GMP/HACCP Guidelines for SLDBs – key aspects

Bangkok, June 23, 2014
Outline of Presentation

1. HACCP and SLDBs: challenges

2. Development of a national HACCP strategy

3. Development of Guides to Good Practice
1. HACCP and SLDBs: challenges

Underlying principles:

✓ GHP/GMP and HACCP are recognized as an appropriate and useful tool for enhancing the safety of food and providing food safety assurance

✓ HACCP is for use by all food businesses, however SLDBs experience a number of constraints

✓ Governments should provide a national HACCP strategy that pays special attention to the needs of SLDBs
1. HACCP and SLDBs: challenges

What are SLDBs:

Definition according to the report of the WHO Consultation on “Strategies for Implementing HACCP in Small and/or Less Developed Businesses (WHO, 1999):  

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.
1. HACCP and SLDBs: challenges

What are SLDBs:

Economic measures:

- Size of the business such as financial turnover or number of employees

Qualitative measures:

- Serving local customers
- Having a limited share of the available market
- Being owned by one person or a small group of people
- Being mostly owner-managed and independent of ownership by larger groups of companies
1. HACCP and SLDBs: challenges

Challenges

Infrastructure and facilities:

✓ To comply with hygiene requirements means additional costs for renovating facilities
1. HACCP and SLDBs: challenges

Challenges

Basic hygiene:

- GHP tend to be lacking more in SLDBs, due to various problems: location, facilities, old equipment, poor staff training.
1. HACCP and SLDBs: challenges

Challenges

Awareness and Expertise:

✓ Lack of technical expertise for performing risk analysis
✓ In day-to-day business unaware of importance of HACCP

Education and Training:

✓ Understanding of HACCP concept
✓ Sector specific training
1. HACCP and SLDBs: challenges

Challenges

Human resources:

- High rate of staff turnover, management is reluctant to invest in training
- Cost control, “staff is to work, not to study”

Legal requirements:

A legal requirement can help SLDBs to implement HACCP.
2. Development of a national HACCP strategy

✓ National food safety policies shall coordinate and maximise efforts of all stakeholders towards one common goal: food safety and food quality!

✓ Status and mechanism for food safety policies vary from country to country, depending on:
  - Stage of development
  - Major food safety problems
  - Administrative organisation
2. Development of a national HACCP strategy

✓ Application of GHP/GMP and HACCP programmes along the food chain is a major priority for a national food safety strategy

✓ Within a country implementation of HACCP requires an interdepartmental and multidisciplinary approach
2. Development of a national HACCP strategy

- HACCP development and implementation in a country is connected with other strategies:
  - Implementation of an official food control and inspection system
  - Implementation of official laboratories
  - Evaluation of food safety risks (risk analysis tools)
  - Availability of local infrastructure (water, transport, electricity, construction facilities)
2. Development of a national HACCP strategy

Swiss HACCP strategy:

- Various legal requirements, self control, traceability and recall systems, implementation of GMP/GHP practices (prerequisite programmes), implementation of a permanent procedure based on HACCP principles and which take into account the 7 Codex principles

Applicable to all food businesses
2. Development of a national HACCP strategy

Swiss HACCP strategy:

- The procedure based on HACCP principles can be adapted to the nature and size of the food business
- Flexibility is allowed for certain businesses
- Legal exceptions for milk production and processing in alpine environments
2. Development of a national HACCP strategy

Swiss HACCP strategy:

- Food business operators have to prove to the competent authority that they either:
  - Have put in place a procedure based on HACCP
  - Apply an officially approved sector specific guide to good practice
3. Development of guides to good practice

Benefits of guides to good practice:

- Improve food safety and help SLDBs to implement HACCP procedures
- Provide practical guidance to specific sectors to comply with legal requirements
- Provide harmonised criteria for food safety for one sector
- May serve as training programmes
- Provide a agreed guidance to food businesses
- Minimise the burden (work and money) for single food businesses to implement HACCP-based procedures
3. Development of guides to good practice

✓ Essential elements:

- Competent authorities should encourage sector representatives to develop guides
- Involvement of all stakeholders in the development process
- Shall be adapted to sector specific requirements and local/cultural customs
- Should be user-friendly and practical
- Should take into account practical concerns of SLDBs
- Shall be approved by the competent authority
- Shall be reviewed periodically
3. Development of guides to good practice

Guides to good practice are usually a combination of GHP/GMP and HACCP-based elements and should include:

- Directions for the sector specific implementation of prerequisite programmes
- Requirements for raw/incoming materials
- A hazard analysis
- Pre-determined CCP along the production process, identifying hazards and specific control requirements
3. Development of guides to good practice

Guides to good practice are usually a combination of GHP/GMP and HACCP-based elements and should include:

- Special hygienic precautions in the case of handling vulnerable products or products prepared for susceptible groups of consumers
- Directions for documentation and records
- Sector specific labelling requirements, including validation of use-by-dates
3. Development of guides to good practice

<table>
<thead>
<tr>
<th>Leitlinie</th>
<th>verantwortlicher Gesichts(holder, Verband</th>
<th>genehmigt am:</th>
<th>genehmigte Version:</th>
<th>Bemerkungen</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leitlinie für eine gute Hygienepraxis in Fleischfachbetrieben</td>
<td>SFF Schweizer Fleischfachverband Steinwiesstrasse 59 Postfach 8032 Zürich</td>
<td>04.10.2011</td>
<td>2. Auflage 2013</td>
<td></td>
</tr>
<tr>
<td>Branchenleitlinie für die gute Verfahrenspraxis in der gewerblichen Milchverarbeitung</td>
<td>Fromate Die Schweizer Käserei- und Schokoladenfabriken Schweizerstrasse 26 Postfach 3001 Bern</td>
<td>07.04.2010</td>
<td>Version April 2010</td>
<td></td>
</tr>
<tr>
<td>Linee dirette per una buona prassi procedurale ai sensi dell'art. 52 dell'Ordinanza Svizzera sulle derrate alimentari e gli oggetti duso</td>
<td>USIS, Unione Svizzera Importatori di Salumi Presso Bernacchi SA Casella postale 91 6814 Cadempino</td>
<td>18.05.2009</td>
<td>Version 1</td>
<td></td>
</tr>
<tr>
<td>Hygieneleitlinie für eine gute Verfahrenspraxis für das Bäckerei-, Konditorei und Konfiseriegewerbe</td>
<td>SBKv / ASPBP / ASNPP Seilerstrasse 9 Postfach 3001 Bern <a href="http://www.swissbaker.ch/sbkv@swissbaker.ch">http://www.swissbaker.ch/sbkv@swissbaker.ch</a></td>
<td>03.03.2008</td>
<td>Version Januar 2008</td>
<td></td>
</tr>
</tbody>
</table>
3. Development of guides to good practice

How to measure HACCP implementation in SLDBs:

- Assessment of professional auditors:
  - HACCP well implemented, but not adequate or not offering the necessary level of hazard control
  - Appropriate HACCP established, but not implemented correctly
3. Development of guides to good practice

Indicators of successful HACCP implementation:

- History of track record of the SLDBs:
  - Number of non compliances
- Number of consumer complaints
- Number of product recalls in a sector
- Number of rejections in importing countries
- Results of audits by foreign competent authorities
3. Development of guides to good practice

Conclusions:

- The basic objective of implementing HACCP based procedures is to control hazards in foods

- Different means can be used to achieve the objective:
  - Traditional HACCP
  - Guides to good practice
  - Generic HACCP plans

BUT/AND:
3. Development of guides to good practice

Conclusions:

- Procedures to control hazards have to be risk-based
- Prioritised and focused on what is important for food safety in a food business/sector