



New Zealand
Aged Care Association

Submission to the
Ministry of Primary Industries on the
draft Food Control Plan

23 February 2017

Introduction

1. This submission is from the New Zealand Aged Care Association (NZACA), the peak body for the aged residential care sector in New Zealand. With over 590 members, we represent over 90% or approximately 37,000 beds of the country's aged residential care (ARC) sector. Our members range from the very small stand-alone care homes to the large co-located sites that include care services and retirement villages. Our members' services include rest home, hospital, dementia and psychogeriatric care, as well as short-term respite care and a small number of YPD (young persons with disabilities) beds.
2. Advocating and lobbying to government to shape policies and create an environment that helps our members provide outstanding quality care is at the heart of what we do. We also provide leadership on issues that impact on the success of our members. We also produce valuable research, professional development opportunities, information and publications to help our members make informed business decisions, improve capability and keep them up to date with sector developments.
3. We have a small team of five staff based in Wellington and led by Chief Executive, Simon Wallace, a representative Board of eleven directors chaired by Simon O'Dowd and a network of sixteen branches around New Zealand.
4. Any enquiries relating to this paper should in the first instance be referred to Kathryn Maloney, Senior Policy and Research Analyst at kathryn@nzaca.org.nz or by phone on 04 473 3159.

Comment

5. The draft Template Food Control Plan addresses a number of problems with the current template. However, it does not address some of the issues facing operators.
6. Noted improvements in the draft template include the following.
 - The draft template is easy to use.
 - The draft template uses plain language.
 - The know/do/show formatting is better: it is easy for operators to know what they need to record and show to an evaluator or verifier.
 - An operator who owns just one or two ARC homes could develop a food control plan easily using this format (most already have a food safety programme which would cover off much of what is required).
 - The sections pertaining to water supply in the chapter on "Set-up", record keeping in the chapter on "Starting", and when something goes wrong in the chapter on "Troubleshooting" are all much more concise than the original template.
 - Recall procedures are better defined.
 - The specific section for poultry, liver and minced meat in the chapter on "Cooking" gives better information with respect to what to do with high risk food.

7. Issues still to be addressed in the Food Act 2014 include the following.
- While a template Food Control Plan is suitable for an operator who owns just one or two ARC homes, an operator with multiple sites will probably opt for a custom plan so that they can register with MPI rather than each individual council. (The template is a great resource and can assist with writing a custom plan.)
 - An ARC operator with multiple sites across New Zealand needs to have each site evaluated individually (at significant cost) or apply for an exemption for some sites.
 - The exemption process is slow (for example one larger aged residential care operator, who has multiple sites, applied to MPI for an exemption on 3 February yet only received a response on 22 February and that was to say its application was being considered.)
 - Once the Food Control Plan is evaluated and registered with MPI, each site owned by one individual ARC operator will need to be verified (by an approved verifier) annually, again adding significant cost.
 - The system is very paper based.

Recommendations

8. ARC operators with multiple sites have sample homes evaluated (10 percent of their homes) to make evaluation and registration of the plan simpler and more cost effective.
9. Speed up the exemption process or make amendments to the Food Act 2014 to better account for ARC operators with multiple sites using the same Food Control Plan.
10. Include verification of the Food Control Plan in existing external audits or verify operators using a randomly chosen sample of ARC homes.

Regards,



Simon Wallace
Chief Executive
New Zealand Aged Care Association
PO Box 12481
Wellington 6144
New Zealand