



SAFE FOOD IN ACP
A PROGRAMME FUNDED BY THE EU

HANDBOOK

1.12

TOPIC 1
Food Safety
System

12

ORGANISATION OF OFFICIAL CONTROL SYSTEMS



The handbooks are tools designed for civil servants in charge of restructuring the food safety system, and for all operators involved in drawing up the food safety policy and organising official controls (qualified civil servants, heads of laboratories, heads of departments in official organisations, those in charge of official controls, trainers, technicians, researchers, experts or company executives). They aim to provide an overview of the main points of a specific subject. All of the topics addressed by EDES during the training sessions are covered in separate handbooks.

The handbooks have been designed and drawn up by the EDES Training Unit in cooperation with the Consortium members.



EDES is a European cooperation programme managed by COLEACP. COLEACP is an international network promoting sustainable horticultural trade. It is funded by the European Union and was implemented at the request of the ACP (African, Caribbean and Pacific) Group of States. EDES aims to promote food safety in African, Caribbean and Pacific countries. EDES operates in all sectors in response to a request filed at national level by any public or private stakeholder involved in the food safety process.



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1. The purpose of official controls for food safety

The World Health Organisation (WHO), Food and Agriculture Organisation (FAO), along with other national and international bodies have recognised that protecting food safety is a public health function and a global priority. Around the world, food is increasingly produced, processed, traded and delivered through supply chains involving many food businesses. Food is traded internationally and purchased from retailers in a prepared state. Much food is eaten outside the home.

It is no longer feasible to ensure that food is safe through random sampling and testing of the end product combined with thorough cooking or other food safety measures by the consumer before eating. It is necessary to use harmonised risk-based process control measures to ensure that food hygiene is maintained throughout the food chain continuum (the 'farm-to-table' principle).

Codex Alimentarius (meaning the food code) was set up by the World Health Organisation (WHO) and Food and Agriculture Organisation (FAO) to set and maintain internationally accepted food standards, codes of practice and guidelines to protect the health of consumers and ensure fair practices in food trade. The objectives of the Codex General Principles of food hygiene are presented in Appendix 1.

Codex works in conjunction with two other international standards setting organisations: the World Organisation for Animal Health (OIE), which sets standards for veterinary public health and zoonoses, and; the International Plant Protection Convention (IPPC), which sets standards related to plant health.

The World Trade Organisation (WTO) Agreements on Sanitary and Phytosanitary measures (SPS Agreement) and Technical Barriers to Trade (TBT) refer to Codex, OIE and IPPC standards as part of their mission to ensure fair trade in food ingredients and food products.

One of the basic principles of international food safety control is that food business operators at all stages of production, processing and distribution have primary responsibility for providing food that is safe and suitable for consumption. They must ensure that consumers have information enabling them to protect their food from contamination and spoilage by food-borne pathogens, and they must maintain confidence in food products.

The role of governments is to:

- enforce food law and protect consumers through policies that consider the risk to the population;
- provide assurance that food is suitable for human consumption;
- maintain confidence in internationally traded food, and;
- provide health education programmes to communicate the principles of food hygiene to industry and consumers.

Governments must ensure good hygiene and food safety throughout the food chain

Governments should ensure the safety of food imports and exports to the same standards as are applied to domestic production and consumption.

The European Union (EU) is the world's largest trading area and biggest food importer and its food safety regulations are harmonised with international standards and guidelines. The European Commission (EC) ensures that food exports from EU Member States and imports into the Community comply with EU legislative requirements. In accordance with SPS and EU requirements, the European Commission supports exporters of food products to Europe in complying with EU requirements.

The European Commission is able to approve specific pre-export checks to be carried out by third countries prior to dispatch to reduce or replace checks required at the EU border.

Importing countries are not able to dictate specific control measures that must be taken by the exporting country. They operate on the principle of equivalence, where the exporting country's measures must achieve the appropriate level of protection as in the importing country.

The purpose of official controls

- Food safety is a public health function
- The guiding principle of food safety control is to ensure that all food placed on the market is safe to eat and provides a high level of protection of human life and health
- Food safety controls must take into account the diversity of supply and the need to facilitate trade
- Food business operators are primarily responsible for producing safe food by applying good hygiene and process control measures in their businesses
- The role of government is to:
 - ensure that food safety measures are applied throughout the food chain;
 - provide assurances to the consumer, and;
 - educate the industry and consumers on food safety

This handbook covers the organisation of official control systems to enable governments to meet their obligations to ensure that food is safe to eat, protect the consumer and ensure fair practice in trade.

2. Challenges for official control systems in developing countries

Achieving effective food control at the national level is a joint effort involving government, producers, processors, caterers and retailers, as well as consumers.

Developing countries face particular challenges that make it difficult to achieve universal food safety controls, including:

- General lack of infrastructure, facilities, skills and resources. Basic facilities required for safe food production include: reliable and safe water supplies and sanitation; dependable electricity supply; adequate storage facilities, including cold storage; suitable transport facilities and transport network. Sufficient resources and funds may not be available to provide adequate laboratory testing as a means of enforcing controls.
- Lack of knowledge of farmers and processors concerning the safe use of agro-chemicals and pharmaceutical products. For both their own health and consumer protection, producers and processors need to be properly educated and controlled in their access and use of hazardous products.
- Fragmented food sectors with both sophisticated industries and small-scale producers and processors, some of whom may be unregistered and operating outside the formal economy. This fragmentation hinders the uniform application of controls along the food chain;
- Dual standards for domestic and export markets. A focus on export markets for food products is good for trade, but may mean that the domestic market is neglected with regard to food safety. Whilst the focus on exports is perhaps inevitable, strategies can be developed so that there are spin-off benefits for the local market;

The food export market can provide a stimulus for improving domestic food safety

- Private standards (such as GLOBALGAP) are sometimes confused with formal international standards in producer countries. Although private standards have a role in food safety, some developing countries have complained to the SPS Committee that private standards are a barrier to trade. Higher standards for consumers - as sometimes required by private standards - may be to the detriment of exporters, who face increased costs in meeting the standard. This issue is under active discussion by the World Trade Organisation and the other international committees.
- Lack of awareness and knowledge of food safety by food business operators and consumers. With education and awareness, consumers can exert an influence on food producers and processors to improve the safety of food put on the market.

Food safety is a joint effort involving government, industry and consumers

- Relative high food prices compared to income mean that low-income consumers in developing countries may be reluctant or unable to pay a price premium to cover the costs of ensuring good hygiene and food safety. Poor people may be unaware of the risks and cannot afford to reject food that does not comply with food standards and may be unsafe to eat. This is why food safety is a public health issue.

Additional problems faced by governments regarding food safety controls include:

- Inadequate or out-of-date legislation that does not encompass the risk-based process control approach;
- food safety responsibilities split between a number of ministries and departments, and not harmonised;
- Inconsistencies and gaps in enforcement, surveillance and monitoring.

Challenges for official control systems in developing countries

- Lack of infrastructure, skills and resources
- Ignorance on the safe use of agro-chemicals and pharmaceuticals
- Fragmented food sectors make it difficult to apply controls along the food chain
- Dual standards for domestic and export markets may be to the detriment of local consumers
- Confusion between formal and private standards may make it more difficult to deliver clear awareness messages on how to improve food safety
- Lack of awareness on food safety by operators and consumers
- Relative high food prices compared to incomes act as a disincentive for consumers to pay a premium for good hygiene and safe food
- Inadequate or out-of-date legislation
- Government responsibilities split between ministries and departments
- Inconsistencies and gaps in enforcement, surveillance and monitoring

3. Basic principles for official control of food safety

National official control systems for food safety should be developed to harmonise with Codex Alimentarius and the other international agreements and standards (SPS Measures, TBT Agreement; OIE and IPPC standards).

Official controls should be consistent with internationally accepted basic principles for food safety:

- All food placed on the market must be safe to eat and provide a high level of protection of human life and health;

All food must be safe to eat

- Suitable legislation and statutory procedures are required for enforcement of official controls;
- A scientific risk-based approach should be used by the industry to apply the most appropriate food safety control measures according to the circumstances.

Food safety measures should be targeted according to the risks

- Risk analysis comprises risk assessment, risk management and risk communication. Risk assessment must be science-based and carried out independently from risk management, which is policy based. Risk communication is linked to both risk assessment and risk management. Governments play a leading role in risk analysis and official controls are part of the risk management function;
- Official controls should be appropriate to the food safety risks in each food business;
- Food business operators shall apply process controls in an integrated farm-to-table approach to maintain food hygiene throughout the production and supply chain;
- Prime responsibility for food safety lies with the food business operator at each stage of the food chain. Food processors should base their control mechanisms on Hazard Analysis and Critical Control Point (HACCP) principles together with good hygiene practice. The application of HACCP principles to primary production is generally not feasible and primary producers should apply specific good hygiene measures;
- Transparency, consultation and communication are necessary to ensure stakeholder involvement and consumer confidence at all stages;

Official controls should be transparent

- Food businesses should be registered (where required by legislation) to facilitate supervision and traceability;
- Flexibility of the food safety system is necessary to adapt to local circumstances and specific products (e.g. traditional products), but this should not compromise food hygiene. This is an important consideration for developing countries that have difficulty complying with international standards and the import requirements of developed countries (including the European Community).

Basic principles for official control of food safety

- All food placed on the market must be safe to eat
- A legal base is required to implement official controls
- Food business operators should targeted control measures according to the risks to food safety
- Food business operators should apply a farm-to-table approach to food safety
- Prime responsibility for food safety lies with food business operators at each stage of the food chain. Food processors should base their controls on good hygiene practices and HACCP principles. Primary producers should apply good practices
- Official controls should be appropriate to the food safety risks in each food business
- Official controls should be transparent, involving consultation and communication with stakeholders
- Food businesses should be registered (when required) to facilitate supervision and traceability
- The food safety system and official controls should be flexible and adaptable to local circumstances

4. Organisation of official controls

This section covers the following issues:

- Government responsibility
- Competent authorities
- Objectives of official controls
- Components of official controls
- Key components for organisation of official control systems

4.1. Government responsibility

Governments have overall responsibility for:

- food safety policy;
- the development of food law and regulations;
- ensuring the necessary infrastructure for official controls, including surveillance and laboratory networks;
- ensuring the provision of an effective inspection and enforcement service with suitably qualified staff.

4.1.1. Food law and regulations

Official controls should be based on legislation and regulations to allow powers of enforcement. The laws must accommodate changes that take place in the food sector, the use of modern technology and the development of new food products.

Food law has to cover a range of issues beyond basic food hygiene, such as additives, flavours, food supplements, natural contaminants (e.g. toxins), labelling, food composition, nutrition, and genetic modification. Increasingly food law is being extended to cover indirect food safety issues such as the environment, animal health, animal welfare and plant health.

There are various options for organising official controls at national level. FAO and WHO (FAO/WHO, 2003) have produced guidelines for the development of national policies and effective food safety controls. The European Union legislation is comprehensive and covers controls on exports from third countries to the EU. These and other sources have all been used in compiling the following guidance. A list of reference material is included in Appendix 2.

Individual countries must develop food safety policies, regulations and strategies to steer the development of official controls and effective food safety systems that will protect consumers and facilitate trade and economic development.

4.1.2. Food safety systems

FAO/WHO guidelines describe three basic models for national food safety systems, as described below (and in more detail in EDES Handbook 1.10 “Coordination of activities in a food safety system”).

National food safety systems encompass all three functions of risk analysis: risk assessment, risk management and risk communication. Official controls fall within the risk management function.

► Multi-agency food safety system

This is the traditional food safety model in many countries, where different ministries have responsibility for different stages in the food chain. Within each ministry there may be subdivision of food safety activities by commodity sector (e.g. animal production and crop production). Typically the ministry of agriculture would be responsible for food safety aspects in primary production and primary processing, whereas the ministry of health would be responsible for further processing, distribution and retail sale. The tendency would be for each ministry to work independently without sharing food chain information. The focus of control would be routine testing of end-products.

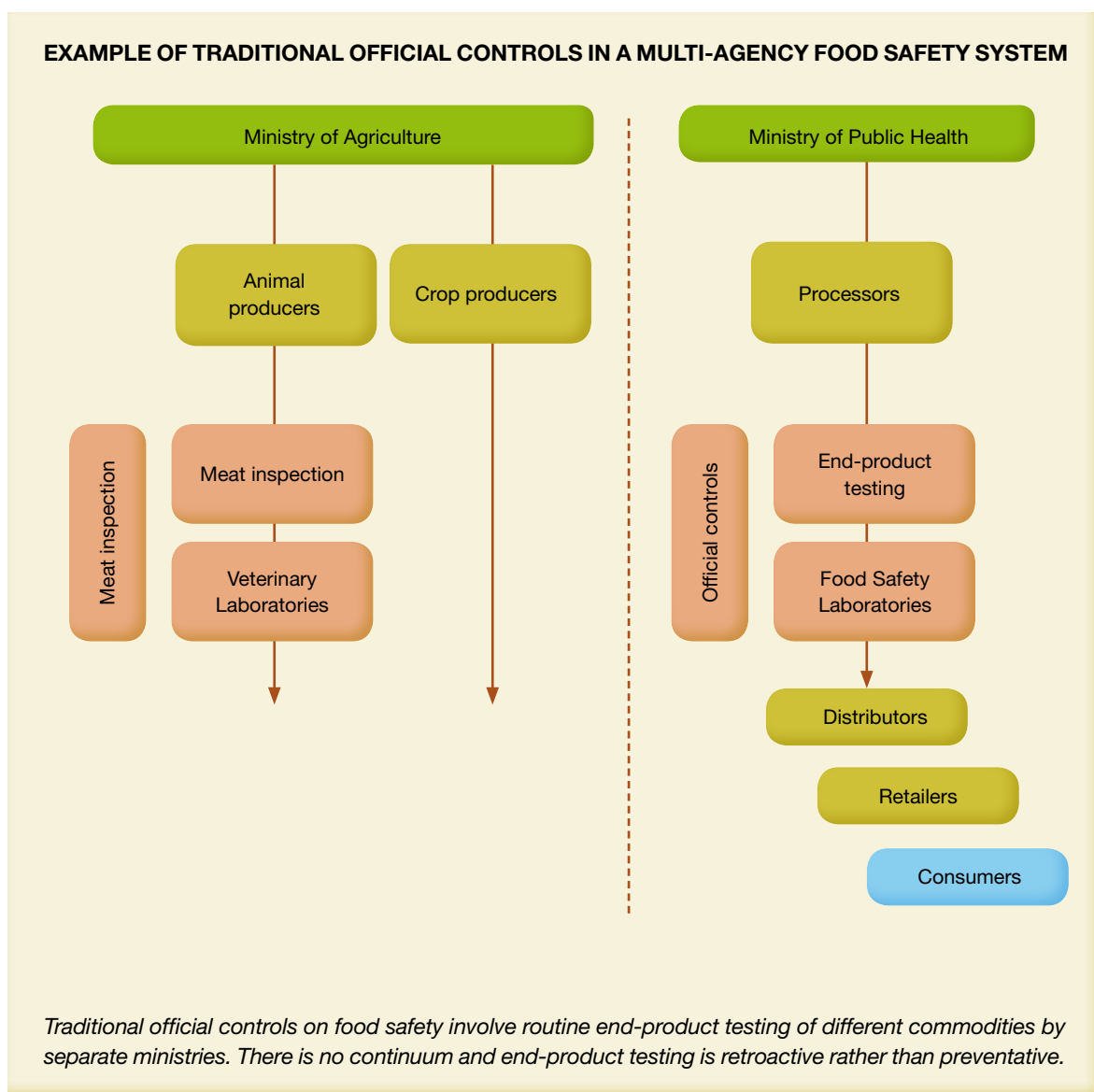


Figure 1. Example of traditional official controls in a multi-agency food safety system

The main advantage of the multi-agency approach is that it makes use of existing structures without major reorganisation. However the disadvantages include lack of coordination at national level, overlapping responsibilities and duplication of activities, and uneven implementation. It can be difficult to apply the risk-based farm-to-table approach in a multi-agency system.

► Single agency food safety system

Consolidating all official control activities in a single agency brings advantages in terms of cohesion and a unified approach. It allows a food chain approach to risk analysis based on science.

Setting up a separate agency creates a separation from government and overcomes conflicting priorities from different ministries and departments.

However, a possible drawback is that setting up a separate agency responsible for official food safety controls involves major restructuring with relocation of experts from their home ministries. Such a move may be politically or logistically difficult in some countries.

Another potential disadvantage is that the centralised control makes it more difficult to interact with food business operators and consumers at the local level. This may hinder consultation and cooperation with industry and consumers.

4.1.3. Integrated food safety system

An integrated system is a variation of a single agency model where some functions are delegated to other competent authorities or to independent control bodies; at national, regional and local levels.

This allows harmonisation and the uniform application of control measures in a farm-to-table approach, but retains the benefits of local contacts and the participation of different ministries. It may therefore be more feasible to set up than a single agency system.

Various options of integrated system are possible. Official controls can be delegated to another competent authority with a local network, or directly to local control bodies.

Figure 2 gives an example of delegated official controls in an integrated food safety system.

Whilst the food agency approach has been widely adopted in developed countries, take-up has been less in developing countries. One of the complications may be the dual nature of food safety systems in developing countries, where it is necessary to prioritise the allocation of scarce resources resulting in different levels of control being applied to the export sector and food products for the domestic market. The dual control system may work better in a sector specific approach.

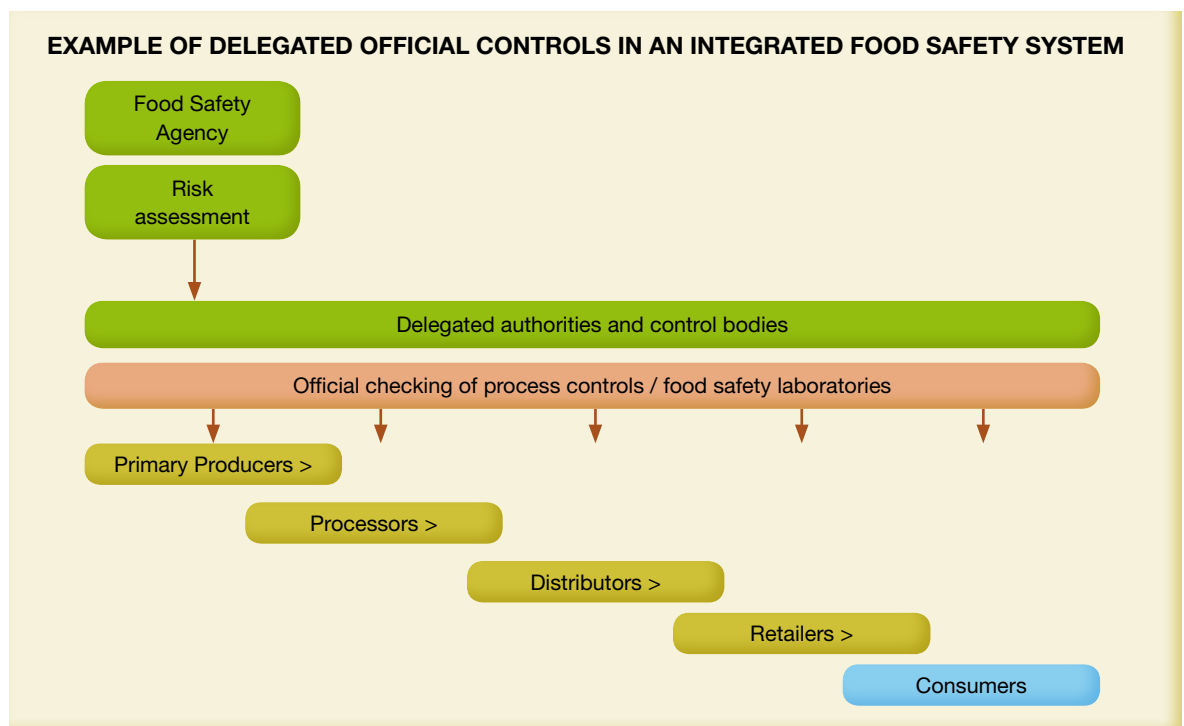


Figure 2. Example of delegated official controls in an integrated food safety system

4.1.4. Private standards

Private standards have an important impact of food safety control systems. They can serve two purposes:

➤ **Provide a mechanism for compliance with official standards and regulations**

Certain non-governmental standards such as the International Organisation for Standardisation (ISO) are considered by regulators as providing formal verification mechanisms for food businesses to comply with official food safety standards. They are not referred to as private standards.

➤ **Demonstrate achievement of private criteria and quality schemes**

Private sector food businesses (particularly large supermarkets in importing countries) may require producers and suppliers to conform to private quality standards (e.g. GLOBALGAP). These are unofficial standards used by food businesses to increase consumer confidence in their products.

Where national food safety systems in developing countries are not yet developed to the level of international standards, private standards may provide a mechanism for international compliance (as described in the previous paragraph). They provide a process control, food chain approach in specific export sectors.

However, private standards may go beyond official requirements (i.e. set stricter requirements) for commercial reasons. This means they may not follow WTO disciplines for international standards. Consequently, they have been the subject of complaints by developing countries to the SPS committee that they are a barrier to trade.

*Unofficial private standards help producers in developing countries achieve export compliance.
But they may be costly for producers to achieve and may be barriers to trade if they set limits beyond official levels without scientific justification*

Food producers in developing countries may also be faced with high costs of complying with several different private standards, as might be required to access certain market outlets.

The role of private standards in food safety systems is under active discussion by the SPS Committee and other international organisations.

4.1.5. HACCP

The Hazard Analysis and Critical Control Point system (HACCP) is a universally recognised and accepted method of food safety assurance in food businesses. The HACCP approach is endorsed by WHO and adopted by Codex Alimentarius. Regulators such as the European Union recommend the use of HACCP based approaches.

The HACCP system is a process control system that identifies where food safety hazards may occur in a food production process and puts into place stringent controls to prevent the hazards from occurring.¹ This provides a system for food businesses to assure the safety of the food they produce.

HACCP is a preventative approach that can be applied throughout the food chain, from primary production to final consumption. However, it is generally more appropriate for food processors than for primary producers, where good hygiene practices may provide a more suitable and practical approach.

Use of the HACCP approach and pre-requisite measures provides a means for verifying regulatory compliance and thus forms part of an official control assessment.

Implementation of HACCP principles will only succeed if food business operators show commitment to the system. Pre-requisite measures for good hygiene practice must already be in place within the business in order to implement HACCP principles. HACCP is then applied to control steps in the process that are critical for ensuring the preparation of safe food.

¹ <http://www.standards.org/standards/listing/haccp>

HACCP - Hazard Analysis and Critical Control Points

- HACCP is a process control system adopted by Codex Alimentarius
- It is based on the application of control measures to a food business operation at critical steps in the production process
- It is a tool for food businesses to assure the preparation of safe food
- It is a preventative approach that can be applied throughout the food chain, although simpler good hygiene practices may be more suitable for primary producers
- HACCP can be used to verify regulatory compliance in an official control assessment
- Pre-requisite good hygiene measures must already be in place to implement HACCP
- Successful implementation depends on the full commitment of food business operators

➤ **Pre-requisite measures and HACCP principles**

The pre-requisite hygiene measures for HACCP implementation include:

1. Cleaning and Disinfection
2. Maintenance
3. Personnel Hygiene and Training
4. Pest Control
5. Plant and Equipment
6. Premises and Structure
7. Services (compressed air, ice, steam, ventilation, water etc.)
8. Storage, Distribution and Transport
9. Waste Management
10. Zoning (physical separation of activities to prevent potential food contamination)

The HACCP system is based on seven principles:

- i) Conduct a hazard analysis
- ii) Determine the Critical Control Points (CCP)
- iii) Establish critical limits
- iv) Establish a system to monitor control of the CCP
- v) Establish the corrective action to be taken when monitoring
- vi) Establish procedures for verification to confirm that the HACCP system is working effectively
- vii) Establish documentation concerning all procedures and records appropriate to these principles and their application

➤ **HACCP in practice**

Although HACCP is a proven technique for improving food safety in food businesses, official control inspectors cannot take for granted that it will automatically ensure food safety. HACCP has to be applied accurately and diligently to be effective. Inspectors must be suitably trained and experienced to check that the HACCP principles are functioning properly in the food establishment.

HACCP must be applied accurately and diligently to be effective

It is important for official control inspectors to be aware of potential difficulties with implementing HACCP. These include:

- **Hazard analysis**
Hazard analysis requires specific expertise and knowledge of chemical and microbiological hazards and their risks. Such expertise may not always be available. Proper training in hazard analysis and the availability of suitable qualified staff is therefore important for precise hazard analysis.
- **Validation of critical limits**
Critical limits are borderlines between acceptability and unacceptability of the food product, such as temperature and time for heat treatment. It is necessary to ensure the critical limits are properly validated to check that they are effective and that the HACCP process will ensure safe food.

Validation must be carried out in food businesses to ensure that critical limits are appropriate for the actual operating conditions. This may be a particularly difficult procedure for small businesses and expert support may be required.
- **Inconsistent implementation of HACCP**
Implementation of HACCP involves monitoring, corrective action and verification. If the documented procedures are not carried out effectively, the HACCP controls may fail to provide proper control of food safety. Problems can arise if the HACCP controls are too restrictive as frequent deviations may occur during working time and staff may decide to bypass the HACCP procedures in order to keep the production process going and meet targets. Such problems can arise when external experts prepare the HACCP plan without full collaboration with company staff, as they may set unrealistic control measures.
When preparing the HACCP plan it is necessary to see that staff directly involved with the process are consulted in order to sure that the plan is practical to use.
- **Inadequate internal verification**
Verification is an important tool to check the proper functioning of the HACCP system. Food business operators may confuse validation, monitoring and verification procedures. In particular the overall system verification process may not be carried out thoroughly including review of documents and records.
- **Monitoring data**
HACCP monitoring generates data, which can be used to analyse trends. The data analysis requires knowledge and skills that may not be present in small businesses. It is important to ensure that this data is collected and analysed thoroughly.

➤ **Official control of the HACCP system in a food business**

Official control inspectors need to be properly trained in HACCP procedures in order to carry out meaningful assessment visits to food businesses. Official control assessment should cover the following points:

- the overall objective of official control of the HACCP approach in a food business is to obtain evidence that the seven HACCP principles have been effectively applied and the HACCP plan and pre-requisite measures have been correctly implemented and the system maintained;
- the specific purpose of the assessment is to ascertain whether the HACCP system is effective in assuring that the business is capable of producing safe food;
- the adequacy of the pre-requisite measures should be assessed, as well as other regulatory requirements regarding food safety;
- The official control assessment should determine:
 - whether the HACCP plan includes and addresses all the necessary requirements;
 - whether the system is satisfactory for maintaining food safety;
 - whether the implemented processes comply with the documented procedures in the HACCP plan;

The assessment should cover:

- HACCP management - compliance history, level of training, availability of required technical knowledge within the business or available to it, the existence of satisfactorily documented procedures and food safety management systems;

- HACCP planning - the accuracy of the plan, process description and flow diagram, the level of expertise reflected in the plan, the adequacy of the pre-requisite measures;
- Hazard analysis - hazards have been identified and analysed, validation records, sample results, product safety history, generic plans, predictive models;
- Effectiveness of the control measures – adequacy of the critical control points, appropriateness of the critical limits including whether they are realistic and how they were determined and validated, adequacy and frequency of monitoring
- Verification procedures carried out by the food business operator – details and results of the verification, actions taken to address HACCP deficiencies, other deficiencies and new hazards;
- Documentation - description of the food product, flow diagram with location of critical control points and other parameters, HACCP worksheet, list of verification activity, records of pre-requisite measures;
- Overall HACCP implementation – adequacy of implementation, maintenance and function of the HACCP plan, sufficient training of operators, complete records;

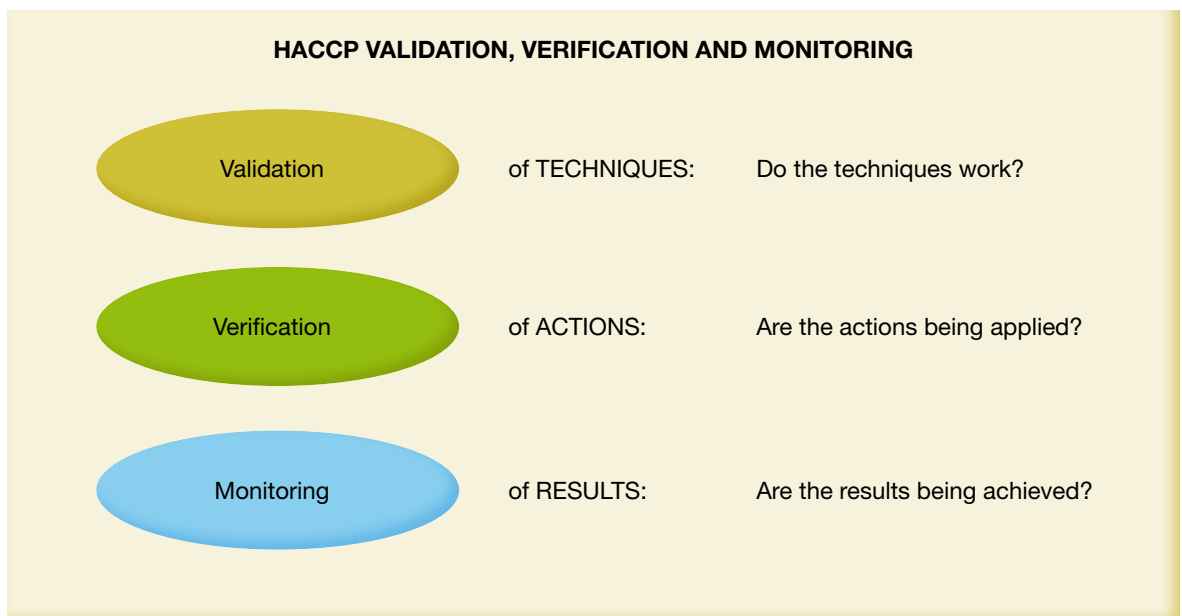


Figure 3. HACCP validation, verification and monitoring

The frequency of assessment should be based on the following risk factors:

- classification of the business according to potential hazards related to the process or product, compliance history, and food safety management system;
- history of food safety incidents;
- any other risk factors.

HACCP and the pre-requisite hygiene measures are one of the most important risk management tools available to food businesses. However, HACCP alone is not enough to ensure food safety: it must be complemented with other measures such as, traceability, labelling and laboratory analysis.

HACCP alone is not enough to ensure food safety

4.1.6. ISO standards

ISO is the International Organisation for Standardisation.² It has a current membership of 164 national standards bodies. ISO is a non-governmental organisation and its standards are voluntary, although in some cases they have become market requirements, for example with regard to laboratories. ISO does not itself provide certification.

Although not specifically designated as such, ISO standards are considered to be formal international standards as ISO uses principles and codes of practice set out in the WTO SPS and TBT agreements. They are thus distinct from 'private standards' that do not specifically follow WTO disciplines.

In developing countries ISO standards are important to primary producers as a means of gaining technical knowledge and of demonstrating capability to export. Certification to an ISO 22000-based food safety management system is widely accepted as a benchmark for companies to gain export status.

ISO certification in food businesses is an indicator of good hygiene practice and therefore facilitates official control procedures and contributes to enhanced food safety.

Similarly ISO certification of laboratories and specific laboratory tests is an indicator of reliability for laboratory testing.

4.2. Competent authorities

Competent authorities are appointed by government to carry out official controls. The appointment is covered by legislation so that the competent authority has the necessary statutory powers to carry out official controls.

Official controls are the responsibility of competent authorities, who may delegate some tasks to other authorities or independent control bodies.

Depending on the legislation, competent authorities may delegate specific tasks to other authorities or suitably qualified control bodies at national, regional or district levels.

Some tasks, such as meat inspection, may be delegated to control bodies, which could be private contractors who charge fees to the food businesses for their services.

The competent authority should ensure efficient coordination between other authorities and control bodies, particularly regarding the allocation of responsibilities and tasks. Each delegated authority and control body must have a clear understanding of the legal requirements and procedures to be used.

It is necessary to avoid duplication and overlapping of actions by different competent authorities and control bodies. At the national level, it is necessary to avoid conflicting priorities between different ministries and government departments.

4.3. Objectives of official controls

Based on the example of EU legislation, official controls are required to:

- enforce food law and regulations, and monitor and verify that they are fulfilled by food business operators at all stages of production, processing and distribution;
- prevent, eliminate or reduce risks to human health, either directly or through the environment;
- guarantee fair practices in feed and food trade to protect consumer interests, including food labelling and other forms of consumer information.

Official controls are necessary to enforce food law

² <http://www.iso.org/iso/home.htm>

4.4. Components of official controls

Official controls may include the following components:

Components of official controls

- Procedures for official controls of food safety
- Programming of control plans
- Control tasks: surveillance checks, inspection, verification, audit, sampling
- Laboratory testing
- Monitoring plans
- Registration and approval of establishments, where required
- Authorisation and control of veterinary medicinal and phyto-pharmaceutical products
- Residue plans
- Border controls
- Official certification
- Other activities, including animal health, plant health and public health, in particular concerning zoonoses and traceability systems
- Communication with consumers
- Training of inspection staff performing official controls
- Communication, training and awareness for food business operators

This section considers key components regarding the organisation of official controls: procedures; control plans; inspection tasks; and communication, awareness and training.

4.4.1. Procedures for official controls

Procedures for official controls should address the following subject areas:

- The organisation of the central competent authority and the relationship between other authorities that have been delegated certain official controls;

Different organisational structures are possible: the critical factor is to have clear relationships and responsibilities

- The relationship between competent authorities and control bodies to which they have delegated tasks related to official controls;
- A statement of the objectives for official controls;
- Tasks, responsibilities and duties of staff;
- Sampling procedures, control methods and techniques, interpretation of results and consequent decisions;

Official controls should be carried out according to documented procedures and control plans

- Monitoring and surveillance programmes;
- Cooperation with other countries and international organisations;
- Action to be taken following official controls;

- Cooperation with other services or departments with relevant responsibilities;
- Verification of the appropriateness of sampling, analytical and detection methods;
- Any other activity or information relevant to the effective functioning of official controls.

4.4.2. Control plans

Competent authorities for official controls on food safety should prepare control plans based on the procedures outlined in the preceding section.

A control plan is a description of the structure and organisation of the official control system of a competent authority.

Control plans provide a description of the organisation and structure of the official control system

The purpose of a control plan is to establish a solid base for the inspection services to carry out regular official controls. It should provide a means to confirm that official controls are carried out according to the requirements of the competent authority. Official controls cover imported food ingredients and products as well as domestic production.

The control plan should describe the general structure and organisation of the national food control system, including related issues such as the control of animal health and welfare, and respect for the environment, as appropriate.

The control plan should address the following issues:

- The strategic objectives of the plan and the prioritisation of controls and allocation of resources to meet the objectives;
- The risk categorisation of the activities concerned;
- The designation of competent authorities and their tasks at central, regional and local levels, and the resources available to these authorities;
- The general organisation and management of official controls at national, regional and local levels, including official controls in individual food businesses;
- Control systems applied to different sectors and coordination between the different sectors of the competent authorities responsible for official controls in these sectors;
- Delegation of tasks to other authorities and control bodies, where appropriate;
- Methods of compliance with operational criteria covering: effectiveness of the controls; conflicts of interest; laboratory capacity; equipment and facilities; legal powers; contingency plans for emergencies; obligations of food business operators to cooperate in the official controls;
- Training of control staff;
- Organisation of cooperation and mutual assistance.

Control plans should be prepared on a multi-annual basis and updated as necessary.

The control plan should take into account the following guidelines:

- take a consistent, comprehensive and integrated approach to official controls (including feed and food, animal health and animal welfare, as included in the scope of the official controls) and embrace all sectors and all stages of the feed and food chain, including imports;
- identify risk-based priorities and criteria for the risk categorisation of the activities concerned and the most effective control procedures;
- identify other priorities and the most effective control procedures;

- identify the stages of production, processing and distribution of feed and food, including the use of feed, which will provide the most reliable and indicative information about compliance with feed and food law;
- encourage the adoption of best practices at all levels of the control system;
- encourage the development of effective controls on traceability systems;
- provide advice on the development of systems to record the performance and results of control actions;
- reflect relevant international bodies' standards and recommendations regarding the organisation and operation of official services;
- lay down criteria for the conduct of audits;
- lay down the structure and information to be included in reports;
- indicate the main performance indicators to be applied in assessing the delivery of control plans.

The control plan provides a baseline for monitoring the performance of official controls

4.4.3. Official control tasks

Types of official control task include surveillance checks, inspections, verifications, audits, sampling and testing.

'Surveillance' means a careful observation of one or more feed or food businesses, feed or food business operators or their activities;

'Inspection' means the examination of any aspect of feed, food, animal health and animal welfare in order to verify that such aspect(s) comply with the legal requirements of feed and food law and animal health and animal welfare rules;

'Verification' means checking, by examination and the consideration of objective evidence, whether specified requirements have been fulfilled;

'Audit' means a systematic and independent examination to determine whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives;

As appropriate according to the circumstances, governments should carry out the following official control tasks:

- procedures to ensure the registration of food and feed businesses, where required;
- routine surveillance checks, inspections, verifications, audits, sampling and testing;
- laboratory testing based on internationally approved procedures;
- effective, proportionate and dissuasive actions against breaches of food law and regulations;
- public communication on surveillance regarding food safety;
- training of staff performing official controls;
- control of imported food and exports to ensure compliance or equivalence with national food safety standards for domestic food production.

Official controls should be carried out at an appropriate frequency as determined by the risks to food safety in each food business. The risk analysis should take into account: identified risks to food or feed; the compliance record of the food business operator, any information regarding non-compliance, and; the reliability of the checks that are carried out.

Official controls should be appropriate to the risks to food safety

Official controls should be carried out without warning, except when it is necessary for the food business operator to prepare for the visit. Ad hoc visits can also be carried out. Official controls shall be carried out at any stage of the production, processing and distribution process, including feed production and primary production.

Official controls should be based on documented procedures to ensure uniformity and consistency. Where different control bodies are involved, their actions should be effectively coordinated. Similar coordination is required where activities have been delegated to regional or district levels. Official control staff shall be suitably trained.

Official controls should particularly focus on the following points regarding food businesses:

- the implementation of good hygiene practice and HACCP principles, as appropriate;
- food safety management systems;
- the microbiological, physical and chemical safety of food and feed.

Official controls should focus on
- HACCP implementation
- food safety management systems
- food safety criteria

Food business operators should be provided with a copy of the inspection report, at least in the case of non-compliance.

4.4.4. Communication, training and awareness

► Training of official control staff

Training of official control staff is required to ensure the correct implementation of control techniques. It is also necessary to provide training to ensure staff make uniform decisions, in particular with regard to HACCP principles. Training is also required for laboratory staff involved in testing samples taken under official controls.

The 2nd Global Forum of Food Safety Regulators, 2004 (National School of Veterinary Services, France) identified three levels of training:

1. Prior training

Prior training refers to the education required for the recruitment level: professional staff or support staff.

2. Post-recruitment training

Post-recruitment training refers to occupational training for the specific job. In some countries, this is acquired whilst working on-the-job. Other countries provide short-term training for a few days or weeks. Elsewhere staff obtain professional qualifications.

3. Staff development training

Staff development training or Continuous Professional Development (CPD) is required to keep up-to-date with technical developments, administrative changes and to for career development.

Training may cover the following subject areas:

- Control techniques, such as auditing, sampling and inspection;
- Control procedures;
- Feed and food law;
- The different stages of production, processing and distribution, and the possible risks for human health, and where appropriate for the health of animals and plants and for the environment;
- Assessment of non-compliance with feed and food law;

- Hazards in animal feed and food production;
- The evaluation of the application of HACCP procedures;
- Management systems such as quality assurance programmes that feed and food businesses operate and their assessment in so far as these are relevant for feed or food law requirements;
- Official certification systems;
- Contingency arrangements for emergencies, including communication with international organisations and other countries;
- Legal proceedings and implications of official controls;
- Examination of written, documentary material and other records, including those related to proficiency testing, accreditation and risk assessment, which may be relevant to the assessment of compliance with feed or food law; this may include financial and commercial aspects;
- Any other area, including animal health and animal welfare, necessary to ensure that official controls are carried out in accordance with food law and regulations.

➤ **Awareness and education of food business operators**

Studies have shown that involving and educating food business operators through participatory approaches including training helps to provide greater understanding of food safety issues, resulting in improved compliance. These then need to be backed up with formal control measures.

PARTICIPATION with food business operators to improve their understanding works better than PRESCRIPTIVE measures against non-compliance

Applying prescriptive measures alone may stimulate an immediate compliance response but fail to develop the same understanding and therefore there is little lasting benefit.

4.5. Key components for organisation of official control systems



Figure 4. Organisation of official controls

5. Appendices

Appendix 1. Codex General Principles of food hygiene

SECTION 1 – OBJECTIVES

1.1 The Codex General Principles of food hygiene:

- identify the essential principles of food hygiene applicable throughout the food chain (including primary production through to the final consumer) to achieve the goal of ensuring that food is safe and suitable for human consumption;
- recommend an HACCP-based approach as a means to enhance food safety;
- indicate how to implement those principles, and;
- provide a guidance for specific codes that may be needed for sectors of the food chain, processes, or commodities to amplify the hygiene requirements specific to those areas.

SECTION 2 – SCOPE, USE AND DEFINITION

2.1 Scope

2.1.1 The food chain

This document follows the food chain from primary production to the final consumer, setting out the necessary hygiene conditions for producing food that is safe and suitable for consumption. The document provides a base-line structure for other, more specific, codes applicable to particular sectors. Such specific codes and guidelines should be read in conjunction with this document and “Hazard Analysis and Critical Control Point (HACCP) system and guidelines for its application” (Annex).

2.1.2 Roles of governments, industry, and consumers

Governments can consider the contents of this document and decide how best they should encourage the implementation of these General Principles to:

- protect consumers adequately from illness or injury caused by food; policies need to consider the vulnerability of the population, or of different groups within the population;
- provide assurance that food is suitable for human consumption;
- maintain confidence in internationally traded food; and
- provide health education programmes that effectively communicate the principles of food hygiene to industry and consumers.

Industry should apply the hygienic practices set out in this document to:

- provide food that is safe and suitable for consumption;
- ensure that consumers have clear and easily-understood information, by way
- of labelling and other appropriate means, to enable them to protect their food
- from contamination and growth/survival of foodborne pathogens by storing,
- handling and preparing it correctly; and
- maintain confidence in internationally traded food.

Consumers should recognize their role by following relevant instructions and applying appropriate food hygiene measures.

Appendix 2. Reference documents

1. Regulation (EC) No 882/2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2004R0882:20060525:EN:PDF>
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<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:226:0083:0127:EN:PDF>
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7. European Commission Guidance Document on certain key questions related to import requirements and the new rules on food hygiene and on official food controls
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18. WHO Improved coordination and harmonisation of national food safety control services,
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19. FAO, 2007, Conference: Bridging the gap between food safety policies and implementation
<ftp://ftp.fao.org/docrep/fao/meeting/012/k0924e.pdf>
20. WHO Food Safety and Nutrition Food Law Guidelines
http://www.afro.who.int/index.php?option=com_docman&task=doc_download&gid=1722
21. FAO, 2006 Strengthening national food control systems. Quick guide
<ftp://ftp.fao.org/docrep/fao/010/a1142e/a1142e00.pdf>
22. Danilo Lo Fo Wong, Defining the responsibilities of stakeholders within a national strategy for food safety and control. Technical University of Denmark
http://www.cfs.gov.hk/tc_chi/whatsnew/whatsnew_act/files/Presentation/11%20-%20Danilo%20LO%20FO%20WONG.pdf
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24. European Commission, White Paper on Food Safety, 2000
http://ec.europa.eu/food/food/index_en.htm
25. Regulation (EC) No 852/2004 on the hygiene of foodstuffs
<http://eur-lex.europa.eu/>
26. WHO Fact Sheet 8, Developing national food safety policies and legislation
<http://www.afro.who.int/en/clusters-a-programmes/hpr/food-safety-and-nutrition-fan.html>
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Handbook Topics

- 1 Food Safety System
- 2 Regulations and Standards
- 3 Risk Assessment
- 4 Training Methods
- 5 Risk Communication
- 6 Self-Assessment Systems
- 7 Traceability and Labelling
- 8 Management of Laboratories
- 9 Procedures
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EDES is funded by the European Union

Printed on FSC-certified paper
with environmentally friendly
solvent-free inks.
Publication date: September 2012

