

Position Paper

UEAPME¹ position on the Stakeholder Consultation on HACCP (Hazard Analysis and Risk-Based Preventive Controls for Food

Brussels, Belgium, June 2014

General comment

UEAPME, the European association of Small and Medium Sized Enterprises and Craft enterprises in Europe would like to take the current revision of the Hazard Analysis and Risk Based Preventive Control for Food System (HACCP) as occasion to raise some general and particular concerns.

We underline that the implementation of the Regulation COM(2004)852 on food hygiene is very different according to the MS and food sector concerned. For this reason, the answers given in the document could be sometimes contradictory.

In some countries such as Belgium, France, Italy and Luxembourg the HACCP principle is supported by relevant guidelines to help the implementation process, when companies sell directly food to final consumers (It is not the case when they sell only to others companies). In other countries such as Germany for instance, the existing professional principles replace the direct application of HACCPs. Here, the EC guidelines, even without establishment of critical control points with documentation the preventive controls for food are based on HACCP principles according to article 5 of Regulation COM(2004)852. It would be unrealistic to apply a formal HACCP system in some confectionary sectors, for instance where documentation would be required on baking temperature, general monitoring and deviations. Therefore the HACCP concept in seven stages in the craft sector is not practicable but the food safety is assured by the general good practices and the professional standards.

The following paragraphs are the UEAPME attempt to answer the specific EC questions. As said here above we notice differences of implementation in sectors among food business. These may vary according to the countries, too.

¹ UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](#).

UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES
 EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE
 EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES
 UNIONE EUROPEA DELL'ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

QUESTIONS

1. What have been the main positive and negative aspects of your organization's experience with the implementation of procedures based on HACCP principles?

1.1 General situation

The HACCP system is complex and constantly evolving. To be implemented, all steps must be verified and implemented so that everything goes as planned.

Because it is a complex system it is recommended however, that the company regularly runs training in this area with the aim to make workers more receptive to the change of working methods. Only through education and awareness of all elements of the food chain it is possible to achieve the best performance and best results.

1.2 Positive aspects to organizations

- Increased consumer confidence
- Reduced legal and insurance costs (in some countries such as Greece)
- Increased market access
- Reduction in production costs (reduced recall \ wastage of food)
- Improved product consistency and stability
- Improved staff-management commitment to food safety and
- Decreased business risk
- More structured analysis of sector of activity and the functioning of the enterprise

1.3 Negative aspects

- Cost of training for the entrepreneur and the staff
- Time for training of the food operators
- Question of vocabulary and technical terminology: How to explain HACCP to SMEs in keeping to the principles?
- Bureaucratic procedures of HACCP (drafting of the self-monitoring plan, register of controls, documentation in case of non-conformity, ...)

2. Please describe your organization's experience with the flexible implementation of HACCP principles (*main benefits/ difficulties encountered*)

2.1 The Benefits of the application of HACCP?

- Preventing possible hazards and supplying safe products
- Minimising risks of food poisoning
- Raising consumer confidence
- Raising industry authenticity
- Supplying active auto-control systems
- Minimizing product costs
- Simplification of marketing
- Increasing products' shelf life
- Solving product problems systematically
- Making product export easy, due to its international acceptability
- Increasing food safety and hygiene conscious of food industry staff

3. Are the differences between full and flexible implementation of HACCP principles clearly explained and understood?

- a. Do FBOs clearly understand how to apply flexibility in implementation of HACCP principles? What aspects? If any are not clearly understood?
- b. Describe any weaknesses and difficulties encountered (give examples)
- c. What are the strengths of these procedures? Please provide examples.

3.1 Describe the processes and products to be covered

For the procedure based on the HACCP principles, flexibility may be adopted in order to guarantee the application of this procedure in any different situations, especially in the case of small businesses.

The simplification of the procedures of this scheme, taking into account the artisan/craft tradition includes few checks in correspondence to the critical points, but is characterised by maximum effectiveness, in order to achieve the highest level of product safety possible.

This means that food business operators must have a system to detect and check on a permanent basis the significant hazards and adapt the system whenever necessary.

This can be achieved, for instance, through the proper application of basic requirements and correct hygiene practices, applying the principles of the HACCP system (possible in simplified manner), using manuals of good operating practices or through a combination of the above mentioned.

It may be appropriate to focus on products individually and identify relevant food safety information such as composition, physical/chemical structure, treatment, preservatives, etc., on a product-by-product basis. However, in multi-product small businesses, such as catering operations, it may be simpler to focus on products with similar characteristics. Products should be correctly and clearly categorized.

The *intended use* of the product, such as the probable handling by the end-user or the consumer, should also be considered. In specific cases, vulnerable groups may have to be considered. If a business is using a *guide*, it is important that it is specific to the foods and/or processes under consideration.

4. Please describe your experience with official controls on procedures based on HACCP principles (*strengths and weaknesses*)

4.1 Government (official controls) Commitment

Government commitment is probably the single most important factor in the development and implementation of a successful HACCP initiative. In this respect, one of the most important tasks of governments is to raise the awareness of industry to the benefits of and the need for introducing HACCP to produce safe food.

Government awareness and commitment can be influenced by:

- Epidemiological data on foodborne diseases and food contamination;
- Consumer awareness and concerns;
- The need for food safety and HACCP for export of foods to other countries; and

To promote HACCP and secure the commitment of enterprises, governments may need to draw the attention of food enterprises to the:

- Benefits achieved in rationalization of food safety management;
- Risks inherent in certain foodstuffs or production processes;
- Costs, including compensation costs resulting from production failure; and
- Value of HACCP in safeguarding the enterprise's image from any associated outbreaks and/or product recalls.

4.2 Example of Italy Given that the competent supervisory authorities are different on each territory, it happened that some of them, believing that the records are an important tool to enable the verification of the correct functioning of the

food safety procedures of food businesses, have argued, contrary to what is specified in the manuals, that they should be carried out always and not only in relation to non-compliance detected.

In fact, in the manuals, in addition to clearly indicate whether there is a need for records and the period of time during which such records must be kept, it's specified customary that the records may be limited only to the measurement of non-compliance detected (e.g., the inability of a device to maintain the correct temperature), also including the corrective measures taken. The use of a diary or of a checklist is an appropriate tool for the records in such cases.

The records should be kept for a suitable period of time so as to ensure that the information is available in case of a problem due to the concerned food product.

4.3 Difficulties

The difficulties include:

- Lack of government commitment;
- Lack of customer and business demand;
- Absence of legal requirements;
- Human resource constraints;
- Lack of expertise and/or technical support;
- Inadequate infrastructure and facilities; and
- Inadequate communications.

5. Please identify areas where additional specific guidance could be helpful benefits of the application of guides

Guides can be useful for the business sector. They provide practical assistance to the food industry (for SME's) in order that they may better comply with legal requirements on food safety, including HACCP requirements where these exist. Trade associations also use guides to improve the standard of food safety and to promote increased public confidence in products produced. Guides may also form the basis for a common understanding between specific food sectors and the regulatory authorities with regard to the application of legislation and practical application of HACCP. They will also assist in overcoming some of the barriers identified (cfr. here above) and can help the communication process between all stakeholders. To industry sectors, guides provide harmonized criteria for food safety and, in effect, an agreed sector norm on necessary good hygienic practices. In some cases, guides are used as a basis for training programmes.

For individual businesses, one major advantage of the guides is that they provide a single agreed source of guidance. Furthermore, if a guide contains advice on the application of HACCP in Food companies can improve the operators' knowledge and understanding of the risks associated with their products, provide them with practical advice on how to control those risks and thereby enhance the safety of the foods produced and promote a consistent approach to the implementation of HACCP. The guide will also help minimize the burden of instituting a HACCP system and the advice is made available at a relatively low cost.

It should, however, be stressed that a guide cannot be a substitute for an operator's individual responsibility for his business. Operators still need to analyse their own operation for potential food safety problems and ensure that the necessary controls are in place but the guide is essential to help every operator, and it is useful for official controls when the guides are validated by member states (as this is the case for instance in Belgium, France, Luxembourg and Italy). Therefore UEAPME proposes that these guides are recognized as good practice of application of HACCP.

6. Please provide any general suggestions for improvement

It may be useful for official control authorities to put in place a mechanism to officially approve guides. This is for instance the case in Belgium, France Luxembourg and Italy where the guides are recognized as official documents. Such a function could be performed by a government department or through a state or other agency approved for the purpose. This will allow businesses and enforcement agencies to use a guide, knowing that it is in conformity with the food safety

legislation. Official approval in advance of final publication of a guide is preferable. To determine the effectiveness of a guide, after a reasonable period, an evaluation of the guide should be carried out, preferably by the same experts who developed the guide.

6.1 Recommendations

1. Given the barriers to the implementation of HACCP by food companies, governments and industry/trade associations should develop strategies to facilitate its implementation.
2. When implementing HACCP in food companies, attention should be paid to the strategies identified and guidelines developed by this consultation.
3. Recognizing the important role that sector-specific guides play in implementing HACCP in food companies, every effort should be made to prepare and disseminate such documents.
4. It is recommended that international organizations, such as FAO and WHO, set up a central database of existing guides including information on their scope, language and intended use and make it accessible in electronic format (on a website).
5. In order to assist developing countries, international organizations, such as FAO and WHO, should explore ways and means to provide support to governments and industries on an ongoing basis.
6. Where HACCP systems have been developed and/or approved at national level, their acceptance across national borders ought to be examined and facilitated.

Government commitment is probably the single most important factor in the development and implementation of a successful HACCP initiative. In this respect, one of the most important tasks of governments is to raise the awareness of industry (SME's) to the benefits of and the need for introducing HACCP to produce safe food.

6.2 Government awareness and commitment can be influenced by

- Epidemiological data on foodborne diseases and food contamination;
- Consumer awareness and concerns;
- The need for food safety and HACCP for export of foods in the EU and to other countries; and
- Advocacy by international organizations, e.g. Codex Alimentarius Commission, WHO, FAO and the World Trade Organization (WTO).
- To promote HACCP and secure the commitment of enterprises, governments (all government agencies, including health, agriculture, trade, tourism, industry, planning, etc.) may need to draw the attention of food enterprises to the:
 - Benefits achieved in rationalization of food safety management;
 - Risks inherent in certain foodstuffs or production processes;
 - Costs, including compensation costs resulting from production failure; and
 - Value of HACCP in safeguarding the enterprise's image from any associated outbreaks and/or product recalls.

6.3 Legal Requirements

- Consider establishing HACCP implementation committees or fora in collaboration with all interested parties (including consumers, industry representatives, trade associations, etc.);
- Organize media campaigns;
- Develop guidance materials and generic models;
- Train regulatory authorities in HACCP;
- Ensure, via regulatory authorities, and other bodies that GHP is being practiced;
- Fund initiatives to accelerate the implementation of HACCP in high-risk sectors;
- Develop schemes that recognize HACCP systems; and
- When necessary, review food laws to shift from end-point testing to a safety management system approach.
- The use of guides of good practices should be encouraged and referred to especially when the business has direct consumer contact.

6.4 Recommendations specific for those countries who had already implemented the HACCP principles in the food sector

The competent authorities, in relation to the tools chosen in full liability by the food business operators to ensure compliance with the HACCP requirements (that can either be the basic requirements or the manuals of good hygiene practice), should make the appropriate assessments during the phase of control on the correct application of procedures in order to facilitate the operations of control and not to constitute a new burden of time and costs for the companies themselves.

However, very often, in relation to a plethora of supervisory authorities whose activity is not harmonized, the frequency of controls can become excessive. Moreover, this it is not put in the right relationship with the results of self-control done by the operators of the sectors concerned and using the selected tool.

Therefore the supervisory authorities continue to use, in several occasions, the system of sampling and analyses as actual evidence of the safety of the food product, disregarding de facto the analyses carried out by the operator themselves.

Also this point would require a clarification about the value that has ben recognized to applied self-control procedures, which, whether correct, should be sufficient to avoid the need to recur to further tests.

7. Please provide any notable example(s) of good practice in relation to guidance documents, official controls, etc.

Guides of good practices in hygiene should be tools for SMEs in production and direct sales. They are validated by official authorities (such as ANSES in France and the Health Ministry in Italy which operate like the European Food Safety Agency EFSA).

These may for example include:

- Industry/trade associations
- Trade press and exhibitions
- Enforcement authorities
- Mass communication media
- Production of leaflets, posters, videos, and other aids
- Developing registers or lists of businesses, colleges, universities and educational bodies
- Websites.

7.1 Technical Support

Food operators often lack the technical expertise required to implement HACCP alone and may therefore need external support. The capacity of governments and industry/trade associations to provide adequate technical support is a critical factor in the successful implementation of HACCP by food companies.

The type of technical support that could be offered by governments or industry/trade associations may include:

Providing relevant, technical training with consideration given to the level of education, culture and language of the food managers and staff;

Facilitating the availability of appropriate, current, scientific support;

Facilitating access to low cost analytical services;

Providing accessible, sector-specific generic guidance to businesses, such as industry guides, templates, and generic HACCP plans; and

Establishing and maintaining foodborne disease surveillance programmes and facilitating access to collected epidemiological data.

A document providing general advice on the development of a Guide, which may include advice on content, structure, issues to be covered and the development process.

7.2 Terminology

Care should be given to the use of the correct terminology. Scientific language or jargon may be poorly understood by users of the guide and may only serve to obscure the meaning.

7.3 Making use of the Guides

Food companies, in particular benefit from being able to use a single agreed source of guidance.

Therefore, having made the effort to produce the guide, it is equally important to ensure that the potential users are aware of its availability. In parallel with the development phase, arrangements for the marketing of the guide should be considered. The same parties, who contributed to the elaboration of the guide, can help in this process. Potential users, channels and methods of distribution should be identified. If not distributed free of charge, it is important that the price of a guide does not become a barrier to its purchase and use.

Access to and use of guides can be enhanced by:

- Distribution through trade associations and regulatory agencies;
- Advertising and organizing information seminars;
- Providing training based on the guide; and
- Government support in promoting the guides.

For further information, please contact Birte Day, ++32 2 23075 99, b.day@ueapme.com