



Better Training for Safer Food BTSF

Section 5 HACCP Based Procedures DG SANCO Guidance Annex II

What is a Procedure Based on the HACCP principles? (1)

A proactive hazard management system:

- To enable the FBO to identify and control significant hazards on a permanent basis
- Identification of any steps critical to food safety
- Implementation of effective control procedures at these steps

(EC DG SANCO HACCP Guidance Document)

What is a Procedure Based on the HACCP principles? (2)

- Monitoring of control procedures for effectiveness
- Periodic review of procedures and after any change
- Particularly appropriate for food businesses preparing, manufacturing or processing food.

(EC DG SANCO HACCP Guidance Document)

Procedures based on HACCP principles

This can be achieved by:

- Correct implementation of prerequisite requirements and good hygiene practices
- Using Guides to Good Practice for Food Hygiene
- Application of HACCP principles (possibly in a simplified way)

Or a combination of the above

(EC DG SANCO HACCP Guidance Document)

Prerequisite requirements and the control of food hazards

“Where prerequisite requirements achieve the objective of controlling hazards in food, it shall be considered, based on the principle of proportionality that the obligations laid under the food hygiene rules have been met....”

“In these cases it can be considered that the first step of the HACCP procedure (hazard analysis) has been performed”

(EC DG SANCO HACCP Guidance Document)

Prerequisite requirements and the control of food hazards

Where there is NO preparation, manufacturing or processing of food, for example:

- Market stalls; Bars
- Small grocery shops; Coffee shops

Where food safety so requires, it must be ensured that the necessary monitoring and verification is carried out.

(EC DG SANCO HACCP Guidance Document)

Procedures based on HACCP principles

This can be achieved by:

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- **Using Guides to Good Practice for Food Hygiene**
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Or a combination of the above

(EC DG SANCO HACCP Guidance Document)

Role of the Industry Guides

Sector Specific Advice, set out in National and Community Guides to Good Practice, developed under Regulation 852/2004 – (Articles 7, 8 ,9)

Such guides enable food business to describe in more detail how operators can comply with the legal requirements and control hazards

Voluntary

(EC DG SANCO HACCP Guidance Document)

Guides to good practice (1)

Guides to good practice may help food businesses to control hazards and demonstrate compliance

Guides describe in a practical and simple way methods to control hazards without necessarily entering into detail the nature of the hazard or formal identification of CCPs

(EC DG SANCO HACCP Guidance Document)

Guides to good practice (2)

Should:

- Cover all significant hazards (without necessarily entering into detail on the nature of hazards)
- Define procedures to control these hazards (without the formal identification of CCPs)
- Define the corrective actions in case of problems

(EC DG SANCO HACCP Guidance Document)

Guides to good practice (3)

Can be applied by any food sector such as:

- Restaurants
- Bakeries
- Retail, including Butchers shops

Where food handling procedures are well known and often part of vocational training

(EC DG SANCO HACCP Guidance Document)

Guides to good hygienic practices and HACCP based elements

For ready to eat products (vulnerable/perishable)
and/or products for highly susceptible consumers:

- Prerequisite food hygiene requirements
- A hazard analysis
- Pre-determined CCPs
- The need for documentation and records
- Protocols for validation of use-by dates

(EC DG SANCO HACCP Guidance Document)

Procedures based on HACCP principles

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Or a combination of the above

(EC DG SANCO HACCP Guidance Document)

Generic HACCP guides (1)

Can suggest hazards and controls common to a sector

Can assist in the production of procedures and record keeping

There may be other hazards specific to the user that must be considered

(EC DG SANCO HACCP Guidance Document)

Generic HACCP Guides (2)

Sectors with commonality of activities between businesses, e.g.:

- Slaughterhouses
- Dairy establishments

Sectors that apply standard processing procedures, e.g.:

- Canning of food
- Freezing of food

(EC DG SANCO HACCP Guidance Document)

Flexibility with Regard to the HACCP Principles (1)

Hazard analysis:

- May not be required when implemented prerequisite programme are able to control possible hazards (Guides of Good Practice recommended)
- May demonstrate that prerequisite food hygiene requirements can control all hazards (See this section)
- May be possible to pre-determine hazards (See generic HACCP guides)

(EC DG SANCO HACCP Guidance Document)

Flexibility with Regard to the HACCP Principles (2)

Critical limits can be established based on:

- Experience (best practice)
- International documentation (e.g. Codex Alimentarius)
- Guide to good practice
- They do not have to be a numerical value
- Changes to food during cooking

(EC DG SANCO HACCP Guidance Document)

Flexibility with Regard to the HACCP Principles (3)

Monitoring may be a simple procedure:

- Visual observation of an activity
- Reading of a temperature indicator

Or may not need to be systematically carried out:

- If standard processing procedures are used
- Well established culinary procedures followed

(EC DG SANCO HACCP Guidance Document)

Flexibility with Regard to the HACCP Principles (4)

HACCP related documentation:

- Guides to good practice or generic HACCP guides can substitute for individual developed procedures
- “Recording by exception”, record only measurements of non-compliance
- Potential use of a diary or checklist

(EC DG SANCO HACCP Guidance Document)

Flexibility with Regard to the HACCP Principles (5)

HACCP related documentation:

- Records should be retained
- e.g. two months after date of consumption when known
- Reasonably short period if date of consumption not known

(EC DG SANCO HACCP Guidance Document)

Commission Report on the application of HACCP COM(2009) 403 final (1)

Art 5 perceived to be sufficiently flexible even to
small businesses

Most MS reported difficulties particularly in micro
and small catering and retail establishments

Record keeping is sometimes perceived as a
burden by small businesses

Commission Report on the application of HACCP COM(2009) 403 final (2)

Tendency for some CA to have high expectations of small businesses and exaggerate documentary requirements

FVO missions reported difficulties in adequate assessment of HACCP based procedures

MS consider it impracticable to extend HACCP based requirements to primary production.

Regulation EC 183/2005

Flexibility

Application of HACCP principles should allow sufficient flexibility in all situations

- Not possible to identify CCPs in certain feed businesses
- Good practice can replace monitoring of CCPs
- Critical limit does not have to be a numerical limit
- Retention of documents should not be burdensome for small businesses

Preamble (15)

Documentation concerning the HACCP system

- **Take account of the nature and size of the business**

Article 7 (2)

Regulation EC 183/2005

Flexibility:

“such flexibility should not compromise feed hygiene objectives.”

Regulation EC 183/2005 Farms

Farms, including home mixers, must

- follow basic hygiene procedures in relation to the feed they use and apply a risk-based approach to ensure hazards are properly controlled (GAP/GHP)

Farms that buy-in additives and premixtures and add them directly to feeds have to apply the principles of HACCP in a formal way.

Regulation EC 183/2005 Feed Hygiene

Feed business operators take measures or adopt procedures to achieve a high level of feed safety

- Depends on the nature of the product and process and size of business

Two approaches

- Application of GHP [conditions and measures to ensure safety of products]
- Application of HACCP principles [GHPs (PRPs) and CCPs (OPRPs) where significant hazards are controlled by targeted preventative measures]

Guides to Good Practice for Feed Production

Sector Specific Advice, set out in National and Community Guides to Good Practice, developed under Regulation 1831/2003 – (Articles 20,21,22)

Such guides enable food business to describe in more detail how operators can comply with the legal requirements and control hazards

Voluntary

- Compound feed and pre-mixture manufacturing
- Feed additive and pre-mixture operators
- Manufacture of safe pet foods

Community and National Guides

Community guides

http://ec.europa.eu/food/food/biosafety/hygienelegislation/good_practice_en.htm

http://ec.europa.eu/food/food/animalnutrition/feedhygiene/guide_goodpractice_en.htm

Collated list of national/industry guides from the member states

http://ec.europa.eu/food/food/biosafety/hygienelegislation/register_national_guides_en.pdf

Industry Guides of Good Practice

Food / Feed industry also write guides

Written by the sector for the sector

Not approved by a competent authority but will include the legal requirements and how they may be met by businesses in that sector