European
Commission

Final Overview Report on the state of implementation of HACCP in the EU and areas for improvement

FVO-Plant health, Food of plant origin and food quality

Food Safety

Background- FVO HACCP Project

MS Annual Reports highlight variable and frequently poor implementation of HACCP

Objectives of project

➢Obtain overview of situation

➢Identify main difficulties and good practice examples

➢Receive suggestions for improvement

The FVO HACCP Project

➢Three strands (2014)

  ➢Series of fact-finding missions to eight Member States (BE, CZ, DK, FR, DE, NL, SI and UK)
  ➢Questionnaire to the non-visited Member States (19)
  ➢Stakeholder consultation

➢Roadmap for better HACCP implementation

  ➢ Devised with Member States (May 2015)

➢Publication of Overview Report (July 2015)

Stakeholder Consultation

- Project introduced at Plenary session of Advisory Group (4 April 2014)

- Working Group (16 May 2014)

- Responses to Questionnaires deadline (15 June 2014)

- Responses received from 12 EU level and 2 National level organisations (listed at point 4.4.3 of the report)

Stakeholder Consultation: The Main issues raised

Legal Provisions and Guides

- Strong demand for clearer guidance with examples, taking account of particular needs of small operators, catering and businesses with high staff turnover

- *Good guides should be made widely available*

- *Guides should take into account certification*

- *Existing legislation does not take into account private certification*

- *Use of external consultants could result in overly complex plans*

Prerequisites (PRP) & HACCP

- Crucial importance of PRP highlighted
- Many hazards are more appropriate to PRP
- Proper design of PRP avoids unnecessarily complex HACCP

Implementation of certain HACCP principles

Hazard Analysis

- A critical issue
- Many small FBOs lack qualified personnel
- Lack of sector-specific GHP guides in certain sectors
- Demand for clearer guidance
- *Guidance should make clear that a hazard analysis must always take place. This may lead to conclusion that there is no CCP in a process*
- *A database of raw materials?*

CCPs

- Uncertainty as to when a CCP should be identified
- Demand for guidance with examples
- Number of CCPs must be manageable

Flexibility

- Crucially important for small FBOs

- Consensus that flexibility cannot compromise safety

- Lack of common understanding between and within CAs

- FBOs experience difficulty in gaining CA acceptance for flexible implementation (GHP/PRP)

Official Controls/Training

- Lack of common understanding between CAs and operators
- Concern about and criticism of official controls
  - CA inspectors need to be better trained
  - Lack of knowledge by CA inspectors on HACCP results in uneven controls
  - Inconsistent approaches/interpretation of requirements taken across CAs and between inspectors
  - Variability in how Competent Authorities take account of GHP/private certification schemes (a particular issue for small FBOs)
  - Lack of sector-specific training for CA inspectors (eg process technology)
  - Some CA inspectors look at CCPs only without giving due attention to Prerequisites

Food Safety

Administrative Burden

- HACCP needs to be seen as useful and practical to manage safety on a day to day basis

- Documentation requirements seen as excessive

- More account should be taken in official controls of the contribution of private certification to reducing hazards

Results of the Project

Global Results – The positives

➢General experience of **operators** with HACCP is positive

➢General agreement on the importance and **benefits** HACCP

➢HACCP is **fundamental** to food safety and facilitates operators to meet their responsibilities

➢In all Member States there is a reasonable level of **implementation** of HACCP-based procedures

Global Results – Need for improvement

➢National frameworks for implementing HACCP-based systems vary between and within Member States leading to **inconsistencies of interpretation and implementation**

➢Some of the **core concepts** are not always understood, particularly by small FBOs, and are not applied in a consistent manner

➢**Flexibility** is the least understood HACCP concept and is inconsistently applied and evaluated across and within some Member States

Conclusions

➢There is room for **improvement** in the implementation of HACCP and in MS controls

➢There is general agreement on where improvements can be made – the report identifies **"7 key issues"**

➢The Overview Report contains **examples of good practice** which demonstrate possible ways to address the **"7 key issues"**

➢ The Overview Report includes a **roadmap** for better HACCP implementation (developed in the May 2015 BTSF workshop with MS experts)

The 7 Key issues (1-3)

- Legal Provisions and Guides
  » *Concepts are not clearly understood*
- Prerequisites (PRP) & HACCP
  » *Difference between Pre-Requisites and HACCP not clearly understood*
- Implementation of certain HACCP principles
  » *Difficulties with hazard analysis, CCP and verification*

The 7 Key issues (4-7)

- Flexibility
  » *Lack of a common interpretation and implementation*
- Official Controls
  » *Different approaches and interpretations*
- Training
  » *Need for improved training*
- Administrative Burden
  » *Need to reduce unnecessary burdens*

Roadmap for Better HACCP Implementation

A. and B. Actions at EU/Member States level
➤Revision of the Guidance document on the implementation of procedures based on the HACCP principles *(including clarification of concepts)*

C. Actions at Member State Level
➤Ensure a uniform approach to official controls

Roadmap for Better HACCP Implementation

D. Actions at the level of Industry/Federations

➢Review coverage and regularly evaluate and update GHP guides, ensuring they are operational

➢Collaborate with competent authorities to fill gaps and develop more interactive tools

➢Focus on staff training

Progress on Parts A and B of the Roadmap

➢ Rapid progress has been made in a Working Group with Member States on a new *Guidance document on the implementation of food safety management systems covering prerequisite programs (PRPs) and procedures based on the HACCP principles, including the facilitation/flexibility of the implementation in certain food businesses*

➢The Advisory Group was consulted
➢To be presented to SCPAFF for endorsement

➢Document on "Key principles to be taken into account in Official Controls" discussed with Member States at MANCP audit Network (28 October) and MANCP Network (26 November)

Overview Report published on FVO website

http://ec.europa.eu/food/fvo/overview_reports/details.cfm?rep_id=78
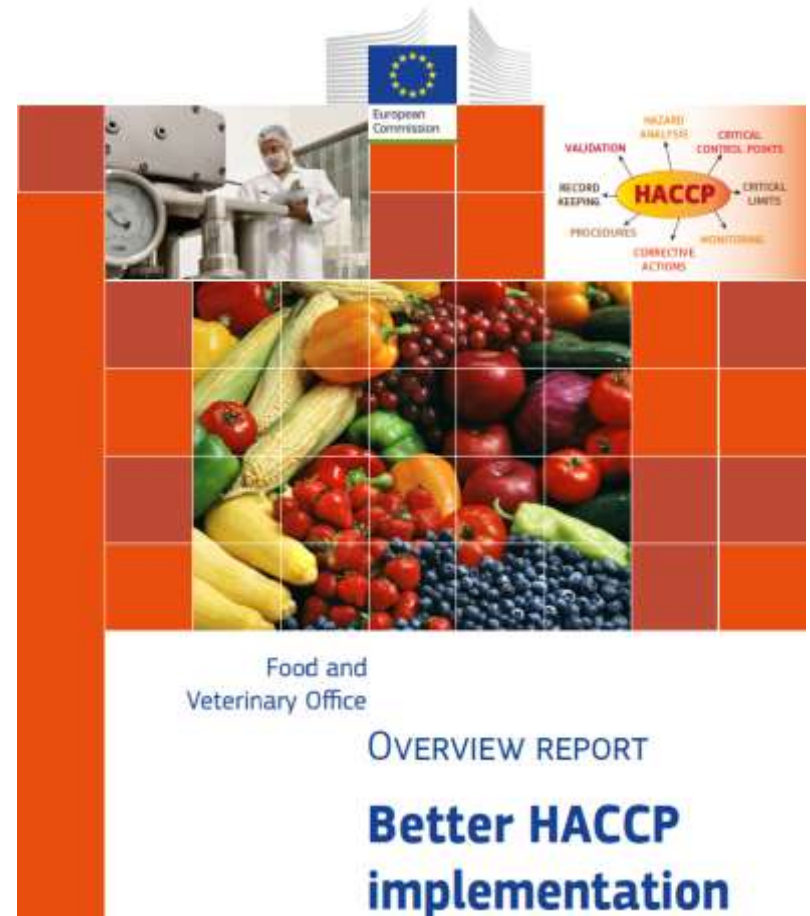
Thank You

Food and Veterinary Office
European Commission
Grange, Dunsany, Co. Meath, Ireland