New Zealand Food Safety
Ministry for Primary Industries
Manatū Ahu Matua

Food Safety Good Governance Guide for Directors

Te Kāwanatanga o Aotearoa
New Zealand Government

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Executive summary

Food safety is a critical issue for New Zealand's food producers, manufacturers, and marketers. Consumers expect that our food is safe and suitable. Our local and international reputations depend on our food meeting each country's food safety and suitability requirements. If businesses don't manage food safety risks, they can harm consumers and their families, which causes lost revenue, reputation, and consumer trust for companies. New Zealand has an enviable reputation and track record, which features which must be protected and enhanced.

Food safety is a company-wide, end-to-end business responsibility involving everyone. With the food sector's business environment constantly changing, it is vital for food businesses to continually build and develop good food safety and suitability within its capability. Effective leadership is key to a successful business, ensuring good food safety culture is at the core of its operation. Boards of directors hold a duty of care to the businesses they oversee, to ensure that food is safe and suitable for consumers here and overseas.

Risk is one of the primary matters that boards of directors must address, which includes food safety risk. The Good Governance Guide helps directors and boards understand their food safety role and responsibility, and how to improve food safety capability, capacity, and culture within their organisation.

The Guide is structured in two parts: Part One: Food Safety – The Board's Role and **Part Two: A Director's Briefcase**.

Part One sets out the case for food safety governance, the legislative requirements, and the leadership role that boards of directors must play in the governance of food safety. At the core of the Guide is a food safety governance model to help boards in their food safety activities.

In this model, the board has two principal roles:

- creating the right environment in which food safety can operate successfully; and
- holding management to account for implementation of the food safety system.

These roles are expanded in a four-step food safety governance model:

Step 1: Commit to food safety governance *– sets the for food safety governance in the food business.*

Step 2: Lead food safety culture *– is about creating a supportive environment, one in which food safety can become part of the company DNA.*

Step 3: Assure food safety risk is identified, assessed, and effectively managed *– covers the practical steps required to assure that risk is being assessed and mitigation or management measures are developed and applied to reduce risk.*

Step 4: Monitor system design and company performance *– ensures that the system design is fit for purpose and that the food safety system is responsive to the information and data generated from the risk management activities.*

Part Two: A Director's Briefcase expands on Part One with support tools and information to assist with developing your food safety governance capability. It includes A Director's checklist which offers a practical tool to help measure and incorporate food safety in every part of your business. It also sets out the legal environment, key roles in food safety regulation, what comprises a food safety system, examples of food safety performance measures, and an introduction to food safety risk.

While largely written for directors and boards, senior managers and business owners in the wider food industry may also find the content useful.

Ko tāu rourou, ko tāku rourou, ka ora ai te iwi.

By sharing your food basket with my food basket, the people will thrive.

Part One: Food Safety – the board's role

What does an effective food business board look like?

An effective board structure meets the planning and oversight requirements of its business. The board is responsible for leading a company, setting its values, standards, aims and objectives.
The board is composed of the chair, executive and non-executive directors. The Institute of Directors offers details for a successful board structure.[1]
For food businesses, board members should have a variety of skills and experience including food production and safety. In addition, they must understand their responsibilities under the relevant legislation and embrace them.

1 (Institute of Directors, Kāhore he rā)

Food safety: the issues and the risks

Why is food safety an issue today?

Food safety is a critical issue, similar to workplace health and safety, but affects each of your customers and your brand. Assuring food safety has always been challenging but is becoming more complex. Complexities in new consumer-ready products include longer supply chains, new technologies, diverse ingredients or suppliers, and more players in food development and production. In addition, the increased scrutiny in social media and potentially malicious behaviour show how important food safety is to society.

Food safety incidents can quickly harm consumers and damage company reputations, and restoring reputation and trust in the marketplace is a lengthy and costly task. The immediacy of media and social media mean that a local incident can become national or global news overnight.

Food safety, once the domain of technical and production functions, has become a company-wide, end-to-end business responsibility and consequently must become part of the board's work programme.

Positives arising from excellence in food safety

While the headlines may focus on a few high-profile food safety events, the New Zealand food industry has a sound history of producing and marketing safe and suitable foods. Safe food and our known food safety systems are part of the New Zealand story: we have a competitive advantage, and this brings many opportunities for international trade. Our system also enables New Zealand to work cooperatively with its many customers and efficiently resolve any issues that arise.

What do we mean by safe food?

To understand safe food, we must recognise what is unsafe food. Unsafe food takes many forms but is generally food containing a biological, chemical, physical hazard or undeclared/incorrectly allergen which could lead to an adverse health effect.

Changes in our food supply and lifestyle have led to a broader range of causes for, and consequences of, unsafe food.

Biological hazards include microbiological contamination such as pathogenic bacteria (for example, Salmonella), fungi or naturally occurring toxins (for example, tutin or marine biotoxins) and parasites.

Chemical hazards include naturally occurring food allergens (for example, peanut, milk), chemical contaminants and undeclared food additives or introduced contaminants such as agricultural residues.

Physical hazards include foreign matter such as glass or metal.

Allergens can cause harm when due to the presence of undeclared allergens or the presence of allergens being incorrectly declared on the product (incorrect allergen labelling), and incorrect allergen-related claims being made on food.

For an unsafe food to cause illness or an adverse health effect there must be exposure to the hazard, through consumption of the food, sufficient to cause an adverse effect. Conversely, where the hazard is present at non-significant levels and/or the food consumption is low, adverse effects are less likely.

Risk: the probability and consequence of an adverse effect occurring. The combination of both the hazard and the level and type of exposure to the hazard is necessary for risk. Without exposure, a hazard remains a hazard. For example, in summer, midday sun is a hazard, but if you stay inside and there is no exposure, it is not a risk.

Food safety: a risk that can bring lasting harm to consumers and families

Foodborne illness or adverse health effects can cause lasting harm to individuals and their families. Many local and international incidents of foodborne illness resulted in serious harm, and in some cases, leading to fatalities.

All over the world, instances of contaminated foods have caused hospitalisations and even deaths among healthy and vulnerable populations.[2]
New Zealand companies and members of the New Zealand public have been affected by foodborne diseases and illnesses. Many children who are hospitalised after food safety incidents face longer term or ongoing medical care.

In addition to risks associated with chemical or microbiological hazards, foodborne illness, foodborne incidents associated with undeclared or accidental allergens in food products can also have serious consequences. Allergen incidents can cause serious adverse health effects in sensitive consumers and have resulted in several deaths in Australia and New Zealand over the last decade.[3]

Example: Hepatitis A

The rate of Hepatitis A in New Zealand has been steadily declining, but the disease is still of note and concern to national health, and some outbreaks have been traced back to imported food.[4] Many companies selling uncooked imported frozen berries risk selling product contaminated with Hepatitis A. Since New Zealand companies import berries from multiple growers and countries with different handling and processing methods, traceability is essential for managing risk.

Between 28 June 2022 and 3 July 2023, New Zealand reported a total of 39 locally acquired clinical cases of Hepatitis A linked to imported frozen berries from Pams.[5] As such, the company initiated a product recall of approximately 478500 bags incurring significant expense.[6] A few months later the same batch of berries triggered another recall. In total, three recalls of frozen imported berries took place during this 2022-2023 period, causing confusion among consumers, drop in sales and economic impact on the industry.

Following the incident, New Zealand Food Safety developed new import rules for frozen berries, which came into effect on 1 August 2024.[7] Adhering to the new import rules for frozen berries helps ensure that companies can more effectively manage risk offshore before the product comes into the country.

2 In 2008, melamine adulteration of infant foods in China resulted in more than 50,000 children being hospitalised and six deaths. (Contaminated Chinese milk costs Fonterra $139 million, 2008). Separately, In July 2012, food supplied to a hospital in New Zealand was contaminated with Listeria. The contamination was linked to two deaths, and two other people were affected in New Zealand (Sharpe, 2-15).
3 In 2017, an undeclared allergen (milk) in meat products resulted in two children having moderate to severe allergic reactions and one child hospitalised. (Hellers prosecuted over mispackaged Sizzlers sausages, 2019). 38-year-old Grant Freeman died after an anaphylactic shock from an allergy in his restaurant meal resulted in heart failure. (Man dies after restaurant meal, 2009).
4 The rate of Hepatitis A in New Zealand declined from 145.7 per 100,000 in 1971 to 0.9 per 100,000 in 2024. (8. Hepatitis A, 2024); (Institute of Environmental Science and Research Ltd, 2024).
5 (Check your freezer if you bought Pams frozen berries in the South Island yesterday, 2023)
6 (Al Saafin, 2023)
7 (New import requirements for frozen berries a win-win for consumers and food importers, 2024)

Food safety: a risk that can bring lasting damage to companies

Food safety incidents can bring lasting damage to companies. Companies can lose earnings, consumer trust and their reputation, as well as time and money to recalls, legal proceedings, penalties, and the ensuing publicity. International incidents are particularly damaging, especially if multiple jurisdictions have different legal liabilities. Additionally, companies might find themselves losing market access in the long term. There are many instances around the world where food safety failures have led to business failure.

Example: E. coli

The fallout from food safety incidents is difficult to contain and can also affect other operators in a sector, the industry, or even the whole country. One such instance is the deadliest bacterial E.coli foodborne outbreak in Europe recorded. A highly pathogenic strain of E. coli, attributed to fenugreek sprouts grown in Germany, resulted in more than 3,000 infections and 53 deaths.

Initially, Germany made incorrect assumptions about the bacteria's origin and linked it to Spanish cucumbers. As a result, Spain reputedly lost USD$200 million in exports, cucumber purchases declined sharply, and political tensions escalated within the European Union (EU). Testing confirmed the origin to be fenugreek sprouts grown in Germany. The event is estimated to have cost USD$2.8 billion in human damages (sick leave, medical bills).[8]

Following this event, consumers lost confidence in the supply of fresh produce and consequentially, growers and producers throughout Europe experienced an economic loss of USD$330 million per week after the inaccurate warning.[9]

The whole fresh produce sector suffered, and European Health Commissioner John Dalli stated that "in the future, we need to see how the timing of the alerts can be closer to the actual scientific basis and proof."[10]

How leaders respond to an incident or crisis significantly influences not just the level of public health risk but also consumer perception, and economic outcomes for better or worse.

8 (Marler, 2011)
9 (Hallum & Penfold, 2011)
10 (Hallum & Penfold, 2011)

Food safety: using food recalls to mitigate risk

What is a food recall?

Businesses can recall food if they find something is wrong with the food after distribution to reduce consumers' exposure to the hazard. A food recall lessens the risk of harming consumers once a hazard is discovered. Recalls are "after the fact" and consumers may have already been exposed to harm.

Each food safety event has the potential to cause serious harm to consumers. In 2023, there were 70 consumer level food recalls in New Zealand, with undeclared allergens and microbiological contamination being the leading causes. You can find further information about recalls in NZFS' **Food Recalls Annual Report** on the MPI website and learnings from current food safety issues are regularly examined in **Food Safety Insights, Emerging Risk and Current Issues Bulletin**.

Undertaking and managing food recalls is a crucial part of managing any food business. It protects consumers, maintains a positive reputation and minimises financial losses while ensuring compliance with applicable legislation. Food businesses should have plans in place for managing food recalls, including procedures for identifying affected products (scope of the recall), a communication plan with personnel, suppliers, and customers. Traceability and record keeping is important throughout the whole process.

While an effective measure, recalls take time, and consumers are at an elevated risk until the recall is completed. Mock, or simulated recalls are an excellent way to boost efficiency when an actual recall is required.

Simulated recalls

In New Zealand, all businesses registered under the Food Act, Wine Act, or Animal Products Act, as well as importers and exporters need to carry out a simulated food recall. A simulated (or mock) recall tests a business' effectiveness and traceability procedures. Regulations require businesses to undertake a simulated recall at least every 12 months unless an actual food recall occurs within the year.

Simulated recalls ensure that businesses have processes in place to act quickly to effectively identify any areas for improvement. **Recall information and guidance for businesses** can be found on MPI's website.

Sign up to **receive notification of any food recall alerts**.

Directors and Senior Managers' Liability

Food Safety legislation

New Zealand's food safety legislation is set out primarily in two Acts, the **Animal Products Act (APA)** with a primary industry focus, and the **Food Act**, which focuses on food for sale. Secondary legislation include food standards, orders in council, regulations and notices issued under those Acts. Codes of practice also offer supporting guidance to comply with standards and requirements such as codes of practice.

There are also food safety provisions in industry specific legislation including the **Wine Act** and the **Agricultural Compounds and Veterinary Medicines Act** (ACVM Act).

Liability

Unsafe food is bad for consumers and bad for business. Food producers are morally, ethically and legally obliged to produce and sell safe and suitable food. Obligation falls on the body corporate and extend to directors and senior management.

Under the APA and Food Act, directors and senior managers are accountable for failures in food safety, such as a product safety event that has caused harm, or failure to meet requirements of the Acts.

Legal obligations under the APA	Legal obligations under the Food Act
• To produce and sell foods that are fit for their intended purpose. • To develop, register and operate an end-to-end or through-chain Risk Management Programme (RMP), and have it independently verified.	• To produce and trade foods that are safe and suitable. • To develop and use risk-based measures (usually a Food Control Plan (FCP) or National Programme) that is registered and independently verified.

Penalties under the APA and Food Act can be up to $500,000 for a company, and up to $100,000 plus five years' imprisonment for individuals, including senior managers and directors.

Governance, risk, and its relationship to food safety

Boards of directors are required to address risk. The New Zealand Institute of Directors identifies both culture and risk management as a key focus for a board and defines risk management as a process of identifying and prioritising risk, establishing a risk management plan and monitoring implementation. It also notes the importance of a culture that values ethical behaviour.

The purpose of food safety risk management is to protect food consumers (and users) by identifying and managing risk. Food safety governance ensures that food safety risks are identified, understood, and controlled within a supportive organisational environment.

Food safety has its own language and methodologies:

- Food safety risk is present when a foodborne hazard (biological, chemical, physical or undeclared allergen) is combined with exposure to the hazard, usually through consumption of food containing the hazard.

Current legislation and industry best practice require that risk-based measures (RBM) are developed and adequately resourced to ensure food is safe and suitable or fit for purpose, in which:

- companies use a structured process to assess food safety risks and develop controls. Structured processes may include food sector good operating practices (GOP), good agricultural practices (GAP), good manufacturing processes (GMP) and good hygiene practice (GHP) and hazard analysis critical control point (HACCP);
- companies implement those controls and maintain records;
- companies apply the applicable GAP and HACCP processes to all operations that can impact directly and indirectly on product safety;
- verification and audit of systems effectiveness is undertaken.

A wide array of technical, social, and environmental factors can affect risk. Risk is ever evolving, and food safety systems must be refreshed regularly to account for this.

Managing these risks in risk management programmes (RMPs) or food control plans (FCPs) is essential for any food business. The best RMPs or FCPs take a broader approach, considering product manufacture and supply chain processes, as well as key relevant activities in business support functions such as sales and marketing, research and development, human resources management and finance.

Food production and processing is inherently variable. Variations in raw materials, climate conditions, staff responses and product specifications can influence processing conditions. Producing safe and consistent product is an ongoing challenge to staff, processing equipment and to food safety systems. Control system designers must recognise and cater for that inherent variability.

A culture that supports food safety is an essential element to maintain a sustainable food industry. The board has an important role in leading food safety culture.

The food safety governance model

The food safety governance model shows how boards of directors can take an active role in assuring that food safety risks are identified, understood and controlled, and that this occurs within a supportive organisational culture.

This guide offers a **four-step** food safety governance model to help boards to achieve effective food safety governance. In this model, the board has two principal roles in governance of food safety:

- creating the right environment in which food safety can operate successfully;
- holding management to account for implementation of the food safety system.

Creating the food safety environment

Directors are responsible for creating the right environment through committing to food safety governance, and leading food safety culture. These are the foundations of food safety governance. In addition, directors and senior management must clearly articulate and document expectations and the desired system performance outcomes for themselves and the company.

Holding management to account – exercising due diligence

In holding management to account, directors must ensure that risk is proactively assessed and managed and that system design and company performance is satisfactory. In doing so, directors should understand the status of food safety in the company, confirm they are informed of food safety issues at the time they arise, key issues and directors need to be visible to be visible in food safety discussions and ensure team members responsible for food safety (such as compliance or quality assurance managers) are resourced, supported and heard. Directors also need to adequately resource any food safety actions expected to be taken.

If directors are uncertain or dissatisfied with current performance or trends in food safety performance, they should engage constructively and delve deeper to ensure that appropriate action is taken. In doing so, directors perform their due diligence. As with any significant area of risk or exposure, external advice may be helpful if these concerns cannot be resolved.

Cyclic activity

The four steps of the food safety governance model are a cyclic activity. The food safety governance cycle should continue as boards and companies regularly seek to improve food safety governance and outcomes, as well as respond to changing business conditions.

Step 1: Commit to food safety governance

Commitment can be demonstrated through:

- ensuring directors are informed about food safety;
- including food safety in the Board Charter;
- considering food safety from a consumer's perspective and potential impacts on health in personal and family settings;
- developing a food safety governance framework that provides a template and guidance for directors in discharging their food safety responsibilities, including "turning one's mind to matters of food safety" and document outcomes; and
- preparing business-wide food safety policy and goals and set clear expectations such as progress in implementing food safety programmes, audit results and company food safety culture.

The board can reinforce commitment by:

- including food safety as a standing item on agendas with a consumer-focus in mind;
- expecting consistency from senior management in handling food safety matters;
- understanding the appetite for risk. While management will make the decisions in most cases, directors should be aware of the importance and nature of these decisions, and the risks taken on their behalf;
- holding management to account for implementing food safety strategy and driving food safety implementation and improvement initiatives;
- ensuring organisational strategy and capital programmes include initiatives that can improve food safety outcomes; and
- communicating commitment widely to staff and developing feedback mechanisms.

Step 2:
Lead food safety culture

Leading food safety culture is a critical element of creating the right environment for food safety. Culture is the underlying set of values and beliefs that underpin everyday behaviours and decisions. Directors have a profound influence on culture, and this is fundamental to how food safety is perceived and addressed within companies.

Food safety culture describes an alignment of values and behaviours with respect to food safety, from senior management through to frontline staff. Food safety culture is led from the top and driven down throughout the organisation.

A strong food safety culture is supported by collaborative partnerships across the sector including regulators, industry, education organisations, research institutes and consumers.

Research into food safety in New Zealand shows that most food business owners, managers, and staff have an inherent sense of pride in what they are doing.[11] However, there is still work to do to ensure consistently high standards of food safety culture and practices across all types and sizes of businesses.

A food safety charter, statement of expectations and policy are the foundations of food safety culture. Once these have been set, directors can lead food safety culture by expecting unequivocal support for food safety and requiring adherence to the food safety system.

Directors enable this unequivocal support for food safety by:

- ensuring all directors and staff are inducted, trained and regularly updated in food safety;
- expecting consistent decisions and messaging from the board and senior management with regard to food safety;
- keeping food safety on the agenda. When directors engage with staff, suppliers and vendors on matters of food safety, everyone sees a tangible recognition and reinforcement of its importance;
- ensuring culture is assessed on a regular basis, and results acted upon; and
- recognising and celebrating outstanding food safety performance.

A positive food safety culture is dynamic; people need to feel they can make a difference, and their views are valued. Management needs to be empowered by directors to implement suggestions from staff.

11 (Colmar Brunton; Ministry for Primary Industries, 2017)

Step 3:
Ensure food safety risk is identified, assessed and effectively managed

As a board, this step is about holding management to account for designing and implementing the food safety system, assuring that the food safety system design is fit for purpose and that the company's food safety risks are controlled and managed.

A working knowledge of food safety principles and practices provides directors with the required understanding to effectively evaluate and contribute to food safety governance discussions.

Some suggestions for board members include:

- acquiring and updating their knowledge of food safety practice;
- knowing the company's greatest risk(s). Boards should keep key risks in focus and a risk heat map can be useful in representing relative risk;
- key food safety risks on the company risk register;
- ensuring fit for purpose processes are in place and operating for the business to assess, manage and report on food safety risk and events;
- ensuring a framework is in place for matters relating to risk to be raised and addressed including considering a secure, independent channel for staff participation;
- ensuring a regular review of risk is conducted, that is, recognising that risk changes and asking what new risks are emerging or have emerged; and
- assuring that recall, incident and crisis response and communications plans are prepared and rehearsed.

Risk can occur in any stage of a company's operation. Risk identification, assessment and management processes should be applied throughout the organisation where there can be an impact on food safety.

Food safety risk can be found and mitigated in a wide variety of organisational functions. For example, sales and marketing risks can arise from tight production scheduling and new product-market introduction. Supply chain risk can arise from improper storage conditions or lapses in security of product control and product data.

Similarly, human resource activities, including recruitment, training, leadership, and development, can all play a role in food safety risk management capability development and decision making.

Boards also carry the burden of leading resilience to unanticipated risk. The Food and Agriculture Organization of the United Nations (FAO) advocates leaders examine possible future conditions that could affect food safety risk[12]. NZFS' **Food Safety Insights, Emerging Risk and Current Issues Bulletin** provides regular future-focused information on new and changing food safety risks.

12 (Food and Agriculture Organization of the United Nations, n.d.)

Step 4:
Monitor system design and company performance

This step has two main elements. The first element is ensuring that the food safety system performs as designed, and there are no obvious or material conflicts.

Boards may consider the following:

- Ensure the Chief Executive role specification and performance measures include food safety and encourage food safety to be considered ahead of production imperatives.
- Recognise and address possible conflict between food safety outcomes and production output measures in executive performance incentives. Note that staff who must report on food safety issues may find it challenging to be the messenger of news which will affect business. Directors should support the staff involved with reporting and ensure they are supported in this position.
- Consider food safety responsibility and reporting lines.
- Ensure system capacity is balanced with current and evolving requirements. There may be an imbalance between food safety demands and system capacity for example, when significant food safety issues call upon additional product sampling and testing, raising and investigation of non-conformance reports.
- Ensure audit findings been considered and incorporated into refreshed risk management procedures.

The second element is **monitoring system outcomes**, and ensuring the system is effectively managing food safety throughout the business.

Boards should focus on exception reporting and clearly articulate what they would like to see. Suggestions regarding scope are listed below, and further examples are given in Part two.

- Ensure performance management reporting includes food safety system reporting using both lead (capacity building) and lag (performance or outcome) indicators such as:
  - meeting legislated requirements set down in the APA and Food Act;
  - building company-wide food safety capability, including culture, to reduce risk;
  - involving all aspects of the business essential for embedding food safety throughout the business;
  - reviewing company RMP performance such as serious non-conformances and the remedial action taken;
  - reviewing the number of serious non conformances outstanding and why.
- Review outcomes from third party and customer audit activities. Ensure these outcomes have been actioned, and that they are reflected in an updated RMP or FCP.
- Recognise that risk profiles change as company activities and food safety techniques and requirements change and undertake regular review of system effectiveness; and ensure that there is periodic system refreshment.

In discharging their duty of care, directors should take the opportunity to "verify" what is being reported on key matters. Verify by taking a "deep dive" into a small number of specific important issues, asking for verbal reports or more information, to ensure adequate analysis and response has taken place.

Review and reset goals

It is recommended that boards periodically review and reset goals. The review will then renew the governance cycle and presents directors with the opportunity to refresh all elements of the food safety governance model.

Review capacity to respond to a food safety event

A business' response to a food safety event has a major influence on how much impact an event may have. Companies with prepared, tested, and effective crisis response and communications plans are better prepared if, and when, a food safety event occurs. A simulated food recall is an excellent exercise in risk response and preparedness.

While typical product recalls can be rehearsed, not all scenarios can be planned for. Infrequent, high impact events that cause significant damage can be overwhelming. Building capability to respond is beneficial.

Where food safety concerns are present, the initial decisions and communications are critical. Informing consumers is vital. Media enquiries become immediate and urgent. Social media can trend within minutes. It is essential that media spokespeople (directors and senior managers) are trained for such events.

Boards should review response capacity as part of their performance monitoring activities.

Putting it all together

The following points have been adapted from the joint WorkSafe New Zealand and Institute of Directors publication Health and Safety Guide: Good Governance for Directors.

The points have been adapted, with permission, to the subject of food safety:

- Be proactive and actively engage in food safety matters (for example, by understanding the business and the associated hazards and risks).
- Be informed and involved about food safety risks – bear in mind that risk changes as the business changes.
- Ensure there is robust reporting on food safety issues, audit outcomes and investigations, and that action is taken.
- Trust, but verify. Check systems are operating the way intended.
- Ensure there are appropriate resources and processes for dealing with food safety and that there are staff participation practices in place.
- Refresh board food safety governance training regularly.
- Ensure food safety is on the agenda at board, audit and risk sub-committee level.

Final point

Investing time and effort into consistent food safety at a governance level protects your customers' health and safety; builds your business' reputation and brand value; ensures the ongoing success and enterprise value of your business; and sustains New Zealand's reputation and commercial success here and overseas.

Part Two: A Director's Briefcase

This section comprises information and support tools that may be helpful when developing food safety governance capacity:

- Five questions to ask at a board meeting
- Director's checklist
- The food safety legal environment
- Lead a food safety culture
- Example food safety performance measures
- Introduction to food safety risk
- Protecting food from deliberate events

Five questions to ask at a board meeting

1. Am I informed about food safety in my company?
2. What does food safety culture look like in my company?
3. What are the critical risks to food safety in my company and how are senior staff managing these?
4. How am I receiving information about my company's performance and system monitoring?
5. How do we ensure that staff are actively engaged and incorporating good food safety practices into their everyday operation?

Director's checklist

1. Understand and commit to food safety governance	
Do I understand my food safety obligations and liabilities?	☐
Do I have sufficient understanding about food safety basics and the risk management programme (RMP) and risk-based measure structure to enable informed and productive engagement?	☐
Is food safety in the Board Charter and are expectations established. Are these known by all staff?	☐
Is food safety a standing item on our board agenda, and is there true engagement about issues, performance, capacity building? How do we listen to customer feedback including audits?	☐
Does food safety feature in our strategy and capital works programme?	☐

2. Policy and goals	
Is there a company food safety policy and are goals established? Are these known by all staff?	☐
Has the board discussed risk appetite? Has the executive team been involved?	☐
Do our board minutes reflect our commitment to, and consideration of, food safety?	☐

3. Lead food safety culture	
Am I confident about the depth and breadth of commitment to food safety in our company?	☐
Do staff often see directors putting the good food safety practices into action expected of other staff when visiting food sites?	☐
How does food safety fare when difficult decisions have to be made?	☐
Would a member of staff feel confident about telling a director coming onto the production floor to wash their hands?	☐
When I do site visits, does food safety come up in discussion? Do I feel confident to raise it?	☐
Do we assess food safety culture through a staff survey? Are we acting on the findings?	☐
What is the status on food safety training across the business?	☐
What communication channels are available to reinforce food safety messages and for the board to receive feedback on food safety initiatives?	☐

4. Assure risk is assessed and managed	
Do I understand our key food safety risks? Does the Risk Register include food safety risk?	☐
Has there been a review of food safety risk recently? Does it reflect changes in risk profile?	☐
Am I assured that there are adequate business-wide food safety management processes, controls and reporting in place and being applied consistently?	☐
Does food safety involvement extend across the whole business? Have we considered upstream and downstream activities provided by other parties?	☐
Have incident and crisis response and communication plans been prepared and rehearsed?	☐
Does the communication plan identify who can say what? Is there a back-up spokesperson?	☐

5. Monitor system design and performance	
Design	
Does the senior food safety manager have ready access to the Chief Executive Officer (CEO)?	☐
Has the senior food safety manager reported to the board recently?	☐
Does food safety have a place in CEO performance incentives? Is there conflict between food safety and other performance measures?	☐
Is system capacity balanced with requirements?	☐
Do we address tension between food safety and other objectives for example, production output, sales and marketing or research and development?	☐
Have we thought about malicious or criminal attacks on our business?	☐
Performance	
Is reporting balanced with a mix of lead and lag indicators coupled with performance reporting on specific matters?	☐
Do I have a clear picture of our food safety status and issues, and how they are being handled?	☐
Have we considered benchmarking our performance?	☐
Do I know what types of food safety decisions will be referred to the board?	☐
How are we performing in verification and customer audits? Are we learning from them?	☐
Incident and crisis response	
Has our recall, crisis management and communications plans been rehearsed recently?	☐
Did we learn from it? Was it a true test of our response systems? Were there independent observers?	☐
Am I confident that our media response will be appropriate?	☐
Do we have a trained alternate if the primary media person is unavailable?	☐
Ask about the most recent food safety issue. Were you appropriately informed and involved? Do you know what the learnings from this issue were? Did you subsequently put measures in place?	☐

The food safety legal environment

Boards and directors are accountable for meeting legislated requirements for their companies, including for food safety.

Food Safety legislation

New Zealand's food safety legislation is set out primarily in two Acts, the Animal Products Act 1999 (APA) (primary industry focus) and the Food Act 2014 (focused on food for sale), along with secondary legislation including food standards, orders in council, regulations and notices issued under those Acts. There is also supporting guidance such as codes of practice.

There are also food safety provisions in industry specific legislation including the Wine Act 2003 and the Agricultural Compounds and Veterinary Medicines Act 1997.

The Acts are similar in that they require companies to develop and use risk-based measures to ensure where foods are produced and sold, they are "fit for purpose" (APA) or "safe and suitable" (Food Act).

The Ministry for Primary Industries (MPI) administers these Acts including implementation and enforcement.

In the following paragraphs, several excerpts have been taken from the Acts to illustrate their requirements. As excerpts, they are incomplete and are not intended to interpret or summarise the Act(s). Where necessary, boards should seek independent legal advice to ensure compliance.

Animal Products Act 1999

The APA makes it clear that foods must be "fit for intended purpose". This is a broad term comprising:

- using a registered RMP for animal products such as dairy, meat and seafood processing, packaging, and distribution;
- applying any relevant standards or regulations; and
- ensuring that the product including packaging and labelling is suitable for the purpose for which the product is specifically stated.

An RMP must:

- set out the procedures the business operator will use for identifying, controlling, managing, eliminating, or minimising risk factors;
- describe the steps the business operator will take to confirm that the programme is working effectively;
- provide for appropriate corrective actions (including recall of product) to be undertaken where the product may not be fit for intended purpose or not in accordance with its labelling or identification;
- set out appropriate and auditable documentation and record keeping; and
- make appropriate provision for verification activities.

Offences involving endangerment of human, or animal health include:

- failing to comply with the APA knowing that the contravention or failure would or is likely to endanger the lives or health of the public, or the life or health of any individual.

If an operator of a regulated control scheme contravenes or fails to comply with any provision of the APA, they may directly or indirectly:

- put human or animal health at risk; or
- increase the likelihood of an existing risk to human or animal health.

Food Act 2014

Food sold in New Zealand is subject to the Food Act. MPI administers this legislation. The Food Act takes a similar risk-based approach to the APA.

Legal obligations under the Food Act 2014 are similar:

- to produce and sell foods that are safe and suitable;
- to develop and use risk-based measures (usually a FCP or National Programme) to ensure food is safe and suitable. FCPs must be registered and independently verified.

The Food Act applies to food sold in New Zealand and covers food manufacturing and retail, catering, quick service restaurants, food service, hospitality and tourism and some logistics businesses.

Safe means a condition in which food, in terms of its intended use, is unlikely to cause or lead to illness or injury to human life or public health.

Suitable includes matters not related to food safety but that could make food unacceptable. Examples include mislabelling, faulty packaging, composition issues.

Penalties (depending on the offence)

- Corporations – up to $500,000 fine.
- Individuals – up to five years imprisonment, and up to $100,000 fine.

Liability

Where the body corporate is found guilty of an offence the liability may flow on to senior managers and directors.

As food producers, companies are morally, ethically, and legally required to produce and sell safe food, always. Obligations fall on the body corporate and extend to boards of directors and senior management.

Under the APA and Food Act, directors and senior managers are accountable for failures in food safety, such as a product safety event that has caused harm, or failure to meet requirements of the Acts.

You can read court judgments made under the Food Act on the MPI website.

Companies Act 1993

The Companies Act includes relevant provisions for directors' behaviour and conduct – including clauses related to "acting in good faith and in best interests of company", "reckless trading" and "duty of care". While risk analysis and risk management are not specifically mentioned or defined in the Companies Act, board practice typically includes active consideration of risk, as well as developing and managing a company risk register, which includes food safety.

More information

The MPI website has information for food businesses about the APA and the Food Act, as well as the Wine Act 2003, ACVM Act, and the Australia New Zealand Food Standards Code.

What are the main roles in food safety regulation?

According to legislation, companies are responsible for identifying and managing their food safety risks. Companies follow a systematic process for risk assessment, mitigation and management including validation and verification of the risk-based plans based on legislative requirements.

The regulator sets the rules, provides information on how the legislation works, ensures food companies are using a regulated risk management scheme, oversees verification activities and carries out enforcement activities.

Verification is typically carried out by a third party within a regulatory framework that is developed by the regulator. The regulator has power to intervene where food safety risk is considered to warrant special and immediate action.

There are three main roles in food safety regulation; the roles of each party are described below.

Regulator (Ministry for Primary Industries)

- Provides policy advice to the Government.
- Administers law.
- Issues notices, codes of practice and guidance.
- Supports and monitors implementation.
- Undertakes audits of the system.
- Undertakes enforcement.

Coordinates food recalls and food safety responses in partnership win other agencies and food industry.

Company

- Prepares and validates through chain risk-based systems for example, an RMP required by the Animal Products Act 1999 and/or an RBM required by the Food Act 2014.
- Registers the RMP and/or FCP with the regulator.
- Obtains verification to ensure the RMP and/or FCP is compliant with legislation (through an independently recognised verifier).
- Operates the RMP and/or FCP.
- Reports specified product non-compliances to verifier and regulator.
- Arranges ongoing third-party verification activities and close out of the RMP and/or FCP non-conformances.

Verifier

- Verifies that the company is following their registered RMP and/or FCP and that RMPs and/or FCPs are compliant with the law.
- Responds to non-compliances and verifies corrective actions.
- Maintains recognition as a verifier.

What comprises a food safety system?

An effective food safety system requires the combination of well-designed risk-based programme with an organisational culture that supports and drives food safety outcomes.

Meeting legislative requirements

The first step is to develop a control system that meets legislative requirements. New Zealand food legislation requires businesses to develop and operate risk-based systems.

The APA and Food Act describe what is required.

The main points are summarised below:

- Identify, control and monitor hazards preferably by using HACCP (Hazard Analysis Critical Control Points) seven step method.
- Use a through-chain (or end-to-end supply chain) approach (for example, supply of all ingredients, utilities, processing, services, logistics, laboratory services) and extend into the marketplace where appropriate.
- Apply good processing practices or codes of practice. These should be documented or referenced in the RMP or FCP.

Include specific procedures such as:

- traceability and recall procedures;
- calibration of critical instrumentation;
- product sampling and testing (compliance checks);
- staff training to be undertaken;
- review of non-conformance events plus corrective action; and
- record keeping.

Building capacity to reduce risk

Food safety is often considered a technical and operations function, but the whole business needs to be engaged. Consider food safety opportunities beyond core technical and operations functions including:

Governance	Setting the company risk appetite and food safety policy, approving investment decisions, signing off on strategy and leading culture.
Sales and marketing	New product development where commitment to new products or product delivery schedules can affect food safety.
Learning and development	Trained and competent staff make better decisions leading to reduced risk which is especially important in 24-hour operations.
Finance	Identifying food safety and quality costs can support opportunities to improve food safety and quality through supporting investment analysis.
Information Technology Departments	These can contribute to food safety by avoiding or mitigating issues arising during business interruption or a cyber attack, where loss of data or corruption of data can affect food safety outcomes.
Food Safety HACCP	Conducting food safety HACCP on capital works and major maintenance presents an opportunity to improve the risk profile.
Food safety to protection of food integrity	Look beyond food safety to protecting food integrity for example, vulnerability of raw material supply, logistics outside of site and digital systems.

The role of international standards

Many international standards are relevant to the food industry. ISO 9001 and FSSC 22000 are two examples. While these standards are widely recognised and may form part of commercial arrangements, they are not requirements of the APA or Food Act 2014. Two relevant standards are outlined below:

ISO 9001 is the international standard that specifies requirements for a quality management system (QMS). Organisations use the standard to demonstrate the ability to consistently provide products and services that meet customer and regulatory requirements.

FSSC 22000 is a Food Safety Management System Certification Scheme. FSSC 22000 was designed to provide companies in the food industry with an ISO-based food safety management system certification that is recognised by the Global Food Safety Initiative (GFSI). Recognition by GFSI provides worldwide recognition and acceptance by food manufacturers and retailers. FSSC 22000 defines requirements for integrated processes that work together to control and minimise food safety hazards.

Building capacity to reduce the impact of a food safety incident

Even with the best systems, processes, and culture, food incidents still happen. Whatever the cause, the way companies handle incidents, particularly in the first 24 hours, is critical to the outcome.

For example, if a product is hazardous, it must be quickly traced, quarantined and recalled if necessary to reduce risk of harm. Companies must review and even pause their production processes until the hazard is controlled. A company must also prepare messaging to customers, staff, suppliers and the media. Regulators may be involved and require the attention of management and staff.

Many companies have crisis management and communications plans, which should be rehearsed and refreshed at regular intervals. Plans should be refreshed regularly and when there are changes to policies or operating environment.

In addition, businesses with a plan or programme under the Food Act, Wine Act, or Animal Products Act, as well as importers and exporters, must carry out a simulated recall every 12 months. Simulated recall guidance can be found on the MPI website.

Ensure senior managers and directors are media trained and available to front the media during a food safety incident or event.

Low-frequency, high-impact events are particularly concerning, because they are impossible to predict and hard to respond to. Events can escalate, for example, as cases of illness proliferate and can have the best companies stretched. Often these events can't be foreseen or meticulously planned for, however developing and rehearsing a generic response capacity can improve a company's response and limit the impact.

Recall, crisis and communications plans should consider all stakeholders including those in the immediate situation as well as international suppliers and customers. Communications are particularly important for customers. If there is a problem, customers should hear about it from the company first, not from the media.

Lead a food safety culture

It is not enough to have good technical systems; food safety culture must be embedded throughout an organisation so staff embody the attitude that food safety is just part of their day-to-day work.

Culture is recognised as the underpinning of behaviour and ultimately performance and with the right culture in place, the right decisions get made. Food safety culture relies on unequivocal support and consistency of decision making throughout the organisation: top to bottom, side to side.

Create the right environment and framework

Some practical steps to create the right environment for all are outlined below:

- Commit to food safety in the Board Charter and communicating expectations.
- Develop food safety policy and goals to deliver on expectations.
- Induct, educate, and train staff (including directors) in food safety.
- Set food safety key performance indicators (KPIs), then measure and report on them.
- Communicate progress to stakeholders.
- Recognise and celebrate achievements.
- Survey culture and act on findings.

Lead by example

Directors and management actions have a huge impact on how staff react and behave in matters of importance of food safety. Directors have a clear leadership role in this area and can reinforce their commitment to food safety by:

- putting food safety on the board and risk sub-committee agenda;
- talking about it regularly and seeking open feedback from staff;
- taking care when making decisions that food safety is not overtaken by financial or production expediencies;
- consistency in decision making; and
- recognising outstanding performance.

Assess food safety culture

Many organisations survey organisational culture on a regular basis. Food safety culture should be included as a part of surveys, with clear and obvious follow up on findings and actions arising from the survey. Questions could look like the sample matrix below.

"I know my company cares about food safety because..."

Statement	Strongly Disagree	Disagree	Agree	Strongly agree
I am encouraged to speak up about food safety issues.				
Food safety is on my supervisor's agenda.				
I feel confident when asked to talk about my role in food safety in my team: to management, to directors, to auditors and to customers.				
I feel confident that my team members follow food safety practices.				
In our company, food safety is in good hands.				
Food safety issues are fixed.				
Food safety decisions are separated from commercial decisions.				
I feel I understand our customers' needs and expectations.				
I feel I am trained in food safety.				

Example food safety performance measures

KPIs – Lag (assessing outcomes based on previous performance)

- Food safety system performance: Food safety reports from current production – full supply chain exceptions and trends reporting; "near misses".
- Outstanding non-conformance reports or incident reports, trends in resolution time.
- Audit performance: non conformances (severity, number) and close out time, tracking verification outcomes.
- Recall, crisis response and communication plan review outcomes.
- Customer food safety complaints: nature, resolution, trends.
- Evidence of continuous improvement.

KPIs – Lead (improving capacity by looking for opportunities)

- Building capacity to reduce risk and impact:
- Breadth of the food safety plan throughout the business.
- Acting on results from crisis and communication plan rehearsals including media training.
- Culture, learning and development:
- Progress on issues arising from culture survey.
- Progress with learning and development and training programme, including Directors' food safety and risk training.
- Progress on learning opportunities arising from audits.
- Senior staff external exposure to external food safety learning opportunities and experiences.
- Preparedness for unpredictable events:
- "Black Swan" scenario(s) developed, and response plan prepared.
- A simulated recall is carried out at least every 12 months and findings acted on.
- Response plan rehearsed and findings documented.

Introduction to food safety risk

Defining risk

Food safety risk is a combination (or function) of the likelihood of suffering illness or harm and the impact or severity of the illness or harm. In Figure XX, increasing consumption or exposure increases the likelihood of suffering illness or harm if there is a food hazard present. The increasing severity of hazard increases the impact when affected food is consumed.

High risk arises from a combination of a serious hazard and ample opportunity for exposure, such as eating unsafe food.

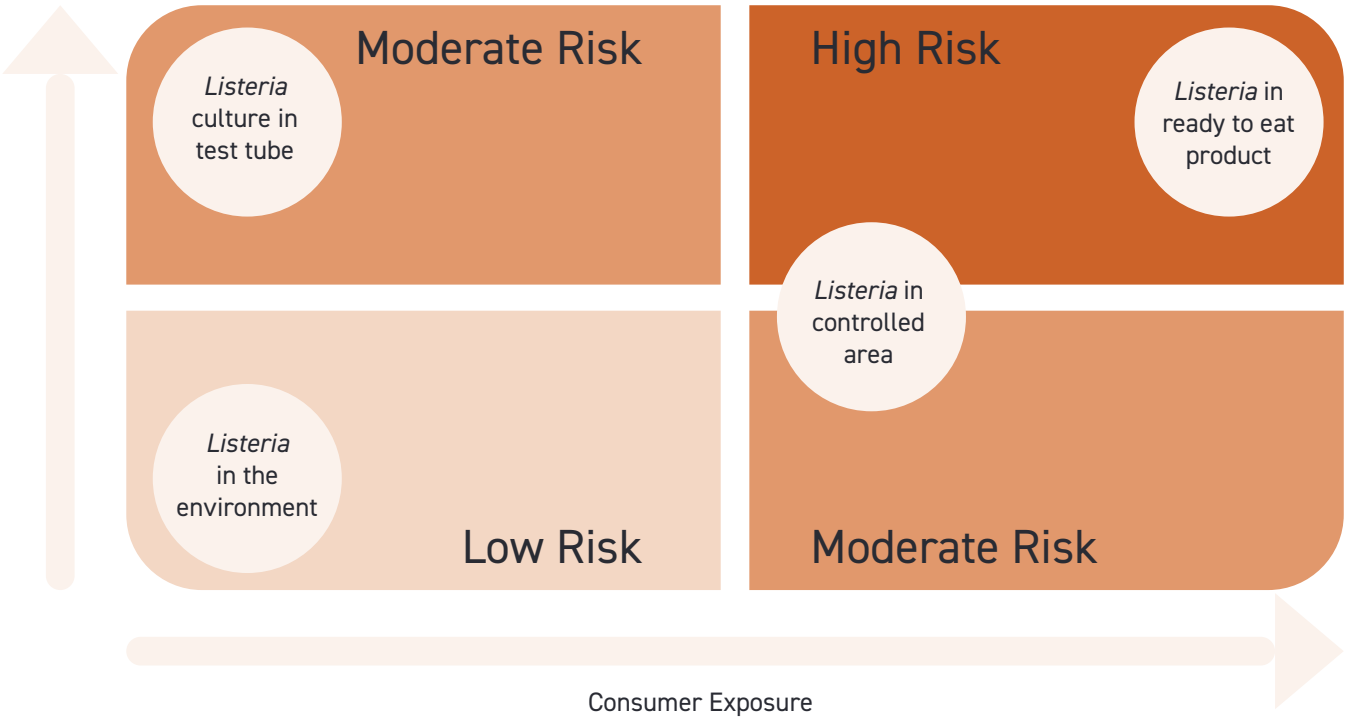
Example of foodborne risk: *Listeria*

Listeria is everywhere in the environment at low levels and is a hazard, but at low levels and with low exposure it is low risk. When humans are exposed to Listeria, the risk of contracting listeriosis is serious and the affects can be deadly.

Listeria found in a food processing environment is one step away from human exposure through food. It is moderate to high risk and immediate action should be taken for example, stopping production, cleaning, quarantining, and testing of recent production.

Listeria in a ready-to-eat (RTE) final product is a serious hazard and human exposure occurs when the food is eaten without further cooking. Immediate action should be taken. Actions may include stopping production, cleaning, initiating traceback, quarantining and testing of recent production, or even a product recall. RMPs and FCPs will require advising the verifier or MPI.

Range of risks associated with Listeria



Risk is dynamic

Effective risk management processes recognise hazard profiles and control any associated risk by applying a combination of processing steps and controls aimed at avoiding, eliminating, or reducing the hazard and/or exposure to the hazard.

But things do not stay the same for long. Materials, processes, market demands, and human behaviour are variable, and management of risk requires constant revision, assessment, and adaptation of controls.

Analysing risk: hazard analysis critical control point

Hazard analysis critical control point (HACCP) is a structured process for identifying and controlling hazards to reduce risk. Originally developed for foods used in the American space programme it is used widely in primary products and food industries.

At the heart of HACCP is a seven-step method:

- Identify biological, chemical, and physical hazards of significance at each process step.
- Determine the critical control points (CCPs) and control measures.
- Establish critical limits for each CCP.
- Establish a system to monitor the control of the CCP. Establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control.
- Establish verification procedures to ensure the control system is working.
- Establish documentation concerning all procedures and records relevant to the HACCP principles and their application.

Chief executive officers should have a thorough knowledge of their hygienic controls and CCPs, as they ensure the competency of their food safety measures. Directors and boards should know whether a CCP or equivalent set of controls exists for their company and are able to request a briefing on it from their chief executive officers.

For clarity, three examples of HACCPs are available at the end of this guide.

Protecting food from deliberate events

While infrequent, directors must consider how to protect their product from deliberate contamination. This could include intentional contamination (harm to consumers) or adulteration by biological, chemical, physical, allergen, cyber, or radiological agents or ingredient substitution. Businesses should consider their processes for mitigating risks of deliberate harm.

Types of intentional harm include:

- Adulteration: using a substance, which contaminates the final product.
- Malicious contamination, such as the threat of putting 1080 poison in dairy products.
- Intellectual Property (IP) threat or espionage, such as unlawfully obtaining formulations or processing technology.
- Counterfeiting, where a cheaper alternative product or ingredient is falsely marketed as the original or another similar higher value product.
- Cyber or systems attack, where food safety risk includes altering records, and corrupting quality and grade data.

The motivation for causing intentional contamination or adulteration could be economic, ideological, the result of extremist views, personal revenge, for opportunist satisfaction.

Risk assessment and mitigation

Reducing risk from malicious or intentional contamination is challenging and requires a different mindset when applying risk analysis processes.

One approach is applied throughout the supply chain and business operations and considers:

- Who might want to contaminate our foods, if any?
- How might they do it?
- Where are we vulnerable?
- How can we stop them?

How we can appropriately monitor

How can we prepare for an event, that is, business continuity, crisis management and communications planning?

Some brands are more vulnerable to deliberate contamination, including those that have significant export or have well-known brands, others will have limited risk. Therefore, it is important food businesses consider their own risk and put in place actions proportionate to the risk.

Appendix I: Hazard analysis critical control point worked examples

Several worked examples have been prepared to illustrate the hazard analysis critical control point (HACCP) process in action from a range of sectors within the food industry. While these examples only show one CCP, there may be more than one CCP and more than one solution for each CCP.

Some processes may not have a CCP for each hazard, (for example, minimally processed chilled products), but rely on non-critical control points, Good Agricultural Practice (GAP), or industry-specific codes of practice (COPs) to mitigate risk at several process points instead.

Once a risk mitigation measure has been put in place, it is important to avoid reintroducing the hazard for example, microbiological recontamination. Specific processing measures may be required.

Where CCPs are exceeded or not met, many RMPs and FCPs will include corrective action measures. RMPs and FCPs often require that MPI or the verifier is advised when a CCP is breached.

The HACCP methodology applies to all hazards whether they occur in manufacturing, logistics, plant utilities and service or ingredients supply. Use HACCP when considering support functions such as human resources and sales and marketing where opportunities to reduce risk can be found.

HACCP worked example: poultry

Process step: Immersion chilling of chicken carcasses

Hazard	Microbiological contamination of immersion chiller water leading to contaminated chicken (for example, Campylobacter).
Critical control point	Chilled water quality (temperature, pH, bactericide (acidified sodium chlorite)) concentration, flow rate.
Critical limits	For example, water exit temperature 2-4˚C at specified flow rate, pH 2.5-3.2, sodium chlorite 50-150 mg/l.
Control system	Temperature probe and data logger monitor temperature, with audio visual alarm system to indicate deviation. Routine operator monitoring of pH and sodium chlorite concentration, for example, half hourly.
Corrective action	If chilled water solution is outside limits, immediately correct deficiency. Quarantine product from last satisfactory test until the next satisfactory test for further evaluation. Refer RMP for further information.
Verification	Includes routine maintenance checks on temperature monitoring system, independent (once daily) checks on pH and sodium chlorite concentration, checks on chicken temperatures (ingoing, outgoing).
System documented	System specification written into RMP and Standard Operating Procedures. Records retained.

HACCP worked example: meat

Process step: Pre-cooking hamburger patties

Hazard	Potential pathogens in consumer packs of pre-cooked hamburger patties.
Critical control point	Heat treatment at cooking/grilling.
Critical limits	Set time-temperature limits known to kill pathogens of interest (for example, internal patty temperature 68°C for 15 seconds).
Control system	Cooking procedure standardised and validated using temperature probe and data logger. Process parameters monitored continuously, plus evaluation of batch records.
Corrective action	Deviations and exceptions are notified by alarm. Records review, then quarantine suspect product – that is, where time-temperature requirement not met. Stop production until fault identified and remedied. Consider alternatives, for example, reprocess or dispose of affected product. Advise MPI or verifier.
Verification	Includes revalidation checks on cooking procedure and periodic microbiological test on product.
System documented	Written into RMP and Standard Operating Procedures (SOPs). Records retained.

HACCP worked example: horticulture

Process step: Receiving of raw vegetables for processing – raw material acceptance

Hazard	Chemical residues for example, pesticides, fungicides.
Critical control point	Raw material inspection (prior to processing) to ensure chemical residues are within specifications.
Critical limits	Compliance with ACVM Act conditions of registration (for example, correct rate of application, pre-harvest withholding periods and correct spraying practices) to ensure compliance with maximum residue limits (MRLs).
Control system	Supplier provides documentary evidence of compliance to regulatory measures.
Corrective action	Quarantine raw materials where documentation is inadequate or indicates non-compliance. Refer to FCP for instructions regarding disposition or destruction.
Verification	Periodic check by plant quality control (QC) staff. Periodic samples submitted for residues analysis by independent laboratory. Non-compliance may result in increased testing, at suppliers' cost, until confidence is restored. In extreme cases – refer to FCP for further instructions for example, product trace back and withdrawal.
System documented	Written into FCP and Standard Operating Procedures (SOPs). Records retained.

Appendix II: Glossary of terms

ACVM Act	Animal Compounds and Veterinary Medicines Act 1997. In New Zealand the Agricultural Compounds and Veterinary Medicines (ACVM) Act 1997 is the statutory basis for regulating products that are used on animal or plants. Agricultural Compounds and Veterinary Medicines Act 1997 Public Act (as at 30 November 2022)
APA	Animal Products Act 1999. The Animal Products Act 1999 (APA) is New Zealand's legal framework for processing animal material into food, such as meat and dairy products. It aims to minimize and manage risks to human and animal health arising from the production and processing of animal material Animal Products Act 1999 No 93 (as at 01 March 2017), Public Act Contents – New Zealand Legislation
CCP	Critical control point. A point, step or procedure at which controls can be applied and a food safety hazard can be prevented, eliminated or reduced to acceptable levels for example, heat treatment of raw materials to control microbiological hazards.
COP	Codes of practice. Introduction to Codes of Practice | NZ Government
ERM	Enterprise Risk Management is a top-down strategy that identifies, assesses and prepares for potential risks to a company's operation and goals.
FCP	Food Control Plan – a specific term under the Food Act 2014 – "a food control plan is a plan designed for a particular food business to identify, control, manage, and eliminate or minimise hazards or other relevant factors for the purpose of achieving safe and suitable food". The Act specifies a number of several additional generic requirements, for example, lot coding and traceability, plan registration and verification.
FMCG	Fast-moving consumer goods.
Food Act 2014	The Food Act 2014 sets out the framework for regulating food in New Zealand. It covers the definition, classification, and control of food, as well as the roles and responsibilities of the Minister, chief executive, and territorial authorities. Food Act 2014 No 32 (as at 18 December 2024), Public Act Contents – New Zealand Legislation
Food recall	A food recall is action taken by a food business to remove unsafe food from distribution, sale and consumption. All food businesses must be able to quickly remove food from the marketplace to protect public health and safety. Food recall guidance for businesses
Food safety governance	Food safety governance is ensuring that food safety risks are identified, understood, and controlled, and that this occurs within a supportive organisational culture. Food business | NZ Government The Four Pillars of Governance Best Practice | IoD NZ

Food safety system	A generic title or descriptor for food safety systems. Risk management programmes and food control plans are specific and defined elements of a food safety system.
FSSC 22000	A Food Safety Management System (FSMS) Certification Scheme. www.fssc22000.com/documents/home.xml?lang=en
GAP	Good Agricultural Practice. Refer to link: www.newzealandgap.co.nz
HACCP	Hazard analysis critical control point – a seven step methodology for identifying and evaluating hazards, establishing, implementing, and documenting controls. Hazard Analysis and Critical Control Point | NZ Government
Hazard	A food hazard is any biological, chemical or physical contaminant in food, which could cause harm, injury or illness. Food safety hazards may occur naturally, or introduced (intentionally or unintentionally).
ISO 9001	The international standard that specifies requirements for a quality management system (QMS). See: https://www.iso.org/iso-9001-quality-management.html
Maximum residue limit	The maximum permitted level of agricultural compounds in foods, beyond which the food is not permitted to be sold.
New Zealand Food Safety (NZFS)	A business unit of the Ministry for Primary Industries. Under New Zealand law, the food industry is responsible for producing safe and suitable food and demonstrating compliance with standards. NZFS oversees the functioning of the food safety system as a whole. NZFS set the regulatory standards relevant to each part of the food supply system and verify that they are being met on a continuous basis. They also work with industry to develop food safety guidance, promote food safety culture within industry and monitor food safety and suitability outcomes. About New Zealand Food Safety | NZ Government
QC	Quality control – the operational techniques and activities used to fulfil requirements for quality. Refer: www.qualitygurus.com/download/DifferenceBetweenQualityAssuranceAndQualityControl.pdf
Regulator	The regulator sets the rules, provides information on how the legislation works, ensures food companies are using a regulated risk management scheme, oversee verification activities and carry out enforcement activities.
Risk	The Codex Alimentarius definition of risk is: "A function of the probability of an adverse health effect and the severity of that effect crisis, for example, related to a hazard(s) in food".
RMP	Risk management programme. A programme designed to both (a) identify; and (b) control, manage, and eliminate or minimise hazards and other risk factors in relation to the production and processing of animal material and animal products in order toto ensure that the resulting animal product is fit for intended purpose". The APA specifies a number of several additional generic requirements for example, lot coding and traceability, programme registration and verification.
RTE	Ready-to-eat products are prepared and sold without any need for the consumer to add ingredients. The food can be eaten with minimal preparation.
Verifier	Verification is typically carried out by a third party within a regulatory framework that is developed by the regulator. The regulator has power to intervene where food safety risk is considered to warrant special and immediate action.
Wine Act 2003	The Wine Act 2003 is a New Zealand law that sets out a framework to ensure that wine is fit for its intended purpose and provides for the setting of standards for identity, truthfulness in labelling, and safety of wine Wine Act 2003 No 114 (as at 30 November 2022), Public Act – New Zealand Legislation

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