



RÉPUBLIQUE FRANÇAISE

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# Food and beverage management

## Hazard Analysis and Critical Control Point (HACCP) in the EU from the French experience



# Some history ...

HACCP is a science based and systematic approach aimed at identification, evaluation and control to ensure the safety of food.

1993 → First mention of HACCP in the UE regulation (Dir. 93/43/CE) « New Approach »

Ten years later ...

2004 (01/01/2006) → European Food law, Art.5  
Reg. 852/2004

## Hazard analysis and critical control points

1. Food business operators shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles.



# Some history ...

In UE, HACCP is compulsory, it is NOT an option !

A producer can not prevail of the application of HACCP procedure, as it is compulsory.

Community legislation does not contain a requirement for HACCP procedures to be certified e.g. under quality assurance schemes. Any initiative to proceed to such certification emanates from private initiatives.

The only assessment that is provided for under Community law is an assessment by the competent authorities in the Member States in the context of their normal official control duties.

The official approval (when required : aquatic, meat and dairy products) is enough to certify that the producer applies an HACCP procedures, and it has been validated officially.

FR

89.123.456

CE

Approval  
number





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# The balance of the first ten years of HACCP implementation (1993-2004)...

10 first years assesment had demonstrated (2004) :

- ➔ The need for Food Business Operators (FBO) to engage more into the procedure, and to provide guidelines and tools for small business.
- ➔ The need for official controls to be harmonized, with a single procedure and appropriate training of inspectors.

10 years later (2014) : the goals have been reached but the system need to be continuously improved



# The Food Business Operators Obligations (1/2)

Who is concerned ?

Food business operators shall ensure that all stages of production, processing and distribution of food under their control satisfy the relevant hygiene requirements

All products (but primary production, Annex I 852/2004)



# The Food Business Operators Obligations (2/2)

*Article 5. 852/2004*

## **Hazard analysis and critical control points**

1. Food business operators shall put in place, implement and maintain permanent procedures based on the HACCP principles.

➔ French Approach : Food Safety Control Plan (FSCP)





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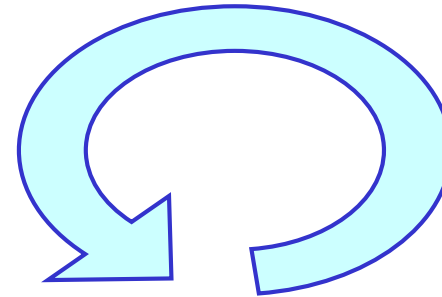
The **food safety control plan (FSCP)** describes the measures taken by the operators to ensure the safety of their production towards biological, physical and chemical dangers.

It contains the necessary implementation elements and the evidence of this implementation :

**Traceability  
withdrawal-recall  
procedures**

**HACCP**

**Good hygiene practice  
and prerequisite**



**Inspection  
and authorization  
of the establishments**



# 食品安全風險管理體系(FSCP) (2/3 )

由企業(生產、加工、銷售等)制定的關於保障食品安全的整體措施

可追溯性 &  
不合格產品的管理

**HACCP**

**SSOP**

**GMP**

對風險管理措施有效性的  
確認、監督與驗證

內部監控體系







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# Food safety control plan (FSCP) (3/3 )

Art. 18 & 19 Reg. 178/2002

**Traceability  
with withdrawal-recall  
procedures**

Art 5 Reg. 852/2004 + Section II  
Annex II Reg. 853/2004

**HACCP**

Art 4. Reg. 852/2004 + Annex II Reg.  
852/2004

**Good hygiene practice  
and prerequisite**

Importance of the Prerequisite : if not present, the pyramid will fall down !



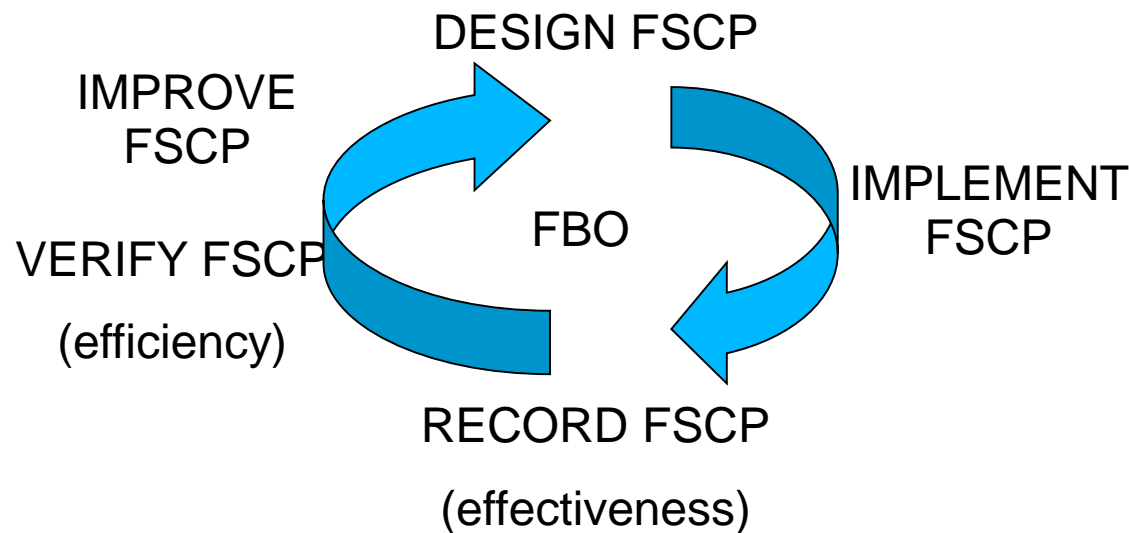


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# The Food Business Operators responsibilities (1/3)

- UE regulation assign general targets (high level of food safety). It is the FBO's responsibility to design it's own organization system to ensure those targets are achieved.
- ➔ primary responsibility for food safety rests with the food business operator





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# The Food Business Operators responsibilities (2/3)

Legal responsibility :

A food business operator is best placed to devise a safe system for supplying food and ensuring that the food it supplies is safe; thus, it should have primary legal responsibility for ensuring food safety. (Whereas 30, Reg. 178/2002)





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# The Food Business Operators responsibilities (3/3)

*Article 17 reg. 178/2002*

## Responsibilities

1. Food operators at all stages of production, processing and distribution **shall ensure** that foods or feeds satisfy the requirements of food law which are relevant to their activities and **shall verify** that such requirements are met.
- ➔ The FBO shall have **validated** a system to control the food safety (the Food safety control plan), and he must demonstrate this system is **effective** and **efficient**





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# The Food Business Operators responsibilities : records keeping (1/2)

- UE recommendation in the Guide line for HACCP implementation :  
[http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidance\\_doc\\_haccp\\_en.pdf](http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidance_doc_haccp_en.pdf)
- FR regulation :
  - 1) Generic documentation :
    - 5 years
    - if « best before date » > 5 years → BB date + 6 months
    - If « use by date » < 3 months → production / delivery date + 6 months





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# The Food Business Operators responsabilities : records keeping (2/2)

Record-keeping for documentation specifically related to FSCP verification = 3 years:

- Results of microbiological or chemical tests
- Records of Non-conformity for CCP / PoPR (and corrective measures / actions)
- Record of non-complying internal audit
- Record of non satisfactory microbiological survey of cleaning / disinfection program
- Clients' complaints for sanitary reasons ...



# Organization of the Official controls of FSCP (1/5)

‘official control’ means any form of control that the competent authority or the Community performs for the verification of **compliance with food law** (Art 2. Reg. 882/2004)

The inspection of FSCP is made of two distinct sequences:

- 1) The verification of conformity to regulatory requirements (« Hardware inspection » : facilities, equipment, presence of a FSCP with procedure according to the HACCP principles, ...)



# Organization of the Official controls of FSCP (2/5)

## 2) The audit of the FSCP (« Software inspection » : efficiency of the FSCP)

Art. 10 2d Reg. 882/2004 :

Official controls on food shall include an assessment of procedures on good manufacturing practices (GMP), good hygiene practices (GHP), and HACCP, taking into account the use of guides established in accordance with Community legislation





# Organization of the Official controls of FSCP(3/5)

During the inspection the following points must be verified :

- The FSCP is made of all the procedures required by the UE regulation (HACCP, cleaning and disinfection plan, sanitation plan, ...)
- ➔ In order to harmonized the inspection, a check list has been validated at national level.
- The FBO provides documentation the support its FSCP (justification of the choice of hazards and of the appropriate control measures)
- The FBO implements its FSCP ➔ Audit



# Organization of the Official controls of FSCP(4/5)

What documentation FBO can provide to support its FSCP ?

- **Validated Guides to good practice for food hygiene and for application of HACCP principles**

usually a combination of Good Hygienic Practices (GHP) and HACCP-based elements, and include for example:

Guidelines for the practical implementation of the prerequisite requirements, A hazard analysis, Pre-determined critical control points and specific control requirements, The need for documentation and records, Protocols for the validation of use-by dates.

# Organization of the Official controls of FSCP (5/5)

What documentation FBO can provide to support its FSCP ?

- Some technical professional institutes provides Guide-lines of Generic guides to the implementation of the HACCP system to the FBO of their specific industry (restaurants, bakeries, ...)
- ANSES (French food safety risk assesment auhority) provides also documentation as « microbiological food safety hazard fact-sheets ».





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# The inspection of the procedures based on HACCP principles (1/6)

Training for inspectors is critical, as it is absolutely necessary for inspector to perfectly understand the difference between PRP (prerequisite program), OPRP (operational prerequisite program ) and CCP (Critical control point)

➔ Since 2006, each new food safety inspector must receive a specific training on HACCP and FSP inspection

➔ Network of experts at regional level





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# The inspection of the procedures based on HACCP principles (2/6)

Inspectors must verify that for each CCP a critical limit has been determined (while it is not always the case for OPRP)

CCP must be monitored on a permanent basis continuously or not continuously), while OPRP are monitored on a regular basis but not necessary permanently

Non conformity to CCP triggers systematically corrective measures on the product, which is not necessary the case for OPRP.

When GHP (PRP) are identified as control measures, they must be documented (records, regular survey, record of corrective actions, ...) EX : cold-chain maintenance

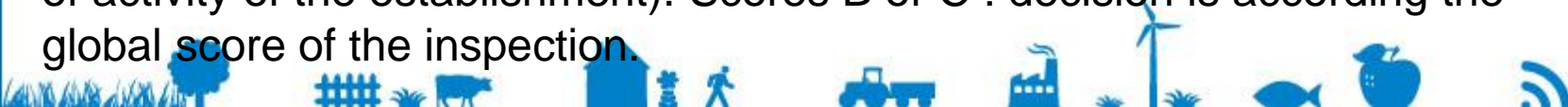


# The inspection of the procedures based on HACCP principles (3/6)

## The National HCCP inspection guide-line

- Established for the first time in 2006, by a group of experts from Central administration (policy makers), field food safety inspectors, scholars, scientific from the food safety risk assessment agency. Regular up-dates since then (last in 2013)
- Guide line organized by items. For each one description of :
  - What is expected from the FBO (according the regulation and illustrated by-real life examples)
  - What the inspector as to verify (methodology of verification)
  - How to score the result

Scores are given from A to D (A the best). A score D is a major non conformity, that may lead to emergency measures (including the suspension of activity of the establishment). Scores B or C : decision is according the global score of the inspection.



# The inspection of the procedures based on HACCP principles (4/6)

Guide line for inspection of procedures based on HACCP principles :

2 parts :

Items « G » : during this inspection, the inspector verify the presence of the procedures and that adapted record-keeping documents are existing.

Inspector do not verify the application of the procedure, nor the records.







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# The inspection of the procedures based on HACCP principles (5/6)

Items « G » :

- Hazard analysis
- Identification of critical points (including OPRP, CCP)
- Critical limits (CCP) / Targets (OPRP)
- Monitoring and verification procedures for CCP and OPRP
- Correctives measures and actions
- Revision procedure of FSCP







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# The inspection of the procedures based on HACCP principles (6/6)

- 2) Items « E » : verification of the effective implementation of the planned procedures and of the records. Must be performed on-site.
- Application of products description and flow-chart of process
  - Monitoring of CCP / OPRP and implementation of corrective actions and measures
  - Effectivity of verification procedures (including self-controls)
  - Efficiency of verification procedures



# Flexibility of the HACCP principles

## (1/3)

The concept allows HACCP principles to be implemented with the required flexibility in all cases, particularly in small food businesses.

*“In particular, it is necessary to recognize that, in certain food businesses, it is not possible to identify critical control points and that, in some cases, good hygienic practices can replace the monitoring of critical points. Similarly, the requirement of establishing ‘critical limits’ does not imply that it is necessary to fix a numerical limit in every case. In addition, the requirement of retaining documents needs to be flexible in order to avoid undue burdens for very small businesses.”*

The need for establishing documentation and records must be **commensurate to the nature and the size of the food business**. (5 2 g Reg 852/2004)

Article 5(5) of the Regulation that allows the adoption of arrangements to facilitate the implementation of the HACCP requirement by certain food business operators. These include the use of **guides for the application of HACCP principles**.





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# Flexibility of the HACCP principles (2/3)

When there is no **preparation, manufacturing or processing of food**, all hazards may be controlled through the implementation of the prerequisite requirements.

➔ it can be considered that the first step of the HACCP procedure (hazard analysis) has been performed and that there is no further need to develop and implement the other HACCP principles.

Example : market stalls and mobile sales vehicles, bars, coffee shops, small retail shops, the transport and storage of pre-packed food or non perishable food...





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# Flexibility of the HACCP principles (3/3)

**It is clear however that it must be ensured that the necessary monitoring and verification (and possibly record keeping) are carried out, for example where the cold chain must be maintained.**

In that event, monitoring of temperatures, and where necessary, checking the proper functioning of the refrigeration equipment are essential.



# UE Guide line for HACCP Implementation :

[http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidance\\_doc\\_haccp\\_en.pdf](http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidance_doc_haccp_en.pdf)

## Merci pour votre attention !

Pour plus d'information :

<http://agriculture.gouv.fr>

ou <http://alimentation.gouv.fr>

