Ministry for Primary Industries
Manatū Ahu Matua

RISK MANAGEMENT PROGRAMME TEMPLATE FOR INSHORE VESSELS - FISH FILLETING

November 2015

Disclaimer

(1) Considerable effort has been made to ensure that the information provided in the Inshore Vessels (Fish Filleting) Risk Management Programme Template is accurate, up to date, and otherwise adequate in all respects. Nevertheless, this Template is approved STRICTLY on the basis that the Crown, Ministry for Primary Industries, its statutory officers, employees, agents, and all other persons involved with the writing, editing, approval or publication of, or any other kind of work in connection with the Template:

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NB: This is a cover page only and is not to be used by the vessel operator as part of their RMP.

Title Page

Section 1: Business Identification	
Business ID: _____ *The operator must select an ID according to MPI Requirements – refer to relevant guidelines:* *http://www.foodsafety.govt.nz/industry/general/animal-products/*	RMP No:_____/_____ _____ The RMP number is a combination of the business identifier and the number of the RMP. In the majority of cases the RMP ID will be 01

Section 2: Operator Name, Business Address and Contact Details to which this RMP Applies	
Legal entity: *(tick one)* [ ] Company [ ] Sole trader [ ] Partnership	Details *(Fill out appropriate line – should correspond with the box you have ticked.)*: Name listed at Companies Office: *or* Name of business owner: *or* Names of Partners:
Trading name *(if different):*	
Fishing Vessel name:	
Fishing Vessel Registration Number:	
Postal address *(for communication):*	Phone No: Fax No: E-mail address: [ ] Tick to consent to get electronic information

Section 3: Responsibility for the RMP	
Name, Position or Designation of Day-to-day Manager of RMP	**Contact Details (if different from above)**

Management Authorities and Responsibilities

The Day-to-day Manager of the RMP (as identified above) has full authority and responsibility for the RMP and associated operations, including responsibility for the following:

- Notifying the Director-General, in writing, without unnecessary delay, of any change to the name or position or designation of the person(s) responsible for the day-to-day management of the programme.
- Notifying the Director-General, in writing, of any emerging, new or exotic biological hazards or new chemical hazards that come to the operator's notice in relation to the programme as soon as practical after discovery.
- Notifying Verification Services, in writing, without unnecessary delay, of the following issues relating to the operation of the programme:
    - Any significant concern about the fitness for intended purpose of animal material or animal product;
    - Where the cumulative effect of minor amendments necessitates the registration of a significant amendment to the programme as provided in section 25 of the Act;
    - Where the risk management programme is no longer considered to be effective;
    - Where the vessel identified as being used by the programme is not or no longer suitable for use;
    - Where anything within the physical boundaries of the programme is used for additional purposes or by other operators and the programme has not adequately considered relevant hazards or other risk factors.

Table of Contents

[✓] I confirm that all of the above documents are attached and are appropriate for my operation.

[✓] I confirm that all facilities and equipment necessary to implement the RMP are available and ready to operate.

[✓] I confirm that I have authorised the RMP, including all attachments.

[✓] I confirm that the RMP has been, or will be, implemented as written.

Signature of Operator or Day-to-day Manager of RMP: _____

Date: **/ /**

Section 5: Central Amendment Register			
Section Number / Procedure	**Details of Change**	**Reason for Change**	**Date Amended**

Section 6: Scope of the RMP

Physical Boundaries

The RMP includes the following areas of the vessel (tick areas included):

[ ] Deck
[ ] Hold
[ ] Processing area
[ ] Chiller
[ ] Freezer
[ ] Other (specify)_____

Animal Materials and Processes

The RMP covers the following animal material (tick the options you wish to include):
[ ] Fin Fish
[ ] Other seafood (EXCEPT bivalve molluscan shellfish)

The RMP covers the following processes or activities (tick the options you wish to include):
[ ] Whole fish storage
[ ] Live storage
[ ] Limited processing (heading, gutting, tailing, fins, etc)
[ ] Fillet processing
[ ] Other processing (specify)_____

Risk Factors

[✓] The risk factors covered by the RMP include:
- Hazards to human health
- Risks associate with wholesomeness
- Risks associated with false or misleading labelling

Section 7: Product Description			
Products (Tick the products your RMP includes)	[ ] Whole Fish / Live Storage	[ ] Limited Processing [1]	[ ] Fillets / Other
Intended Customer	Human consumption (general public) [2]	Human consumption (general public) [2]	Human consumption (general public - NZ Market only) [3]
Intended Use of Product that Leaves RMP	Further processing and / or packing and / or preparation and / or cooking prior to consumption.	Further processing and / or packing and / or preparation and / or cooking prior to consumption.	Further processing and / or packing and / or preparation and / or cooking prior to consumption.
Regulatory Limits	None	None	None
Storage / Temperature Requirements (Tick the requirements your RMP includes)	Product (other than live fish) is chilled or frozen without unnecessary delay by: [ ] Icing [ ] Refrigeration [4]	Product is chilled or frozen without unnecessary delay by: [ ] Icing [ ] Refrigeration [4]	Product is chilled or frozen without unnecessary delay by: [ ] Icing [ ] Refrigeration [4]
Labelling **(HC Spec 32)**	Transportation outers are labelled with: • common and scientific names of the fish • lot identification (or packing date) • storage directions If unpackaged product cannot be labelled as above the required information is included in documentation accompanying the product.	Transportation outers are labelled with: • common and scientific names of the fish • lot identification (or packing date) • storage directions If unpackaged product cannot be labelled as above the required information is included in documentation accompanying the product.	Transportation outers are labelled with: • common and scientific names of the fish • lot identification (or packing date) • storage directions If unpackaged product cannot be labelled as above the required information is included in documentation accompanying the product.

[1] Limited processing refers to processing such as heading and gutting but does not include filleting.
[2] Product is eligible for export provided it is received by a processor operating under a registered RMP and is confirmed as meeting export requirements. Product is not eligible for export directly from the vessel.
[3] Filleted product cannot be exported.
[4] HC Spec 104 (2) requires fish (other than live fish) that is preserved by refrigeration must be reduced in temperature as per the following, prior to release from the primary processor:

- Chilled whole fish -1°C to 1°C
- Chilled fish product -1°C to 4°C
- Frozen fish or fish product ≤ -18°C

Inshore Vessels - Fish Filleting RMP

Date: / /

Section 8: Process Description
(Tick the processes your RMP includes)

Whole Fish / Live Storage	Limited Processing	Filleting	Other
[ ] Receiving	[ ] Receiving	[ ] Receiving	
[ ] Washing	[ ] Storage	[ ] Storage	
[ ] Packing / Placing in Bins	[ ] Processing (head, gut, tail etc)	[ ] Filleting	
[ ] Icing	[ ] Washing	[ ] Washing	
[ ] Storage	[ ] Chilling / Icing	[ ] Chilling / Icing	
[ ] Unloading	[ ] Freezing	[ ] Freezing	
[ ] Other (describe)	[ ] Packing / Placing in Bins	[ ] Packing	
	[ ] Storage	[ ] Storage	
	[ ] Unloading	[ ] Unloading	
	[ ] Other (describe)	[ ] Other (describe)	

Section 9: Process Inputs and Outputs

Inputs to Process (Tick the Inputs your RMP includes)	Outputs from Process (Tick the Outputs your RMP includes)
[ ] Whole fish	[ ] Chilled whole fish
[ ] Ice	[ ] Chilled partly processed fish (headed, gutted etc)
[ ] Water	[ ] Chilled fish fillets
[ ] Packaging	[ ] Frozen whole fish
[ ] Other (describe)	[ ] Frozen partly processed fish (headed, gutted etc)
	[ ] Frozen fish fillets
	[ ] Waste / Offal
	[ ] Other (describe)

Section 10. External Verification

[ ] I have contracted a recognised verifying agency to perform external verification activities

Name and contact details of verifier:

_____

_____

[ ] I have attached a letter from the verifying agency confirming they will verify my RMP*

1. Purpose / Scope

To ensure that all product areas of the vessel, facilities and equipment are designed, constructed, installed and operated in a sanitary manner that minimises contamination of product, packaging, other inputs, equipment, and the processing environment.

2. Procedures

2.1 Landing, Reception and Processing Areas

[✓] The landing area/deck is designed and constructed to:

- facilitate easy drainage
- allow easy cleaning.

[✓] The reception area is designed to:

- minimise the risk of contamination
- allow fish to be processed in order of catch.

[✓] Internal structures of the processing and product areas are designed and constructed to:

- minimise contamination of products;
- assist in cleaning and maintenance;
- resist corrosion;
- minimise pests; and
- minimise environmental contamination.

[✓] Floors that are subject to wet cleaning are constructed of impervious material, are easy to clean and easily drained.

Note: See the Seafood Code of Practice for further guidance on appropriate design and construction standards: http://www.foodsafety.govt.nz/elibrary/industry/code-practice-seafood/index.htm

2.2 Facilities

[✓] Facilities are available and kept in a satisfactory condition for:

- hygienic processing and packing of products;
- storage of chemicals, cleaning agents and other materials;
- personnel hygiene (e.g. accessible hand washing facilities with hand cleanser and clean towels or drying devices, toilets);
- washing protective clothing such as boots, aprons, gloves; and
- effective drainage and disposal of wastes.

[✓] Facility and equipment layout allows for good hygienic practices, access by personnel and effective cleaning.

[✓] Lighting is sufficient for effective operations.

[✓] Any glass, including light fixtures, is of a safety type, or otherwise protected to prevent contamination of the products, materials or packaging.

> Safety glass or covers are necessary only in enclosed processing areas or where lights are sited where they could contaminate the product if broken.

2.3 Equipment

[✓] Equipment that comes into contact with products is:

- designed, constructed, installed and operated in a manner that minimises the contamination of the product; and
- constructed of materials that are fit for purpose, inert, durable easily cleaned and sanitised.

[✓] Suitable cleaning equipment is available (refer to Attachment F).

[✓] Any equipment designed to cool products is operated within its design and capacity, and consistently delivers the required temperature.

2.4 Repairs and Maintenance

[✓] Alterations, repairs and maintenance are done when necessary to ensure that facilities and equipment are in a suitable condition for processing.

[✓] Alterations, repairs and maintenance are done in a manner that minimises the exposure of product or packaging to hazards.

[✓] Once the work is completed the affected areas and surfaces are cleaned with approved chemicals effectively before use.

2.5 Calibration

[✓] Equipment used for critical measurements such as temperature monitoring equipment is calibrated according to manufacturer's instructions.

[✓] Calibration is carried out so that it is traceable to a national or international standard.

> Note: Calibration of temperature probes is usually done once a year. Alternatively some operators decide to buy a new probe each year.

2.6 Compressed air

Compressed air is used in contact with product: [ ] Yes [ ] No

If Yes:

[✓] Compressed air that comes into contact with product is filtered.

[✓] Filters are replaced as required by the manufacturer, and comply with one of the following:

a. the current International Organisation for Standardisation Standard on "Compressed Air for General Use Part 1, Contaminants and Quality Classes": Ref. No. ISO 8573.1, 2010 or

b. any other international standard recognised by the Director-General.

2.7 Water Source and Reticulation

Water used in the processing area is: (tick the sources your RMP includes)

[ ] Clean Seawater

[ ] Desalinated Clean Seawater

[ ] Potable Water taken on-board while in port

[✓] Ice is made from clean seawater, desalinated clean seawater or potable water.

See **Attachment G Water Programme** for further details.

2.8 Monitoring

[✓] The responsible person checks compliance with Part 2 of this attachment at least monthly (see section 4: Document List).

3. Records Kept

[✓] Any alterations, repairs or problems detected;

[✓] Calibration certificates and other Calibration records;

[✓] Any corrective action taken (follow the procedure in Attachment K, Part 2).

Risk Management Programme Attachment B

PEST CONTROL **PAGE:** 1 OF 1 **DATE:** / /

1. Purpose / Scope

To control pests and minimise contamination of products, packaging, other inputs, equipment, and the processing environment. Pests include rodents, birds, insects, dogs and cats.

2. Procedures

2.1 Control of Pests

[✓] Vessel and water storage facilities are designed and constructed in a manner that minimises the entry of pests.
[✓] Food storage and processing areas are kept clean and tidy.
[✓] Processing areas are kept in good repair.
[✓] Waste scraps are appropriately discarded at each port.
[✓] Cats and dogs are not permitted in processing areas of the vessel.

2.2 Pests Control Activities

[✓] Pesticides are approved, handled, used and stored according to chemical control requirements (see Attachment C)

The following pest control activities are used on-board the vessel (tick the options your RMP includes):
[ ] Rodent bait traps/stations
[ ] Electroblitz machine
[ ] Chemical insecticides (i.e. fly spray)
[ ] Other (please specify)
[✓] If there are signs of insect infestation the vessel is sprayed with approved insecticide (when in port).

2.3 Handling and Disposition

[✓] Where there is evidence of contamination by pests, the following actions are carried out:

- Affected products are dumped;
- Affected packaging is either washed and sanitised (where practicable) before use, or is not used for packing any product for human or animal consumption;
- Affected food contact surfaces are cleaned and sanitised before use.

2.4 Monitoring

[✓] The responsible person checks compliance with Part 2 of this attachment at least monthly (see section 4: Document List).

3. Records Kept

[✓] Records of pesticide use;
[✓] Location of bait stations
[✓] Any corrective action taken (follow the procedure in Attachment K, Part 2).

Risk Management Programme Attachment C

CHEMICAL CONTROL **PAGE:** 1 OF 1 **DATE:** / /

1. Purpose / Scope

To ensure that chemicals are approved, handled, stored and used in a manner that minimises the contamination of products, packaging, other inputs, equipment, and the processing environment. Chemicals include maintenance compounds used for cleaning, sanitation, fumigation, pest control, and repair and maintenance of equipment.

2. Procedures

2.1 Purchase and Receipt

[✓] All chemicals (maintenance compounds, cleaning chemicals, pest control chemicals) are approved for intended use. For list of MPI Approved Maintenance compounds see http://www.foodsafety.govt.nz/registers-lists/maintenance-compounds/
[✓] All chemicals are checked on receipt to confirm they are correct as ordered.

2.2 Storage

[✓] Chemicals are stored away from products and ingredients.
[✓] The chemical storage area is kept clean and tidy.
[✓] Chemicals are kept in sealed containers when not in use.
[✓] Chemicals are clearly labelled with the name and manufacturer of the chemical.
[✓] All containers/implements used for measuring or pouring of hazardous chemicals are labelled 'For Chemicals Only'
[✓] The location of the store is identified on the Chemical Register (see Appendix 2).

2.3 Use

[✓] Details of all chemicals used are recorded in the Chemicals Register (see Appendix 2).
[✓] All chemicals are used according to the directions of the manufacturer and the conditions of the approval.
[✓] Directions for use are readily available to the user (e.g. given in the label or product information data sheets).
[✓] Products and exposed packaging are removed from the area or kept protected (e.g. covered) before chemicals are used.
[✓] Equipment and other food contact surfaces are cleaned by thorough washing after exposure to chemicals that are not approved for food contact.

2.4 Handling and Disposition

[✓] Empty chemical containers are not re-used in a way that could contaminate product.
[✓] When contamination by a hazardous chemical occurs, the following actions are carried out:

- affected inputs and products are declared unfit for human or animal consumption,
- affected food contact surfaces are cleaned and sanitised prior to reuse, and
- affected packaging is washed and sanitised (where practicable) before use, or not used for packing product.

2.5 Monitoring

[✓] The responsible person checks compliance with Part 2 of this attachment at least monthly (see Section 4: Document List).

3. Records Kept

[✓] Approved chemicals used on premises (e.g. list, receipts, delivery dockets, invoices)
[✓] Any problems detected and the corrective action taken (follow the procedure in Attachment K, Part 2)

1. Purpose / Scope

To ensure that all personnel are fit to undertake their duties in a hygienic manner to minimise contamination of product.

2. Procedures

2.1 Sickness Policy

[✓] No personnel are permitted to be in a food-handling area if suffering from:

- vomiting or diarrhoea (or has suffered from this) in the previous 24 hours.
- jaundice (yellowing of the skin)
- hepatitis (or suspected hepatitis A)
- scaly, weeping or infected skin unless it can be totally covered during food handling.

[✓] If a food-handler vomits whilst at work or has vomited or had diarrhoea in the previous 24 hours, they are excluded immediately from all food processing areas. The affected area and all contaminated surfaces, including equipment and utensils are cleaned and sanitised (this may also include toilet seats, handles, taps, etc in staff facilities where appropriate). Any food that may have become contaminated is disposed of.
[✓] Any food handler who has had two or more episodes of diarrhoea or any vomiting within a 24 hour period must report this to the skipper.
[✓] The skipper ensures the food-handler is excluded from work until they meet the appropriate clearance criteria.
[✓] A record of all employee illnesses is kept.

2.2 Protective Clothing

[✓] All personnel who enter processing areas wear suitable clean protective clothing and foot wear.
[✓] Outer protective clothing is changed when it is visibly soiled, and at least daily.
[✓] Waterproof protective clothing is scrubbed with cleaner/sanitiser and rinsed at each break in processing and whenever it becomes excessively dirty or contaminated.
[✓] Protective clothing made from cotton or other fabric is laundered after each trip.
[✓] Clean protective clothing is stored in a hygienic manner and kept separate from personal gear.

2.3 Washing of Hands and Arms

All personnel are required to wash their hands:
[✓] before commencing work and after breaks;
[✓] after every toilet visit;
[✓] after handling or coming into contact with dirty equipment or surfaces or waste material;
[✓] after contaminating hands from coughing, sneezing, and blowing the nose; or
[✓] at any time they become soiled.
Hand-washing and drying procedures:

- rinse hands in potable water;
- apply soap or sanitizer and rinse hands;
- rinse off soap or sanitizer;
- dry hands.

[✓] All soaps and sanitisers used for hand washing are:

- approved for their intended use in a seafood processing plant
- appropriately identified by way of labels or other suitable method of identification
- used in accordance with manufacturers' instructions.

2.4 Behaviour

[✓] All personnel behave in a manner that prevents the contamination of product, packaging, equipment and the processing environment. Eating, drinking, smoking or spitting are not allowed inside the processing areas.

2.5 Visitors and Contractors

[✓] Visitors and contractors are required to report to the skipper on arrival.
[✓] If a visitor or contractor is visibly ill the skipper has the right to deny them access to operative processing areas.
[✓] Visitors and contractors who may have contact with the product or product contact equipment are required to wear clean protective clothing and footwear in operative processing areas.
[✓] Product is protected or removed while a contractor is working in processing areas.

2.6 Handling and Disposition

[✓] When contamination occurs, e.g. from human blood or pus, the following actions are carried out:

- affected products are declared unfit for human or animal consumption;
- affected food contact surfaces are cleaned and sanitised prior to reuse; and
- affected packaging materials are not used for packing of products.

2.7 Monitoring

[✓] The responsible person checks compliance with Part 2 of this attachment at least monthly (see Section 4: Document List).

3. Records Kept

[✓] Records showing compliance with Part 2 above (including sickness records and medical certificates).

Risk Management Programme Attachment E

STAFF TRAINING **PAGE:** 1 OF 1 **DATE:** / /

1. Purpose / Scope

To ensure that all personnel have the training and skills to carry out their tasks under the RMP.

2. Procedures

2.1 Induction and Ongoing Training of Personnel

[✓] New workers are informed of their job description, health requirements and hygienic practices and procedures before starting work.
[✓] Ongoing supervision and/or training are provided to ensure that personnel are adequately trained on their specific tasks as provided for in this template.

2.2 Competency Requirements

[✓] The Day-to-day Manager:

- holds a management position;
- know the requirements and procedures in the company's Risk Management Programme; and
- understands the regulations and specifications associated with risk management programmes under the Animal Products Act 1999.

[✓] Persons responsible for monitoring, corrective action and records know requirements and procedures for the programmes they are checking.

At least one person on the vessel has qualification listed in either Option 1 or Option 2 below (tick the option that applies):

[ ] Option 1: Assessed as competent to the following unit standards:

- 5331 Handle seafood product or 15344 Handle bivalve shellfish product
- 5332 Maintain personal hygiene and use hygienic work practice while working with seafood
- 6212 Clean & sanitise a seafood processing plant

[ ] Option 2: Holds a supervisory (or higher management) position and has completed training in the following areas:

- Seafood handling
- Personal hygiene & hygienic work practices
- Cleaning & sanitation

2.3 Monitoring

[✓] The responsible person checks compliance with Part 2 of this attachment at least monthly (see Section 4: Document List).

3. Records Kept

[✓] Records showing compliance with Part 2 above (including sickness records and medical certificates).

[✓] Induction / training records.

1. Purpose / Scope

To ensure the effective cleaning and sanitation of the processing facilities and equipment.

2. Procedures

2.1 Hygiene Checks

[✓] Staff check processing areas and equipment to ensure they are visually clean and ready to operate:

- Before every processing run; and
- After cleaning at any changeovers (see parts 2.3 and 2.4 below) ; and
- After any repairs or maintenance.

2.2 Waste Management

[✓] Process scraps and waste, including wrapping and packaging, are not allowed to contaminate product, equipment or personnel.

[✓] Process scraps and waste are collected in identified or colour-coded containers to prevent cross-contamination and are:

- disposed of at sea; or
- stored until disposal at a shore based facility.

[✓] Waste packaging is not allowed to accumulate in a food area.

[✓] Waste containers are cleaned and sanitised when necessary.

2.3 Cleaning (see Part 2.4)

[✓] The landing deck and hold are kept clear of anything that could contaminate the product.

[✓] The processing facilities are cleaned and sanitised as necessary and at least after every processing run.

[✓] All relevant equipment, containers and product-contact surfaces (e.g. tables, cutting boards, knives, bins, freezer trays) are cleaned and sanitised whenever they become contaminated or come into contact with waste material, and at least at the end of every production run.

[✓] Cleaning equipment is cleaned and sanitised daily.

[✓] All cleaning cloths used on product contact areas are rinsed and sanitised or discarded after each use.

[✓] Cleaning solutions and sanitisers are used in accordance with manufacturer's instructions and conditions of approval.

[✓] After being cleaned and sanitised, product contact surfaces are visually inspected for product residue.

[✓] There is no wet cleaning of equipment where finished product is exposed.

[✓] Hosing is carried out in a way that minimises splashing.

[✓] High pressure hosing is avoided during processing to prevent aerosols from contacting product, product contact surfaces or packaging materials.

[✓] Hose nozzles are kept off the floor at all times to prevent back-siphonage and contamination of staff hands.

[✓] Storage areas are kept clean and tidy and sanitised at the end of each trip.

[✓] Freezers and freezer stores are kept clean and defrosted regularly.

[✓] The amenities (e.g. galley, toilet areas) are cleaned regularly.

2.4 Details of Cleaning and Sanitation Procedures

[✓] Staff complete the following procedures when cleaning and sanitising the processing facilities and equipment:

- Clear all product, equipment and packaging/containers from the area;
- Hose floor, benches and tables to remove visible fish matter;
- Make up cleaning chemicals as per instructions provided by the manufacturer;
- Apply cleaning chemicals to all surfaces and brush or scrub;
- Rinse off all surfaces with cold water;
- Apply sanitiser (if used) as per instructions from manufacturer;
- Leave sanitiser on for required contact time;
- Rinse with cold water (if required by manufacturer's instructions).

Record any other cleaning and sanitation procedures used here:

Area/item to be cleaned	Cleaning method / procedure	Frequency

2.5 Monitoring

[✓] The responsible person checks compliance with Part 2 of this attachment at least monthly (see Section 4: Document List).

3. Records Kept

[✓] Any problems detected, e.g. at pre-operational inspections.
[✓] Any corrective action taken (follow the procedure in Attachment K, Part 2).

1. Purpose / Scope

To ensure that potable water or clean seawater is available for hygienic operations and good manufacturing practices so that resulting products are fit for their intended purpose.

2. Procedures

2.1 Supply

[✓] An adequate supply of water (potable, clean seawater or desalinated clean seawater) is available and used wherever water comes into direct or indirect contact with processing areas, equipment, personnel, materials or products.

2.2 Source

Water used on the vessel is (tick the sources your RMP includes):
[ ] Clean seawater
[ ] Desalinated clean seawater
[ ] Potable water taken on-board while in port e.g. supplied by local council.

If using clean seawater:
[✓] Clean seawater is taken from places that are not affected by any pollution source, e.g. at least 1km from any point of land and where there is no obvious contamination in the water.
[✓] The intake for clean seawater is located away from any waste water discharge points.

If using desalinated seawater:
[✓] desalinated seawater is made from clean seawater as described above.

If using potable water taken on board while in port:
[✓] A written statement is obtained from the council stating that the water supply meets the requirements of the NZ Drinking Water Standards.

2.3 Ice

[✓] Ice that comes into direct or indirect contact with the product is made from clean seawater, desalinated clean seawater or potable water and is stored so as to prevent contamination.

2.4 Water Reticulation

[✓] The reticulation system for all water supplies and for the desalination plant is checked for leaks as part of the weekly maintenance check and during the vessel's annual survey.
[✓] Staff check the smell and colour of the processing water daily and notify the skipper if they notice any unusual colour, smell or sediment.
[✓] The reticulation system is flushed (i.e. taps are opened at point-of-use to allow a significant flow of water to occur) after any repairs to the system, or if water is not used for more than 7 days, to ensure that stagnant water, rust, scale and other material is flushed out of the system.

2.5 Water Sampling and Testing

[✓] Water is tested to confirm potability:

- after significant changes to the water system
- if non-conforming product is traced back to water problems. In such cases a sample of water is taken for microbiological testing on arrival in port.

2.6 Non-complying Water

If the skipper or day-to-day manager has reason to believe that the water is not fit for use then all operations requiring potable water or clean seawater will cease until:
(Tick the options you want to have)
[ ] the water is given additional treatment to make it potable (for fresh water); or
[ ] an alternative source for clean seawater is established; or
[ ] there is evidence that the water supply is now fit for use.

2.7 Handling and Disposition

[✓] If a problem is identified, corrective action is taken and includes some or all of the following:

- holding any affected product until its safety is determined;
- fixing the problem where possible
- taking a sample of water for microbiological testing on arrival in port;
- disposing of any product found to be unfit for human consumption (food safety risk),
- on arrival in port, checking the vessel reticulation system for any possible sources of contamination.

2.8 Monitoring

[✓] The responsible person checks compliance with Part 2 of this attachment at least annually (see Section 4: Document List).

3. Records Kept

[✓] Observations from monitoring.
[✓] Any water testing results.
[✓] Any corrective action taken (follow the procedure in Attachment K, Part 2).

Risk Management Programme Attachment H

PURCHASE HANDLING AND STORAGE OF NON-FISH INGREDIENTS AND PROCESSING AIDS

 DATE: / /

1. Purpose / Scope

To ensure that substances added to products are safe and suitable for use.

2. Procedures

2.1 Purchase and Receipt

[✓] Goods are ordered from suppliers who are trading under appropriate legislation (e.g. Food Act, Animal Products Act).
[✓] Goods are checked on arrival or before use to ensure they are clearly labelled and are fit for purpose.

2.2 Storage

[✓] Goods are stored (e.g. cupboard, room, chiller) away from chemicals. This area is kept tidy and clean.
[✓] Goods are stored at appropriate temperature as per manufacturer's instructions, e.g. room temperature, chiller or freezer.
[✓] Goods are stored off the floor and kept in sealed containers or packs when not in use.
[✓] Goods are clearly labelled with their name and manufacturer.

2.3 Use

[✓] Goods are used before any "use by" or "expiry" dates.
[✓] Goods are used in accordance with manufacturer's instructions and the Food Standards Code requirements.
[✓] Directions for use are readily available to the user (e.g. given in the label or product information data sheets).
[✓] Gases used in contact with food are filtered and the filters maintained and changed as per manufacturer's recommendations. Filter size does not exceed 0.3 micron filter size.

2.4 Monitoring

[✓] The responsible person checks compliance with Part 2 of this attachment at least annually (see Section 4: Document List).

3. Records Kept

[✓] Records of purchase of goods (e.g. receipts, delivery dockets, invoices).
[✓] Any problems detected.
[✓] Any corrective action taken (follow the procedure in Attachment K, Part 2).

1. Purpose / Scope

To ensure that product contact packaging is fit for intended purpose and that product is correctly labelled.

2. Procedures

2.1 Product Contact Packaging

Compliance with regulatory requirements
[✓] Evidence is obtained from packaging suppliers to show that packaging meets the requirements stated in the United States Code of Federal Regulations, Title 21 CFR, Parts 170-199 (21 CFR 170-199).

Receipt
[✓] Packaging is checked on arrival to ensure it is intact, clean, clearly labelled and matches the order.

Storage
[✓] Packaging is stored in a dry area away from all chemicals. This area is kept tidy and clean.
[✓] Packaging is protected from contamination when not in use.

Use
[✓] Packaging is visually clean and undamaged.
[✓] Dirty or damaged packaging is discarded.
[✓] Packaging materials adequately protect the product.
[✓] Packaging materials are adequately cleaned and sanitised between use if they can be reused.

2.2 Labelling

[✓] Unpackaged product transferred from the vessel in an open container has the following information on a tag attached to the container, or in documentation that accompanies the product:

- Common name of species or description
- Storage directions (where necessary)
- Lot identification (this can be the date)
- Scientific name of the species
- The licence number of the vessel

[✓] Packaged product (not for retail sale) is labelled with the following information:

- product name or description – both scientific and common names
- product form or storage instructions
- date of packing (lot identification)
- vessel name and identification number (who processed and packed the product).

[✓] Packaged product for direct retail sale the product is labelled in accordance with the Food Standards Code.

2.3 Status Changes

If the status of a product's suitability for processing or fitness for intended purpose changes:
[✓] any related labelling is amended to reflect the product's new status; or
[✓] the packaging (including labelling) is replaced.

2.4 Monitoring

[✓] The responsible person checks compliance with Part 2 of this attachment at least annually (see Section 4: Document List).

3. Records Kept
[✓] Evidence provided by suppliers under Part 2.1above; [✓] Record of packaging details [✓] Any problems detected [✓] Any corrective action taken (follow the procedure in Attachment K, Part 2).

Risk Management Programme Attachment J

TRACEABILITY / INVENTORY **PAGE:** 1 OF 1 **DATE:** / /

1. Purpose / Scope

To ensure that products are identified sufficiently at receipt, processing, storage and delivery for inventory control purposes, and to allow for traceability in the event of a recall.

2. Procedures

2.1 Inventory Control / Traceability

[✓] Delivery dockets/invoices and labels are checked for accuracy against any goods received.
[✓] Labels are applied where necessary to maintain traceability of products while in storage or use.
[✓] Sales to seafood processors are receipted / invoiced and show the date, the product and the quantity.

2.2 Monitoring

[✓] The responsible person checks compliance with Part 2 of this attachment at least annually (see Section 4: Document List).

3. Records Kept

[✓] Records showing goods received, e.g. delivery dockets, invoices, diary.
[✓] Any problems.
[✓] Any corrective action taken (follow the procedure in Attachment K, Part 2).

1. Purpose / Scope

To ensure that if problems occur, they are managed appropriately.

2. Procedures

2.1 Normal Corrective Action

Problems are normally identified by persons as they carry out, monitor, or verify the effectiveness of the tasks documented in the RMP.

[✓] Problems detected through the "normal" operation of the RMP are addressed by a suitably skilled person who:

- assesses the problem;
- restores control;
- identifies and retains any suspect product and determines the product disposition appropriate to the nature of the problem and the intended use of the product (e.g. reject, send to pet food or rendering, or release as is);
- takes action to stop the problem from recurring; and
- records the corrective actions (including restoration of control, product disposition and prevention of recurrence).

2.2 Corrective Action for Unforeseen Circumstances

The RMP cannot be written to cover unusual events. If such an event happens, appropriate corrective action must be determined on a case-by-case basis and taken.

[✓] When problems due to unforeseen circumstances are detected, the day-to-day manager of the RMP nominates a suitably skilled person to carry out the "normal" corrective actions (see above) and to be responsible for:

a. doing an in depth assessment of the suspect product (by reviewing relevant processing records, inspecting the product, advice from experts etc);

b. organising product disposition as appropriate to the nature of the problem and the intended use of the product (e.g. reject, release under restricted conditions, re-grade for alternative use where permitted under the RMP); and

c. report the following to the verifier:

- a description of the problem and the affected product;
- a summary of the assessment made; and
- the decision on the disposition of the product; and
- any actions taken to prevent recurrence of the non-compliance.

3. Records Kept

[✓] Any corrective action taken (follow the procedure in Part 2 above).
[✓] Any reports given to the accredited verifier.

Risk Management Programme Attachment L

RECALL PROCEDURE **PAGE:** 1 OF 1 **DATE:** / /

1. Purpose / Scope

To ensure that every attempt is made to trace and get back any product that has been released and later found to be not 'fit for intended purpose'.

2. Procedures

[✓] The operator or the day-to-day manager will initiate a recall if they believe that products have been released that are not fit for intended purpose.
[✓] The day-to-day manager is responsible for the recall and will:

- identify affected product (based on processing dates and times);
- put any affected product that is still at the premises on hold and separate it from other product;
- notify the recognised RMP verifier and the MPI of the recall, the reasons for it, the products that are affected and the actions being taken;
- coordinate all recall communications;
- record all communications including the date, time, contact person, discussion, agreed actions, due dates;
- make all reasonable attempts to contact purchasers of affected product e.g. phone known customers, if necessary, place a newspaper and/or radio advertisement in accordance with MPI guidelines advising of the recall;
- hold recovered product in a clearly labelled area to prevent release;
- decide what to do with any affected product;

A final decision will depend on the nature of the problem and any product inspection or test results. Options include dumping (especially if the history of temperature control is not known), further processing, or re-grading (e.g. to pet food) as appropriate. Contact the MPI or the recognised verifier for advice.

- investigate the cause of the problem and take appropriate corrective action;
- review and improve the recall procedures based on the experience gained;
- report as soon as possible on all of the above to the MPI and the recognised verifier.

3. Records Kept

[✓] Load-out dockets or invoices for wholesale goods.
[✓] Diary detailing all communication about the recall and copies of all written correspondence.
[✓] Details of any product recovered and its disposition.
[✓] Recall review notes.

Risk Management Programme Attachment M

OPERATOR VERIFICATION AND EXTERNAL VERIFICATION

 DATE: / /

1. Purpose / Scope

To ensure that the RMP continues to be effective and to notify the required parties when problems arise.

2. Procedures

2.1 Operator Verification

[✓] The day-to-day manager of the RMP will verify that the RMP is effective by ensuring that the following checks are done.

Activity	Details	Frequency
Record checks	Collect all records and check they are correctly filled out and that all results are acceptable or that appropriate corrective action has been taken.	When completed.
Staff supervision	Ensure that staff are following correct practices and procedures.	As required.
Review of RMP	Read through RMP and amend it where necessary. If amendments are significant get them evaluated and registered.	At least annually. When processes or products change. When RMP is not working.

2.2 Notification

[✓] The day-to-day manager of the RMP will send an email to MPI or a letter to the Manager Appointments & Approvals, MPI, PO Box2526, Wellington or approvals@mpi.govt.nz notifying of any:

- change to the name or position or designation of the day-to-day manager of the RMP, or
- any emerging, new or exotic biological hazards or new chemical hazards that have been discovered.

[✓] The day-to-day manager of the RMP will send an email or letter to the recognised RMP verifying agency without unnecessary delay on discovering:

- significant concerns about the fitness for intended purpose of the product
- that the cumulative effect of minor amendments necessitates the registration of a significant amendment to the RMP
- that the RMP is no longer effective.

3. Records Kept

[✓] Any information or evidence relating to operator verification activities.
[✓] Copies of any emails or letters sent to MPI or the recognised RMP verifying agency.
[✓] Any problems.
[✓] Any corrective action taken (follow the procedure in Attachment K, Part 2).

External Verification

Verifier's Freedom and Access to carry out Verification Functions (RMP Specifications 2003, clause 15)

I authorise my contracted verifier to have the freedom and access necessary to allow him/her to carry out verification functions and activities, including allowing —

a. such freedom to access vessels, places, or facilities covered by a risk management programme as is necessary to enable a recognised risk management programme verifier to carry out his or her functions and activities; and

b. such access to documents, records and information that relate to, a risk management programme as is necessary to enable a recognised risk management programme verifier to carry out his or her functions and activities; and

c. such access to things (including containers, packages) that are used in connection with producing and processing animal material and animal products under a risk management programme as is necessary to enable a recognised risk management programme verifier to carry out his or her functions and activities; and

d. such access to animal material, animal product, equipment, packages, containers and other associated things used in processing animal material and animal products under a risk management programme as is necessary to enable a recognised risk management programme verifier to carry out his or her functions and activities (including identifying and marking any of those things); and

e. such freedom examine and take samples (for the purpose of analysis or retention) of any animal material, animal product or any other outputs, substance, or associated things which has been, is or may be in contact with, or in the vicinity of animal material or animal product being produced or processed under a risk management programme as is necessary to enable a recognised risk management programme verifier to carry out his or her functions and activities.

Signature of Operator or Day-to-day Manager of RMP: _____

Date: / /

Risk Management Programme Attachment N

DOCUMENT CONTROL AND RECORD KEEPING **PAGE:** 1 OF 1 **DATE:** / /

1. Purpose / Scope

To ensure that all RMP documents are managed under a document control system so they are up-to-date, authorised and where necessary registered with MPI, and that obsolete documents are removed from use.

2. Procedures

2.1 Document Control

[✓] RMP documents are:

- numbered and dated at time of issue
- authorised before use by the operator, or day-to-day manager of the RMP
- authorised by signing the document list and initialling all attachments
- available to any person with responsibilities under the programme

[✓] If amendments are minor the changes are hand-written onto the relevant RMP pages and implemented as soon as they are authorised.
[✓] Amended pages are given a new date then initialled on the bottom by the authoriser. The relevant dates on the document list are updated and the authoriser signs the new list.
[✓] If amendments are significant the operator registers these amendments to the RMP before implementing the changes.
[✓] All copies of the RMP are updated immediately after authorisation (and if necessary, registration).
[✓] Old pages are removed, crossed diagonally to show they are obsolete and filed.
[✓] All RMP documents, including a copy of obsolete documents are kept for at least four years.
[✓] All RMP documents, all reference material, and any archived documents are readily accessible, or can be retrieved and made available to required persons within two working days of any request.

2.2 Monitoring

[✓] The responsible person will check compliance with Part 2 of this attachment at least monthly (see Section 4: Document List).

3. Records Kept

[✓] Obsolete documents and document lists are filed.

Risk Management Programme Attachment O

RECORD CONTROL **PAGE:** 1 OF 1 **DATE:** / /

1. Purpose / Scope

To ensure that records are kept to demonstrate compliance with the RMP. This includes monitoring, corrective action and operator verification records for all controls.

2. Procedures

2.1 Record Control

[✓] All records identified in the RMP are completed as required in a legible manner.
[✓] All RMP records are stored for at least 4 years.
[✓] Any electronic records are backed-up at least monthly and the back-up is held off site.
[✓] The following information is recorded on monitoring, corrective action and operator verification records —

- the date and time (where appropriate) of the activity
- a description of the results of the activity
- the signature or initials of the person(s) who performed the activity, or in the case of electronic records, the name of the person entering the data unless access to the record is password protected.

[✓] All RMP records can be made available within 2 working days of any request.

2.2 Monitoring

[✓] The responsible person will check compliance with Part 2 of this attachment at least monthly (see Section 4: Document List

3. Records Kept

[✓] All those records identified throughout the RMP.

1. Purpose / Scope

To ensure the effective implementation of good operating practice including appropriate process control measures at each process step identified in section 8 of the RMP.

2. Procedures

2.1 Reception

[✓] On reception checks are made to ensure that the fish:

- free of contamination with foreign matter unless the contamination can be completely removed during processing;
- is not contaminated with chemicals (eg fuel, oil, cleaning compounds, filth);
- does not have a strong odour or other indication of significant spoilage.

[✓] Fish that do not meet the above requirements are rejected as waste.

2.2 Store /Release to Processing

Fish are reduced in temperature as soon as possible after capture by using (tick the options your RMP includes):
[ ] Ice or ice slurries;
[ ] Refrigeration such as chillers or freezers.

The following checks are carried out to confirm that the fish is being reduced in temperature:

[ ] Ice/Ice Slurry (tick box if using ice or ice slurry)
[✓] Sufficient ice is used to ensure the product is reduced in temperature as quickly as possible.
[✓] Fish is maintained at -1 to +4°C.
[✓] The temperature of the fish is checked once per day and recorded.

[ ] Chillers (tick box if using chillers)
[✓] The temperature of the chiller is checked once per day and recorded.
[✓] Chillers are operating at -1 to +4°C.

[ ] Freezers (tick box if using freezers)
[✓] The freezer temperature is checked once per day and recorded.
[✓] Freezers are operating at colder than -18°C.

[✓] From the time of catching the fish are handled, held and stored to minimise deterioration and are protected from contamination.
[✓] Bins containing edible product do not come into direct contact with the floor.
[✓] Containers are not stacked on top of each other if the bottom of one container is able to touch product in the container below.

2.3 Hygienic Processing Techniques

[✓] Fish are processed without unnecessary delay.
[✓] Gutting processes minimise contamination of the fish
[✓] After gutting, fish are washed with clean seawater or potable water.
[✓] Filleting processes minimise contamination of the fillets.
[✓] Processed product is chilled or frozen without unnecessary delay.
[✓] Fish not required for processing are chilled or frozen without unnecessary delay.

2.4 Product Movement

[✓] Any fish products that are moved through non-product areas are contained and covered.

2.5 Dropped Product

[✓] Fish fillets are discarded if they are dropped on the floor in the processing area.
[✓] Whole or partly processed product (with skin on) is washed and returned to processing area.
[✓] Workers wash their hands after picking up dropped product.

2.6 Loadout / Delivery

[✓] Before any product is loaded onto the delivery vehicle, loaders check that the vehicle is clean and does not contain materials that may contaminate product.

Before load out checks are made to ensure that:
[✓] All products are in good condition; and (tick boxes below if relevant)
[ ] Temperature of fish chilled by mechanical refrigeration is between -1°C and +1°C for whole fish and between -1°C and +4°C for processed fish;
[ ] Temperature of frozen fish is -18°C or colder.

2.7 Monitoring

[✓] The responsible person checks compliance with Part 2 of this attachment (see Section 4: Document List).

3. Records Kept

[✓] Monitoring of control measures and corrective actions.
[✓] Any problems detected.
[✓] Any other corrective action taken (follow the procedure in Attachment K, Part 2).

Risk Management Programme Attachment Q

1. Purpose / Scope

To identify the hazards that are reasonably likely to occur at each process step including all inputs.

To ensure that appropriate controls are included in the RMP so that the products are fit for intended purpose.

2. Good Operating Practice

[✓] The operator is following Good Operating Practices as outlined in the attachments listed in the Table of Contents, page 3.

3. Identification of Hazards and CCP Determination

Table 1: Hazard Identification from Inputs

Input	Description or Specification	Biological (B)	Chemical (C)	Physical (P)
Raw material - Fish (various species) and Squid	No signs of deterioration	Bacterial pathogens associated with contamination after catching[1] (e.g. Listeria monocytogenes, Salmonella spp) Pathogenic parasites (e.g. Anasakis[2]) in susceptible species.	Histamine in scombroid species[3] (eg, Jack Mackerel, Kahawai, Tuna, species) Chemical contamination from catching vessel (e.g. fuel, hydraulic fluid)	None
Sea Water	Clean sea water	None	None	None
Potable Water	Potable Water	None	None	None
Ice	Made from clean sea water or potable water	None	None	None
Packaging Materials & Containers	Suitable for use as a food contact material	None	None	None
Other Additives and Ingredients	Suitable for use in food	None	None	None

1. Fish may be contaminated after catching through the use of unclean equipment and containers, and through exposure to environmental contaminants such as dust, dirt, and bird droppings.

2. Anisakid nematodes are known to occur in New Zealand fish such as barracouta and jack mackerel, and there has been at least one reported case of illness in New Zealand due to this parasite (Fletcher, 1996).

3. Scombroid poisoning is internationally considered to be the most common intoxication arising from eating fish. Histamine is the toxin responsible for this type of poisoning. When fish are improperly handled and temperature abused certain types of bacteria breakdown histidine in fish tissue to histamine. Elevated levels of histamine only occur in fish which contains naturally high levels of free histidine, such as members of the Scombroid family, e.g. tuna and mackerel.

Most New Zealand incidents of scombroid poisoning are due to the consumption of smoked fish. Although there have been several reported cases of scombroid fish poisoning in New Zealand, it does not appear to be a major problem for New Zealand seafood (Fletcher, 1996).

Table 2: Hazard Analysis and CCP Determination

Process Step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and answer Q2.	Q2. Is this step a CCP?
Receive fish on-board	Whole fish	B – Bacterial pathogens	Possible contamination after catching	Yes, GOP – checking for visible contamination	No
		B – Pathogenic parasites in certain species	Possible in susceptible species	No	No
		C – Histamine in scombroid fish	Possible in susceptible species	Yes – GOP checking for visible deterioration. Also temperature control at subsequent steps	No
		C – Chemical contamination	Possible contamination during catching	Yes, GOP – checking for visible contamination	No
Store	Whole fish	B – Pathogenic parasites in certain species	Hazard carried from previous step	No	No
		C – Histamine in scombroid fish	Hazard carried from previous step	Yes, GOP - to reduce temperature to prevent histamine forming at unacceptable levels.	No
Process (optional)	Whole, partly processed or filleted fish	B – Pathogenic parasites in certain species	Hazard carried from previous step	Yes – for filleted product, visible parasites removed during gutting and filleting.	No
		B – bacterial pathogens introduced by product handlers	Personnel have potential to cause cross contamination	Yes, GOP – temperature control will minimize growth of microorganisms, and hygienic handling will minimize contamination	No
Wash (optional)	Whole, partly processed or filleted fish	B – bacterial pathogens introduced by product handlers or unclean water	Personnel have potential to cause cross contamination	Yes, GOP – temperature control will minimize growth of microorganisms, and hygienic handling with minimize contamination	No

Process Step	Inputs	Hazard reasonably likely to occur on or in the product at this step	Justification	Q1. Is there a control measure(s) for the hazard at this step? If yes, identify the control measure and answer Q2.	Q2. Is this step a CCP?
Chill / Ice	Chilled whole, partly processed or filleted fish	B – bacterial pathogens introduced by product handlers or unclean ice	Personnel have potential to cause cross contamination	Yes, GOP – temperature control will minimize growth of microorganisms, and hygienic handling with minimize contamination	No
Freeze (optional)	Frozen whole, partly processed or filleted fish	B – bacterial pathogens introduced by product handlers	Personnel have potential to cause cross contamination	Yes, GOP – temperature control will minimize growth of microorganisms, and hygienic handling with minimize contamination	No
Pack/Place in Containers	Chilled or frozen whole, partly processed or filleted fish	B – bacterial pathogens introduced by product handlers or unclean packaging/containers	Personnel have potential to cause cross contamination	Yes, GOP – temperature control will minimize growth of microorganisms, and hygienic handling with minimize contamination	No
Store	Chilled or frozen whole, partly processed or filleted fish	B –bacterial growth if temperature control not maintained sufficiently		Yes, GOP – temperature control will minimize growth of microorganisms	
Unload	Chilled or frozen whole, partly processed or filleted fish	B –bacterial growth if temperature control not maintained sufficiently		Yes, GOP – temperature control will minimize growth of microorganisms	

The hazard analysis and CCP determination did not identify a CCP for these processes.

Pathogenic parasites may still be present in whole, unfrozen fish, posing a risk of foodborne illness to consumers who eat fish in a raw state. This hazard remains uncontrolled in chilled whole fish and operators must record it as an uncontrolled hazard.

Risk Management Programme Attachment R

OTHER RISK FACTORS IDENTIFICATION AND CONTROL

 DATE: / /

1. Purpose / Scope

To identify the risk factors other than hazards and ensure that appropriate controls are included in the RMP so that the products are fit for intended purpose. These risk factors are: risks from false or misleading labelling, and risks to wholesomeness.

2. Risks to Wholesomeness

Risk Factor	Source or Cause of Risk Factor	Control Measures
Spoilage	Micro growth due to improper time/temperature control	GOP – time/temperature control Refer to Attachment P
Non-pathogenic parasites	Can be found in certain fish species	GOP – correct gutting techniques, visual checks during processing Refer to Attachment P
Bones in fillets, scales in scaled fish	Poor filleting and scaling	GOP – training of staff on correct techniques Refer to Attachment P
Other foreign objects that are not hazards (e.g. hair, plasters)	Contaminants from personnel	GOP – personnel hygienic practices Refer to Attachment D

3. Risks from False or Misleading Labelling

Risk Factor	Source or Cause of Risk Factor	Control Measures
Incorrect details on label or transportation outers, e.g. • Type of product • Product description • Lot Id • Storage directions	Incorrect label design	Labels designed according to Attachment I
	Product put in wrong carton or pack	Product packed according to Attachment I

Risk Management Programme Appendix 1

MONITORING AND RECORDING OPTIONS **PAGE:** 1 OF 4 **DATE:** / /

There are two main parts to your Risk Management Programme (RMP) documentation:

1. The Risk Management Programme

2. Records that you need to keep

The RMP details your processes and procedures for producing food that is fit for its intended purpose. The records show that you are undertaking the checks you have said you will in your RMP. The way in which you record your checks is up to you – see Recording Options below.

Recording Options

You can use any recording device that works for your operation, for example –

- Logbook
- Diary
- Recording forms that you develop for yourself.

Whatever you choose, you must be able to provide documented 'evidence' that you are following your RMP and have this evidence available to the recognised verifier when they carry out their verification visits.

Most of the RMP attachments include contains a Monitoring section (checks required) and a Records to be Kept section.

Recording Option 1

Add to a document you already use on your vessel, such as your Safe Ship Management Plan log book:

- a description of the RMP monitoring checks required; and
- recorded evidence that the checks have been made (Records to be Kept)

For example, if you use a vessel logbook for completing forms to record daily, weekly, monthly, yearly and other checks required under your Safe Ship Management system, then all you need to do is add the RMP monitoring checks and records to this log book.

Option 2

A second option involves using a diary to record monitoring checks. Under this option, you could refer to the checklist in Table 1 below to identify RMP monitoring checks required for each Attachment and use a diary to keep records of the checks you have made and any corrective action taken.

Table 1: Example of Monitoring and Recording checklist

Document	Section	Monitoring Frequency	Examples of Monitoring Records	Other Records that might be kept as evidence
General RMP Sections	-	-		
Title page, Business ID, Operator, Day-to-day manager	1-3	No monitoring required		
Table of contents: RMP document & amendment register	4,5	No monitoring required		
Scope of RMP	6	No monitoring required		
Product description	7	No monitoring required		
Process description	8	No monitoring required		
Process inputs and outputs	9	No monitoring required		
External Verification	10	No monitoring required		
Supporting systems		-		
Design, Construction and Maintenance of facilities & equipment	A	Monthly checks to confirm compliance	Record check completed, any problems found, corrective action taken, in diary on the last trip of the month	Calibration Certificates
Pest control	B	Monthly checks to confirm compliance	Record check completed, any problems found, corrective action taken, in diary on the last trip of the month	Pesticides (chemicals) recorded in Chemical Register, Record location of bait stations
Control of chemicals	C	Monthly checks to confirm compliance	Record check completed, any problems found, corrective action taken, in diary on the last trip of the month	Chemical Register[1]
Personnel health and hygiene	D	Monthly checks to confirm compliance	Record check completed, any problems found, corrective action taken, in diary on the last trip of the month	Medical Certificates
Staff training	E	Monthly checks to confirm compliance	Record check completed, any problems found, corrective action taken, in diary on the last trip of the month	Induction / Training Record
Cleaning and sanitation	F	Daily check to confirm compliance at pre-op. Monthly check to confirm compliance	Record check completed, any problems found, corrective action taken, in diary each day before beginning processing Record check completed, any problems found, corrective action taken ,in diary on the last trip of the month	

[1] See Appendix 2

Supporting systems	Section	Monitoring Frequency	Examples of Monitoring Records	Other Records that might be kept as evidence
Water Programme	G	Daily check of water smell & colour. Weekly checks to confirm compliance	Record check completed, any problems found, corrective action taken, in diary each day before beginning processing. Record check completed, any problems found, corrective action taken ,in diary on the last trip of the week	Council Supply letters (if taking potable water on board in port)
Purchase, handling and storage of non-fish ingredients and processing aids	H	Annual check to confirm compliance	Record check completed, any problems found, corrective action taken, in diary on the last trip of December	Processing aids, additives register[1]
Packaging and Labelling	I	Annual check to confirm compliance	Record check completed, any problems found, corrective action taken, in diary on the last trip of December	Supplier guarantees Packaging register[1]
Traceability / Inventory	J	Annual check to confirm compliance	Record check completed, any problems found, corrective action taken, in diary on the last trip of December	
Corrective action	K	No actual monitoring – records are generated part of on-going checks		
Recall procedure	L	No actual monitoring – records unless a recall is carried out	As necessary	Load-out dockets, Sales dockets, Product details, Recall review
Operator verification and external verification	M	Monthly check to confirm compliance Annual check to confirm compliance	Record check completed, any problems found, corrective action taken, in diary on the last trip of the month Record check completed, any problems found, corrective action taken, in diary on the last trip of December	
Document control and record keeping	N	Monthly checks to confirm compliance	Record check completed, any problems found, corrective action taken, in diary on the last trip of the month	
Record control	O	Monthly checks to confirm compliance	Record check completed, any problems found, corrective action taken, in diary on the last trip of the month	

Process control	Section	Monitoring Frequency	Examples of Monitoring Records	Other Records that might be kept as evidence
Process control	P	Daily checks to confirm compliance	Record check completed, any problems found, corrective action taken, in diary on the last trip of the month	
HACCP Application	**-**	**-**		
Hazard Identification and control	Q	No additional monitoring required		
Other risk factor identification and control	R	No additional monitoring required		

Risk Management Programme Appendix 2

1. Attachment C: Control of Chemicals

Use this table to record relevant details, including where the chemicals are stored and used.

Location of Chemical Store: _____

Chemical Trade Name	Manufacturer	Area Used	Purpose	Approval Code

2. Attachment H: Purchase, Handling and Storage of Non-fish Ingredients and Processing Aids

Use this table to record any processing aids, additives or ingredients. If none are used, write N/A.

Name of processing aid, additive or ingredient	Type (processing aid, additive, ingredient)	Approval or Required Criteria	Products for which additives etc used

3. Attachment I: Packaging and Labelling

Use this table to record details of packaging supply and storage.

Type of Packaging	Supplier Guarantee Received	Designated Storage Area on Vessel