HARPS
HARMONISED AUSTRALIAN RETAILER PRODUCE SCHEME

HARPS Standard Version 2.0 Guidance

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Contents

Register of HARPS Elements

Introduction

Acknowledgements

The continuing support and technical expertise provided by the HARPS Retailer and Technical Committees are gratefully acknowledged.

Transition Requirements to HARPS Standard Version 2.0

The HARPS Standard Version 2.0 has been published as of 17 October 2022 and transition to this version will need to occur according to the timeline shown in Figure 1.

Figure 1 HARPS Standard Version 2.0 Transition

Scheme Background

In 2012, Horticulture Innovation Australia Ltd (now known as Hort Innovation) initiated a project to harmonise the food safety certification requirements of the major retailers in Australia. The result of this project is the **Harmonised Australian Retailer Produce Scheme (HARPS).**

The scheme is voluntary, and application is open to all fresh produce businesses that undertake the following activities:

- Grow produce for retail sale or food service;
- Pack produce for retail sale or food service;
- Operate as an aggregator, distributor, broker or agent supplying produce for retail sale or food service; or
- Are Suppliers or subcontracted Suppliers, that is they pack into retailer-branded packaging or bulk loose packs.

The Retail Customers in the HARPS program are shown below. These are the businesses that have agreed to accept the HARPS program as a replacement to their own bespoke requirements and also sell the products covered within the defined scope to the final consumer.

The term 'Customer' that is used throughout HARPS documents refers to these, this means the business purchasing from you. For Tier 2 Suppliers this is the Tier 1 Supplier, and for Tier 1 Suppliers this is the HARPS Retail Customers. Where the term 'Customer' is used, this refers to **all** impacted or relevant Customers.

The HARPS Standard is a set of criteria that provide an additional level of prescription above the basic Food Safety Global Food Safety Initiative (GFSI) Standards, which the Retail Customers agree are fundamental for the delivery of safe produce to Australian consumers. In addition to food safety requirements, HARPS also include requirements relating to legal and trade legislation. HARPS is a retailer-led scheme that addresses the pain-points experienced by retailers that have occurred through customer complaints, rejections at retailer Distribution Centres, product withdrawals and

product recalls.

Through the harmonisation process, multiple retail requirements have been combined and simplified to ensure a streamlined and more cost-effective way for produce suppliers to achieve appropriate food safety certification with a single scheme covering the needs of many retailers.

HARPS is managed and administered by One Direction ANZ Pty Ltd on behalf of the participating Retail Customers. Hort Innovation owns all HARPS intellectual property and have granted a management licence to One Direction ANZ.

HARPS Retail Customers

The Retail Customers in the HARPS Scheme are:

ALDI Stores	**Coles Supermarkets**	**Costco**	**Harris Farm Markets**
HelloFresh	**Metcash**	**Woolworths**	

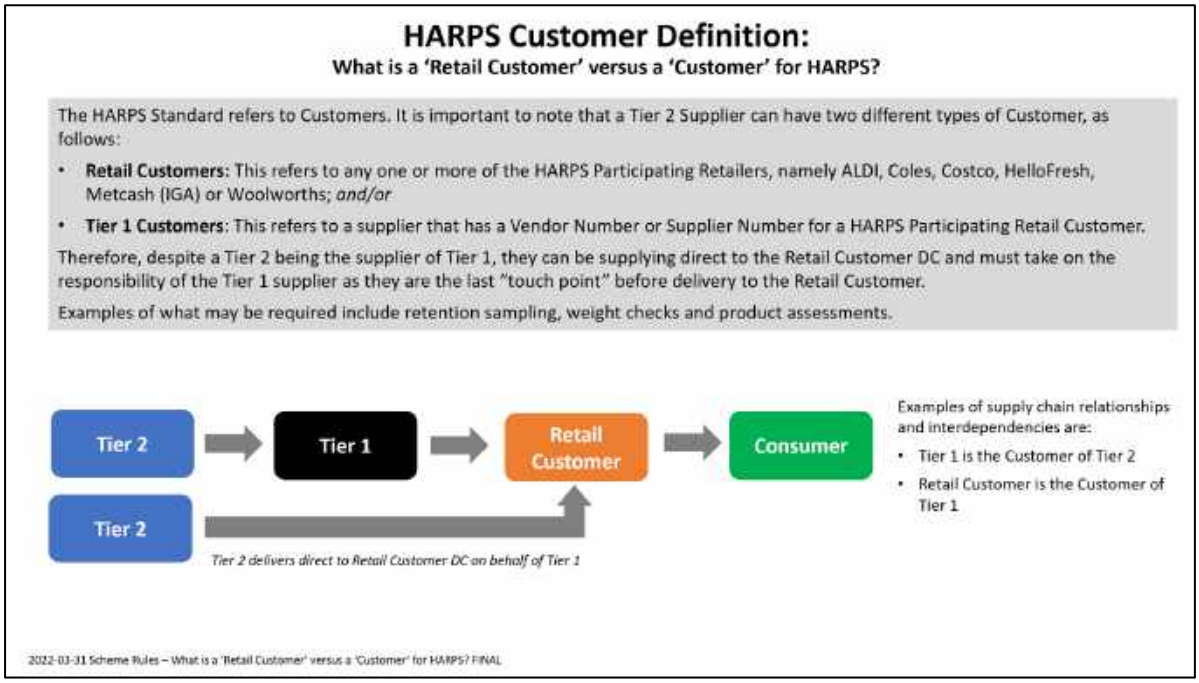
Scope

The scope of the HARPS Standard is for the growing and packing of whole produce (whole fruit, whole vegetables and in-shell nuts). The scope does not include the processing or value-adding of produce.

The scope covers all operations from site selection and preparation, growing, harvesting, packing, storage, ripening and distribution. The addition of food service providers as HARPS Retail Customers has not led to an adjustment on the scope or increase in rigour of HARPS. The scope remains as whole fruit and vegetables and in-shell nuts.

The HARPS Standard defines 'Retail Customers' and 'Customers' differently as shown in Figure 2.

Figure 2: Definition of Retail Customer versus Customer



The HARPS Standard specifically applies to Tier 1 and Tier 2 Suppliers as defined in the HARPS Decision Graphic. However, Tier 1 and 2 Suppliers are responsible to manage Tier 3 Suppliers as Approved Suppliers.

The HARPS Decision Graphic explains the different tiers and associated requirements in more detail and is shown in Figure 3.

Figure 3: HARPS Decision Graphic

* Also available on the HARPS website.

Underpinning GFSI Schemes

Under the HARPS Scheme Rules, approval will only be granted once a Tier 1 or Tier 2 Supplier is certified to one of the following GFSI Schemes *plus* the HARPS Standard. Tier 3 Suppliers are required to implement a recognised GFSI Scheme only.

Figure 4 shows the applicable GFSI Schemes.

Figure 4: GFSI Schemes Underpinning HARPS Standard

Standard	Application for	Excludes
BRC Global Standard for Food Safety	• Packers	• Growers
BRC Agents and Broker Standard	• Agents & Brokers	• Growers • Packers • Transport & Distribution • Wholesale • Ripening
SQF Food Safety Code – Primary Production	• Primary Production • Packing	• Manufacturing • Storage & Distribution
SQF Food Safety Code – Manufacturing	• Manufacturing	• Primary Production • Storage & Distribution
SQF Food Safety Code – Storage & Distribution	• Storage & Distribution	• Primary Production • Manufacturing
GLOBALG.A.P Integrated Farm Assurance	• Growers & Packers	
Freshcare Food Safety & Quality Standard	• Growers & Packers	• Storage • Ripening • Transport & Distribution • Wholesale • Brokerage & Virtual
Freshcare Supply Chain Standard	• Packers & Handlers • Storage • Ripening • Transport & Distribution • Wholesale • Brokerage & Virtual Brokerage • Provedore	• Growers

*Applicable schemes depend on scope and risk. Please refer to your Retail Customer(s) if unclear.

** GLOBALG.A.P. Multisite Option: Each Retail Customer must approve any suppliers wishing to work under the multisite option.

HARPS Standard Version 2.0 Implementation

For Suppliers who are already approved to HARPS Standard Version 1, transition to Version 2.0 needs to occur as per the prescribed transition date.

This will necessitate the site updating all Food Safety Program documentation and collection of records to meet the requirements of the new version.

An introductory HARPS Version 2.0 Transition Course and Version 1.0 to Version 2.0 Changes Document will take you through the key changes and updates to the HARPS Standard.

The audit process will occur as previously.

For new Suppliers to the HARPS Scheme, it is recommended to use the Pre-Assessment Checklist that can be found on the HARPS website https://harpsonline.com.au/tools-and-templates/ to get audit ready.

An audit can be scheduled with one of the approved Certification Bodies listed on the HARPS Website https://harpsonline.com.au.

The HARPS Standard has been designed to be audited together with the GSFI Scheme and shall occur during a period of production and / or packing.

If there is a reason to delay an audit or an exemption is sought, agreement must be first be provided by the Customer(s). Following this, the HARPS Extension and Exemption Request Form must be submitted to HARPS as described in the form. The form can be downloaded from the HARPS website at https://harpsonline.com.au/tools-and-templates/.

Document Structure

The following section includes all of the Elements and Requirements of the HARPS Standard Version 2.0 as well as guidance.

The Element Requirements need to be implemented in full, whereas the guidance suggest possible ways of being compliant with the element. The guidance text does not form part of the auditable standard.

The following is the structure of each of the standard elements and guidance.

Element	Requirement	Document	Tier
Element Number	**Requirement Title** Requirement text.	Document Type that addresses the requirement.	Supplier Tier that needs to address the requirement.
Guidance of how compliance against the requirement can be achieved. The guidance text does not form part of the auditable standard.			

HARPS Guidance

1.0 GFSI Schemes and Approved Suppliers

Element	Requirement	Document	Tier
1.1.	**GFSI Certification** Suppliers shall maintain Certification to a HARPS approved GFSI Scheme.	Record	1 & 2
Tier 1 and Tier 2 Suppliers must be audited against one of the approved GFSI Schemes as appropriate to their scope. GFSI Scheme Certification must be current when supplying Customers. Suppliers need to show compliance by keeping a current certificate for the chosen GFSI scheme. This certificate must include all of the products and processes for which the business is certified. This is required in addition to current HARPS Approval. Any delay in (re)-Approval, for example due to seasonal delays, must be agreed with the Customer(s). Once agreement has been obtained, HARPS must be notified using the HARPS Extension / Exemption Request Form found on the HARPS website at https://harpsonline.com.au/tools-and-templates/.			

Element	Requirement	Document	Tier
1.2	**Certification Scope** All products and ancillary services provided to the Customer shall be included in the scope of GFSI program certification.	Record	1 & 2
All products in scope for the HARPS Scheme, as listed in the Introduction, and supplied to any Customer must be included in the GFSI certification scope. This also applies to Ancillary Services applied to these products, for example ripening and fumigation services. The GFSI Scheme Certificate must show all of the products and processes that have been certified.			

Element	Requirement	Document	Tier
1.3	**Approved Supplier Register** Suppliers shall ensure that a register of current Approved Suppliers is available and maintained.	Record	1 & 2

A current list of all Approved Suppliers has to be maintained.

Approved Suppliers include any Tier 2 or Tier 3 growers and / or packers supplying to Tier 1 or Tier 2 Suppliers.

Approved Suppliers may also be Tier 1 Suppliers if products are traded from one Tier 1 Supplier to another.

Ancillary Service Providers, such as ripening and storage services, are considered Approved Suppliers.

Approved Supplier records must be regularly updated, and version controlled to ensure that only current Approved Suppliers are supplying.

Product or raw material from unapproved suppliers must not be sent to Customers.

The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for Approved Supplier records. Use of it is not mandatory.

Element	Requirement	Document	Tier
1.4	**HARPS Decision Graphic** Suppliers shall ensure their Approved Suppliers meet the actions required by the HARPS Decision Graphic, refer to Introduction.	Record	1 & 2

Tier 1 and 2 Suppliers need to ensure that Approved Suppliers, that is all Tier 1, 2 and 3 Suppliers providing product to them, comply with the requirements to be certified to an approved GFSI Scheme and are HARPS approved, where required.

Compliance to the HARPS requirements, including approval expiry date, needs to be recorded in the Approved Supplier record of Element 1.3.

2.0 Specifications

Element	Requirement	Document	Tier
2.1	**Customer Specifications and Approval** A Register shall be developed and maintained that includes all products along with the corresponding specification that is supplied to the Customer. Finished Product Specifications shall be developed by the Customer or developed by the Supplier and approved by the Customer. Finished Product Specifications shall be reviewed whenever the product or process changes, or at least every 12 months. Changes to Product Specifications shall be approved in writing by the Customer before implementation occurs. Records of approval shall be kept.	Record	1 & 2

A Register of products and their corresponding specifications shall be developed and maintained so that only current specifications are used. This list shall cover all Customer and Supplier Branded Products as well as bulk products.

The Customer generally develops the Product Specification. When this is not the case, i.e., the Supplier develops the specification, then approval must be sought from the Customer (in writing) prior to the specification being implemented.

Specifications shall also be reviewed when the product or process changes. An example of a process change is when a new sanitiser is introduced during the washing process.

From time-to-time Customers may issue updates or variations to a Product Specification, particularly due to seasonal factors. Variations are generally applicable for a specified period of time only. The Supplier should revert to the standard specification once this period of time has expired. Tier 1 suppliers are responsible for ensuring any Approved Suppliers are aware of Specification changes and variations.

Element	Requirement	Document	Tier
2.2	**Approved Supplier Access to Specifications** Tier 1 Suppliers shall ensure that Approved Suppliers that supply product in final Retail Customer packaging have access to the relevant product, packaging and labelling specifications.	Record	1
It is the responsibility of Tier 1 Suppliers to ensure that all their Approved Suppliers in final packaging use up-to-date finished product specifications. This also applies to packaging specifications and labelling specifications. These requirements are essential to ensure that Suppliers provide product that meets Customer requirements and that correct packaging and labels are used. Incorrect packaging and / or labelling is a major cause of product withdrawals and recalls, requiring careful management. To ensure that specifications are current, they need to be regularly reviewed. This is further detailed for product specifications in Element 2.1.			

Element	Requirement	Document	Tier
2.3	**Tier 2 Specification Access** Tier 2 Suppliers shall ensure that they have access to the relevant product, packaging and labelling specifications as provided by the Tier 1 Supplier.	Record	2
The reciprocal requirement to Element 2.2 is that Tier 2 Suppliers must ensure that they are working with up-to-date specifications. If no update is provided by a Tier 1 Supplier, the Tier 2 Supplier must contact the Tier 1 Supplier to receive any updated specifications. To ensure that specifications are current, they need to be regularly reviewed. This is further detailed for product specifications in Element 2.1.			

Element	Requirement	Document	Tier
2.4	**Finished Product Specification** Where the Supplier develops a finished product specification, the specification shall include all relevant information required by the Customer and shall comply with Australian legislation including the Food Standards Code, National Trade Weight Measurement Regulations and Australian Competition and Consumer Law.	Record	1

If a Supplier develops a finished product specification for approval by the Customer, all legal and Customer requirements must be addressed.

Customer requirements will include physical parameters and packaging materials, amongst others.

Legal requirements are found in the Food Standards Code for labelling requirements, including allergen declarations, compliance with chemical residue limits, primary production standards and handling and storage requirements where applicable, e.g. “wash before use”.

Additionally, weight and measurement regulations must be complied with. These are managed by the National Measurement Institute.

The Australian Competition and Consumer Commission (ACCC) further regulates commercial conduct, including the requirements to not mislead consumers, declaring the Country of Origin accurately and to provide safe products.

Other legislation may apply, for example meeting import requirements for products sourced from overseas.

Element	Requirement	Document	Tier
2.5	**Product Assessment** Product assessments shall occur at a minimum twice per product per production day, at the beginning and end of each run. Non-conformance to criteria shall be documented and corrective action undertaken, with the results made available to the Customer upon request. Customers shall be immediately advised of food safety issues if product has been despatched to the Customer. Further action shall be taken as agreed between the Supplier and the Customer.	Record	1 & 2

The finished product specification forms part of the purchasing agreement with the Customer.

Therefore, packed product (pre-packed and bulk) needs to be inspected to ensure that all the parameters in the finished product specification are met. This includes checking physical parameters and percentage defects, among others.

Checks may need to occur at several stages of the distribution chain, such as at initial packing and after ripening of some products to ensure compliance. For example, inspection at initial packing would be important for sizing and defects, whereas after ripening the ripeness parameters, final weight and additional damage may need to be assessed.

Unless otherwise stated by the Customer, assessments must be carried out at least at the start and end of each production run for each individual product and on each day. This is separate to any in-process checks, for example during grading.

Where finished product is found to not be compliant with the specification, action is required to bring the product into specification. This may include repacking or reworking and adjusting on-line parameters to ensure a compliant finished product.

Those corrective actions have to be recorded and be made available to the Customer on request. This could possibly occur where the Customer inspection has found product to be marginally within tolerances.

Where an issue has been identified, the Customer must be immediately informed. In this case the Customer may want to inspect products in their own control further and take appropriate action to protect the consumer.

In this case, further actions in relation to the impacted food need to be agreed with the Customer.

Element	Requirement	Document	Tier
2.6	**Supporting Data and Validation Evidence** Maintain current supporting and validation data for the finished product shelf-life validation, data supporting the Nutrition Information Panel (NIP) and packaging requirements and specifications.	Record	1 & 2

Supporting information that shows that finished product specifications and labels are accurate and legally compliant have to be kept by the Tier 1 Supplier in relation to all products supplied to the Customer.

Where a label contains a Nutrition Information Panel, validation in the form of theoretical data, for example from the Australian Food Composition Database (https://www.foodstandards.gov.au/industry/npc/Pages/nutrition-panel-calculator.aspx), before launch of the product and then actual testing must be maintained.

Where a nutrition claim is made on the label there is a maximum 10% tolerance of test results from the stated value. A 20% tolerance applies where no specific claim has been made beyond the NIP unless information has been sourced from the retailer or other government authority

However, for absolute claims such as 'Free From' or 'Less than x% Fat' there is no tolerance, and the claims must be fully complied with.

Supporting evidence from testing must be kept for any claims and provided to the Customer on request.

Additionally, Tier 1 and Tier 2 Suppliers have to maintain shelf-life validation data to justify 'Best Before' or 'Use By' date coding, see also Section 4.

Tier 1 and Tier 2 Suppliers must maintain raw material specifications, whether for the product purchased from an Approved Suppliers or for inputs such as waxes. This is to assure that product is safe and will be compliant with finished product specifications on delivery to the Customer.

Tier 1 and Tier 2 Suppliers also have to maintain packaging specifications that ensure that product is suitably protected, meets finished product specifications and is food contact safe.

3.0 Retention Samples and Shelf-life

Element	Requirement	Document	Tier
3.1	**Shelf-Life Validation** Shelf-life validation of finished product in final packaging shall occur on all new products (bulk and pre-pack) prior to first sale or when unit size, packaging materials or format of a finished product is altered, or when a significant change to the process has occurred.	Record	1

Shelf-life validation ensures that product lasts through the supply chain for the set date coding and that consumers obtain sufficient shelf-life in the home.

Shelf-life validation is also a valuable tool to suppliers as it may allow the increase of shelf life or reduce over-pack requirements which generates savings.

Shelf-life validation will generally be carried out by Tier 1 Suppliers but may be conducted by Tier 2 suppliers where that is more convenient. However, Tier 1 Suppliers must maintain the validating data for shelf-life setting. A written agreement between the Tier 1 and Tier 2 Supplier must be kept detailing the activities required and what information needs to be shared.

Shelf-life testing must be completed before product is launched to ensure that an appropriate finished product specification can be set.

For new products, shelf-life must be tested in the product's final packaging. Shelf-life validation is also required for seasonal changes that impact on product life.

Shelf-life validation must include checks that the product's net weight is maintained until the end of shelf-life (if date code is applied)/ unsaleability (if no date code is applied) for pre-packed product or until delivery to the Customer for bulk product. Potential weight changes that must be considered include changes during ripening and quarantine treatments.

Shelf-life validation must occur for all products, whether a shelf-life will be labelled on a pre-packed item or not or whether it is a bulk packed product.

As shelf-life can change when packaging changes, for example by increasing weight in a package, selecting new packaging materials with different water transfer rates, or changing ventilation holes in boxes, shelf-life has to be re-validated at that stage.

New processes, for example changing the cooling technology for the product, also require re-validating the shelf-life.

The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for Shelf-Life Testing records. Use of it is not mandatory.

Element	Requirement	Document	Tier
3.2	**Supply Chain Testing** Supply chain product performance testing, unless low risk of quality and safety impacts are documented, shall be undertaken as part of shelf-life validation, including elements such as elevated temperatures, transport and ripening where relevant. Supporting documentation shall be made available and records of validation maintained.	Record	1

Packaged product can be negatively impacted throughout the supply chain. This could be through road transport vibrations and temperature changes, temperature fluctuations during cross-docking or during application of quarantine treatments, and box collapse, especially if the box becomes wet.

Tests will generally be carried out by Tier 1 Suppliers but may be conducted by Tier 2 suppliers, particularly if they are the last touchpoint prior to delivery to the Retail Customers' Distribution Centres. The receiving party at destination can assist where that is more convenient. However, Tier 1 Suppliers must maintain the validating data for this testing and make this available to Customers as requested. A written agreement between the Tier 1 and Tier 2 Supplier must be kept detailing the activities required and what information needs to be shared.

Product performance testing must be carried out for bulk and pre-packed items including sleeves, bagged items, bunches etc. to ensure that products can survive the supply chain in sufficiently good condition and with sufficient shelf-life.

These distribution trials need to include all operations from packing to the final destination. Where product is ripened, or quarantine treated this must also be evaluated.

Trials should include temperature records during distribution, inspection of condition on arrival, performance during ripening if relevant, shelf-life validation and check of weight maintenance.

Where the Customer requires raised temperature evaluation, this must also be conducted.

If a risk assessment shows that there is low risk of product underperforming due to supply challenges or where adequate data exists to show how product will perform, no additional supply chain testing needs to occur.

All testing, risk assessment and historical data relied on have to be recorded and supplied to the Customer on request.

Element	Requirement	Document	Tier
3.3	**Shelf-Life Validation at Last Touch Point** Shelf-life Validation, including labelled weight compliance, shall be conducted at least annually for pre-packed and bulk products and records of validation maintained. The responsibility sits with the last touch point for the product before delivery to the Retail Customer DC. Corrective actions are required if shelf-life is inadequate or net weight is not maintained over shelf-life.	Record	1 & 2

After initial shelf-life validation as for Element 3.1, shelf-life validation must be repeated.

The minimum frequency of re-validation is at least once a year; more frequent re-validation is required if growing conditions or packing formats change during the year. This includes checks of weight maintenance of the product over shelf-life.

Re-validation of shelf-life is required as seasonal impacts can dramatically affect shelf-life and weight loss, even in packaging.

Where no shelf-life is labelled on an item because it is a bulk product or a date code is not labelled on a pre-packed product, testing must show that the shelf-life detailed in the finished product specification can be achieved.

Net weight of pre-packed products must be maintained until the expiry date on the label.

Where the pre-pack label does not show an expiry date, labelled net weight must be maintained until product is unsaleable, generally when first rots occur, or other significant visual defects occur.

For bulk product, net weight must be maintained until the product is received by the Retailer Customer.

Where testing shows that product cannot achieve the required shelf-life or loses excessive weight relative to the labelled net weight, corrective actions are required. This will include informing and agreeing with the Customer actions such as adjusting finished product specifications or date coding applied to labels.

The responsibility sits with the last touch point for the product before delivery to the Retail Customer DC.

Records of the test outcomes have to be maintained and made available to the Customer on request.

Element	Requirement	Document	Tier
3.4	**Retention Samples** Representative retention samples of loose and pre-packed products shall be kept at a daily to weekly frequency based on a documented assessment of product safety and quality risks as well as volume of product supplied. The rationale for the actual retention sampling shall be recorded and reviewed at least annually or if there are significant changes of risk.	Record	1 & 2

Retention samples are reference samples that can aid in the identification of issues experienced with specific product batches or that can be tested in case of exceedances of maximum residue limits being found.

Retention samples need to be representative of what was pre-packed or supplied in bulk to the Customer. When assessing bulk product, the typical purchase weight or size should be set aside as a retention sample.

The benefits of retention samples are 1) ability to retest for chemical residues, 2) ability to verify compliance with legal weights and measures or labelling requirements and 3) ability to monitor quality aspects such as moisture tare validation and investigation of rejections and to ensure specifications are being met.

The Supplier that has the responsibility for applying the end-label and Best Before date (for loose or pre-packed product) is required to maintain retention samples; generally, that will be the Tier 1 Supplier and not the Tier 2 Supplier if they can formalise this arrangement.

Where product is going to be ripened separately from the place of packaging, retention samples need only be kept by the Ripener or final distributor after ripening has occurred.

When considering how many retention samples need to be kept in a given production week, the variability of the product is key. If the product is uniform with consistent growing and harvesting conditions, less retention samples are needed than if product is harvested in varying weather conditions or from different growing regions.

Variability is especially high at the start or end of a growing season, so more retention samples are required during those times. Additionally, it must be considered whether pre-packed or bulk product behaves differently. When volume of production changes, this may affect handling of products, and this must be considered.

It is not required to separately hold each Customer's product where they are identical. However, different Customers' product should be tested in rotation in that case.

The rationale for the actual retention sampling must be recorded and reviewed at least annually or where there are significant changes of risk, detailing what the likely issues are and the times during the year they are likely to occur.

Element	Requirement	Document	Tier
3.5	**Retention Sampling Duration** Retention samples shall be retained for the entirety of the shelf-life of pre-packed and bulk products under the recommended storage conditions. Retention samples shall be assessed against specifications at end of shelf-life. Corrective actions shall be taken if product does not meet regulatory or shelf-life requirements.	Record	1 & 2

Retention samples must be kept for the full length of shelf-life as labelled or as detailed in the finished product specification.

Storage conditions must mirror recommended storage conditions, that is as described in the finished product specification or on the label.

Retention samples in the relevant packaging format can be used for shelf-life validation.

On completion of shelf-life, retention samples must be assessed against specifications to ensure that the product lasts through shelf-life and that labelled net weight is maintained.

Where product quality or weight is insufficient at the end of specified or labelled date, corrective actions are required.

Suitable corrective actions may include trending, re-evaluation of the length of shelf-life, increasing the overpack and communication with the Customer(s).

4.0 HACCP Training

Element	Requirement	Document	Tier
4.1	**HACCP Training** The HARPS Practitioner shall complete HACCP Training by a Registered Training Organisation (RTO) or a local or international equivalent. A Statement of Attainment, or equivalent, confirming successful completion shall be maintained and in Australia include the following preferred Units of Competency (UOC) as a minimum: ○ *FBPFSY2002 Apply Food Safety Procedures*; and ○ *FBPFSY3002 Participate in a HACCP Team*. The training shall be delivered either face-to-face or online. Online training must be live/ trainer-led (i.e. allows for meaningful interaction between the trainer and trainee in real-time). Not all RTOs offer the two preferred UOCs stated above. Any of the following UOCs listed below may be completed in combination that addresses an understanding of: ○ The Principles of HACCP; ○ Conducting a risk assessment; ○ Implementing HACCP in the workplace; and ○ Teamwork, good agricultural and hygiene practices. The Unit Codes *FBPFSY2002 Apply Food Safety Procedures* and *FBPFSY3002 Participate in a HACCP Team* shaded green in Table 1 below are the preferred UOCs. However, completion of these two units is not mandatory provided any combination of the two units listed below is completed. Examples of possible UOC combinations to satisfy Element 4.1 are shown below in the Guidance Section. Where a business' representative (now called the HARPS Practitioner) has previously met the training requirements of HARPS v1.0 Element 5.1, this training is considered compliant under HARPS v2.0 Element 4.1.	Record	1 & 2

HACCP (Hazard Analysis Critical Control Points) is a well-established method of understanding and managing food safety risks. It forms the basis of all GFSI programs. A representative of the organisation that is an employee must undertake training and achieve competency in all listed national competencies (if based in Australia or equivalent for international suppliers) from a Registered Training Organisation (RTO).

Examples of meaningful engagement include significant involvement in the development and implementation of the food safety plan, frequent review of documentation and records, acting as the Team Leader for the ongoing review of the plan and managing updates. This individual shall be empowered with the appropriate level of authority within the business to oversee the food safety plan and implement change.

The training should be targeted so it is relevant to managing food safety risks in horticultural production where available, from growing through to dispatch, not food manufacture, as risk management challenges differ between sectors.

The training shall be delivered either face-to-face or online. Online training must be live/trainer-led (i.e., allows for interaction between the trainer and trainee in real-time). One UOC is typically eight hours in duration.

Examples of possible UOC combinations to satisfy meeting element 4.1.

The four criteria included have been identified as demonstrating a comprehensive understanding of the key principles of HACCP, Good Agriculture and Hygiene Practices, as well as the implementation of this criteria into your business.

The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for Training Records. Use of it is not mandatory.

FBPFSY2001 Implement the Food Safety Program and Procedures has been superseded by *FBPFSY2002 Apply Food Safety Procedures*.

Table 1: Units of Competency available for completion to satisfy Element 4.1.

Unit Code	***Title***	***The Principles of HACCP***	***Conducting a Risk Assessment***	***Implementing HACCP in the Workplace***	***Teamwork, Good Agricultural Practice & Hygiene Practices***
FBPFSY2002	*Apply Food Safety Procedures*			*X*	*X*
FBPFSY3002	*Participate in a HACCP Team*	*x*	*x*	*x*	
FBPFSY3003	*Monitor the Implementation of Quality and Food Safety Programs*			*x*	*x*
FBPFSY4001	*Supervise and Maintain a Food Safety Plan*			*x*	*x*
FBPAUD4004	*Identify, Evaluate, and Control Food Safety Hazards*	*x*	*x*	*x*	
FBPFSY5001	*Develop a HACCP-based Food Safety Plan*	*x*	*x*		

Element	Requirement	Document	Tier
4.2	**Refresher HACCP Training** The HARPS Practitioner shall undertake Refresher HACCP Training (RHT) once every three years. The Refresher HACCP Training shall be conducted by a Registered Training Organisation (RTO) (or a local or international equivalent) or a Certified Trainer affiliated with an RTO. Refresher HACCP Training shall be trainer-led and can be delivered either online or face-to-face.	Record	1 & 2

The purpose of completing Refresher HACCP Training is to update your knowledge of Codex HACCP and to stay current with new trends in food safety.

Trainer-led training can be an online course that involves two-way, live, interactive communication between the trainer and the trainee

The typical duration for Refresher HACCP Training is four hours.

Evidence of Refresher HACCP Training completion must be maintained. An example of such evidence is a Certificate of Attendance or Participation with details of the training provider.

5.0 Labelling and Packaging

Element	Requirement	Document	Tier
5.1	**Label Claim Validation** Claims on Retail Customer branded label and packaging, i.e. nutritional, marketing and sustainability claims, shall be validated prior to commencing supply for Tier 1 Suppliers as well as Tier 2 Suppliers that are responsible for the design of Retail Customer branded packaging. Claims must be verified for the supply period and the contracted supply period and records shall be maintained.	Record	1 & 2

Claims on labels must be accurate, not misleading and meet the requirements of the Australia New Zealand Food Standards Code and ACCC legislation.

To ensure continued compliance of packaging and labels, these must be reviewed against legal changes, or changes made by the Retail Customer to meet their requirements. Examples of legal changes that occur are updates and amendments to the Food Standards Code and ACCC requirements, e.g. Country of Origin Labelling requirements.

Claims can include nutritional claims such as relating to low GI status, sustainability claims such as organic or marketing claims such as compostable packaging.

Evidence can, among others, be in the form of testing, product traceability and certification against relevant standards depending on the claim. Where testing can assist in claim verification, for example for organic standards, an appropriate testing program should be implemented.

Supporting evidence for any claims has to be collected prior to product launch and again while the product is in the marketplace. The frequency of verification depends on Customer requirements.

All evidence must be documented.

Element	Requirement	Document	Tier
5.2	**Artwork Approval** Prior to packaging being used, or when changes occur, a record of approval from the Retail Customer, via the portal or email communication, must be kept. This applies to all Retail Customer branded artwork. Once approved, the Tier 1 Supplier shall provide copies of the artwork to all approved Tier 2 Suppliers.	Record	1
Retail Customer branded artwork needs to be approved by the Retail Customer before the product is launched. Evidence of Retail Customer approval must be maintained. Once the Retail Customer branded artwork has been approved, the Tier 1 Supplier is responsible for providing a copy of the approved artwork to all Tier 2 Suppliers. Supplier branded packaging is the responsibility of the Supplier and must meet FSANZ, NMI and ACCC requirements. All superseded samples of Retail Customer branded artwork must be identified and removed to prevent inadvertent use. This must be retained for a period required by state-based legislation.			

Element	Requirement	Document	Tier
5.3	**Packaging and Labelling Review** All packaging and labelling shall be reviewed for legal and customer compliance when changes occur. This element also applies to Tier 2 Suppliers if they are designing their own packaging and labelling.	Record	1 & 2
To ensure continued compliance of packaging and labels, these must be reviewed against legal changes, or changes made by Customers to their requirements. Examples of legal changes that do occur are updates and amendments to the Food Standards Code and regulations administered by the ACCC (e.g. Country of Origin labelling).			

Element	Requirement	Document	Tier
5.4	**Packaging and Labelling Compliance on Receival** A procedure shall be developed to ensure that packaging and labelling materials are assessed to ensure they comply with specifications, and records are kept demonstrating that on receipt to the site that materials are correct and current. Records of assessments shall be maintained.	Procedure & Record	1 & 2
When receiving packaging, label or packaging film stock onto the production site, these need to be checked against specifications. For Customer branded product, this should include a check against the copies kept under Element 5.2. Record of the checks must be kept showing that all materials checked were compliant. Non-compliant material should not be accepted.			

Element	Requirement	Document	Tier
5.5	**Label Checks** Packaging, labelling and date coding shall be checked to ensure accuracy and legibility for each product variant. Checks shall be undertaken daily on each production run, at the start and end of a production run, and when packaging replenishment occurs. Checks shall also be undertaken when packing resumes after downtime on the product line.	Record	1 & 2

Incorrect labelling causes significant issues resulting in withdrawals and recalls.

Therefore, robust processes and checks are required to prevent mistakes during the labelling process. Specifically, all packaging and labelling and all labelled information must be checked as correct and fully legible for each product.

These checks must be carried out every day on each production line.

Production variant refers to differences in fruit stickers and tags, weight, count, Customer and variety etc.

Checks are required for every production run covering the start and end of production, and when product changes occur online.

Additionally, checks must be carried out when packaging and label materials are replenished during a production run, since this is a high-risk time for mistakes to occur.

Breaks in production are also a high-risk time for errors. Breaks include meal breaks, maintenance interruptions or evacuations during fire drills or alarms. On return to work, label checks and on-line confirmation of the correct label in use at that time is required.

Date codes printed on the production line must be checked for accuracy and legibility during the label checks.

A copy of the label must be kept.

It is recommended to attach the label copies to the production records and initial on the label all critical information as being correct, for example the weight statement, date code and product name.

Digital records must capture all of this information.

The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for Label Check records. Use of it is not mandatory.

Element	Requirement	Document	Tier
5.6	**Off-Line Label Checks Prior to Packing** For Suppliers who print their own labels or code packaging off-line, checks shall be conducted to ensure the correct coding has been applied at the point of printing.	Record	1 & 2
Where labels or date codes are printed prior to packing at a separate station, additional checks to the ones under Element 5.5 are required at the location where the printing occurs. Information has to be correct and legible.			

Element	Requirement	Document	Tier
5.7	**Record of Packaging and Labelling Checks** Records of packaging and labelling checks shall be maintained, including a copy of the actual label being applied. The first label of all issued labelling materials shall be signed-off and verified by an appropriately trained person.	Record	1 & 2
Checks under Elements 5.5 and 5.6 have to be documented and a copy of the applied label or packaging film, with all required information on it, retained at every check. Checks must be completed by a person that clearly understands the significance of labelling mistakes, in that they can lead to product rejections, withdrawals and recalls. Retained labels allow cross-checks where issues are identified at a later stage. It is recommended to attach the label copies to the production records and to initial all critical information on the label as correct, for example weight statement, date code and product name.			

Element	Requirement	Document	Tier
5.8	**Storage of Packaging Material** Packaging shall be stored within a secure and dedicated area that is kept clean and free from pests.	Procedure	1 & 2
Packaging materials, if contaminated during storage, can become a source of contamination of food. Packaging should therefore be stored in a secure area that controls pest access and ingress of dirt, and is dedicated ensuring that no contamination with, for example, chemicals occurs. Packaging storage areas do not need to be internally locked unless this is the control method for ensuring authorised access under Element 5.10.			

Element	Requirement	Document	Tier
5.9	**Packaging and Labelling Identification** Packaging and labelling materials shall be appropriately identified and used as intended.	Procedure	1 & 2
Packaging and labelling materials need to be easily identifiable in store to reduce the risk of picking the wrong materials for a production run. This could be in the form of removing labels from inside a box and sticking them to the outside of the box. An alternative could be the use of individually labelled compartments that hold only specific packaging film or labels. Examples of inappropriate use include using packaging materials to store waste, tools, equipment and cleaning materials etc.			

Element	Requirement	Document	Tier
5.10	**Authorised Personnel Access** Only authorised personnel shall have access to packaging and labelling.	Procedure	1 & 2
Untrained and/or unauthorised personnel are much more likely to make a mistake picking packaging and labelling materials. This is because they may not understand the critical importance of correct labelling and/or know what particular information to check to ensure that they have picked the correct item. Therefore, only authorised personnel must have access to packaging and labelling materials. This can be managed by locking storage areas or through procedures and records that show only authorised personnel carried out this function.			

Element	Requirement	Document	Tier
5.11	**Packaging and Labelling Storage at Production Line** Only the packaging and labelling specific to product being packed shall be made available for use at the time of packing and shall be stored in a clearly identified location in close proximity to its point of use.	Procedure	1 & 2
Many packaging and labelling materials look similar and may be confused during a production run, especially if there are a lot of loose materials in an area. Therefore, only packaging and labelling materials that are required at that time should be issued to a production line. The holding area for packaging materials and labels needs to be clearly marked and be immediately next to the relevant production line.			

Element	Requirement	Document	Tier
5.12	**Counting of Unused Packaging Material** Label records shall include a count of unused packaging material being returned to the storage location.	Procedure	1 & 2
Unused packaging materials and labels need to be accounted for to minimise the risk of them being used for the wrong product during packing.			

Element	Requirement	Document	Tier
5.13	**Line Clearance and Unused Packaging** At the end of a production run, the production line must be fully cleared of label and packaging material. Unused packaging shall be fully covered when returned to the storage location.	Procedure	1 & 2
At the end of a production run, the production line shall be cleared of any packaging and labelling that relates to the previous production run. Any leftover packaging and labelling materials must be immediately returned to the secured storage location when they are no longer required for a current production run.			

Element	Requirement	Document	Tier
5.14	**Excess Label Destruction** Unused, pre-coded packaging shall be destroyed, and the volume of packaging disposed of documented.	Record	1 & 2
Any packaging or labelling that has been already printed with a date code and that is surplus to what was needed during the production run must be destroyed. This is to ensure that no materials containing an incorrect date code can be issued for future production runs. The volume of packaging destroyed must be recorded. In investigations, the amount of destroyed materials plus materials that were used for finished products needs to equal amounts of materials issued to production. The calculation must demonstrate: ***Destroyed*** + ***Used*** = ***Issued Pre-coded Labelling*** Counting or weighing labels are both acceptable approaches for the above calculation. In investigations of labelling issues, a difference would indicate that the wrong label may have been used.			

Element	Requirement	Document	Tier
5.15	**HARPS Logo Requirements** Where the HARPS logo is used on packaging or for external business communication, use shall comply with the HARPS Logo Style Guide rules and specifications.	Record	1 & 2

The HARPS logo is protected by copyright and must not be used in contravention to the HARPS Scheme Rules and the HARPS Logo Style Guide rules and specifications (https://harpsonline.com.au/wp-content/uploads/2020/11/202068_HARPS_Logo-Style-Guide_A4P_v2-1.pdf)**.**

The HARPS logo or name must only be used by suppliers that are currently approved to HARPS in accordance with the HARPS Scheme Rules at https://harpsonline.com.au/document-library/.

Suppliers must immediately cease using the HARPS Logo or name on all packaging, marketing and other communication materials if approval lapses or is revoked.

6.0 Personal Hygiene

Element	Requirement	Document	Tier
6.1	**Handwashing Facilities** All sites shall have handwashing facilities that are easily accessible to all personnel, contractors and visitors.	Policy	1 & 2

Proper handwashing is essential for maintaining good personal hygiene and to protect food from contamination during handling.

Therefore, all sites, including packhouses and on-farm locations, must have easily accessible handwashing facilities.

Easily accessible means a location near an entrance to a packhouse or near the particular harvesting area where workers are located at any given time. In-field facilities may need to be mobile to avoid workers having to walk long distances to wash hands.

Element	Requirement	Document	Tier
6.2	**Sufficient Facilities** The number of facilities for all produce handlers shall be adequate to support the number of employees.	Policy	1 & 2

Queues at hand washing stations discourage adequate handwashing by personnel.

Multiple hand washing stations and toilets are needed where queues may form, and the number required should be assessed based upon the likelihood of unacceptable queues forming.

Some guidance on minimum facilities is available from the NSW Code of Practice - Managing the Work Environment and Facilities August 2019. This is based on a national model code of practice developed by Safe Work Australia.

Recommended Number of Toilets (Women Only)	Recommended Number of Toilets / Urinals (Men Only)	Recommended Number of Sinks in Toilet Area
1 per 15	1 per 20 / 1 per 25	1 per 30

Element	Requirement	Document	Tier
6.3	**Facilities Separate to Toilets** For packhouses these facilities shall be separate to those used as toilet handwashing facilities.	Policy	1 & 2
Sinks for handwashing are required within the toilet facilities or next to the toilets. However, these must not be the only handwashing sinks available. This is due to sinks, door handles and other surfaces being prone to contamination in the toilet area. It is also not possible to assess whether personnel have washed their hands properly. Therefore additional handwashing stations are required outside of any toilet areas, ideally upon entry to the packhouse.			

Element	Requirement	Document	Tier
6.4	**Water Quality and Consumables for Handwashing** All hands shall be washed with soap and dried using paper towels or air dryers. Packhouse and in-field handwashing facilities shall be connected to or otherwise provided with a supply of water which is tested as E. coli <1 cfu / 100 ml. Where this quality water is not available in-field, irrigation quality water is acceptable, provided that after drying hands this is followed with the use of an alcohol solution (minimum 60%) based hand sanitiser.	Record	1 & 2
All handwashing facilities, whether in a packhouse or in-field, must use potable water. The microbial limit for potable water is E. coli <1 cfu / 100 ml. In a packhouse, handwashing facilities must be plumbed into the potable water supply. In-field, potable water may be supplied in suitable containers such as barrels. Barrels must not have been used previously for any other purpose and must be regularly cleaned to ensure water inside them is potable. The only exception is for in-field handwashing where potable water is not available, in which case irrigation quality water may be used for hand washing with a hand sanitiser (minimum 60% alcohol) after hands have been dried. Paper towels must be disposed of so that they do not pollute or become a nuisance.			

Element	Requirement	Document	Tier
6.5	**Replenishment of Handwashing Consumables** Consumables for handwashing facilities must be replenished to ensure availability at all times.	Procedure	1 & 2
Handwashing stations must at all times be stocked with consumables required to wash hands. This includes liquid soap, paper towels or an alternative that does not pose a risk of further contamination, and an alcohol solution (minimum 60%) based hand sanitiser.			

Element	Requirement	Document	Tier
6.6	**Hairnets and Suitable Protective Clothing** When a risk to product is identified, all employees, visitors and contractors shall wear a hairnet and other suitable protective clothing when working around exposed product.	Procedure	1 & 2
Hair falling into packaged products can contaminate product and cause consumer complaints. Therefore, loose hair must be fully enclosed in a hair net where there is a risk to exposed product. For example, this risk may exist during field packing, grading and packing product in a packhouse. Where there is a low risk to product, for example for products like pumpkins, pineapples and mangoes where the skin is not eaten, caps may be used instead. Additional risk of contaminating product can arise from dirty clothing in the packhouse or in-field. Where there is a risk of direct contact between clothing and product, it must be assessed whether protective clothing is needed to stop further product contamination. Suitable protective clothing may consist of suitable overcoats, disposable aprons or company laundered tops or as otherwise identified. Risks identified and managed for this Element must be documented.			

Element	Requirement	Document	Tier
6.7	**Facial Hair Covers** For workers, visitors or contractors with facial hair, all facial hair shall be covered by beard nets when packing or inspecting final packed product.	Procedure	1 & 2
In addition to hairnets in Element 6.6, covering facial hair is important in some situations. This is specifically required when packing or inspecting final packed product, in a packhouse or in-field, and a high risk of contamination has been identified. Risks identified and managed for this Element must be documented.			

Element	Requirement	Document	Tier
6.8	**Illness Return to Work Policy** A return-to-work policy shall be documented and implemented for staff returning to work after suffering a communicable disease.	Policy & Record	1 & 2
Staff suffering from a communicable disease are not allowed to handle food. Symptoms of communicable disease can include vomiting, diarrhoea, cramps, dizziness, fever and / or chills, among others. A policy is required to manage staff returning from illness. It must ensure that food handlers are assessed by a doctor before returning to work to handle food. This is to ensure that the food handler is no longer able to pass on the disease as some diseases can be spread even when the food handler no longer shows symptoms. The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for a Return-to-Work Policy and Return-to-Work Record. Use of it is not mandatory.			

Element	Requirement	Document	Tier
6.9	**Contamination from Illness or Injury Procedure** A documented procedure shall be implemented detailing actions to be taken when illness or injury results in a contamination incident. Incidents shall be documented.	Procedure & Record	1 & 2
Product can become contaminated if, for example, a food handler bleeds from a cut or vomits in a food handling area. The site must respond appropriately and ensure that potentially contaminated product and packaging materials are disposed of. Any impacted areas, equipment and implements must be cleaned and sanitised before re-commencing production. The procedure needs to detail how an incident is to be managed including removing the individual where possible from further harm, stopping further contamination and specifics of how large an area needs to be cleared, cleaned and sanitised in different scenarios. In particular, aerosols resulting from vomiting that can spread pathogens over wide areas have to be considered.			

7.0 Recall

Element	Requirement	Document	Tier
7.1	**Product Recall** All Customers shall be notified of a product recall from sale within sixty (60) minutes of the decision to recall product being made. This means a Tier 2 Supplier must inform their Tier 1 Customer and the Tier 1 Supplier its Retail Customer.	Procedure	1 & 2
Providing safe products to consumers is a legal requirement. Where an issue in relation to consumer safety has been identified, a product recall is required. This takes precedence over any other business activity, and this must be executed as soon as possible. In order for the Customer to help facilitate the recall process and to rapidly implement a product recall, Customers must be notified within sixty minutes after a Supplier decides to conduct a recall. Additionally, Certification Bodies and GFSI Schemes (as required) must be contacted within this timeframe. This is as Certification may need to be suspended immediately as per the GFSI Scheme rules and additional audits may need to be scheduled. Food Standards Australia New Zealand provides guidance on conducting a recall. This can be found by at https://www.foodstandards.gov.au/industry/foodrecalls/firp/pages/default.aspx.			

Element	Requirement	Document	Tier
7.2	**Product Withdrawal** All Customers shall be notified of a product withdrawal from sale within sixty (60) minutes of the decision to withdraw product being made. This means a Tier 2 Supplier must inform their Tier 1 Customer and the Tier 1 Supplier its Retail Customer.	Procedure	1 & 2
Product withdrawals are generally implemented where there is a quality risk to product that is deemed unacceptable for the consumer. Withdrawals may also be conducted as a precautionary measure where there is as yet insufficient information to conduct a product recall. Therefore, the same timelines and notifications apply as for Element 7.1.			

Element	Requirement	Document	Tier
7.3	**Mock Recall** A mock recall, including mass balance check, shall be completed on one product supplied to any Customer at least annually. Where possible, different products shall be tested in each mock recall. One hundred percent (100%) of product shall be accounted for within two hours. An actual recall conducted within the last twelve (12) months may be used provided the process and product have not changed.	Record	1 & 2

Conducting a product recall correctly without preparation is nearly impossible. Considerations for a legally compliant recall include:

- The correct regulators to engage with;
- How impacted product can be traced, retrieved, isolated and quarantined and then destroyed where required;
- Correct drafting and advertising of the recall notice where a public level recall is required;
- Communications to a comprehensive list of all Customers (nationally and internationally) and whether their contact details are current;
- Investigation of the incident and recovery from it; and
- Reporting requirements.

To test all required product recall systems, a mock recall must be conducted at least every 12 months.

The mock recall must be conducted for one product or raw material for one Customer every year. It is therefore not required to conduct a mock recall for each individual Customer every year. Where possible, a different product should be used for each mock recall.

Key to verifying full traceability of all affected product or raw materials is a mass balance check. For a successful mass balance check, the amount of raw materials received must equal the amount of final product produced, plus any waste. Final product and waste must amount to 100% of the amount of raw materials.

A mass balance check and traceability must be able to be completed within 2 hours.

In general, a mass balance can be conducted by calculating:

a) ***Saleable Mass = Total Mass – Waste Mass*; and**

b) Raw Material Mass In = Finished Product Mass Out – (Product Waste Mass + Raw Material Waste Mass + Stored Material Mass + Rework Mass + QC Sample Mass)

If a Supplier was involved in an actual recall in the preceding 12 months, no additional mock recall is required if the product and processes are still the same in the business.

The HARPS website at https://harpsonline.com.au/tools-and-templates/ and Appendix B contains a Mass Balance Fact Sheet that can further assist in conducting a successful mass balance check.

8.0 Allergens

Element	Requirement	Document	Tier
8.1	**Allergen Labelling Compliance** Allergen statements on product labels shall comply with Customer allergen labelling policies (where applicable). Approval shall be sought from the Customer when the allergen status of a product changes or allergen statements on product labels are altered. The Customer shall approve changes in writing before implementation occurs. Records of approval shall be maintained.	Record	1

Allergen declarations on labels are mandatory in Australia for the following allergens **prior to 25 February** 2024:

- added sulphites in concentrations of 10 mg/kg or more;
- gluten containing cereals, including wheat, rye, barley, oats and spelt and hybridised strains;
- crustacea;
- egg;
- fish;
- milk;
- peanuts;
- soybeans;
- sesame seeds;
- tree nuts, other than coconut from the fruit of the palm Cocos nucifera; and
- lupin.

From 25 February 2024, labelling must state the following allergens (changes is **bold**):

- added sulphites in concentrations of 10 mg/kg or more;
- barley, oats, rye (and hybridised strains) if they contain gluten plus **gluten**;
- wheat (and hybridised strains) regardless of gluten content plus **gluten** if present,
- **mollusc (marine);**
- crustacea;
- egg;
- fish;
- milk;
- peanuts;
- soybeans;
- sesame seeds;
- **cashew, hazelnut, walnut, almond, Brazil nut, macadamia, pecan, pine nut, pistachio**; and
- lupin.

This is the case whether the allergen is a food, an ingredient or a processing aid.

An allergen summary statement and other Plain English Allergen Labelling (PEAL) requirements in accordance with the Food Standards Code (https://www.legislation.gov.au/Series/F2015L00397) will be mandatory from 25 February

Element	Requirement	Document	Tier
	2024. Additionally, it should be considered whether cross contact of the product with one of these allergens can occur. Where that is possible, cross contact should be eliminated. If it is not possible to eliminate cross contact, additional labelling with a precautionary statement may be made; this is not legally required but may be Customer policy. It is up the Tier 1 Supplier to inform themselves of any Customer requirements. Where a change to a product would result in a change in allergens present, the Customer must approve this in writing before the change is implemented. A change may be the addition or removal of an allergen listed above. Where a change to a label is to be made, whether adding or removing an allergen declaration or precautionary statement, the Customer must approve the change in writing. The requirement for approval applies for both Customer branded and Supplier branded generic labels. Any approval given by a Customer must be recorded.		

Element	Requirement	Document	Tier
8.2	**Allergen Claims** Allergen related claims shall be verified at a frequency based on a documented risk assessment and include, as a minimum, raw material testing (i.e. fruit waxes), cleaning verification and full allergen screen testing. Supporting documentation shall be maintained.	Record	1 & 2

Where an allergen related claim is made on a label, for example gluten free, regular allergen testing must be carried out.

The frequency of testing depends on the risk of cross contact with any allergen during harvesting, packing and any specific processes that the product undergoes.

To ensure that the claim is true, raw materials must be tested to ensure that they do not contain that allergen.

Where allergens may contaminate a product on a production line, for example from a prior production run, the production line must be cleaned prior to production. Cleaning verification must be carried out. This can be conducted through a mix of ATP swabbing (cleanliness assessment) and specific allergen swabbing (assessment of an individual allergen of concern).

Making an allergen claim may leave the impression with the consumer that the product is safe in regard to all other declarable allergens. Therefore, the relevant product must be tested for the presence of all allergens listed in Element 8.1 that are not declared on the label. The frequency of this testing depends on assessed risk and / or Customer requirements.

Where a declarable allergen is found in product or raw material that is not declared on the product label, or cleaning was insufficient, immediate corrective actions are required.

This corrective action is likely to require a product recall where a wrongly applied label is not showing a declarable allergen that is present in the food.

All risk assessments as well as all test results must be documented.

9.0 Premises, Equipment and Maintenance

Element	Requirement	Document	Tier
9.1	**Equipment Register** A register of all equipment shall be developed and maintained, with multiple pieces of the same equipment individually identified. The register shall identify permitted use in specified packing and storage areas. This applies to product contact equipment (e.g. washing baths, conveyors and harvest aids), measuring and detection equipment, processing and picking tools and maintenance tools.	Record	1 & 2

The equipment register allows tracking of equipment in the field, production and processing areas.

Integrity checks and maintenance of registered equipment can then be scheduled and conducted with the knowledge that no items are missed.

Equally, it is possible to check against the register whether items have gone missing and could pose a risk to product.

Safe management of equipment also requires that all individual items that are identical are listed separately in the register.

Equipment for Element 9.1 is defined as any item that:

- Comes in contact with the product, for example harvest aids, washing and grading equipment;
- Any measuring equipment such as pH meters and refractometers;
- Detection equipment such as metal detectors;
- Processing and picking tools such as knives and scissors; and
- Maintenance tools.

The equipment register also needs to capture whether specific items are allowed in specific packing and storage areas. Packing includes in-field packing.

To reduce the number of items that have to be captured on the equipment register, equipment allowed in the packing and storage areas should only be what is necessary. Equipment should, where possible, also remain in the areas where it is required for use and/or storage.

Equipment permanently held in maintenance areas that are separate from product handling and storage areas, for example the tractor shed, does not need to be captured in the equipment register.

However, any maintenance equipment brought into product handling and storage areas must also be removed again on completion of maintenance.

The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for an Equipment Register. Use of it is not mandatory.

Element	Requirement	Document	Tier
9.2	**Equipment Register Compliance** Controls shall be implemented to manage compliance to the register, including compliance by visitors and contractors.	Procedure & Record	1 & 2

Equipment listed in the equipment register must be controlled to ensure that it does not go missing and that no additional equipment is brought into controlled areas without being registered.

A procedure is required to ensure that appropriate controls are implemented.

Controls can include, among other methods, the labelling of equipment with equipment numbers, regular checking of equipment numbers against the register and removing unregistered equipment or equipment that is not listed as permitted in a packing or storage area.

Where visitors or contractors come on site, their equipment needs to be controlled and checks implemented to ensure that any necessary tools and equipment are removed at the end of the visit.

Element	Requirement	Document	Tier
9.3	**Equipment Cleanability** All equipment used in production and for packing shall be designed and accessible to facilitate effective cleaning.	Policy	1 & 2

Equipment used in production and packing needs to be regularly cleaned to prevent damage to and contamination of product.

Therefore, all equipment used in these situations must be designed to allow cleaning and be positioned so that it is freely accessible for cleaning.

Considerations include the ability to open shielded equipment, release tensions on belts and to move equipment items that block other equipment during cleaning.

Effectively designed also means that equipment must be made of cleanable materials.

Equipment in contact with produce must be smooth, impervious and suitable for use in production and packing.

Element	Requirement	Document	Tier
9.4	**Equipment Assessment and Maintenance** Equipment shall be frequently assessed to ensure it is in good condition. Equipment shall be maintained according to a planned maintenance schedule.	Record	1 & 2
Equipment on the Equipment Register must be checked that it is not damaged at a set and recorded frequency. It also must have a recorded frequency for preventative maintenance. Records of planned maintenance must be kept ensuring that the required frequency is adhered to. The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for an Equipment Glass Hard Plastic Condition Report and a Maintenance Log. Use of these is not mandatory.			

Element	Requirement	Document	Tier
9.5	**Wooden Items Management** Procedures shall be in place to ensure wooden tools, field bins and pallets are regularly inspected to assess the condition and suitability for use. Damaged wooden items which present a risk to product shall be removed from use.	Procedure & Record	1 & 2
Wooden tools, field bins and pallets pose multiple risks to product. This may be from splintering, nails becoming loose, contamination with dirt and by absorbing chemical residues. To manage these risks, all wood containing items need to be inspected regularly. The frequency depends on use. For example, wooden pallets should be assessed on receival, and wooden bins used for storage before product is placed in them. At inspection, a decision needs to be made and recorded as to whether the wooden item is suitable for use, to be repaired and/ or cleaned before use or is to be rejected. Repairs may include replacing splintering wood panels and removing loose nails. Where chemical contamination is obvious, wooden items must be rejected and not cleaned for further use. This is due to wood absorbing chemicals and cannot be removed effectively by cleaning. Agricultural chemicals that are no longer permitted for use must be specifically evaluated. Wooden bins that have been exposed to these chemicals previously will slowly release these chemicals over time and potentially cause product to exceed allowable Maximum Residue Levels (MRLs). The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for Field Bin and Pallet Inspection Records. Use of it is not mandatory.			

Element	Requirement	Document	Tier
9.6	**Knife Maintenance** Knife and blade sharpening shall be conducted away from product and packaging. Used knives or blades shall be disposed of in a way that prevents further contamination.	Procedure	1 & 2
Knife and blade sharpening releases metal fines that can contaminate product. Therefore, knife and blade sharpening must be conducted in areas that are separate from any product handling areas. Damaged knives and blades, or ones that cannot be resharpened, must be disposed of safely and away from any product handling areas to prevent possible product contamination.			

Element	Requirement	Document	Tier
9.7	**Condition of Workshops, Storage Areas and Tools** Workshop, storage areas and tools shall be in good condition, stored in a clean and safe manner and shall not present a risk to product.	Procedure	1 & 2
All workshop areas, areas for tool and hardware storage and tools themselves need to be kept in good condition to prevent risks of product contamination. Good condition means that facilities, tools, hardware and storage equipment are clean and tidy, not damaged and do not pose a risk to product and people from mechanical or electrical faults. This also includes spare parts and decommissioned equipment that may come into use again. It is also a requirement to keep areas safe and to use tools safely. Safety can also be managed through controlled access to and use of workshop areas and tools.			

Element	Requirement	Document	Tier
9.8	**Prevention of Contamination from Maintenance** Procedures shall be in place to minimise the risk of contamination to product from any scheduled or unscheduled maintenance. All maintenance equipment used in production or packing facilities shall be accounted for upon return.	Procedure	1 & 2

When maintenance is carried out, additional risks are introduced to product and packaging. Contamination from hardware such as nuts and bolts, tools, metal filings and shavings, broken glass and hard plastic and chemicals such as grease can be introduced.

Procedures are required to manage all of these risks during maintenance, whether that is scheduled or whether in response to a breakdown.

Appropriate procedures can include shielding of other production lines or storage areas, swarf mats to capture metal filings, magnetic hardware containers and tools.

Following maintenance, a full clean down of maintained equipment and surrounding areas is needed together with a pre-production sign off.

A check is required that all maintenance equipment brought into production and packing facilities is taken out again on completion of the work. This can be achieved, for example, through listing equipment brought in or out of work areas. Also, the use of shadow boards in the workshop area and making sure that all equipment is present on the board on return is in suitable condition.

10.0 Cleaning

Element	Requirement	Document	Tier
10.1	**Management Responsibility for Cleaning** A Suitable Management Representative shall be responsible for the cleaning program with responsibilities clearly documented.	Policy	1 & 2
Cleaning programs are essential for maintaining a safe environment for product handling and storage. Therefore, the cleaning program requires focus and responsibility by a person that has sufficient understanding of cleaning program requirements and potential risks of not managing cleaning properly. The HARPS Glossary includes a definition for a suitable management representative.			

Element	Requirement	Document	Tier
10.2	**Effective and Safe Cleaning** Procedures shall be in place to ensure facilities and equipment, including harvesting equipment and product storage areas, are effectively cleaned at a suitable frequency. This procedure shall ensure appropriate segregation of product to prevent contamination. The frequency of cleaning shall be based on a documented risk assessment.	Procedure	1 & 2

Cleaning procedures ensure the safe and effective cleaning of facilities and equipment.

Cleaning has to be conducted safely. Safe practices can relate to required isolation of equipment prior to cleaning, specific steps required to assemble and disassemble equipment and safe use of cleaning chemicals, among others. Personal protective equipment (PPE) must be provided where required.

Facilities and equipment within these that must be included in the cleaning program are all areas where product is harvested, handled, packed or stored.

An assessment is needed of how often different areas and equipment items need cleaning. The risk will depend on how quickly dirt accumulates, whether allergen cross contact is a consideration and whether the surface is a food contact surface. Also, Maximum Residue Limits (MRLs) may be exceeded without cleaning of a processing line between different products that receive different treatments, for example with fungicides.

This means that some areas and equipment must be cleaned after a production run or day, and some on a weekly or longer basis where little product contamination risk exists, for example during long term storage of product.

Cleaning procedures must be effective, for example all visible dirt has to be removed from food contact surfaces.

In order to ensure that cleaning was effective, pre-start up checks are required to confirm that equipment and product handling or storage areas are clean. That can be a documented visual inspection of equipment and areas.

The cleaning program has to be designed so that product is not contaminated during cleaning. This can be achieved, for example, through moving raw materials or packed goods away from areas to be cleaned and not using high pressure hoses that could spray particles and aerosols causing contamination.

Element	Requirement	Document	Tier
10.3	**Cleaning of Storage Equipment** Any equipment used to store product shall be cleaned to prevent further contamination.	Record	1 & 2
Harvested product may have been exposed to microbial contamination in the field or orchard. However, further contamination from storage equipment and containers must be prevented by regularly cleaning these. Storage equipment to be considered also includes harvest buckets, bags or bins that that are used to temporarily hold product. The frequency of cleaning depends on how quickly the equipment becomes dirty. For example, harvest buckets that are placed on the ground need to be cleaned before each re-use if they are to be stacked into each other after use.			

Element	Requirement	Document	Tier
10.4	**Deep Cleaning Requirements** A procedure shall be developed showing deep cleaning activities, with a minimum frequency of activity and verification at the commencement and end of each season. For sites that operate continuously, regular deep cleaning activities shall be part of the on-going cleaning program. The frequency of deep cleaning shall be based on a documented risk assessment.	Procedure	1 & 2
Deep cleaning involves the thorough cleaning of all areas and equipment where product may be handled. It includes the insides of equipment, floors, walls and ceilings. Further items that will require cleaning are air ducts, light fixtures, refrigeration equipment including drip trays and drains. As it is not possible to conduct a full deep clean during production, it is a requirement to conduct this at least before commencing operations and after ceasing operations for a particular season. The pre-season deep cleaning removes all dirt and possible pest contamination that may have happened while the facility was non-operational. The post-season deep cleaning removes any accumulated dirt and product waste material that could attract pests during the off-season or that could allow microbial contaminants to grow. For sites that operate year-round, regular deep cleaning activities must be implemented as part of the on-going cleaning program. The frequency of these deep cleaning activities must be risk assessed and this must be documented. A procedure must be documented to detail deep cleaning activities. Deep cleaning activities must be verified as for all other cleaning activities covered in Element 10.2.			

Element	Requirement	Document	Tier
10.5	**Unsuitable Cleaning Tools** Wire brushes, steel wool and sponges shall not be used in storage or packing areas.	Procedure	1 & 2
Wire brushes, steel wool and sponges can become sources of foreign objects contamination through breaking apart and shedding metal and plastic materials. Additionally, these materials are not cleanable, and can accumulate water and product residues that support microbial growth. These items will therefore become a microbial contamination source. Therefore, wire brushes, steel wool and sponges are not permitted for use in storage and packing areas.			

Element	Requirement	Document	Tier
10.6	**Porous Cleaning Item Requirements** Porous cleaning items such as cloths and scouring pads shall be of a contrasting colour to product and assessed for cleanliness and condition prior to use.	Procedure	1 & 2
Porous cleaning items such as cloths and scouring pads can become dirty and become a source of microbial contamination. These cleaning items need to be regularly inspected to make sure they are clean and not disintegrating. If they are not, they need to be cleaned before use or replaced. Parts or fibres from the items can also become a foreign object contaminant. Therefore, these porous cleaning items need to be colour contrasting with products, so that any shedding can be easily seen, and material replaced when necessary.			

Element	Requirement	Document	Tier
10.7	**Squeegee Requirements** Squeegees shall be of single blade construction and maintained in a clean condition.	Procedure	1 & 2
Squeegees that have more than one blade will have gaps that can accumulate water and product. This can give rise to microbial contamination. Therefore, only single bladed, clean squeegees are permitted for cleaning.			

Element	Requirement	Document	Tier
10.8	**Mop Requirements** Mops used in storage or packing areas shall be clean and intact.	Procedure	1 & 2
Mops can themselves become a source of microbial contamination or foreign objects if they shed fibres. Therefore, only intact and clean mops must be used. A mop may be cleaned between uses or a new mop head may be used.			

Element	Requirement	Document	Tier
10.9	**Compressed Air and High-Pressure Water Requirements** Compressed air lines and high-pressure water hoses shall not be used during cleaning unless there are demonstrated benefits that outweigh the risk of equipment and environmental contamination. Supporting documentation shall be maintained.	Procedure	1 & 2
Pressurised cleaning equipment, whether high pressure water hoses or compressed air, widely distributes dirt and microbes from surfaces being cleaned. This is due to particles or droplets being produced that then fly or float over large distances and then settle on equipment and the wider area. If there is a requirement for using compressed air or high-pressure hosing, for example due to difficulties in cleaning equipment, a risk assessment needs to be conducted to show that this can be done with minimal risk of contamination of product. It must also show that not using pressurised equipment results in worse cleaning outcomes. Procedures are required that document in what situations and how pressurised cleaning can be carried out. For example, these should detail how product is to be protected during cleaning and documenting further cleaning steps to be implemented that decontaminate surfaces that may have been contaminated during pressurised cleaning. Documents that show the reason to allow pressurised cleaning must be kept.			

Element	Requirement	Document	Tier
10.10	**Return of Cleaning Equipment** All cleaning equipment used in production or packing facilities shall be accounted for upon return.	Record	1 & 2
Cleaning equipment, if left behind after cleaning, can become a contamination source for product as a foreign object, by leaking cleaning chemicals and as a potential microbial contamination source. In addition, equipment can be damaged by these items and cause further contamination. Therefore, all cleaning equipment must be removed from production or packing areas and must be fully accounted for. This may be documented by checking against the cleaning equipment register and/or counting in and out items such as scourers.			

Element	Requirement	Document	Tier
10.11	**Cleaning Records** Cleaning records shall be maintained, and cleaning activities verified by a suitable management representative to ensure that cleaning has been effectively undertaken.	Record	1 & 2
Records must be kept that detail that cleaning has been carried out for all items as required and that the management representative under Element 10.1 has verified that cleaning was effective as required for Element 10.2 and Element 10.4. The management representative needs to have a job description detailing their responsibilities in relation to cleaning activities. The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for Cleaning and Sanitising Records. Use of it is not mandatory.			

Element	Requirement	Document	Tier
10.12	**Records of Cleaning Training and Proficiency** Records shall be kept demonstrating staff training and assessment of proficiency in cleaning effectively.	Record	1 & 2

Staff must be trained on how to conduct cleaning safely, effectively and according to cleaning instructions.

Records of that training must be kept.

In order to ensure that staff are competent in carrying out the cleaning procedures, specific cleaning instructions are needed.

These must cover requirements such as assembling and disassembling of equipment, mechanical cleaning, selecting the correct cleaning chemicals and concentrations, contact times for chemicals and cleaning equipment to be used for different pieces of equipment and / or surfaces, and correct PPE to be worn.

Staff then need to be shown how to follow these instructions properly and assessed on whether they are competent in following these.

Once observations show that staff are competent, this must be documented.

Where cleaning verification shows that a staff member does not effectively or safely clean, the training and assessment needs to be repeated.

11.0 Foreign Object Control

Element	Requirement	Document	Tier
11.1	**Foreign Object Control** A documented procedure for foreign object control shall be implemented covering activities from harvest through to packing, storage and dispatch (or as per the process scope). The procedure shall include details of how control is maintained of soft (flexible) plastics, hard and brittle plastics, wood, cardboard and paper, glass and metal.	Procedure	1 & 2

Foreign objects are the cause of many consumer complaints, can cause injury to consumers and potentially lead to a product recall.

Therefore, a documented procedure for foreign object control is required.

Components of such a procedure are a register of equipment that is a potential source of foreign objects, methods and frequency of checking that this equipment is not defective, records of checks and referencing of maintenance and cleaning procedures if foreign object issues arise.

Additionally, where possible, sources of foreign objects need to be controlled or removed from product handling and storage areas.

Materials that often give rise to foreign objects and that must be controlled include glass and hard/brittle plastics, metal, wood, cardboard and paper, and soft/flexible plastics.

Where glass or hard plastic breakage occurs or maintenance produces hazards like metal shavings, adequate clean up procedures are required.

The foreign object control procedure must consider all operations on the site's scope, from harvest to final pack and dispatch. Therefore, foreign objects that can arise in the field must be considered. Where there is a risk of objects such as stones, twigs and similar items, to contaminate product in the field, suitable control mechanisms are required and must be documented.

The foreign object control procedures can reference procedures developed under other Sections such as Elements 9.3 to 9.6, 9.8, and 10.2 to 10.9

The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for a Glass and Hard Plastic Register. Use of it is not mandatory.

Element	Requirement	Document	Tier
11.2	**Foreign Object Detection Systems** A risk assessment shall be used to identify if a Supplier requires a Foreign Object Detection System. All foreign object detection systems shall be appropriate and validated for the processes employed and have an effective product rejection device.	Procedure	1 & 2

Foreign object detection can take the form of metal detectors, X-ray detectors, magnets, blowers, optical sorters and sieves.

Where a foreign object detection system is implemented, it has to be proven that the system is going to be effective and sensitive enough to detect the targeted foreign objects.

In addition to detecting foreign objects, detectors must remove any contaminant or contaminated product from production by using an effective rejection mechanism.

For metal detectors and X-ray detectors, this can be through an air blast, tipper or rejection arm. This should be associated with a detection warning and a stop belt system where rejection was not effective.

Effective rejection also requires the secure capture of the rejected item so that it cannot be inadvertently put back on the production line.

Element	Requirement	Document	Tier
11.3	**Operation of Foreign Object Detection Systems** Where metal detectors or other foreign object detection systems are used, checks of the equipment shall be conducted using a method defined and documented by the equipment manufacturer. The frequency of checks shall be based on risk and at a minimum at the start and end of a production run.	Procedure & Record	1 & 2

Where metal detectors or other foreign object detectors are used, checks must be carried out that they are functioning properly.

This generally requires checks that the detector is functioning and detecting the foreign object at the correct sensitivity.

The method of conducting the check needs to follow the equipment manufacturers instructions.

Test pieces of a known size and composition must be used for testing metal detectors.

Any checks need to be conducted as a minimum before a production run starts (to ensure the detection equipment works) and again at the end of the production run (to show that the detection equipment is still functioning).

For longer production runs, there is a risk of large quantities of product not being checked if the final check fails. All of the intervening product, in this case the whole production run, would need to be re-checked after fixing the detection equipment.

Therefore, a risk assessment should demonstrate how often intermediary checks should be carried out, for example every half hour, to reduce the risk of significant delays during re-checking and potential subsequent impact to Customer deliveries.

Element	Requirement	Document	Tier
11.4	**Knife, Pin and Blade Control** Knives and snips must be controlled regardless of their point of use i.e. in-field, packing and storage areas as well as in office facilities such as lunchrooms. Knives shall be signed in and out for in-field and packaging areas and checked for integrity before use. Cardboard packaging shall be opened using safe knives. Drawing or map pins and snap blades shall not be used in any circumstance in production and storage areas, as well as in offices located within these areas.	Procedure & Record	1 & 2

Knives are easily damaged and lost. To prevent knives or knife fragments contaminating product, knives need to be controlled in packing and storage areas, including during field packing.

Control means that knives are signed out of storage and back into storage at the end of a shift to ensure that none have gone missing. Another method would be chaining of knives. Knives must also be inspected before issue or use to ensure that they are not damaged.

Damaged, unsafe knives must not be issued.

Additionally, knives pose a risk of injury to the operator. Therefore, knives used to open cardboard packaging need to be specially constructed safe knives, with a minimal length of blade protruding and made with a single piece blade.

Drawing or map pins and snap blades are common and hazardous contaminants of finished products.

Therefore, these are not permitted in production and storage areas and in offices that are located in these areas. They are also not permitted during field packing.

The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for a Tool Issue and Return Record. Use of it is not mandatory.

Element	Requirement	Document	Tier
11.5	**Prohibited Items for Production and Storage Areas** Use of the following items shall not be permitted in production and storage areas and shall be controlled within offices and other areas located within these: drawing or map pins, metal office staples, paper clips or other metal office fastenings and hole punches.	Procedure	1 & 2
Paper clips, staples and similar items, as well as chaff/confetti created by hole punches can contaminate product. While these items may be needed for filing paperwork, attaching labels to records and so on, use should be minimised. Where their use cannot be avoided, their use in areas where they pose a contamination risk to product must be controlled. This applies to production, storage and office areas associated with them. Examples of controls are procedures of how to use these items and how to dispose of waste generated by them safely, or physically attaching items in specific lower risk locations.			

Element	Requirement	Document	Tier
11.6	**Detectable Equipment** Where a Foreign Object Detection System is installed, detectable versions of equipment are required. Detectable versions of equipment required in processing areas shall be in use (where available), such as pens and clipboards.	Procedure	1 & 2
Any loose item such as pens can become a foreign object contaminant. Also, plastic items such as clip boards can break**,** and pieces then become a potential foreign object contaminant. Therefore, these items should be easily detectable, either when intact or in broken pieces. Metal detectable, one-piece pens and metal clipboards are examples of this. Sites that have no metal detection will still benefit from the detectable versions and are required to use them. One-piece pens are a product contrasting light blue colour and are unlikely to shed parts such as caps. Metal clipboards are also unlikely to break and shed parts.			

Element	Requirement	Document	Tier
11.7	**Foreign Object Audits** Foreign object audits shall be implemented and conducted. The frequency of audits shall be defined, with the frequency based on risk.	Procedure	1 & 2

Foreign objects tend to accumulate in production and storage areas over time. They pose a contamination risk to product as physical items that can injure consumers.

Additionally, foreign objects may be food allergens or introduce chemicals hazards, for example medicines or agricultural chemicals.

Food based foreign objects can also attract pests and support microbial growth.

Foreign object audits, also called bucket walks or bag audits, must be carried out regularly. They are called this as the most effective way to conduct foreign object audits is to take a bucket or bag and to systematically collect any items not meant to be in product handling and storage areas, associated offices and so on.

Examples of items that should be collected include food, glass containers, uncontrolled medicines, 'temporary' tape fixes of equipment, uncontrolled equipment and tools, loose staples, nuts and bolts, loose soft plastic items, broken cleaning equipment and many more.

The aim is to identify and remove potential foreign objects in areas where product may get contaminated.

Further aims are to track and trend foreign objects and to allow investigation and control of foreign object sources.

Lastly, staff can be continuously trained to stop accumulating potential foreign objects by sharing findings with them. This can be done by, for example, exhibiting finds in a lunchroom and discussing the findings at staff meetings.

The frequency of conducting foreign object audits needs to be based on the history of findings. Initially these audits may be conducted weekly until the number of items found declines significantly. Thereafter a monthly frequency may be enough; additional audits may be needed where finds increase again or when investigating an issue such as a serious consumer complaint.

Locations audited include packhouse and storage areas, production associated offices and also in-field areas including harvest aids and product transport vehicles.

The rationale for the frequency and method of foreign object audits needs to be documented in the foreign object audit procedure.

Element	Requirement	Document	Tier
11.8	**Investigation of Foreign Object Audit Findings** Findings of foreign object audits shall be investigated with the results of the investigation and corrective actions documented.	Record	1 & 2

Where foreign objects are found during the foreign object audit, the results need to be recorded and investigated.

Recording the finds can include taking a dated photo of all found items, listing items in a log against areas where they were found and trending repeated finds.

The investigation of trends and serious finds needs to identify the root cause of the issue, such as in the product handling, storage or associated office areas.

In its simplest form, a root cause analysis would consist of the '5 Whys'. An example of conducting this for multiple broken plexiglass pieces is:

1. ***Q: Why was the broken plexiglass there?*** A: A plexiglass guard on equipment broke.
2. ***Q: Why did it break?*** A: It was on 10-year-old equipment and it had cracks.
3. ***Q: Why was the cracked guard not replaced before it broke***? A: The plexiglass guard was not part of the preventative maintenance program.
4. ***Q: Why was it not on the preventative maintenance program?*** A: The preventative maintenance program was only set up for farm vehicles.
5. ***Q: Why was the preventative maintenance program only set up for farm vehicles?*** A: The preventative maintenance program is managed by the tractor mechanic.

The corrective action arising from this analysis may therefore be the need to train the mechanic to include all relevant equipment or to involve other relevant staff such as quality assurance staff in redeveloping the program.

Some of the questions that may need to be answered in the investigation are how the foreign object arose, who brought it into the area and what is required to fix the issue.

The corrective actions needed and completion of them must be documented.

Element	Requirement	Document	Tier
11.9	**Scope of Foreign Object Investigations** This includes reported items, findings from detection systems and foreign object audits.	Record	1 & 2
The investigation under Element 11.8 needs to include not only items found during foreign object audits, from customer complaints or rejections, but also any items detected in detection systems. For example, rejected product from a metal detector needs to be pulled apart to identify the metal contaminant. Further investigation of the metal source and how this is to be controlled is required. Rejected product must not be placed back into production, as it has to be assumed that it contains a foreign object that can harm the consumer. It must not be assumed that false positives have been rejected.			

Element	Requirement	Document	Tier
11.10	**Trending and Corrective Actions for Foreign Object Findings** Foreign object findings shall be documented and trended to establish any common sources and action shall be taken to mitigate future occurrences. Investigations shall involve liaison with raw material Suppliers where appropriate.	Record	1 & 2
Foreign object investigations under Element 11.8 require that trends be identified. Where trends exist, it is likely that an on-going risk to the consumer exists. Trending can establish common foreign objects and can highlight, where they are similar, that there is a single source of these objects. The source needs to be identified and corrective actions taken to prevent this being an on-going issue. Where investigations find that the foreign objects come from a raw material Supplier, for example Tier 2 or Tier 3 Suppliers, the investigation must be expanded to include the raw material Supplier. This is due to the raw material Supplier having to identify the source and to apply corrective actions. The receiving Supplier will not be able to reliably find all contaminants, even when using detection equipment. The packhouse is not a 'hospital' to fix issues that must be controlled at source.			

12.0 Product Testing

Element	Requirement	Document	Tier
12.1	**Microbiological, Chemical and Heavy Metal Testing Program** A documented Microbiological, Chemical and Heavy Metal assessment and testing program shall be implemented that meets the requirements detailed in the Food Standards Code. Microbiological, Chemical, and Heavy Metal Testing shall be undertaken as per the requirements of the GFSI scheme (including any local regulations) and additional specified Retailer requirements and/or specifications. Where products are purchased from multiple growers, testing of each supplier's produce, by product type, shall be completed at a minimum frequency of once per year/season, or at the frequency defined by the Retail Customer. The Tier 1 Supplier is responsible for ensuring all of their Tier 2 Suppliers are made aware of Retail Customer testing requirements, if over and above the GFSI scheme's (including any local regulations) requirements. Testing shall be completed by an ISO 17025 (or equivalent) certified laboratory accredited by NATA (or equivalent) for the product category and test(s) being undertaken. Records of testing shall be maintained.	Procedure & Record	1 & 2

Microbial contaminants, chemical residues, and heavy metal contamination in food pose a health risk to consumers. Therefore, legislation controls the maximum levels of chemical residues and heavy metals allowed and requires that product not be contaminated with microbes that pose a health risk to consumers.

There may be additional requirements from GFSI Schemes, Retail Customer requirements and specifications. These requirements may be in relation to maximum levels allowed, testing required to verify that product is safe and testing frequency.

All microbiological, chemical, and heavy metal testing requirements in the country of sale must be complied with, for example the additional restrictions on chemical residue limits in the importing country.

Product testing is only useful if results are trustworthy and reliable, testing must only be conducted by a suitably accredited laboratory. Accreditation must be for the specific test and product combination that is to be tested. The laboratory must be accredited to a suitable standard and accreditation body, generally ISO17025 and NATA Australia.

A formal testing program must be established that shows what is to be tested, how often, and where the product came from, including different growing areas.

Testing programs must be documented and include the proposed sampling plans, records of test results, and actions to be taken when results are not compliant with legislation or Retailer

requirements.

A Tier 1 supplier may review and keep test results from their Tier 2 suppliers on file rather than conducting these tests in addition to the Tier 2 suppliers.

The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for Product Testing Records. Use of it is not mandatory.

Element	Requirement	Document	Tier
12.2	**Chemical Residue Testing of All Agricultural Products** Chemical residue testing of produce destined for sale to the Customer shall be undertaken against Maximum Residue Limits (MRLs) as detailed in the Food Standards Code. MRL testing must be conducted for all Agricultural Products applied to produce.	Record	1 & 2

All chemicals used in the production of a crop, pre- and post-harvest will likely leave a residue on or in the product. It is therefore important to check that none of these chemicals exceed the allowed limits.

Any further decrease in chemical residues after packing and storage is going to be minimal. However, some chemicals may increase from post-harvests treatments including from quarantine treatments, slow-release sulphur pads and fungicide dips, among others. Therefore, testing before packing, after packing or before delivery to the retailer may be required, depending on the product and when treatments are applied. This needs to be documented in the testing program.

The Australian legal requirements for food, and therefore produce, Maximum Residue Levels (MRLs) are stated in the Food Standards Code Schedule 20. The portion of the food to be tested is listed in Schedule 22. Additionally, Extraneous Residue Levels (ERLs) exist for persistent chemicals that may be still present in the environment after use was no longer permitted and are listed in Schedule 21. For reference, heavy metal limits are found in Schedule 19.

The Food Standard Code Schedules can be found at https://www.foodstandards.gov.au/code/Pages/default.aspx.

Common multi-screen chemical tests cover a range of persistent and currently permitted chemicals. However, many agricultural chemicals are not covered in these screens because they require different test methods. Therefore, the Supplier must check that all chemicals applied to produce are included in the multi-screens. If not, the Supplier must ask for additional tests to be carried out to include all additional chemicals used in that season.

Testing must be carried out at a frequency that meets the requirements of the GFSI Scheme, HARPS standard and any additional Retail Customer requirements.

HARPS require testing of products once per season or year from each grower, that is, the Supplier's own product as well as product supplied by other growers must be tested. As different chemicals are used on different crops and production areas, chemical tests must be conducted for each crop and different production areas. A Tier 1 Supplier may review and keep test results from their Tier 2 Suppliers on file rather than conducting these tests in addition to the Tier 2 Suppliers.

Element	Requirement	Document	Tier
12.3	**Escalation of Testing Breaches** If Microbiological, Chemical or Heavy Metal testing indicates a breach of legal or Retail Customer required limits, all impacted Customers that have received the affected batch shall be notified within sixty (60) minutes of the site receiving the results. Notifications shall be by phone and followed up by email.	Procedure	1 & 2

Where testing under Element 12.1 finds breaches of legal or Customer required limits for microbial, chemical or heavy metal testing, all impacted Customers must be immediately informed.

Tier 2 Suppliers are responsible for ensuring that impacted Tier 1 Customers are advised.

The time limit for informing the Customer is 1 hour after receiving a test result that indicates a breach of permitted levels.

This specifically means that re-testing cannot be conducted first before the Customer is informed.

Re-testing has a significant risk of providing the false impression that the initially found issue does not exist. This is due to some problems, for example microbial contamination, not being distributed equally across all product items. However, the risk to consumers still exists.

This requirement further allows immediate and appropriate actions to be taken to protect the consumer from potential adverse health impacts.

Where a breach is detected, the potential for further breaches/non-compliance needs to be assessed. Where there is a risk of this, further actions must be taken. Actions may include positively releasing potentially affected products or raw materials or widening/increasing the testing program.

Retention samples are useful reference samples that can be tested to further investigate exceedances of MRLs.

Test results as for Element 12.1 and resulting actions taken need to be documented.

13.0 Growing

Element	Requirement	Document	Tier
13.1	**Exclusion of Human Effluent and Biosolids** Treated and untreated fertilisers and soil additives made from human effluent or Biosolids shall not be used on growing sites or potential growing sites. Raw sewage flow into irrigation water sources shall not be allowed.	Policy	1 & 2
Human waste has the potential to carry many disease-causing microorganisms, including bacterial and viral pathogens, worms and parasites. Therefore, actual and potential production sites must not be contaminated with human effluent, raw sewage or biosolids. All water sources used for irrigation must be protected from such contamination.			

Element	Requirement	Document	Tier
13.2	**Suitability of Growing Site** A risk assessment shall be conducted and documented for each growing site to ascertain the suitability for growing fresh produce. Risk assessments shall be reviewed and updated when changes occur that may impact the likelihood or severity of the hazards.	Record	1 & 2

A risk assessment of each growing site is required to ensure that all sites are suitable and to also prevent unmanaged risks to product occurring.

Risks that make a location unsuitable for production include, for example, old chemical dips or storage areas, areas that may be flooded, or where run off from animal farming or compost piles can contaminate soil.

Suitable and unsuitable areas are best shown on property maps to ensure that planting and growing occurs in only in suitable areas.

Buffer zones, minimising risk from spray drift and run off originating from neighbouring areas (for example animal stocking), are unsuitable areas. Buffer zone size must be based on regulatory requirements and/or assessment of risk. Where sensitive areas for spray drift have been identified, the chemical label, chemical permit or APVMA Drift Reducing Technology (DRT) permit will state the required buffer zone. This can vary by chemical used.

The risk assessment must consider both the impact of an issue and the likelihood of an issue occurring. This means that historic chemical contamination of soil from, for example, a sheep dip makes an area unsuitable (high likelihood and high impact), but that areas that can flood once every 10 years (low likelihood and high impact) or previously had livestock on it before potato planting (high likelihood and low impact) are suitable.

Where the risk changes over time, the risk and what areas are suitable needs to be reviewed and appropriate actions taken.

Element	Requirement	Document	Tier
13.3	**Treatment of Manure** Businesses that purchase treated manure must buy this from a company where the process is certified to AS4454 Composts, Soil Conditioners and Mulches (or an international equivalent). Businesses that treat their own manure must have their process certified to AS4454 (or an international equivalent). Green waste must not be introduced into the process.	Record	1 & 2

Animal manures and green waste are a potential source of microbial pathogens that can contaminate product, and weeds or plant diseases that can increase the need to use agricultural chemicals.

Green manures grown on a site and incorporated into the soil before re-planting are not considered green waste. Equally, product dropped on the ground during crop management and harvesting is not considered green waste. However, this has to be managed appropriately to reduce plant disease pressure in the field or orchard, for example by discing to reduce size and to allow product to dry/disintegrate rapidly.

Green waste can be considered as plant material that is brought onto a site from external sources, plant trash produced on site that does not readily decompose in location, and product waste generated during grading and packing.

To ensure that pathogens are killed off before on-farm use of manures, composting is required. The aim of composting is to generate sufficient heat in the organic pile to kill harmful microorganisms.

Composting is a critical process, and therefore compliance with a suitable standard is required. Specific factors that must be managed include temperature achieved, length of time and turning of the pile.

Composting must be carried out to meet AS4454 (or international equivalent) requirements and carried out by a business certified against that standard. Certification must be held by an external business selling compost to the Supplier or by the Supplier themselves where they are composting their own manures.

AS4454 Composts, Soil Conditioners and Mulches can be purchased using this link (https://store.standards.org.au/product/as-4454-2012).The measure of achieving effective composting is test results showing the absence of *Salmonella* in 25g of manure and *E. coli* being less than 100 cfu/g of manure.

Element	Requirement	Document	Tier
13.4	**Management of Raw Manure and Green Waste** Where the harvestable part of the crop is grown in or within 1 metre of the ground surface or is harvested from the ground and the crop may be eaten uncooked, the following processes require an exclusion period of between 45 and 180 days: • Application or raw manure; or • Application of un-composted green waste; or • Livestock stocking. The specific exclusion period is dependent on the mean maximum growing temperature and the Fresh Produce Safety Centre Decision Trees shown in the HARPS Guidance Document. Where raw manure and un-composted green waste applied to growing sites, these shall be incorporated into the soil immediately after application, and for annual crops, prior to sowing or transplanting. Storage sites for all raw manure and un-composted green waste shall be off-site or located, constructed and maintained to minimise the risk of contaminating produce. If on-site, storage shall be indicated on a property map. Equipment used to apply raw manure and un-composted green waste shall be dedicated for this purpose or thoroughly cleaned and sanitised after use.	Policy & Record	1 & 2

Some produce poses more food safety risks to consumers than others. In these instances, uncomposted manures and green waste must be carefully managed.

Green manures grown on a site and incorporated into the soil before re-planting are not considered green waste. Equally, product dropped on the ground during crop management and harvesting is not considered green waste. However, this has to be managed appropriately to reduce plant disease pressure in the field or orchard, for example by discing to reduce size and to allow product to dry/disintegrate rapidly.

Risk is significantly reduced where product is cooked and for any product that is not grown close to or in the soil.

This is due to the cooking process killing human pathogens. However, any product that can also be eaten raw must be considered higher risk.

Microorganisms in the soil or added through soil amendments pose a risk. Any product grown and harvested distant from the soil, above 1 metre, is considered lower risk. This means though that product that is dropped on the ground before harvest or product from un-skirted trees with branches near the ground must be treated as higher risk.

Higher risk crops, potentially consumed without cooking and grown / harvested in close proximity to the soil must therefore not be exposed to raw manure, un-composted green waste or droppings from previous livestock stocking.

An exclusion period of between 45 and 180 days is required to reduce the food safety risk.

The exclusion periods shown in Fresh Produce Safety Centre Decision Guides 1 and 2 provide general guidance as to minimum periods between grazing of livestock or application of untreated animal manure and harvest, based on the mean maximum (air) temperature ranges where the crop is grown. These exclusion periods are based on a review of the peer-reviewed literature, as this has shown that human pathogens die off more rapidly under warmer environmental conditions, and more slowly under cooler environmental conditions.

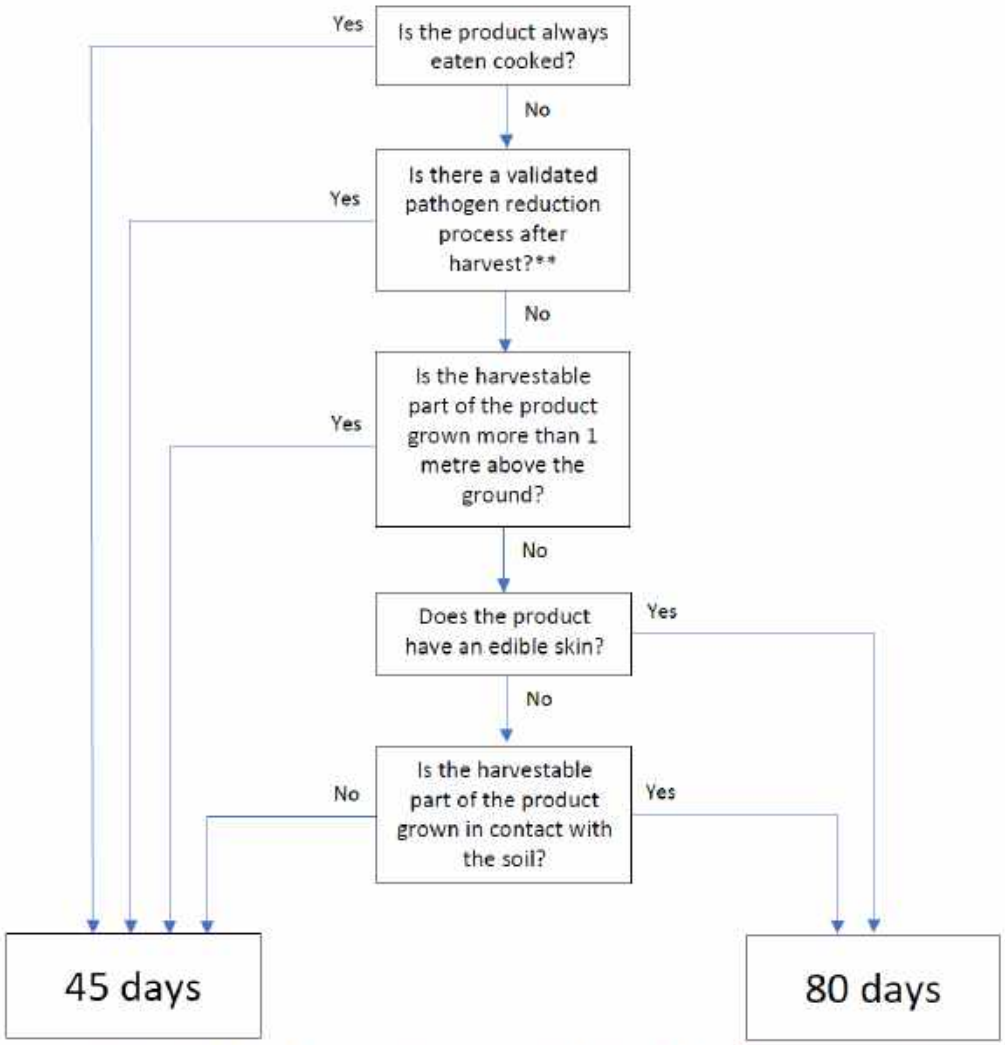
To determine the Decision Guide relevant to your growing conditions, you must first establish the mean maximum (air) temperature where the crop is grown by following the steps below:

1. Visit: http://www.bom.gov.au/
2. Choose your state along the top right menu. Under the heading Past Weather, click on Data and graphs.
3. Under the heading Text search, select Temperature from the first drop-down menu.
4. Under the heading Observations, click on the button next to Monthly, and select Mean maximum temperature from the drop-down menu.
5. Select a weather station in the area of interest by typing in the name of your location in the search box, then clicking on the Find button. A number of bureau stations will appear.
6. Click the name of the location nearest to you, then click on the name of the closest bureau station.
7. Click Get data, and select the year.
8. Scroll to the bottom of the table and look at Monthly mean.

The figures to use are the “Monthly mean” temperatures listed in the last row of the table.

Decision Guide 1: **Mean maximum temperature ≥20°C (Equal to or greater than 20°C)**

Mean maximum temperatures* from Bureau of Meteorology (BOM) can be used as guide to determine which of these decision guides should be used for your location. The number of days is how many days between grazing of livestock or application of untreated animal manure and crop harvest (exclusion period).



* Mean maximum temperature reached between grazing of livestock or application of untreated animal manure and crop harvest. Note that some standards mandate longer exclusion periods e.g. the Fresh Salad Produce Group (A-NZ) voluntary Standard for Fertilisers and Soil Additives and the Harmonised Australian Retailer Produce Scheme (HARPS).

** Pathogen reduction steps after harvest may include:

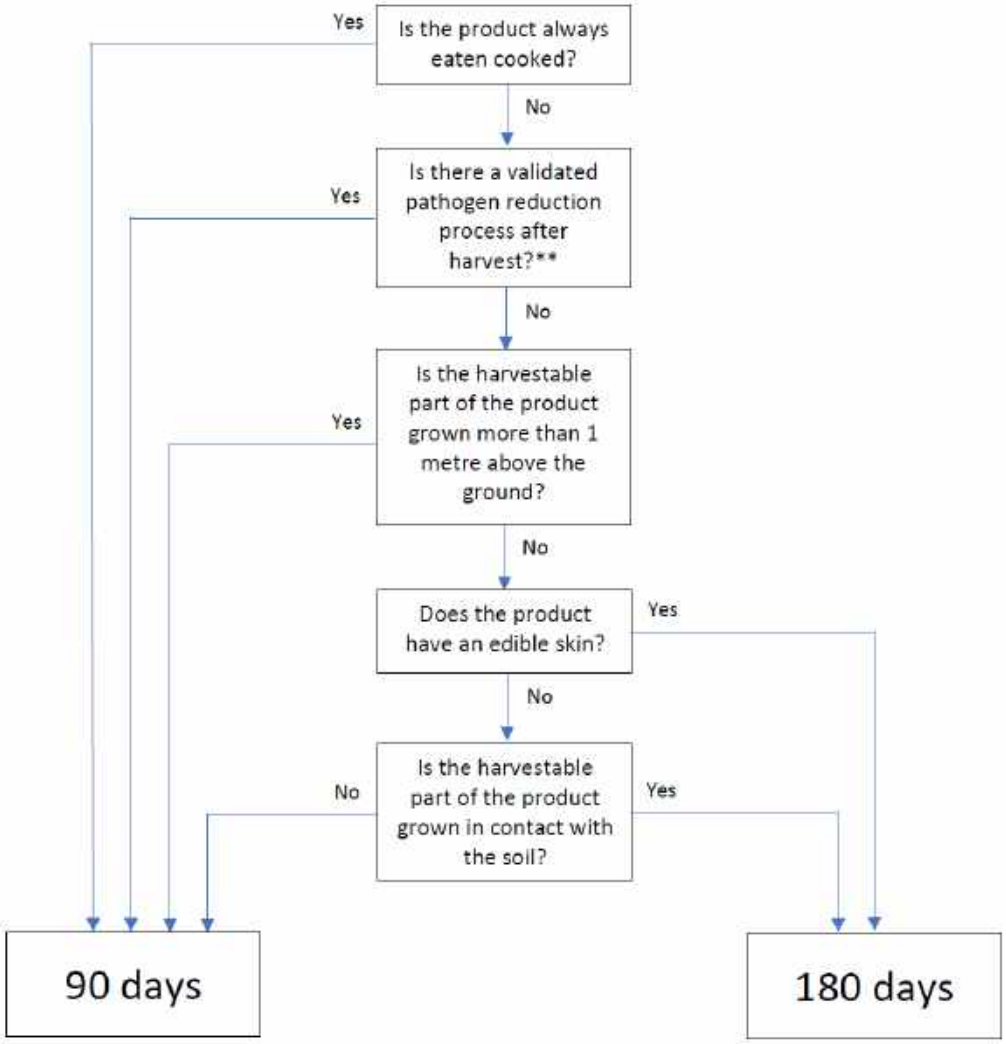
- Period between harvest and consumption
- Validated process that can achieve minimum 2 log reduction of human pathogens; water treated to achieve E.coli <1 cfu/100ml

A 2 log reduction refers to microorganisms being reduced by a factor of 100 by a specific process.

Log Reduction	Reduction Factor	Percent Reduced
1	10	90%
2	100	99%
3	1,000	99.9%
4	10,000	99.99%

Decision Guide 2: **Mean maximum temperature <20°C (less than 20˚C)**

Mean maximum temperatures* from Bureau of Meteorology (BOM) can be used as guide to determine which of these decision guides should be used for your location. The number of days is how many days between grazing of livestock or application of untreated animal manure and crop harvest (exclusion period).



* Mean maximum temperature reached between grazing of livestock or application of untreated animal manure and crop harvest. Note that some standards mandate longer exclusion periods e.g. the Fresh Salad Produce Group (A-NZ) voluntary Standard for Fertilisers and Soil Additives and the Harmonised Australian Retailer Produce Scheme (HARPS).

** Pathogen reduction steps after harvest may include:

- Period between harvest and consumption
- Validated process that can achieve minimum 2 log reduction of human pathogens; water treated to achieve E.coli <1 cfu/100ml

Where it is permitted to use raw manure or un-composted green waste, specific storage, application and equipment cleaning requirements must be followed to prevent contamination risks to other site operations.

Raw manure or un-composted green waste must be incorporated into the soil immediately and for annual crops before planting / sowing. Storage must be in a location that does not contaminate product and spreading equipment must either be cleaned after application or washed.

Where raw manure and un-composted green waste is used, the following must be recorded:

- Records of material used, including origin, contents, batch details and consignment information relating to the applied materials;
- Application records, including date, area(s) and method of application; and
- Methods of application and storage of raw manure and un-composted green waste.

For livestock stocking on growing sites, the following must be recorded:

- Records of movement, including livestock type and number on growing site and movement (date in, date out).

Element	Requirement	Document	Tier
13.5	**Risk Assessment for Water Sources** A risk assessment shall be conducted for each in-use water source, taking potential contamination situations and the characteristics of the crop, irrigation technique and other factors into account. Microbial water quality shall be verified at a frequency dependent upon the level of risk identified.	Record	1 & 2

The level of microbial contamination of water sources varies with the type of water source, for example surface water from dams, river water or bores, and over time.

In particular drought and flooding events can significantly change the level of contamination.

Additionally, risk from irrigation water contaminating crops depends on whether the crop comes in contact with the water or not. Exclusion periods between irrigation and harvest can further reduce risks.

Therefore, each site needs to be assessed for type of irrigation water used, or potentially needing to be used, and the current and expected contamination level where conditions change. This assessment needs consider the type of crop and irrigation method, for example overhead, drip or trickle irrigation under mulch.

All water sources need to be tested based on determined risk and historic data. Where historic data shows little risk and changes little, less frequent testing is required.

Testing points can be rotated throughout the years based on risk assessment.

Irrigation water quality needs to be checked at the closest point of contact to the product, as the irrigation system may become a source of contamination.

Element	Requirement	Document	Tier
13.6	**Management of Crops after Flooding** Produce that comes into contact with floodwater shall not be sold to Retail Customers.	Procedure	1 & 2
Produce that is in contact with flood water either directly or indirectly, due to flood water splashing onto it, is a significant risk to consumer health as it may be contaminated with human pathogens. Therefore, produce that is affected by flood water must not be sold to Retail Customers.			

14.0 Calibration and Weight Checks

Element	Requirement	Document	Tier
14.1	**Weight Verification Requirements** The Retail or Tier 1 Customer shall define the frequency and method of verifying finished product weight. If requirements are not defined by the Customer, all finished products shall meet the minimum net label weight or volume or count at the end of shelf-life, considering weight loss over the product life.	Procedure	1 & 2

It is illegal for underweight prepacked products to be sold to consumers at the point of sale and supplying product that is underweight may breach a Supplier's contractual obligations with the Customer.

A particular risk that causes produce to be underweight is that it will continue to lose weight after harvesting due to transpiration (water loss). This needs to be accounted for as detailed in Elements 3.1 to 3.4.

To ensure that all pre-packed and bulk product is compliant with legal requirements and Customer specifications, regular check weighing of products are required.

Customer requirements in relation to method and frequency of checks must be adhered to.

For bulk product exceeding typical carton weights, weight verification may be conducted by cross checking the total of individual weights from a unit on a smaller calibrated scale.

Where these have not been specified, the minimum requirement is that checks must be conducted to prove that minimum net weight /volume /count of product meets requirements at the end of shelf-life. This needs to account for weight loss.

Further guidance can be found at https://www.industry.gov.au/data-and-publications/guide-to-the-sale-of-pre-packaged-goods.

Element	Requirement	Document	Tier
14.2	**Average Quantity System** The Average Quantity System and ℮-mark shall only be applied with written agreement by the Customer. Where the Average Quantity System is applied, sampling plans and records shall demonstrate compliance.	Procedure & Record	1 & 2
The Average Quantity System (AQS) is a regulated system that allows for average weights across all packages to be used to be compliant. The system has strict rules that must be adhered to as a trade-off for allowing some packages to be underweight. The Customer must grant permission before a Supplier using the AQS, as implementation is difficult, and as consumers may not understand the system. Where the AQS is used, the ℮-mark must be shown on all labels of products packed according to the AQS. Where the AQS is implemented, suitable sampling plans and records are required to show compliance with the system. Data must be provided to the Customer on request.			

Element	Requirement	Document	Tier
14.3	**Customer-Brand Check Weighing and Overpack** All Retailer-branded pre-packed products shall be subject to 100% weight checks to verify labelled net weight plus required overpack using a check-weighing system. Records must be kept.	Record	1 & 2
Retailer-branded pre-packs must be fully weight checked. That is each individual package must be checked for the correct net weight. An overpack is required to off-set weight loss over the shelf-life and allowance must be made for this during the checks.			

Element	Requirement	Document	Tier
14.4	**Automated Check Weigher Requirements** Where in-line, automated check weighers of finished product are in use, records of weight checks for the start, middle and end of every production run for every product pack size shall be maintained.	Record	1 & 2
Where in-line, automated check weighers are used, record of weight checks must be documented. This needs to occur at the start, middle and end of each production run.			

Element	Requirement	Document	Tier
14.5	**Supplier-Branded Pre-pack Weight Checks** For all other pre-packed supplier-branded products, when product is subject to 100% weight checks, cross-check records shall be kept demonstrating compliance on an hourly basis. Minimum net weight product is subject to 100% weight check. Cross-checks shall be carried out on an externally certified trade measurement scale.	Record	1 & 2
For other pre-packs not covered in Element 14.4, i.e., Supplier-branded products, that are 100% weight checked, an hourly cross-check on a trade measurement compliant scale is required. Records must be kept.			

Element	Requirement	Document	Tier
14.6	**Weight Cross-Check Records** For Supplier-branded pre-packed product that is not subject to 100% weight checking, cross-check records demonstrating compliance shall be kept every 15 minutes at a minimum. Cross-checks shall be carried out on an externally certified trade measurement scale.	Record	1 & 2
Supplier-branded products that are not 100% weight checked, require a cross check on a trade measurement compliant scale every 15 minutes as a minimum. Records must be kept.			

Element	Requirement	Document	Tier
14.7	**Bulk Product Weight Checks** Bulk products shall equal the weight and/or count as stated on the Customer's finished product specification and the shipper carton or crate at the time of delivery to the Customer, considering weight loss over product life, including during ripening. Records of weight checks at the start, middle and end of each production run of each bulk carton size shall be maintained.	Record	1 & 2

Bulk products are required to meet weight and/or count requirements stated in Customer specifications and as labelled on the box or crate end label.

An overpack allowing for weight loss during distribution, ripening and so on is required.

Weight checks need to be carried out and documented to ensure that product meets net weight plus overpack requirements.

Counts must be recorded where the Customer specification references them.

This needs to occur at the start, middle and end of each production run for each product and pack size.

Element	Requirement	Document	Tier
14.8	**Scale Verification Requirements** A procedure shall be implemented to ensure scales and check weighers used for retail pre-packs and bulk loose product shall be verified for accuracy at a defined frequency. This shall be no less than once per day before commencement of the production day. Records of verification shall be maintained.	Procedure & Record	1 & 2

To ensure legal and specification compliance of products, accurate weight checks must be carried out.

A procedure is required that details how weight checks are to be conducted accurately. The procedure should include the following checks:

- Sufficient battery power where the scale is battery powered;
- Surface that equipment is placed on is stable;
- Scale is level, compensating for example for falls across the floor; and
- Scale calibration check of all load cells, generally through a five-point check.

Where measured weight during checks differs by more than the allowable tolerance, the scale needs to be externally re-calibrated.

Check weighers need a similar procedure to scales.

The frequency of accuracy checks must be at a minimum at the start of a production day.

All check results must be documented.

The HARPS website https://harpsonline.com.au/tools-and-templates/ and Appendix B contains an example template for Calibration and Weight Check Records. Use of it is not mandatory.

Element	Requirement	Document	Tier
14.9	**Packaging Tares** Procedures shall be in place to calculate and verify packaging tares are used at a suitable frequency to ensure the actual product net weight or volume is measured accurately. Records of verification shall be maintained.	Procedure & Record	1 & 2

To determine the net weight of packed products, the packaging tare weight must be deducted from the overall measured weight.

All packaging materials have to be considered, including carboard, plastic shells and soft plastic film and nets, packaging inserts that protect against rubbing or compression and juice absorbers.

Some packaging weights, such as for plastic clam shells, will be very consistent within a batch. Others such as netting weight may be very variable as the material stretches during the packing process.

A procedure is needed to show how the packaging tare is calculated, how often it has to be determined and how it is applied to different weighing equipment.

Where the tare weight is very consistent, it may be sufficient to measure the tare for a number of packages in a batch and use the highest value. Individual batches received would need to be checked as they can vary. During production, the established value can be set as a tare on scales, or a representative package can be used to tare off.

In cases where the packaging tare is variable, for example from paper-based materials possibly absorbing moisture, daily tares will need to be established. During packing, the highest tare value anticipated must be used.

For packaging with variable tares, the tare for each package needs to be determined individually when checking net weights on a trade measurement compliant scale.

Records of tare weight determination are required.

Element	Requirement	Document	Tier
14.10	**Scale Calibration** Certified test weights shall be used to verify scale and check weigher accuracy. The mass of the test weight shall be at or slightly above the maximum weight to be measured for a product. If in-line check weighers do not allow for the use of test weights, the certified test weight shall be used as part of a cross reference method.	Procedure	1 & 2

Scales and check weighers only can provide reliable weight measurements if checks are accurate.

There are many reasons for accuracy of scales changing over time, including shocks, temperature changes, being placed on an uneven or unstable surface or batteries running out on battery operated scales.

To verify scales and check weigher accuracy, certified test weights are required. These can be obtained from scale providers and come with a test certificate.

To protect test weights, they should be kept in a closed, dry location and be cushioned against scratches and dents.

The mass of the check weight for daily checks needs to be equal or just above the maximum package weight to be measured.

Where in-line weight checkers are not set up or accessible to conduct a direct test weight check, actual package weights determined on the check weigher need to be the same as when the same package is weighed on a scale that was calibrated with a test weight.

Records of test weight checks need to be kept.

Element	Requirement	Document	Tier
14.11	**External Certification of Trade Measurement Scales** A master trade measurement scale (used for pre-packing) and certified test weights shall be externally tested and certified at a frequency recommended by the certifier. If no recommendations have been made, this shall take place annually.	Record	1 & 2

Master trade measurement scales are a reference tool during production to ensure that all other scales are operating correctly and accurately.

This may be through cross-checking measurements between the master trade measurement scale and other scales, or by recording quality control weight checks against the master trade measurement scale.

Therefore, the master trade measurement scale must be working accurately at all times. This must be verified through an external calibration. The frequency of verification should be recommended by the certifier, or if no recommendation is made at an annual frequency.

A certificate of compliance must be issued by the service provider and kept on record. The certificate must show the equipment it relates to, for example through a unique equipment number, weight range certified for, date of certification and expiry date.

The certified test weights equally are reference tools that need to be certified through an external certifier. The frequency of verification should be recommended by the certifier, or if no recommendation is made at an annual frequency.

If the trade measurement scale is not operating within its tolerances, that is the calibration readings are outside the labelled +/- allowance of the scale, or if it is possibly damaged, the scale must be immediately externally re-calibrated.

Immediate recalibration is also required for test weights that appear damaged, scratched or rusty.

15.0 Product Sold or Given to Staff

Element	Requirement	Document	Tier
15.1	**Retail Customer Branded Product Disposal to Staff** Retail Customer branded product shall not be sold through staff, factory, or other retail outlets unless branding is removed. Retail Customer branding shall be removed completely when product is given freely to staff. If Retail Customer branding cannot be removed from staff giveaways, Retail Customer branding shall be defaced and/or marked as "factory second – not for sale". All products sold or given freely to staff shall comply with relevant Federal and State Legislation.	Procedure	1 & 2

Retail Customer branded products are intended for sale by the Retail Customer only.

Where excess Retail Customer branded product has been packed, this can only be sold to staff, factory outlets and other stores if labels and other packaging showing the brand are fully removed.

Retail Customer branded product can be given away for free to staff. However, Retail Customer branding must be removed or where it cannot be removed it must be defaced and/or marked as 'Factory Second – Not for sale'.

Regardless of removing branding or labelling product as 'factory second – not for sale', it must be fully legally compliant. This includes requirements such as compliant net weights at end of shelf-life, compliance with MRLs, allergen labelling compliance and more.

Element	Requirement	Document	Tier
15.2	**Retail Customer Branded Product Donation to Charity** Where Suppliers wish to donate Retail Customer branded product to a charity, written authorisation shall be obtained from the relevant Retail Customer prior to the donation. The Supplier shall maintain a log which records the date of donation, product details, batch numbers, use-by or best before dates, quantities and reason for donation. Donations that have been approved by the Retail Customer and entered into the logbook do not require removal or defacing of branding.	Record	1 & 2
Excess Retail Customer branded products may be donated to charity without removal or defacing of labels. However, the Retail Customer must provide initial, written permission to do so prior to the donation. Additional donations do not need further permission. All donations must be logged and details such as date, product, batch number, date coding, quantity and reason recorded.			

16.0 Insurance

Element	Requirement	Document	Tier
16.1	**Insurance Certificate of Currency** A Certificate of Currency evidencing Product and Public Liability Insurance of such an amount as considered acceptable by the Customer shall be maintained as a controlled document.	Record	1
Product and Public Liability Insurance is required to protect the Supplier and Customer against financial losses associated with product mishaps. The Tier 1 Supplier is responsible for holding this insurance for an amount required by the Customer. Insurance has to be kept up-to-date and the Certificate of Currency must be held secure and current.			

Appendix - Glossary, References and Templates

Appendix A - References

Additional Reading

The following reference is recommended, additional reading and covers food safety risks of horticultural production and conducting risk assessments. However, where differences to the HARPS Standard exist, the HARPS requirements must be implemented.

Guidelines for Fresh Produce Food Safety (2022). Fresh Produce Safety Centre Australia & New Zealand. Downloadable at https://fpsc-anz.com/food-safety-guidelines-2022/.

Referenced Document

NSW Code of Practice - Managing the Work Environment and Facilities August (2019). Downloadable at https://www.safework.nsw.gov.au/__data/assets/pdf_file/0016/50074/Managing-the-work-environment-and-facilities.pdf.

Appendix B - Glossary

Term	Suggested Definition	Source
Agricultural Products	Products such as insecticides, acaricides, herbicides, fungicides, growth regulators, pheromones and other organic treatments used to control pest, disease, weeds and growth, applied on or around the property, production areas and on harvested produce. It includes post-harvest chemicals used on-product such as fruit waxes, sanitisers and fungicides. It also includes cleaning agents and sanitisers and grease, oils and lubricants used for maintenance.	New definition for HARPS
Ancillary Services	Ancillary services, that is support services, may be provided within the business onsite and include processes such as ripening and fumigation. Ancillary services provided on a different site within the business require that site to be approved. Ancillary services provided by a different party require that party to be managed as an approved supplier.	New definition for HARPS
Allergen	A substance that can cause hypersensitive immune response (allergic reaction) in some consumers. The reaction may potentially be life-threatening after exposure by ingestion, inhalation or contact with skin.	Freshcare Code of Practice Food Safety and Quality
AS 4454	An Australian Standard that specifies requirements for organic products and mixtures of organic products used to amend the physical and chemical properties of natural or artificial soils and growing media. It specifies physical, chemical, biological, and labelling requirements for composts, mulches, soil conditioners and related products that have been derived largely from compostable organic materials and which meet the minimum requirements as set out in this Standard.	AS 4454—2012 (Incorporating Amendment No. 1): Composts, soil conditioners and mulches
Australian Competition and Consumer Legislation	Legislation (The Competition and Consumer Act 2010) that covers most areas of the market: suppliers, wholesalers, retailers, and consumers. Its purpose is to enhance the welfare of Australians by promoting fair trading and competition, and through the provision of consumer protections.	https://www.accc.gov.au/about-us/australian-competition-consumer-commission/legislation
Biosolid	Solid or semisolid by-product obtained from treated sewage or wastewater	Freshcare Code of Practice Food safety and Quality
Contamination	The introduction or occurrence of a direct produce food safety hazard or indirect produce food safety hazard through the environment e.g. growing site, water sources.	Freshcare Code of Practice Food Safety and Quality

Term	Suggested Definition	Source
Customer	A party that purchases product from the Supplier. In the HARPS Standard, the Customer of a Tier 2 Supplier is the Tier 1 Supplier and the Customer of a Tier 1 Supplier is the relevant retailer or food service member participating in the HARPS Scheme.	New definition for HARPS
Document - Policy	The HARPS Standard requires recorded evidence for compliance with the specific Elements. Where indicated, this must be in the form of a policy that sets out how the Supplier is going to comply with the element.	New definition for HARPS
Documents - Procedure	The HARPS Standard requires recorded evidence for compliance with the specific Elements. Where indicated, this must be in the form of a procedure that sets out actions to be taken by the Supplier's employees to be compliant with the Element.	New definition for HARPS
Document - Record	The HARPS Standard requires recorded evidence for compliance with the specific Elements. Where indicated, this must be in the form of a record that captures information showing compliance with the requirements of the Element.	New definition for HARPS
Down Time	Down Time includes significant breaks in production such as meal breaks, scheduled maintenance, significant maintenance due to breakdowns, shift change over or emergency evacuations. Brief interruptions for minor line adjustments during a production run is not considered down time.	New definition for HARPS
Effluent	The out-flow water or wastewater from any water processing system or device.	Freshcare Code of Practice Food Safety and Quality
Employee	All people employed by the business, including family members.	Adapted from Freshcare Code of Practice Food Safety and Quality
Fertilizer and Soil Additive	Products that are added to the soil to improve fertility and structure and control weeds. Examples are inorganic (chemical) fertilizers, lime, gypsum and those of organic origin such as animal manure, sawdust, compost, compost tea, seaweed, fish-based products, and other biological compounds.	Freshcare Code of Practice Food Safety and Quality
Floodwater	Water that washes over growing sites from an unintended overflow of a water source beyond its normal limits.	New definition for HARPS
Foreign Object	Any material that is not intended to be present in or with the product. Examples include, but are not limited to glass, hard plastic, wood, metal, paper, string, tape, maintenance debris, pens, paperclips, personal effects (i.e. mobile phones), staples, packaging.	New definition for HARPS

Term	Suggested Definition	Source
Food Service	Food service encompasses all of the activities, services and business functions involved in preparing and serving food to people. It includes restaurants from fine dining to fast food, and institutional food preparation operations at locations such as schools and hospitals, and other speciality vendors such as food truck operators and catering businesses.	New definition for HARPS
Food Standards Code	A list of requirements for food sold in Australia and New Zealand, administered by Food Standards Australia New Zealand. The Code is given legal force through Commonwealth, state and territory and New Zealand food legislation and covers: • general food standards (including labelling and genetically modified food), • specific food product standards, and • Australian food safety standards.	New definition HARPS
GFSI (Global Food Safety Initiative)	Independent forum made up of major retailers, food service companies and manufacturers with the aim of improving food safety. It benchmarks International Standards, leading to international recognition of audit results.	New definition for HARPS
Growing Site	Areas or structures where produce is grown, and where the site history or characteristics are different, inputs to the growing system are different (i.e. different irrigation water supply), different types of produce are grown or where produce is treated differently (i.e. different chemical treatments).	Freshcare Code of Practice Food Safety and Quality
HACCP (Hazard Analysis Critical Control Point)	The methodology of identifying and assessing product and growing / production related hazards, and the process of controlling and monitoring defined hazards.	New definition for HARPS
HARPS Practitioner	A representative of the organisation that is an employee and who is responsible for managing implementation of HARPS.	New definition for HARPS
Illness	A disease, condition or period of sickness affecting the body that may have the potential to result in contamination of produce. Illnesses that can contaminate and be passed on through food include, but are not limited to, Hepatitis A and those caused by Giardia, Salmonella and Campylobacter.	New definition for HARPS
ISO 17021	An internationally recognised standard that contains principles and requirements for the competence, consistency and impartiality of the audit and certification of management systems of all types (e.g. quality management systems) and for bodies providing these activities.	ISO 17021-1: 2015 Conformity assessment -- Requirements for bodies providing audit and certification of management systems

Term	Suggested Definition	Source
ISO 17025	An internationally recognised standard that specifies the general requirements for the competence to carry out tests and/or calibrations, including sampling. It covers testing and calibration performed using standard methods, non-standard methods, and laboratory-developed methods. It is applicable to all organizations performing tests and/or calibrations i.e. laboratories.	ISO 17025:2005 General requirements for the competence of testing and calibration laboratories
ISO 17065	An internationally recognised standard that specifies requirements aimed at ensuring that Certification Bodies operate certification schemes in a competent, consistent, and impartial manner.	ISO 17065:2012 Conformity assessment – Requirements for bodies certifying products, processes and services
Mass Balance	The quantitative reconciliation of process inputs to process outputs minus yield adjustments, rework, and waste. Also known as 'Quantity check'.	WQA Version 8: Glossary of Terms
MRL (Maximum Residue Limit)	The maximum allowable levels of agricultural and veterinary chemicals in agricultural produce entering the food chain. Generally, set by local regulatory bodies i.e. Australian Pesticides and Veterinary Medicines Authority.	Australian Pesticides and Veterinary Medicines Authority
National Trade Measurement Regulations	A series of legislative documents, administered by the National Measurement Institute, which establishes a national system of units and standards of measurement and provides for the uniform use of those units and standards throughout Australia to ensure traceability of measurement.	New definition for HARPS
Non- Conformance - Critical	A Non-Conformance against the HCRs/Australian Retailer Standard which is raised where there is seen to be: A break-down of controls at a Critical Control Point, pre-requisite program or other process step and judged likely to cause a significant food safety risk; i. A breakdown of controls at a Critical Control Point, pre-requisite program or other process step and judged likely to cause a significant food safety risk; ii. A breach of regulation in either the Country of Production or the Country of Sale; or iii. Falsification of records relating to food safety controls.	New definition for HARPS

Term	Suggested Definition	Source
Non- Conformance - Major	A Non-Conformance which is raised where there is: i. A substantial failure to meet the requirements of any clause of the HCRs/Australian Retailer Produce Standard; ii. A situation is identified which would, on the basis of available objective evidence, raise significant doubt as to the conformity of the product; or iii. A lack or deficiency in the Quality Assurance System producing unsatisfactory conditions that carry a food safety or quality risk and likely to result in a System element breakdown.	New definition for HARPS
Non- Conformance - Minor	A Non-Conformance which is raised where a clause of the Australian Retailer Produce Standard has not been fully met but does not lead to an immediate risk to food safety and quality.	New definition for HARPS
Packing Area	Any area where produce is handled, including areas where produce is packed in field. Handling includes, but is not limited to, producing, collecting, harvesting, preparing, packing produce.	New definition for HARPS
Recall	Action taken to remove produce from the supply chain if there is a food safety or potential food safety risk to consumers. A Consumer Level recall involves recovery of produce from consumers and businesses in the supply chain whereas a Trade Level recall only involves recovery of produce from businesses in the supply chain.	Freshcare Code of Practice Food Safety and Quality
RTO (Registered Training Organisation)	Training providers registered by the Australian Skills Quality Authority to deliver nationally recognized courses and accredited Australian Qualifications Framework (AQF) VET qualifications.	New definition for HARPS
Scope	The extent of the area or subject matter that something deals with or to which it is relevant, i.e. sites, produce, and process covered by Approval.	New definition for HARPS
Shall	The word ‘shall’ is used in the HARPS Standard for required elements and means that the element’s requirements must be adhered to.	New definition for HARPS
Storage Area	Any area where produce is stored after harvest. Includes in-field, raw material and packaging storage areas.	New definition for HARPS

Term	Suggested Definition	Source
Suitable Management Representative	A suitable management representative is an individual that has been trained and authorised (by management) and works actively in the business to ensure that the required policies or procedures required of the food safety and quality plan have been effectively implemented and maintained. Examples of Management Representatives may be the business owners or quality personnel, operation or production line managers or supervisors.	New definition for HARPS
Supplier	The grower / packer of product to which Approval applies.	New definition for HARPS
Supplier – Tier 1	A Supplier as defined in the HARPS Decision Graphic as Tier 1.	New definition for HARPS
Supplier – Tier 2	A Supplier as defined in the HARPS Decision Graphic as Tier 1.	New definition for HARPS
Supplier – Tier 3	A Supplier as defined in the HARPS Decision Graphic as Tier 3.	New definition for HARPS
Treated Fertilizer or Soil Additive	Fertilizer or soil additive derived from natural sources that has been treated to achieve levels of E. coli cfu <100/g and Salmonella Not Detected/50g.	Freshcare Code of Practice Food Safety and Quality
Untreated Fertilizer or Soil Additive	Fertilizer or soil additive derived from natural sources that has not been treated or does not achieve levels of E. coli cfu <100/g and Salmonella Not Detected/25g.	Freshcare Code of Practice Food Safety and Quality
Validation	Obtaining evidence that a control measure or combination of control measures, if properly implemented, is capable of controlling a hazard to a specified outcome.	Codex Alimentarius (2008) Guidelines for the validation of food safety control measures
Verification	The application of methods, procedures, tests and other evaluations, in addition to monitoring to determine whether a control measure is or has been operating as intended	Codex Alimentarius (2008) Guidelines for the validation of food safety control measures
Visitor	A person that enters growing, packing or storage areas that is not employed or contracted by the Supplier.	New definition for HARPS
Withdrawal	A food withdrawal is action taken to remove food from the supply chain where there is no food safety risk, or the food safety risk has not yet been confirmed.	Freshcare Code of Practice Food Safety and Quality

Appendix C - Templates

All templates can also be downloaded from the HARPS website at https://harpsonline.com.au/tools-and-templates/ in pdf and excel format.

Templates contain suggestions and do not need to be used as presented.

- Approved Supplier Record (HARPS Example)
- Calibration and Weight Check Record (HARPS Example)
- Cleaning and Sanitation Record (HARPS Example)
- Equipment Glass Hard Plastic Condition Report (HARPS Example)
- Equipment Maintenance Log (HARPS Example)
- Equipment Register (HARPS Example)
- Exclusion Period Record (HARPS Example)
- Field Bin and Pallet Inspection (HARPS Example)
- Glass and Hard Plastic Register (HARPS Example)
- Label Check Record (HARPS Example)
- Product Testing Record (HARPS Example)
- Return to Work Policy (HARPS Example)
- Return to Work Record (HARPS Example)
- Shelf-life Testing Record (HARPS Example)
- Tool Issue and Return Record (HARPS Example)
- Training Matrix and Record (HARPS Example)

Company Name | Site Name | HARPS Example Template - Approved Supplier Record | Date Issued

Input/ Product/ Service[1]	Supplier Name	Supplier ABN	Supplier Address[2]	Supplier Certification Type	Valid Until	Supplier Contact Name	Phone Number	Email	Site Activities	Supplier Specification Date	Date Approved[3]	Approved By	Approval Signature
Contract Grower	Fruit Co	xxxxx	1 Main Street, Mytown VIC 3111 Australia	Freshcare	xx/xx/xxxx	John Doe	xxxx xxxx	johndoe@gmail.com	Growing	xx/xx/xxxx	xx/xx/xxxx	Greg Smith	Signature

NOTE 1: The direct Supplier, i.e. those that are responsible for the final pack, shall be responsible for ensuring all domestic and international Sub-contracted / Co-packer Suppliers (involved in the growing, packing or in-process storage of produce) destined for sale to the Customer meet the following requirements.
NOTE 2: Direct suppliers are responsible to ensure that all domestic and international sub-contracted/ co-packer suppliers have a copy of the relevant product specifications and progress towards compliance with HARPS requirements.
NOTE 3: The Date Approved column aids in the review of the approved suppliers.

Company Name | Site Name | HARPS Example Template - Calibration and Weight Check Record | Date Issued

Date	Time	Equipment Type	Equipment ID Number	Calibration Standard Value Point 1	Point 1 Observed Value	Calibration Standard Value Point 2	Point 2 Observed Value	Initials	Corrective Action if Values Disagree	Corrective Action Completed Date and Time	Initials
xx/xx/xxxx	xx:xx	Checkweigher	xxxxxxxx	500g	500g	NA	NA	XX	NA	NA	NA

Verification Date:		Verified By:		Role:	

NOTE: Calibration of all measuring and dosing equipment should be recorded and under taken at a predetermined frequency. Calibration points are, for example, 0°C (ice slurry), 1000g test mass, stated nozzle flow rates or 3.0mm stainless steel test piece. The number of calibration points depends on the equipment and conditions of its use.

Company Name | Site Name

HARPS Example Template - Cleaning and Sanitation Record

Date Issued

To Be Completed by Cleaner						To Be Completed by Inspector			Recleaning Record (If Required)		
Date	Time	Location	Facility or Equipment Type	Equipment ID Number	Cleaned and Sanitised. Cleaner Initials	Visual Inspection Acceptable (Y/N/NA)	Swabbing Acceptable (Y/N/NA)	Inspector Initials/ NA	Recleaned if not Acceptable (Cleaner Initials)	Reinspection Acceptable (Y/N)	Inspector Initials
xx/xx/xxxx	xx:xx	Packing Line	Grader	xxxxxxxx	XX	Y	NA	PP			

Verification Date:		Verified By:		Role:	

NOTE: Cleaning and sanitation should be recorded when carried out. Facility type includes floors, drains, walls, ceiling, drip trays and air vents. Equipment includes, for example, packing equipment, storage equipment, harvest tools, aids and conveyors. Frequency of cleaning is in accordance with the cleaning and sanitation policy and procedures.

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Company Name | Site Name HARPS Example Template - Equipment/ Hard Plastic and Glass Condition Report Date Issued

Inspection Date	Location	Equipment Type	Equipment ID Number	Operational (Y/N)	Electrical Hazards Observed (Description/ N)	Mechanical Defects Observed (Description/ N)	All Guarding in Place (Y/ N/ NA)	Visual Product Contamination Risks Observed (Description or N)	Maintenance Request Issued (Number or NA)	Reinspection Date	Initials
xx/xx/xxxx	Cold Room 1	Overhead Light	xxxxxxxxx	Y	N	N	Y	N	NA	xx/xx/xxxx	XX

Verification Date:		Verified By:		Role:	

NOTE: Checks should include defects, including but limited to; loose and damaged wires, nuts and bolts, defective welds, fraying belts, cracked or broken glass or hard plastic, contamination with dirt and other product contamination risks.

Date	Location	Equipment Type	Equipment ID Number	Date of Maintenance	Description of Maintenance Carried Out	Maintenance Completed By	Initials
xx/xx/xxxx	Cold Room 1	Thermostat	xxxxxxxx	xx/xx/xxxx	Replacement of Faulty Probe	Brenda Jones	BJ

Verification Date:		Verified By:		Role:	

NOTE: Procedures shall be in place to minimise the risk of contamination to product from any scheduled or unscheduled maintenance.

Date Entered	Location	Equipment Type	Equipment ID Number	Proximity to Product (Above/ Close/ Remote)	Risk of Mechanical Damage (e.g. From Vibrations or Forklift Traffic) (Low/ Medium/ High)	Inspection Frequency Required	Preventative Maintenance Frequency	Initials	Date Decommissioned	Initials
xx/xx/xxxx	Packing Area	Conveyor Belt	xxxxxxx	In Contact	High	Daily	6 monthly	XX	xx/xx/xxxx	XX

NOTE: All product contact equipment (i.e. washing baths and conveyors), measuring and detection equipment, processing and maintenance tools and cleaning equipment should be captured.

Company Name | Site Name

HARPS Example Template - Exclusion Period Record

Date Issued

Location	Field or Block ID	Type of Event	Application Date of Raw Manure or Flood Event	Required Exclusion Period (Days)	Estimated Harvest Date	Harvest Date	Total Actual Exclusion Period (Days)	Initials
Town	Block X	Untreated Manure	15/04/2022	90	15/07/2022	15/07/2022	91	XX
Village	Block Y	Flooding - contact with food crop	21/06/2022	Block not harvested plowed in on 15/07/2022	N/A	N/A	N/A	XX
City	Block Z	Animal Stocking	30/09/2022	45	15/11/2022			

Verification Date:		Verified by:		Role:	

NOTE: The required exclusion period shall comply with the HARPS standard.

Company Name | Site Name

HARPS Example Template - Field Bin and Pallet Inspection Record

Date Issued

				Observations (Counts)				
Date	Equipment Type	Number of Items Received or in Storage	Number of Items Inspected	Number Contaminated with Visible Dirt or Residues	Number of Loose or Protruding Nails	Number of Loose or Splintering Wood or Plastic Fragments	Corrective Actions	Initials
xx/xx/xxxx	Field Bin	25	25	1	0	0	Recleaned dirty field bin	XX

Verification Date:		Verified By:		Role:	

NOTE: Corrective actions can include cleaning, maintenance, disposal or return of items among others. Counts for each action should be recorded.

Date Entered	Location	Equipment Type	Equipment ID Number	Breakage Risk (e.g. From Forklifts) (Low/ Medium/ High)	Shielding (e.g. of Lights) (Y/ N/ NA)	Proximity to Product (Above/ Close/ Remote)	Risk of Perishing (e.g. From Cleaning, Chemicals, Cold Exposure or Vibrations) (Low/ Medium/ High)	Initials	Date Decommissioned	Initials
xx/xx/xxxx	Packing Area	Light Fitting	xxxxxxx	Low	Y	Above	Low	XX	xx/xx/xxxx	XX

NOTE: All glass and hard plastics should be captured on the register including plexiglass shielding, light fittings, protective plastic covers, windows, mirrors, exit signs and revolving warning lights.

Company Name | Site Name | HARPS Example Template - Label Check Record | Date Issued

			Scheduled Production				Label Information						Details Correct and Legible?
Date	Time	Packing Line	Product Name	Pack Size	Brand	Best Before Date	Label Sign Out	Line Cleared of all Prior Labels (Y/N/NA)	Product Name	Pack Size	Brand	Best Before Date	Initials
xx/xx/xxxx	xx:xx	Line 1	Apples	2kg	Juicy	xx/xx	Initials	Y	Apples	2kg	Juicy	xx/xx	Initials

Verification Date:		Verified by:		Role:	

NOTE: Label and date coding checks should be carried out on each production line on each production day and when packaging replenishment occurs during a production or packing run. Checked labels/ packaging must be retained with this record.

Company Name | Site Name

HARPS Example Template - Product Testing Record

Date Issued

Request Date	Test Type (Microbial/ Chemical/ Heavy Metal/ Nutritional)	NATA Accredited Laboratory Name	Product Description	Results Received Date	Report Number	All Data Compliant (Y/N)	Non Compliant Data	Customer(s) Notified (Y/N/NA)	Corrective Actions	Initials
xx/xx/xxxx	Microbial	Lab X	Water	yy/yy/yyyy	xxxx	Y	NA	NA	NA	XX

Verification Date:		Verified By:		Role:	

NOTE: Chemical residue test results shall comply with maximum residue limits (MRLs) of the Food Standards Code. If Microbiological, Chemical or Heavy Metal testing indicates a breach of Critical Limits as per Customer Specifications or regulations, Customers shall be notified within 1 hour of the site receiving the results. Test Frequency and Scope shall comply with HARPS requirements.

Return to Work Procedure

1. If any personnel are suffering from or carrying any communicable disease or are showing the following symptoms, they must report to their Supervisor or Production Manager.

Symptoms of illness may include (but are not limited to):

a) nausea;
b) vomiting;
c) diarrhoea;
d) fever.

2. The Supervisor or Production Manager reassigns staff where appropriate to non-product contact roles or sends the staff home if the illness poses a risk to product or other personnel. Personnel showing symptoms of fever, nausea, vomiting or diarrhoea must not enter growing, packing or storage areas until clear of symptoms for 48 hours.

3. A staff illness register must be maintained by the Supervisor or Production Manager, which contains the following information:

a) Employee's name and job role;
b) Date of absence / reassignment;
c) Alternative role assigned if applicable;
d) Type of illness (or symptoms displayed);
e) Return date; and
f) Sighting of Doctor's certificate allowing return to work if applicable.

4. Before returning to work, the Production Manager will assess the individual based on one of the following for return to work clearance depending on circumstances:

a) a Doctor's certificate is produced by the individual indicating that the person is fit to resume food handling activities; or
b) the individual is free of symptoms for 48 hours after suffering from fever, vomiting, nausea and/or diarrhoea.

Staff Illness and Return to Work Record
(Confidential)

Illness Record								Return to Work Record			
Date Illness Reported	Time Reported	Staff Name	Staff Role	Type of Illness (eg Vomiting)	Action Taken (eg Stay Home, Assigned to Other Duties)	Doctor's Certificate Sighted (Y/N)	Signature	Doctor's Clearance Certificate Sighted (Y/N)	Date and Time of Last Symptoms	First Date Cleared to Return to Work	Signature
10/10/2018	xx:xx	Jane Doe	Grader	Vomiting	Stay home	Y	Joe Blogs	Y	11/10/2018 - 10pm	13/10/2018	Joe Blogs

Date Verified:		Verified By:		Role:	

Product	Variety	Pack Type and Weight	Harvest Date	Packed Date	Best Before Date	Storage Temperature (°C) - Static or Transport Trial	Pre-Storage Weight (g)	Day 1 Visual Quality Score[1]	Day 2 Visual Quality Score	Day 3 Visual Quality Score	Day 4 Visual Quality Score	Day 5[2] Visual Quality Score	Taste Test on BB Day (if sound)	End of Storage Weight (g)	Weight Maintained at End of Life (Y/N)[3]	Shelf Life Achieved (Score 3 or above)	Action if Not Achieved	Signature
Strawberry	Kalinda	250 g clamshell	xx/xx/xxxx	xx/xx/xxxx	xx/xx/xxxx	4°C - Static	260g	5	4	4	3	3	3	253g	Y	Y	NA	Signature

Verification Date:		Verified by:		Role:	

NOTE 1: A score system should be defined, e.g. 5 = Excellent, 4 = Meets Specification, 3 = Minor Defects, 2 = Major Defects, 1 = Not Consumable.
NOTE 2: If the shelf life is longer than 5 days, additional column will need to be inserted for the additional days.
NOTE 3: Weights of packaged products should be checked at the end of shelf life, either as stated on the label or if not labelled just before product is not consumable (eg Quality Score 2).

Company Name | Site Name

HARPS Example Template - Tool Issue and Return Record

Date Issued

Issue							Return					
Date	Time Issued	Equipment Type	Equipment ID Number (or Range)	Equipment Count	Equipment Intact (Y/N)	Initials	Time Returned	Equipment Count	Missing Items (ID Number or NA)	Equipment Damage Observed	Corrective Action for Missing or Damaged Items	Initials
xx/xx/xxxx	xx:xx	Knife	xxxxxxxx	5	Y	XX	yy:yy	4	NA	NA	Find Knife. Located Under Bench. Returned	XX

Verification Date:		Verified By:		Role:	

NOTE: All processing hand tools (knives, scissors), cleaning and maintenance tools shall be issued and accounted for after use or end of shift. On return, equipment damage shall be identified (including for wood damage). Corrective actions are required for missing or damaged items.

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1 of 1

		Date Training Completed														
Name	Position	Induction / Annual Food Safety & HACCP	HARPS Training/ Refresher	HACCP Principles /Refresher	Cleaning and Sanitising	Allergen Management and VITAL 2	Internal Food Safety Auditor	Incoming Goods Receival	CCP Training	Calibration	Labelling	Quality Evaluation	Chemical Usage	Forklift License	Recall and Withdrawal
Jane Doe	Quality Manager	xx/xx/xxxx	xx/xx/xxxx	xx/xx/xxxx	xx/xx/xxxx	xx/xx/xxxx	Plan xx/xx/xxxx	xx/xx/xxxx	xx/xx/xxxx	xx/xx/xxxx	xx/xx/xxxx	xx/xx/xxxx	xx/xx/xxxx	NA	xx/xx/xxxx

NOTE: Include all training relevant to your business in the table. Where training is planned (eg new starter), include "Plan" and date. If specific training is not applicable to a specific position, enter NA. You can add to to your current records. If you have conducted training previously, you may need to conduct additional training required by HARPS.

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