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CONSIDERATION OF THE OBSTACLES TO THE APPLICATION OF HACCP, PARTICULARLY IN SMALL AND LESS DEVELOPED BUSINESSES AND APPROACHES TO OVERCOME THEM

Prepared by The Netherlands

BACKGROUND

The HACCP system has been detailed in the basic texts of the Codex Alimentarius Commission in the HACCP Annex of the Annex of the *Recommended International Code of Practice – General Principles of Food Hygiene* (CAC/RCP 1-1069, Revision-3, 1997) (CAC/RCP 1-1069, Revision-3, 1997).

From 1997 on the committee has been discussing obstacles to the application of HACCP, particularly in Small and Less Developed Businesses (SLDBs) and approaches to overcome them. The proposals presented to amend the Guidelines for application of the HACCP system to make the Guidelines more suitable for application in SLDBs, were seen as a way to overcome these obstacles. In its deliberations the Committee had concluded that, due to several barriers and limitations inherent in SLDBs, the HACCP principles are difficult to be implemented by them. SLDBs were also coming under increasing pressure to apply HACCP to their operations as a result of such external factors as legal requirements, market forces and expectations for in-house management controls.

The barriers to implementing HACCP in SLDBs have been discussed extensively at several Sessions of the CCFH (1997-2001). The same issues were raised by a WHO expert consultation (*Strategies for Implementing HACCP in SLDBs*, June 1999), the report of this expert consultation was input for document CX/FH 99/9 “*Discussion Paper on the Implementation of HACCP in Small and/or Less Developed Businesses*”, which was considered by the Committee at its 32nd Session.

The current Codex Guidelines on the application of HACCP was one factor/barrier, which the WHO Expert Consultation in June 1999, considered to inhibit the more widespread utilisation of HACCP by SLDBs. The present application guidelines acknowledge that HACCP can be applied flexibly in all food businesses, irrespective of their size or nature. However, as they are directed towards the approach that can be taken in larger food operations, the present version provides only limited guidance on how the seven HACCP principles can be applied in practice in SLDBs. The Codex Committee on Food Hygiene has acknowledged

this and also that the current Codex Guidelines on the Application of the HACCP principles are not well suited to use by SLDBs.

HISTORY

At its 32nd Session, the Committee considered a Discussion Paper incorporating information from the WHO Expert Consultation. The Paper provided guidance to governments and organizations on assisting small and less developed businesses in the implementation of HACCP. The Committee generally agreed with the Paper but believed that it would be helpful to provide more explicit practical guidance on the implementation of HACCP by SLDBs and therefore requested the Netherlands, with the assistance of its drafting partners, to revise the Discussion Paper.

The 33rd Session of the Committee considered a substantially revised Discussion Paper, CX/FH 00/10, that proposed enhancing the existing text of the HACCP Annex to the *International Recommended Code of Practice: General Principles of Food Hygiene* (CAC/RCP 1- 1969, Rev. 3, 1997). The revised Paper incorporated into the HACCP Annex additional guidance that reflected the circumstances of SLDBs. The revised document took as its basis for the enhanced text the results of the WHO Joint Expert Consultation on *Strategies for Implementing HACCP in Small and/or Less Developed Businesses (SLDBs)*. The proposed enhancements to the HACCP Annex did not alter the existing HACCP Principles, recognizing that there should be no difference in the principles of HACCP, whether applied in small, medium or large premises. The proposed enhancements did provide further guidance on the application of HACCP by SLDBs.

At this session the Committee concluded that document CX/FH 00/10 was useful, and there was general support to further elaborate it. Therefore the committee agreed to an amendment to the existing HACCP guidelines to enhance the Annex's use by SLDBs and agreed to circulate the document at step 3.

The Commission considered the committee's recommendation as New Work, ALINORM 01/21-Suppl.1. The Committee decided to ask for comments, especially from developing countries, on how to develop the Guidelines. It requested the delegation of the Netherlands, together with its drafting partners to revise the document that should be circulated at step 3 for consideration by the Committee at its 34th Session. Comments were received from India, New Zealand and the USA.

At its 34th Session, the Committee considered Draft Revised Guidelines for the Application of the HACCP system in SLDBs (CX/FH 01/10).

In order to aid governments and businesses, particularly in SLDBs, to overcome the identified burdens and to provide additional guidance, the revised document contained two Annexes to help facilitate HACCP implementation by SLDBs. Annex I proposes changes to the existing HACCP Guidelines currently providing guidance on how to apply the seven principles of HACCP in any size of business including SLDBs. Annex II discusses the obstacles to implementing HACCP by industry, particularly by SLDBs. It provided additional recommendations to help to overcome those obstacles. It was also indicated that the development and use of sector specific codes by governments and industry could be of great importance.

The Committee discussed the proposed draft Guidelines section by section and agreed to a limited number of changes. Some delegations were of the opinion that the amended Annex I provided flexible guidance in implementing HACCP in SLDBs, while a number of other delegations, especially from some developing countries, were of the view that still more flexibility was needed and that clarification of the term SLDBs as well as more detailed classification of the SLDBs was necessary.

The Drafting Group confirmed that Annex II was intended as a possible basis for the development of more detailed guidance by bodies outside of the Codex framework, which was clear from the second recommendation to the Committee contained in document CX/FH 01/10:

The Committee is invited to consider the approaches to overcome obstacles to the application of HACCP described in this paper and to recommend that FAO and WHO develop guidance materials for Governments and Industry to provide aid in the implementation of HACCP by SLDBs, that would take into account the obstacles described in the paper, information from past Committee deliberations, and reports from previously held expert consultations.

The Committee had an extensive debate regarding future work and the use of Annex II. The Committee agreed that Annex II contained important data on obstacles and could be very valuable, however there were contrary opinions expressed regarding its intended use. While some delegations were of the view that Annex

II should be used, especially by FAO and WHO for training purposes as an information paper in developing guidance materials for governments and industry in order to provide additional assistance in the implementation of HACCP by SLDBs, some other delegations favored incorporating Annex II into the main body of Annex I. Some delegations indicated that the implementation of the content of Annex II be left to national governments for the decision on its intended use.

The Committee agreed to request comments on Annex II. Since some delegations expressed the need for consideration of the paper in its totality, the Committee also agreed that written comments and the above discussion in relation to Annex II (Obstacles to the Application of HACCP, Particularly in SLDBs and Approaches to Overcome Them) should be forwarded to the Netherlands for preparation of an up-dated version of the Annex II for consideration at the next Session of the Committee. Consequently the Committee was invited to consider the approaches to overcome obstacles to the application of HACCP described in Annex II and the recommendation that FAO and WHO develop guidance materials for Governments and industry to provide aid in the implementation of HACCP in SLDBs, that would take into account the obstacles described in Annex II, information from past Committee deliberations, and previously held expert consultations.

In response to CL 2001/32-FH, item C3 “Obstacles to the application of HACCP, particularly in Small and Less Developed Businesses and approaches to overcome them” comments from the USA and New Zealand, were received. The comments suggest that the information in annex II of the document CX/FH 01/9, seen as additional to the information to the report of the WHO expert consultation on *Strategies for Implementing HACCP in SLDBs* (June 1999), are valuable and should be used to assist SLDBs. It is suggested that this assistance should be developed by FAO and/or WHO, for example in the form of a Guidance document.

In response to CL 2002/36-FH “Request for comments at Step 6 on the Draft Revised Guidelines for the Application of the HACCP System” some countries commented on the issues that are subject of this Paper “*Consideration of the Obstacles to the application of HACCP, particularly in Small and Less Developed Businesses and approaches to overcome them*”. It was advised to give reference to it in the main HACCP document and be appended to it. Some proposals were made to recognize the difficulties of SLDBs in implementing all seven principles of the HACCP system.

All comments made are related to the future position and use of the text earlier presented as annex II to CX/FH 01/10, no proposals to change or amend the content were made. For that reason the text in the last part of this document (title: OBSTACLES TO THE APPLICATION OF HACCP, PARTICULARLY IN SLDBS AND APPROACHES TO OVERCOME THEM) remains unchanged.

CONCLUSIONS AND RECOMMENDATIONS

It has been indicated that many countries or regions, and some industry sectors within countries or regions, need additional guidance and support to help SLDBs with HACCP implementation and with the application of the system, apart from the proposed amended version of the Draft Guidelines for the HACCP System at Step 7.

The type of information presented in this document (CX/FH 03/4-Add. 1) is mostly not compatible with guidance documents in Codex format, such as the *Guidelines for the Application of the HACCP System*, in the Annex to CAC/RCP 1-1969, Rev. 3, (1997). For this reason it was already recommended in the previous document (CX/FH 01/10), to ask FAO and WHO to provide training or support material for the purpose of this additional guidance. Codex should urge this international organizations to prioritize this task and provide adequate expertise to facilitate the task.

Positive experience has been acquired in some countries with implementing the HACCP system in SLDBs on the bases of industry sector specific guidance, sometimes referred to as *sector specific hygiene codes based on HACCP*. Also assistance in the development of this type of guidance, normally based on both the *Recommended International Code of Practice – General Principles of Food Hygiene* and the *Guidelines for the Application of HACCP*, could prove worthwhile.

The above mentioned additional guidance and support material could, as soon as it is made available, be referenced in the relevant Codex Food Hygiene Basic Texts.

OBSTACLES TO THE APPLICATION OF HACCP, PARTICULARLY IN SLDBS AND APPROACHES TO OVERCOME THEM

The HACCP system has been detailed in the Basic Texts of the Codex Alimentarius Commission: Recommended International Code of Practice – General Principles of Food Hygiene (CAC/RCP 1-1069, Revision-3, 1997). However, due to several barriers and limitations inherent in SLDBs, these principles are difficult to be implemented by them. Therefore, the objective of the following information is to provide guidance and advice, which can help SLDBs in implementation of HACCP principles in light of those obstacles.

To avoid confusion, it is necessary that the term SLDBs is more precisely explained. The report of WHO Consultation on 'Strategies for Implementing HACCP in Small and/or Less Developed Business' (WHO/SDE/PHE/FOS/99.7) has explained the term SLDBs as follows:

The term 'small and/or less developed businesses' (SLDBs) shall mean businesses that because of their size, lack of technical expertise, economic resources, or the nature of their work, encounter difficulties in implementing HACCP in their Food business. The term 'less developed business' refers to the status of the Food safety management system and not to the number of staff or volume of production.

It is important to consider each of the obstacles, in the light of the terms of reference of Codex, and conclude if the proposed text amendment of the present Guidelines in Annex I can assist in overcoming them, or alternatively, if other activities within the terms of reference of Codex can be of any help. Other recommendations are given to assist SLDBs, such as to promote relevant action of national governments and industry and trade organizations. The roles of WHO and FAO or maybe other international bodies, could be instrumental, in achieving improvement in the area of HACCP application in SLDBs.

Each of the following obstacles is seen as having a negative impact on the implementation and/or use of the HACCP system, especially in SLDBs. Approaches are suggested to overcome these obstacles.

OVERVIEW OF OBSTACLES FOR SLDBS TO APPLY THE HACCP SYSTEM

Obstacles with a direct impact on SLDBs, "internal obstacles"

- 1. Inadequate basic hygiene**
- 2. Lack of expertise and information**
- 3. Human resource constraints (inadequate training, limited number of staff)**
- 4. Perceived and real financial constraints**

Obstacles outside the control of SLDBs, "external obstacles"

- 5. Insufficient government infrastructure and commitment**
- 6. Absence of legal requirements (prerequisites and HACCP)**
- 7. Lack of business awareness and positive attitude of industry and trade associations**
- 8. Lack of customer awareness, including consumer awareness**
- 9. Lack of effective education and training programs**
- 10. No expertise, information and technical support made available to SLDBs**
- 11. Inadequate infrastructure and facilities**
- 12. Inadequate communications (see awareness)**

DISCUSSION OF OBSTACLES AND RECOMMENDATIONS TO OVERCOME THEM

1. Inadequate basic hygiene

Characteristics

When basic hygiene is not properly applied in food businesses, application of the HACCP system is becoming pointless. In order to successfully implement HACCP, food businesses should, as part of prerequisite programmes (PRPs), already be operating according to the *Codex General Principles of Food Hygiene*, the applicable Codex Recommended Codes of Practice, and according to the food safety legislation. If needed existing food safety legislation should be improved.

Recommendations to overcome obstacle:

- Modify the text of the HACCP guidelines to stress the importance of adequate basic hygiene as proposed in Annex I.
- Promote the use of Codex General Principles of Food Hygiene and the concept of prerequisite programs.
- Adequate food safety legislation should be in place and enforced by governments.
- Promote (financial) support for training of stake holders to emphasize the essential role of basic food hygiene.
- Promotion of the essential role of basic food hygiene by governments, international organizations, industry associations, and professional organizations.

2. Lack of expertise and information

Characteristics

SLDBs often lack the technical expertise required to implement HACCP alone and may therefore need external support. There should be access to information that is crucial to properly apply HACCP, such as in performing a proper Hazard Analysis. The capacity of governments and especially industry/trade associations to provide adequate technical support is a critical factor in the successful implementation of HACCP by SLDBs.

Recommendations to overcome obstacle:

The external technical support that could be provided 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 SLDB managers and staff
- Facilitating the availability of appropriate, current scientific support.
- Providing accessible, sector-specific generic guidance to businesses, such as industry guides, templates¹, and generic HACCP plans; these documents can also serve as training aids.
- Establishing and maintaining food borne disease surveillance program and facilitating access to collected epidemiological data.
- Availability of databases with specific information on products and processes and their attached hazards.
- Facilitating access to low cost analytical services.

¹ 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.

3. Human resource constraints (inadequate training, limited number of staff)

Characteristics

Major obstacles in the implementation of HACCP by the SLDBs include lack of manpower, a lack of expertise due to inadequate training of employees, and the lack of management commitment and understanding of HACCP. In this respect there is often a need to change attitude and organizational culture towards new management approaches. Additionally, time constraints, rapid turnover of staff, and a low perception of risks are fundamental problems and barriers encountered when implementing HACCP.

Recommendations to overcome obstacle:

- Adequate training is important for overcoming barriers related to human resources. For guidance on HACCP training, SLDBs may refer to WHO document entitled “Training Aspects of the Hazard Analysis Critical Control Point System” and the other manuals prepared by FAO and WHO.
- Continuous training and updating of knowledge.
- Training guidelines need to be adapted to the local requirements taking into account cultural and linguistic differences. It should be targeted to the needs of the SLDBs. A flexible approach of training should be considered. Examples include: distance learning, on-the-job training and recognition of prior experience.

4. Perceived and real financial constraints

Characteristics

Economic constraints are a practical barrier to implementing HACCP by governments and industry; particularly SLDBs. These constraints could mean that the provision of assistance by government, assistance by industry/trade associations, or the capacity of the business itself to implement HACCP is considerably reduced. However, in considering the costs of implementing HACCP systems, it is important to take into account the long-term savings that could accrue to government (in particular public health) and industry budget

Recommendations to overcome obstacle:

To obviate economic constraints, the following measures can be taken:

- Developing sector specific guides and generic models of HACCP implementation common to all businesses in a sector. (Codex may request international organizations such as FAO, WHO to set up a central data base of existing guides including information on their scope, intended use, etc. and to make it accessible through a website.
- Codex may request FAO/WHO to explore ways and means to provide support to governments, international organizations, industry associations, and professional organizations on an ongoing basis.
- Apply a realistic time schedule (including concurrent) implementation as an approach to be taken by governments and businesses as manageable incremental steps. For example, first introduce good hygienic practices (GHP) and then gradually implement the HACCP system.
- Focusing implementation on a sector-by-sector basis
- Support product research (financial); SLDBs can use product research material of government and use such databases.
- Shared verification programs.

5. Insufficient government infrastructure and commitment

Characteristics

Government² commitment is one of the 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 consistently the awareness of industry to the benefits of and the need for introducing HACCP to produce safe food.

Recommendations to overcome obstacle:

Government awareness and commitment can be stimulated by:

- Epidemiological data on food borne diseases and food contamination;
- Consumer awareness and concerns;
- The need for food safety and HACCP for export of foods to other countries;
- 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 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;
- Value of HACCP in safeguarding the enterprise's image from any associated outbreaks and/or product recalls.

6. Absence of legal requirements (prerequisites and HACCP)

Characteristics

Legislation and legal actions can be counterproductive and may hinder the ability and willingness to implement HACCP. However a legal requirement to apply the HACCP system, combined with proper enforcement, can be a strong stimulus to promote HACCP application. Legal HACCP is not a necessity, it is a matter of national policy and will work in some countries/cultures and may be not at all in others. In many cases, the move to introducing HACCP systems may be led by industry. The stimulus may come from within a company itself where, for enhancing food safety and/or quality or for market reasons, a decision has been made to adopt HACCP. Food industries experienced in food safety management systems are more likely to appreciate the need to move to HACCP. Generally they recognize the importance of HACCP in allowing them to gain access to domestic and foreign markets, to protect the company's reputation and to satisfy the customer's demand.

Recommendations to overcome obstacle:

For SLDBs it is more probable that active government intervention will be required to promote and facilitate this change. To this end, when appropriate, governments may need to consider the necessity of mandatory measures^{3,4}. The role of stakeholders is to urge governments to implement and enforce appropriate food safety legislation. Whether HACCP is implemented under voluntary or mandatory schemes, governments could:

- See: government commitment

² All government agencies, including health, agriculture, trade, tourism, industry, planning, etc.

³ HACCP: *Introducing the Hazard Analysis and Critical Control Point System*. WHO document WHO/FSF/FOS/97.2. World Health Organization, Geneva, 1997.

⁴ Motarjemi, Y and Käferstein, F. *Food Safety, Hazard Analysis and Critical Control Point and the Increase in Foodborne Diseases: A paradox?* Food Control, 1999, 10:325-333.

- Consider establishing HACCP implementation committees or fora in collaboration with all interested parties (including consumers, industry representative, trade associations, etc.);
- Train regulatory authorities in HACCP;
- Ensure, via regulatory authorities, and other bodies that GHP is being practiced;
- Develop schemes that recognize HACCP systems;
- When necessary, review food laws to shift from end-point testing to a safety management system approach.

7. Lack of business awareness and positive attitude of industry and trade associations

Characteristics

Food industries experienced in food safety management systems are more likely to appreciate the need to move to HACCP. Generally they recognize the importance of HACCP in allowing them to gain access to domestic and foreign markets, to protect the company's reputation and to satisfy the customer's demand. However in the area of small and/or less developed businesses, these incentives to apply HACCP are weak in many countries.

Industry and trade associations have a particularly important role to play in promoting HACCP in SLDBs and in supporting them in the implementation of the HACCP system. If associations are not in existence, then consideration should be given to their establishment.

Recommendations to overcome obstacle:

The role of government should be:

- Enforcement activities to promote HACCP in particular in SLDBs
- Promote the establishment of food and trade associations and their active role in the promotion of food safety and HACCP application, especially in SLDBs
- Promote food safety on a proactive basis through creating incentives; less government oversight; free training; food safety awards; government public relations;
- Promote industry awareness of the risks to consumers in the absence of HACCP program.

The role of industry and trade associations may include:

- Assistance in the production of industry guides;
- Communication of information pertinent to implementation of HACCP;
- Collection of data on products, hazards and risks;
- Development of product specifications;
- Information on generic HACCP plans;
- Training, material, advice and central expertise;
- Negotiating cost-effective services and support for SLDBs (e.g. bulk purchase or reduced prices for trade members); and
- Working with and representing the sector in the mass media and governments.
- Promote awareness of the risk (loss of business/trade opportunities) to industry in the absence of a HACCP program.

8. Lack of customer awareness, including consumer awareness

Characteristics

When customers (and consumers) do not perceive food safety as an issue of fundamental importance, industry will be tempted to also neglect it, or at least will not pay attention as needed. This effect is more strongly expected in the area of SLDBs.

Food safety should form an important part of business-to-business dealings throughout the food chain. As such, businesses should ensure that they purchase food from appropriate suppliers, transporters and retailers who, in turn, implement food safety management systems. This should, in conjunction with better-informed consumers, create a demand for improvements in food safety.

Consumer demand can be an important driving force for encouraging businesses to implement the HACCP system. Government and international organizations have an important role in educating consumers in this regard. The mass media can exert a powerful influence in educating consumers, promoting the demand for safe food and appropriate control systems. However, it may also have a negative effect, if not handled and informed appropriately.

Recommendations to overcome obstacle:

- Information dissemination by government and industry about all aspects of HACCP and food safety in general, to customers and consumers throughout the food chain.
- Promotion by international organizations.
- Labeling and certification of recognition of HACCP.

9. Lack of effective education and training programs

Characteristics

As previously stated, major obstacles in the implementation of HACCP by the SLDBs include lack of manpower, a lack of expertise due to inadequate training of employees, and the lack of management commitment and understanding of HACCP. In this respect, there is low access to effective educational and training programs that are designed with these barriers in mind. The lack of expertise is perpetuated by the absence of food safety in the curricula of professional schools.

Recommendations to overcome obstacle:

- Providing for adequate training is important for overcoming barriers related to human resources. This is in particular of vital importance for SLDBs. For guidance on HACCP training, SLDBs may refer to WHO document entitled “Training Aspects of the Hazard Analysis Critical Control Point System” and the other manuals prepared by FAO and WHO. (A list of such easily available manuals/documents be provided).
- Include HACCP approaches in professional educational curriculum.
- Training programs may be organized by government sponsored organizations or others for SLDBs. The training program ideally includes both employees within SLDBs and enforcement officials.
- Continuous training and updating of knowledge.
- Flexible approach to use of human resource, e.g., arrange access to professional organizations.
- Training guidelines need to be adapted to the local requirements taking into account cultural and linguistic differences. It should be adapted to the needs of the SLDBs. Flexible approach of training should be considered. Such as distance learning, on-the-job training and recognition of prior experience.
- Awareness educational/training programs identifying the economics and social benefits of implementing HACCP are essential for regulatory officials, managers of SLDBs and food handlers.
- Government or trade associations should help with the development and formulation of registers of HACCP qualified advisers or experts.

10. Lack of expertise, information and/or technical support

Characteristics

SLDBs 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 SLDBs.

Recommendations to overcome obstacle:

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 SLDB 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, templates⁵, and generic HACCP models;
- Establishing and maintaining food borne disease surveillance programs and facilitating access to collected epidemiological data in a format easily understood by industry, particularly SLDBs.
- Mentoring by business associates.

11. Inadequate infrastructure and facilities

Characteristics

Poor infrastructures and a lack of adequate facilities can seriously handicap HACCP application, in particular for SLDBs. Implementation of HACCP may require improvements in the infrastructure and facilities, both within the community and the business itself.

Recommendations to overcome obstacle:

Businesses should ensure that:

- Premises, work surfaces and equipment are designed, constructed and maintained appropriately to facilitate cleaning and to minimize any possibility of cross-contamination;
- Appropriate facilities to encourage personal hygiene are available to staff;
- Adequate, calibrated monitoring equipment is available and used correctly; and in addition to visual assessment, where possible, rapid tests are used to provide real time results.
- Practical tailor made solutions, e.g., sector shared verification programs.

Governments have a role and, in some instances, an obligation to ensure that the appropriate infrastructure (electricity, roads, safe water supply, sewage facilities) is in place and that environmental pollution is minimized.

12. Inadequate communications

Characteristics

Inadequate communications between and throughout international organizations, governments and industry can impede the introduction of HACCP. Communication strategies, covering the content of the communication as well as the channels for communication, need to be part of any HACCP initiative.

Recommendations to overcome obstacle:

⁵ 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.

Communication strategies should include:

- Information on the need for change and the benefits of HACCP⁶.
- Encouraging production of guides for industry containing materials detailing the application of HACCP to various sectors of industry.
- Providing additional and specific guidance for SLDBs.
- Education of consumers regarding the importance of food safety for health through various channels, including the introduction of food hygiene teaching in schools. Trade associations and consumer groups could also sponsor such measures through providing financial and/or teaching resources.
- To ensure a common understanding, it is important to use a consistent and accurate terminology, such as that contained in Codex documents.
- The use of appropriate and effective channels for communication is equally important for effective communication. These may for example include:
 - Industry/trade associations
 - Trade press and exhibitions
 - Enforcement authorities
 - Mass media
 - Production of leaflets, posters, videos, and other aids
 - Developing registers or lists of businesses, colleges, universities and educational bodies
 - Providing access to guidance, especially the use of modern communication technologies, such as INTERNET (e.g. WWW), should be encouraged
 - Activities by governments, international organizations, industry associations, and professional organizations that may contribute to improved food safety management, especially by SLDBs:
 - Translation of relevant documentation
 - Simplification of guidance material

Providing access to databases with specific food safety information

⁶ HACCP: *Introducing the Hazard Analysis and Critical Control Point System*. WHO document WHO/FSF/FOS/97.2. World Health Organization, Geneva, 1997.