACCP team member, should have attended a training course in HACCP Principles, or equivalent.

Scope and Purpose of your HACCP Plan (Step 1 of Codex HACCP)

The scope of the HACCP Plan shall be defined and documented, including the start and end point of the process(es) within the HACCP Plan, and the products covered by the HACCP Plan.

The purpose shall include the intent that all food safety hazards will be identified and controlled.

You can cover quality, environmental, occupational health and safety, or other risk considerations within the scope of your HACCP System, if you wish.

Product Description and Intended Use (Steps 2, 3 of Codex HACCP)

Develop and document a Product Description and Intended Use for all products within your product scope. 'Like' products that are processed in similar ways may be grouped together in the one Product Description. Products that are processed differently require a separate Product Description. Each Product Description shall cover the following criteria:

- Description of product
- Composition
- Physical/chemical structure
- Microcidal/static treatment including method of preservation
- Packaging – primary & secondary
- Storage, handling & distribution methods
- Chemical and biological composition
- Salt, moisture, pH, fat content, as relevant
- Shelf life
- Intended Use of the product(s);
- Labelling requirements (as per Food Standards Code)
- Sensitive consumers – presence of allergens

PRODUCT DESCRIPTION – EXAMPLE ONLY**PRODUCT SPECIFICATION**

| | |
|--------------------------------|--|
| PRODUCTS | Surface Ripened Cheese: Brie and Camembert |
| Customer | General public through selected supermarkets and outlets |
| Composition | Milk, salt, lactic acid cultures, <i>Penicilium camemberti</i> and <i>Geotrichum candidum</i> , non-animal rennet |
| Condition before consumption | Refrigerated, or brought to room temperature; ready to eat |
| Method of preservation | Pasteurisation, followed by refrigeration at less than 5°C |
| Packaging - Primary, secondary | Laminated, breathable barrier film, cardboard shipper carton. |
| Condition at distribution | Chilled to less than 5°C |
| Method of distribution | Insulated and refrigerated transport |
| Shelf life | 6 weeks (you must verify shelf life at least annually) |
| Label instructions | Serve refrigerated or at room temperature |
| Distribution instructions | Keep at less than 5°C |
| Chemical composition | Specify the chemical composition, so as to verify the NIP. Test and record chemical composition at least annually. |
| Microbiological composition | Specify the microbiological limits. Frequency as per Minimum Test Frequency* |

INTENDED USE

| | |
|------------------------------|---|
| Condition before consumption | Serve refrigerated or at room temperature |
| Method of use by customers | Eat direct or use with complementary foods and crackers |
| Type of customer | General public |
| High-risk consumers? | Those sensitive to allergens present in dairy products |

A procedure for the identification, **monitoring and management of allergens** must be developed, documented and implemented.

Allergens present a very real threat to immuno-compromised consumers. The information you provide is the only means a consumer can determine the safety of your product.

Packaging must be labelled with an allergen warning where required.

For more information, visit <http://www.allergenbureau.net/>

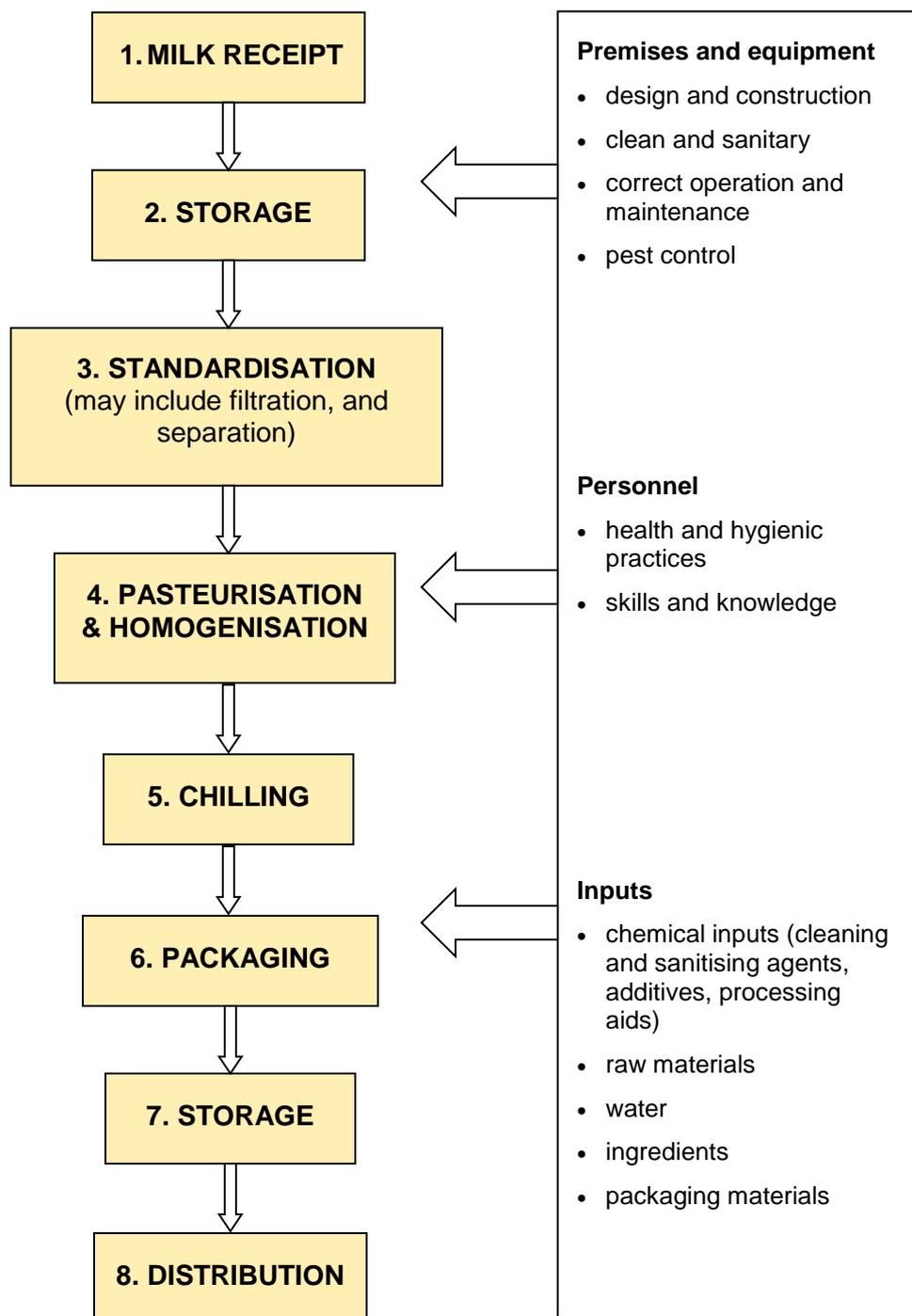
See DFSV Notes 20 and 21 on food allergies.

Process Flow Chart (Steps 4, 5 of Codex HACCP)

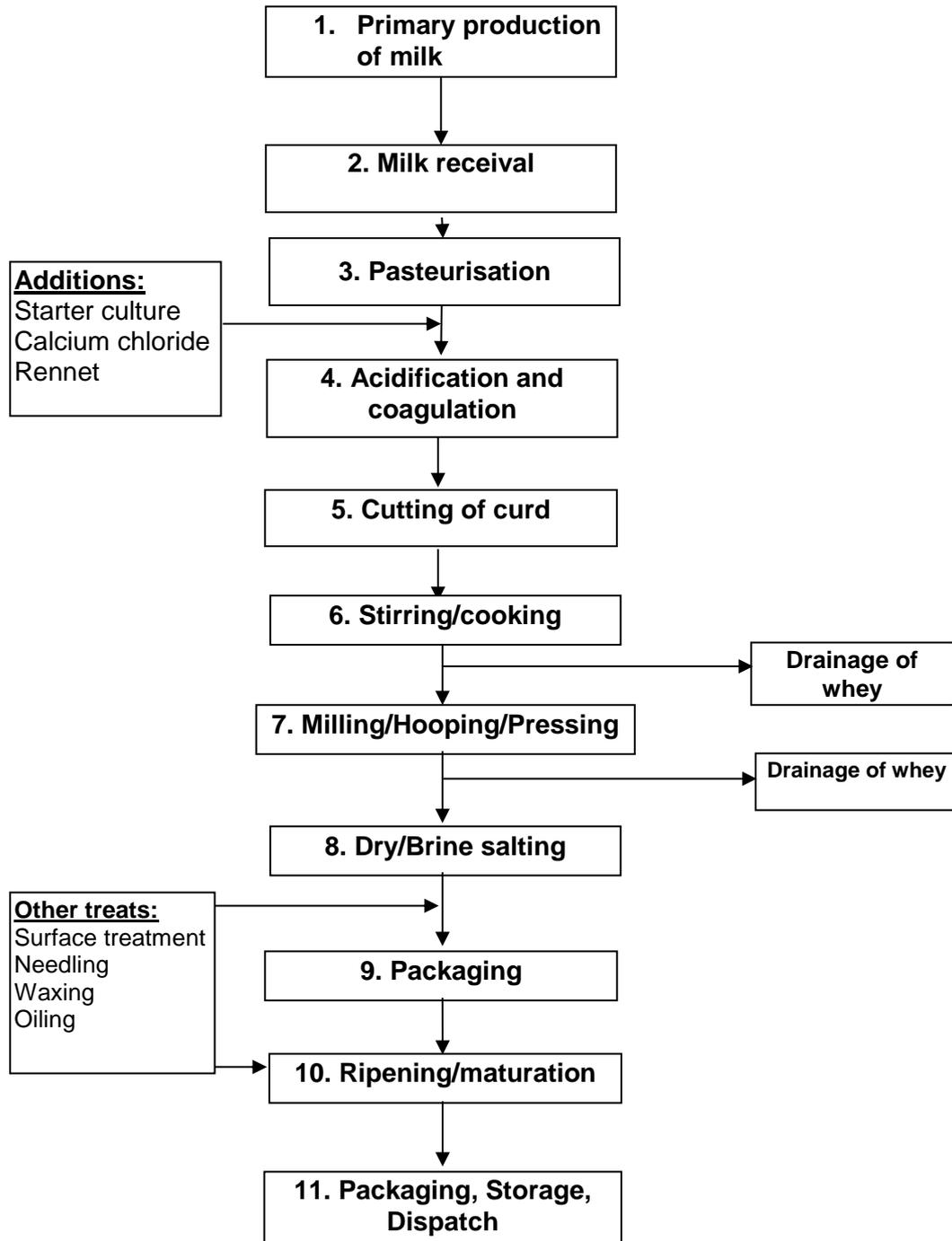
All the major steps in the process (or processes) shall be identified, numbered and documented on a flow diagram. If there are any significant inputs at a particular step, they shall also be identified on the flow diagram. Examples of inputs include water, rework etc.

Once developed, the HACCP Team must verify the accuracy of the Flow Diagram on site and the team leader sign the diagram.

Key steps involved in packaged milk processing



Overview of major steps in the manufacture of cheese



Hazard Identification, Analysis and Control (Step 6, Principle 1 of Codex HACCP)

Hazard analysis is the process of collecting and evaluating information on hazards and conditions leading to their presence in order to decide which are significant for food safety and therefore must be addressed in the HACCP Plan.

The matrix below allows a more consistent approach to determine the significance or otherwise, of any identified food safety hazard (chemical, biological or physical). This then allows the identification of CCP status control measures at a glance ie. For those control measures developed to eliminate, prevent or reduce significant hazards for an acceptable level at least one must be a CCP (even though it may occur at a later step in the process).

Severity (Health Effect)

Likelihood (Relative Risk)

- A. Common occurrence
- B. Known to occur or “it happened at our premises”
- C. Could occur or “I’ve heard of it happening” (published information)
- D. Not likely to occur
- E. Practically impossible

| Consequence (Health Effect) | Likelihood (Risk) | | | | |
|--------------------------------|----------------------|-------------------|----------------|------------------------|--------------------------|
| | A. Common occurrence | B. Known to occur | C. Could occur | D. Not likely to occur | E. ractically impossible |
| 1 Can cause fatality | 1 | 2 | 4 | 7 | 11 |
| 2 Can lead to serious illness | 3 | 5 | 8 | 12 | 16 |
| 3 Can cause a product recall | 6 | 9 | 13 | 17 | 20 |
| 4 Customer complaint | 10 | 14 | 18 | 21 | 23 |
| 5 Not significant | 15 | 19 | 22 | 24 | 25 |

A value of 1-10 (shaded) indicates a significant (Critical) hazard, which signifies that control measure(s) must be put in place. Hazards that are not significant will have values of 11-25 and are generally managed by pre-requisite programs.

It is up to the HACCP team to determine whether it makes good sense to have any control measures in place (ie CP status control measures) to further reduce the risk of the hazard.

By recording the values in the Hazard Analysis worksheets, others, including food safety auditors can then better understand the logic applied by the original HACCP team.

At each step, consider the **5 ‘Ps’**

- Product** (including ingredients and packaging introduced at that step)
- Premises** (the potential hazards from the immediate environment)
- Plant** (the potential hazards introduced by the equipment and services)
- Procedure** (the potential hazards introduced by the methods)
- People** (the potential hazards introduced by the staff themselves)

Determining Critical Control Points (Step 7, Principle 2 of Codex HACCP)

A Critical Control Point (CCP) is a step in the process at which control shall be applied to eliminate a food safety hazard or reduce it to an acceptable level. A CCP is an action taken as part of the process flow, and may not be a control measure as already identified.

The CCP must identify all the process steps where control is necessary to eliminate or reduce a food safety hazard, and shall be applied consistently to all process steps.

HACCP Audit Table

A HACCP Audit Table shall be developed, documented and applied which includes each step of the process(es). It shall list all the CCPs (or QCPs to control quality hazards) identified in the Hazard Analysis, and shall include the following requirements:

Establish Critical Limits (Step 8, Principle 3 of Codex HACCP)

A critical limit is a criterion that separates acceptability from unacceptability. If the critical limit for a CCP is exceeded a hazard may exist.

Monitoring of CCPs (Step 9, Principle 4 of Codex HACCP)

Monitoring is the act of conducting a planned sequence of observations or measurements of control parameters to assess whether a CCP is under control.

Monitoring procedures shall define:

- **who** will undertake the monitoring (this person must be trained);
- **what** will be monitored;
- **where** monitoring will occur; and
- **how** critical limits will be monitored.
- **when**, frequency of the monitoring;

To ensure monitoring is effective and compliant, the following points should be implemented:

- Monitoring procedures should provide real time measurements and not rely on lengthy test methods such as microbiological assessments requiring extended incubation times if the product has to be held pending a result at the CCP.
- Monitoring equipment e.g. thermometers, scales, pH meters, etc. should be selected to record data within an appropriate range and be calibrated to a recognised standard.
- Monitoring records must be kept and all monitoring activities recorded. A supervisor should review and sign the records daily.

CCP Corrective Actions (Step 10, Principle 5) see earlier in the Requirements

Decide and record:

(a) **What specific corrective actions** will be taken to:

- (i) bring the Critical Limit under control;
- (ii) deal with affected product that was produced while the process was out of control;
- (iii) investigate the cause to avoid a repetition of the problem.

(b) **Who** is responsible for carrying out the corrective actions;

(c) What information is to be recorded, where and by whom; and

(d) Who will check that corrective action is carried out properly and where and how this check is to be recorded.

All corrective actions should be documented in the food safety programme.

Verification Activities (Step 11. Principle 6 of Codex HACCP)

Verification procedures are required to ensure that the HACCP System is being followed and is effective. As a minimum, the verification activities that shall be undertaken include: internal audits, HACCP plan review, microbiological and chemical testing (where applicable), shelf life testing (where applicable), finished product assessments (where applicable), and review of monitoring and corrective action records.

Record Keeping (Step 12, Principle 7 of Codex HACCP)

A system of record keeping relevant to the HACCP Plan shall be documented and implemented. All records associated with the HACCP System shall be retained including:

- Monitoring of CCPs (and QCPs);
- Corrective actions taken regarding CCPs (and QCPs);
- Changes to the HACCP system;
- Verification Activities

Records shall be retained for a minimum of 4 years.

Hazards, control, monitoring, corrective action and records set out in a table

| Key step in food operation | Potential hazards (likely to occur at the key step) | Control (for each identified hazard) | Monitoring (of each control) | Corrective action |
|----------------------------|---|--|---|---|
| Pasteurisation | Microbiological (survival of pathogenic microorganisms) | Milk is to be pasteurised to a temperature of at least 72°C for at least 15 seconds. | <p>What Check time/temperature readouts</p> <p>Who Person in charge of shift</p> <p>When Each batch</p> <p>How Comparison of Indicating thermometer and chart recorder. Calibration records</p> <p>Where Records Charts and logs Time/temperature readouts (may be electronic)</p> | <p>Where possible, adjust times/temperatures to meet control specifications.</p> <p>If fault cannot be fixed, stop production.</p> <p>Inadequately pasteurised milk to be discarded if delay exceeds nominated time.</p> <p>Investigate possible cause of problem.</p> <p>Records Record action taken.</p> |

Licence Application Flowchart

