

Recognised Agency & Persons for MPI Verification Guidebook

Contents

Revision History	4
1 Introduction	5
2 Accreditation status	5
3 The verification process	5
3.1 Initial inquiry and proposal.....	5
3.2 New Client Set Up	5
3.3 Evaluation Assessments.....	6
3.4 Verification Assessments.....	6
3.4.1 Arranging the verification.....	6
3.4.2 Verification Audit	6
3.4.3 Verification Findings	7
3.4.3.1 Performing	7
3.4.3.2 Conforming	7
3.4.3.3 Non-Conforming	7
3.4.3.4 Non-Complying	8
3.4.4 Addressing the Findings.....	8
3.4.5 Verification Audit Outcome	9
3.4.5.1 Acceptable	9
3.4.5.2 Unacceptable.....	9
3.4.5.3 Unacceptable findings follow up	9
3.4.6 Verification Report Review and Decision.....	9
3.5 On-going non-conformities	10
3.6 Unscheduled verification audit.....	10
3.7 On-going audits	10
3.8 Certificates	11
3.8.1 Scope of Verification	11
3.9 Variations to verification	11
3.10 Suspension or refusal of verification	12
3.10.1 Enforced by BSI.....	12
3.10.2 Voluntarily by your organization	13
3.10.3 Re-instatement of verification	13

**Recognised Agency & Persons for MPI Verification
Guidebook Revision 2 (February 2019)**

3.11 Cancellation or transfer of certificate 13
3.12 Reduction in scope of verification 13
4 Use of the BSI verification mark 14
5 Use of the JAS-ANZ logo..... 14
6 Standard owner information 14
7 Confidentiality..... 14
8 Additional obligations 15
8.1 Complaints 15
8.2 Assessment scheduling..... 15
8.3 Misleading statements..... 15
8.4 Observers 16
9 Complaints and reconsideration of verification decision..... 16
9.1 Appeals..... 16

**Recognised Agency & Persons for MPI Verification
Guidebook Revision 2 (February 2019)**

Revision History

Rev No	Revision Date	Author	Approved by	Page No	Sec. No	Brief Description of Change
1	August 2018	S Vincent	S Vincent	All	All	New
2	February 2019	A Lord	A Lord			Change title

Recognised Agency & Persons for MPI Verification Guidebook Revision 2 (February 2019)

1 Introduction

This Verification Guidebook is designed to assist your organization on the requirements for verification under the Recognised Agency & Persons for MPI (New Zealand Ministry of Primary Industries).

2 Accreditation status

This scheme is offered as an accredited scheme. The New Zealand Ministry of Primary Industries is the scheme owner.

Accreditation for ISO17020:2012 Type A.1 is held with JAS-ANZ.

3 The verification process

The following section outlines the steps that apply during the BSI recognition process for National Programmes 1, 2 and 3 and Food Control Plans. The MPI scheme is a risk based scheme which includes evaluation and verification of Food Control Plans and verification of national programme businesses.

3.1 Initial inquiry and proposal

BSI will respond to either verbal or written expressions of interest from organizations interested in one or more of our programmes. If your organization is located near a BSI office, an advisory visit may be arranged to discuss your verification requirements and how BSI can help your organization achieve them.

BSI will also, on request and receipt of a Service Request Form, prepare a proposal tailoring our services to your organization's needs. The proposal includes a copy of the BSI Standard Terms and Conditions. This document is an addendum to the Standard Terms and Conditions and outlines additional contractual requirements that your organization is required to follow to ensure verification, once achieved, is maintained.

Receipt of the signed proposal along with the accompanying payment of the non-refundable application fee forms the contract between your organization and BSI.

3.2 New Client Set Up

Your client details and requirements will be entered into our database and a Client Services Officer (CSO) will be appointed to look after your verification and assessment requirements. Your CSO will be your primary point of contact with BSI and their responsibility is to ensure that our services are delivered to your organization in the most effective manner possible.

If you are working with a consultant it is often useful for that person to be party to the communication process.

Depending on the type of business your organization is registering with MPI or your local council you will need an evaluation and/or a verification assessment. This document has not been written to outline all the requirements to meet the Food Act requirements. The MPI website is the best place to get all this information.

Recognised Agency & Persons for MPI Verification Guidebook Revision 2 (February 2019)

3.3 Evaluation Assessments

If your organization has a custom Food Control Plan you are required to have an evaluation for new programmes or when there are any significant changes. Custom Food Control Plans are required to be evaluated prior to registration with MPI.

National Programme and template Food Control Plans are not required to undergo evaluation on the proviso that they have followed the standard guidance provided by the MPI.

BSI does not offer evaluation assessments.

3.4 Verification Assessments

Once BSI has been advised of your registration with MPI your CSO will be in contact with you to arrange the Verification Assessment. The audit will be scheduled in the same manner as the evaluation audit.

This audit is required to be carried out by a different auditor than your evaluation (if applicable).

The focus of this assessment is the implementation of the procedures and policies and ensuring that the Food Safety Programme is effective at ensuring the production and sale of food.

An audit report is prepared at the completion of the audit and provided to your organization within five (5) days. The report will provide information on the areas of conformance and non-conformance.

3.4.1 Arranging the verification

BSI will try and book as far in advance to ensure that your organization can have flexibility in terms of assessment dates. For new clients or for clients that have undergone an evaluation the verification assessment will need to be conducted within 3 months of notification from MPI.

A verifier will be assigned to you to conduct this activity who has MPI approval to conduct this assessment and they will be experienced in your industry sector. You will be able to find their registration on the MPI register.

Once the verification date has been confirmed we will send you a confirmation letter which outlines the details relating to the assessment. This letter also serves as the agreement to conduct the assessment. Your organization is not required to respond to this letter however, no contact from your organization is taken to be agreement.

If, for some reason, you are not happy with the verifier that we have assigned to complete your assessment let us know as soon as possible and we will make arrangements for another verifier.

3.4.2 Verification Audit

All verifiers are required to follow a standard process on every audit they conduct.

At the start of the audit an entry meeting will be conducted. This is an opportunity for the verifier to meet the key people within your organization and to ensure that both yourselves and the verifier are in agreement with regards to the scope of the assessment.

The verifier will re-iterate the audit process that they will be following and outline the non-conformances that could be raised and what will occur if an unacceptable audit outcome is identified.

Recognised Agency & Persons for MPI Verification Guidebook Revision 2 (February 2019)

The audit process involves interviews with key personnel including people involved in the monitoring and measuring activities and the auditor is required to record their findings as evidence of what has been looked at.

The verifier is required to advise your organization of their findings and areas of non-conformance as the audit progresses.

At the conclusion of the audit the verifier needs to have a period of time to collect their thoughts prior to conducting an exit meeting. The exit meeting is a short meeting to report the findings from the audit and outlines the timeframes and process for close out of any non-conformances. The process also provides your organization an opportunity to determine the actions that will be taken to address the findings. Sometimes you may not be able to determine all the actions at the exit meeting.

At the conclusion of the audit the verifier will leave a written copy of any non-conformances so your organization can work to address these before receiving the final audit report.

As your third party verification body, BSI is not able to provide any solutions to any of the non-conformances or observations that are raised.

3.4.3 Verification Findings

At the conclusion of the assessment findings will be assigned the following categories;

- Performing
- Conforming
- Non-Conforming
- Non-Complying

What these mean is explained below.

3.4.3.1 Performing

If your organization is found to be "performing" this means that your organization fully meets the applicable requirements of the Act and your organization has demonstrated that you have a comprehensive knowledge of the applicable requirements of the Act and how to meet them.

3.4.3.2 Conforming

A "conforming" grade indicates that your organization adequately meets the applicable requirements of the Act. In general, your organization has appropriate documented systems and procedures in place and these procedures have been followed in the majority of cases.

3.4.3.3 Non-Conforming

If your organization is found to be Non-conforming (NCF), this means that the verifier has identified that there is a failure or inconsistency of your organization's procedures and systems that directly impact on safety and suitability. Procedures and systems have not been followed and this constitutes a risk to food safety. During the assessment isolated or sporadic lapses in implementation of procedures or practices were observed/demonstrated which were at a variance with applicable requirements of the Act or there was a consistent failure to keep records, or absence of required recording sheets that do not directly relate to controlling food safety and suitability.

Non-Conformances are required to be closed out within 30 days of the last day of the audit.

Recognised Agency & Persons for MPI Verification Guidebook Revision 2 (February 2019)

3.4.3.4 Non-Complying

If your organization is found to be Non-complying (NCP) this means that the applicable requirements of the Act are not fully met and are likely to affect the safety or suitability of food.

If a programme is found to be non-compliant the auditor is required to contact a qualified verifier to discuss the finding prior to the closing meeting to discuss the findings.

The auditor is required to immediately inform the MPI and the BSI Scheme Specialist if a Non- Compliance has been raised.

Non-Compliances are required to be closed within 14 days of the last day of the audit.

Some examples of what constitutes a Non-compliance includes;

- If there is a significant deficiency or failure to manage risks or comply with an applicable requirement of the Act to the extent that food safety and/or suitability is threatened either immediately (Critical Non-compliance) or in the future if improvements aren't made.
- Applicable requirements of the Act are not met and finding can be referenced to an offence provision in part 4 of the Act.
- Procedures and systems that directly impact safety and suitability of food are absent or insufficient to manage the risks; or
- Procedures and systems are not followed and this constitutes a risk to food safety and suitability directly; or
- Records required that directly relate to controlling food safety and suitability is significantly absent, incomplete, or altered.
- Previously reported non-conformance impacting food safety and suitability have not adequately been addressed.
- A number of non-conformances against an applicable requirement of the Act or a pattern of non-conformances of a single requirement over successive verifications are observed.

3.4.4 Addressing the Findings

Your organization is required to send the information outlining how you have addressed the findings. The information that you need to provide contains three (3) parts;

- Correction: What your organization has done to fix the immediate problem?
- Root Cause Analysis: Why did this problem occur?
- Corrective Action: What have you done to ensure that this does not happen again?

Corrective Action Plans (CAPs) are required to be sent to BSI (food.division@bsigroup.com) within the stated time frame along with appropriate information to support the actions taken.

Once your verifier has reviewed the information you will be advised, in writing, if this has been accepted or whether more information is required to be provided.

The verifier will review the information provided and will determine if this is sufficient to close out the corrective action.

It is your organization's responsibility to respond to the non-conformities detailed in your audit report by the designated time frame. Failure to do so may result in suspension or cancellation of your verification.

Recognised Agency & Persons for MPI Verification Guidebook Revision 2 (February 2019)

3.4.5 Verification Audit Outcome

An audit report will be provided to your organization at the conclusion of the assessment and will contain evidence of your organization's compliance to the New Zealand Food Act 2014 and the New Zealand Food Regulations 2015. The complete audit report will be provided within 10 days of the last day of the audit.

The final outcome of the audit will be either an "Acceptable" or "Unacceptable" audit outcome.

3.4.5.1 Acceptable

An audit can be deemed acceptable even if there are non-conformances raised if the safety and suitability of the food is not compromised.

3.4.5.2 Unacceptable

The audit outcome may be deemed Unacceptable if the verifier finds the following;

- A non-compliance has been raised that is likely to result in food being unsafe or unsuitable; or
- The risk assessment is not appropriate or effective for the type of food business
- There is a repeated failing of the organization to identify or address a problem related to the safety or suitability of the product
- Your organization has failed to identify or effectively address a problem or deficiency that has the potential to cause a critical non-compliance
- BSI has no confidence in the operations of your organization because of the combined effect of several instances of non-compliance
- BSI has no confidence in the operations overall due to the extent to which records required under the applicable requirements of the Act are absent, incomplete, or altered.

3.4.5.3 Unacceptable findings follow up

If there is an unacceptable outcome your organization and the verifier must;

- Agree to a period of time within which the operator has to prepare a corrective action plan for the consideration by the verifier; and
- Agree to a corrective action plan, which must state the corrective actions to be carried out and the time within which each action must be carried out.

Your organization is required to comply with the corrective action plan and provide the verifier with evidence that the corrective action plan has been implemented. The verifier is required to re-visit the site with the unacceptable result to verify that the client has taken the appropriate action.

3.4.6 Verification Report Review and Decision

Once the findings have been accepted by the verifier this is passed to the independent BSI technical review team, who are specifically trained in the scheme and accreditation requirements, to conduct a review. It is this team who makes the decision for your organization to be verified.

Recognised Agency & Persons for MPI Verification Guidebook Revision 2 (February 2019)

The audit report, the information that is obtained during the document review and the on-site assessment and the findings information are reviewed by an independent person at BSI to ensure the verifier and your organization have completed all the requirements. Once the report review has been completed, your organization will be advised that you have passed your verification and you will be sent a certificate.

3.5 On-going non-conformities

If there are ongoing non-compliance issues recorded at your organization, BSI is required to notify MPI in writing outlining our concerns and include time frames of when concerns were raised and any response received from your operator.

3.6 Unscheduled verification audit

An unscheduled verification audit may be required if MPI considers there are, in respect of a food business or the operations of a registered importer, potential food safety or suitability issues based on;

- any recalls of food undertaken at the direction of the chief executive or undertaken by any food business or any registered importer:
- any contamination, or suspected contamination, of the food by any hazard:
- any information that the registration authority considers is reasonable grounds for suspecting that the food is not safe or suitable or otherwise does not comply with any applicable requirements of the Act:
- any information that the registration authority considers is reasonable grounds for suspecting that the food business or operations of the registered importer do not comply with any applicable requirements of the Act:
- any findings from monitoring, surveys, or auditing conducted by the registration authority of activities of food businesses or importers:
- any other factors the registration authority considers relevant.

The MPI will advise BSI in writing if an unscheduled verification audit is required. BSI is required to conduct this assessment within a specified timeframe as advised by the MPI.

An unscheduled audit is an announced audit which means that you will know that BSI will be conducting an assessment and when this will take place. Your CSO will advise your organization that there has been a request for an unscheduled audit to take place. You will be provided with a confirmation letter which will outline the scope and objective of the assessment.

3.7 On-going audits

Once your organization has been verified, an audit frequency will be set based on the previous audit outcome and whether your organization has a National Programme or a Food Control Plan.

You will be notified of your audit frequency by your verifier/auditor following the audit.

Recognised Agency & Persons for MPI Verification Guidebook Revision 2 (February 2019)

3.8 Certificates

When your organization has met the requirements and a positive verification decision has been made, BSI will provide you with a Certificate as a statement that your organization has achieved verification to the relevant standard(s).

The certificate will include important information such as your organization's verification number, the standard for which verification has been granted, and the date of verification. The certificate should be displayed where it will be seen by customers and potential customers.

When copies or elements of the certificate are used in tenders or offered to potential or existing customers, the entire certificate should be provided. When certificates are presented in part not all of the information that reflects your verification status is sent and this could be misleading.

All original certificates remain the property of BSI Group ANZ Pty Limited and must be returned on request.

3.8.1 Scope of Verification

The scope of verification fully details the scope of your organization's verification in terms of:

- Names and addresses of all locations covered by the verification;
- Achievement of verification to the relevant standard(s) or code(s) of practice
- The capability statement (range of products, services, and activities) for each location covered by the verification and
- Any specific exclusions from the scope of verification

Your organization is required to ensure that BSI has been formally briefed in a timely manner when any changes (variations) occur. You should not wait until the next scheduled assessment to notify BSI. Failure to do so may compromise the organization's verification status.

3.9 Variations to verification

Your organization is required to ensure that MPI is informed of any changes to the registered business as this will likely require an evaluation and re-submission of your Food Safety Programme.

BSI also requires your organization to formally advise us of any changes that occur. Failure to do so may compromise your organization's verification status.

Variations to verification may originate from:

- Variations to the scope of certified product
- Changes to the premise and equipment
- Changes to the CCPs
- Major nonconformities
- Voluntary withdrawals
- Withdrawal or suspension of verification by BSI
- Change of verification scope
- Change of ownership



Recognised Agency & Persons for MPI Verification Guidebook Revision 2 (February 2019)

- Change of management
- Change of company name
- Change of NZBN etc
- Death, bankruptcy, receivership, voluntary administration or liquidation of the operator or the food business

MPI's requirements will determine if the degree of change is significant to require an additional evaluation or if the changes can be assessed at the next schedule audit.

Your organization is required to complete either;

- Form FA11NP – National Programme or
- Form FA11FCP – Food Control Plans

Both of these documents are available on the MPI website.

3.10 Suspension or refusal of verification

Suspension is a temporary hold on your verification which means that no product/s can be produced, supplied or handled by your organization during that period.

When an organization's verification is suspended the organization shall, for the period of suspension or refusal:

- Withdraw and cease to use any advertising or promotional material that promotes or advertises the fact that the organization is verified
- Ensure that all copies of certificates and scopes of verification are removed from areas of public display and
- Cease to use the verification mark on stationery and other documents including media and packaging that are circulated to existing and potential clients, or in the public domain

The organization shall advise BSI in writing of action taken with respect to the requirements listed above;

- BSI shall advise the organization in writing of the verification processes that will need to be completed to restore verification; and
- During the period of suspension the organization shall continue to pay all fees levied by BSI

Suspensions can be applied for 3 months however, your organization can request a further extension through the MPI.

Your organization is required to ensure that BSI is aware of any changes to your verification status.

3.10.1 Enforced by BSI

In the event that your organization is unable to comply with the requirements of the Food Act, BSI may refuse to grant verification or suspend your current certificate.

The decision to refuse verification, and the grounds for that decision, will be communicated to your organization in writing.

Reasons for BSI enforcing a suspension include;



Recognised Agency & Persons for MPI Verification Guidebook Revision 2 (February 2019)

- Failure to pay for services provided by BSI
- Providing misleading information about your verification status
- Breaching the BSI Standard Terms and Conditions
- Failing to close out non-conformances

MPI will be advised if your verification status is changed by us.

3.10.2 Voluntarily by your organization

Where your organization wishes to voluntarily suspend your verification you will need to advise both the MPI and BSI.

3.10.3 Re-instatement of verification

When your organization is ready to re-instate verification an audit is required to be undertaken to ensure that your Food Safety Programme is still in operation.

Any changes that may have occurred during the period of suspension are required to be notified to MPI and BSI. An evaluation may also be required.

3.11 Cancellation or transfer of certificate

Your organization is required to advise BSI and MPI if you are cancelling verification.

If your organization is transferring to a different recognised agency, it is important to advise BSI of this as there are processes BSI is required to follow to allow the transfer to occur.

When your organization's verification is cancelled or has transferred, you shall immediately:

- Cease any advertising and promotional activities that promote the fact that the organization holds verification
- Withdraw and cease to use any advertising and promotional material that promotes the fact that the organization holds verification
- Cease to use relevant verification marks in any way to promote the fact that the organization holds verification and
- Return all certificates and pay outstanding fees

3.12 Reduction in scope of verification

When an organization's scope of verification is reduced, BSI shall issue revised certificates and scopes of verification as appropriate and the verified organization shall:

- Return all superseded certificates
- Ensure that use of the verification mark is adjusted to reflect the reduced scope of verification
- Ensure that all advertising and promotional activities and materials are adjusted to reflect the reduced scope of verification and
- Pay any fees that are applicable for the facilitation of this activity

A reduction in scope includes removing products from the scope or removing sites.



Recognised Agency & Persons for MPI Verification Guidebook Revision 2 (February 2019)

4 Use of the BSI verification mark

Your organization is entitled to use the appropriate BSI 'kitemark' whilst you maintain verification to this program with BSI. For a copy, visit our website at www.bsigroup.com

Use of the logo is subject to Condition and rules of its application.

5 Use of the JAS-ANZ logo

Organisations that have been granted verification by BSI are entitled to use the JAS-ANZ Accreditation Symbol. The rules for the use of this mark are governed by JAS-ANZ. The JAS-ANZ Accreditation Symbol is required to be used in alongside the BSI verification mark.

at all times.

Your organisation is required to use the specifications and use of the JAS-ANZ Accreditation Symbol described in the following hyperlink -

<https://www.bsigroup.com/LocalFiles/EN-AU/JAS-ANZ%20Mark%20Use%20Guidelines.pdf>

6 Standard owner information

The Ministry of Primary Industries is the scheme owner.

BSI is obligated to advise the MPI as soon as practical of;

- Any unacceptable outcome from a verification decision relating to a food business or the operations of a registered importer
- Any critical non-compliance, identified by BSI
- BSI is required to provide a recommendation of the actions to be taken to the MPI in these instances.

BSI is also required to provide information relating to the verification of your organization any information relating to your NP or FCP and operations as a registered importer.

7 Confidentiality

BSI will treat all information in accordance with the New Zealand Privacy Amendment 1993.

All information of a confidential nature relating to your organization that is disclosed to BSI in connection with the services will be maintained as confidential for six (6) years after it has been received and it will not be disclosed except where BSI is;

- conducting its obligations under the Terms and Conditions
- asked to release information by any governmental or other regulatory authority of accreditation authority,
- instructed by a court or other authority of competent jurisdiction.

BSI is not required to notify your organisation of such disclosure and cannot oppose to any demand made by your organization.

8 Additional obligations

Following verification, there are a number of managerial responsibilities which your organization will need to observe to maintain verification. These include ensuring that your organization;

- maintains continued compliance with the relevant systems standard(s) or code(s) of practice;
- complies with the BSI Standard Commercial Terms and Conditions and obligations as specified in this document as well as other guidance documentation that may be specifically provided from time-to-time;
- conducts regular internal reviews of your system, with appropriate documentation of such reviews and of any subsequent corrective actions;
- notify BSI of any significant changes in the structure (key responsibilities and management system), ownership and operations of your organization to enable the impact of such changes on the ownership system to be evaluated; and
- notify BSI of any litigation or serious events or matters that relate to the scope of your verification. In the event of a product recall, you are required to inform BSI with 3 working days of the decision to issue a recall.

8.1 Complaints

Your organization is required to keep a record of all known complaints. These records must be made available to the audit team and BSI when requested.

Your organization is required to demonstrate that you have taken appropriate action to address these complaints through investigation and correct any deficiencies found. These actions must be documented.

8.2 Assessment scheduling

Your organization is required to make all necessary arrangements to allow the evaluation and surveillance activities to take place. This includes but is not limited to; Equipment, Product, Locations, Personnel and Sub-contractors.

8.3 Misleading statements

Your organization is not permitted to use its verification in a manner that could bring BSI into disrepute. This includes making misleading or unauthorized statements.

If you are unsure if a statement could be misleading you are advised to contact BSI prior to making the statement. Statements include, but are not limited, to the use of the logo on non-certified product, advertising (including your website) and internal communication.

If your organization is required to provide copies of their verification documents these must be reproduced in its entirety. Failure to do so may be misleading to the recipient as to the scope of verification.

Recognised Agency & Persons for MPI Verification Guidebook Revision 2 (February 2019)

8.4 Observers

From time to time BSI requires an observer to be in attendance at an audit. This may be related to training of new staff, witness assessment of existing staff, accreditation bodies and scheme owners. It is a requirement of verification that your organization allows these activities to occur. The Observer does not take an active part in an assessment and the audit outcome should not be influenced by the presence of an observer.

Failure to allow this activity to occur may result in cancellation of your verification.

BSI will, at all times, ensure that the use of observers is kept to a minimum and your organization will be advised prior to the assessment activity.

9 Complaints and reconsideration of verification decision

Appeals against verification decisions and / or complaints against service delivery levels may be raised with your verifier or CSO. If you remain dissatisfied, contact the BSI General Manager Technical and Operations in writing.

All complaints will be investigated and the originator of a complaint will be advised of the outcomes, as appropriate.

BSI will also investigate legitimate documented complaints, relevant to operation of the system, from customers of certified organizations and the accreditation body. Verified organizations shall, at all reasonable times, provide representatives of BSI with access to its premises and records for the purposes of investigating such complaints.

9.1 Appeals

If your organization's application for verification has been refused; or your certified organization's verification has been suspended, withdrawn, or reduced in scope, you may appeal against the decision to a Review Committee constituted and operated as set out below:

- Your organization is required to lodge an appeal (in writing) within 15 working days of receiving the audit report.
- BSI is required to consider the decision within 20 working days of receiving the appeal.
- Where appropriate, the appeal review may be considered by a person independent of the assessment process. The qualifications of the independent person will be considered to ensure that the concerns of your organization are understood but can be placed into the context of the product/s risk and the requirements of the assessment criteria.

To raise a complaint or appeal against the service delivery by BSI or the audit outcome please notify;

Alison Lord

GM Technical & Operations (ANZ)

Email: Alison.Lord@bsigroup.com

Phone: +61 (2) 8877 7100