HACCP

Past, Present, and Future

Part 1, Section 1: History of HACCP and FAO Involvement

Jenny Scott Senior Adviser, Office of Food Safety US Food and Drug Administration USA

An Overview



- . What is HACCP?
- II. History
- III. Applications
- v. Objectives
- v. The Seven Principles
- vi. Prerequisite Programs

What is HACCP?

Hazard Analysis and Critical Control Points (HACCP) is a science-based, systematic, and preventive approach to food safety management that addresses the identification, evaluation, and control of biological, chemical, and physical hazards throughout the chain of food production.

History of HACCP

1960s
Pillsbury,
NASA, and
the Natick
Laboratories
use HACCP
for U.S.
space
program

1970s
Regulation
of Low-acid
Canned
Foods

1980searly 90s U.S. National Academy of Sciences, NACMCF recommend HACCP Mid-90s
FSIS
Final rule:
Meat and
poultry;
FDA Final
Rule,
Seafood

1997
CAC adopts
HACCP
System and
Guidelines
for its
Application
(Annex to
CAC/RCP 11969, Rev. 3)

Early to
Mid2000s
EU rules
requiring
HACCP;
FDA Final
rule: Juice

Present

Worldwide
use of
HACCP
throughout
food
industry



Applications

- Basic Agriculture
- Food Processing
- Retail Operations
- Food service/catering
- Street Vendors



Objectives

- ✓ Eliminate or significantly reduce hazards in food
- ✓Prevent/minimize microbial growth & toxin production
- ✓ Control contamination

The Seven Principles of HACCP

- 1. Conduct a hazard analysis.
- 2. Determine the Critical Control Points (CCPs).
- 3. Establish critical limits.
- 4. Establish a system to monitor control of the CCP.
- 5. Establish corrective actions.
- 6. Establish verification procedures.
- 7. Establish recordkeeping procedures.

Prerequisite Programs

Basic environmental and operating conditions needed before applying HACCP, including GHPs

- Sanitary design: equipment/facility
- Personnel hygiene practices
- Sanitation of equipment /facility
- Preventive maintenance
- Training of employees



HACCP Plan

Describe Product

Diagram process flow

				List		
Step	Hazard(s)	Control Measure(s)	CCPs		Corrective Actions	Records

Verification

Part 1, Section 2: History of HACCP and FAO Involvement HACCP In Codex

Verna Carolissen, Codex Secretariat

HACCP in Codex

- General Principles of Food Hygiene adopted in 1969
- ▶ 1980s HACCP approach taken up in different codes of hygienic practice
- No single reference for HACCP
- ▶ 1984 CCEXEC requested CCFH to address this:
 - How to introduce HACCP approach in different COHPs

Development of HACCP Principles and Guidance

- In 90s CCFH discussed different approaches:
 - Single statement / guidance
- Developed principles and definitions
- Adopted in 1993 Annex to RCP1

HACCP Revisions

- Continued discussions on implementation in small and/or less developed businesses
- Agreed that HACCP principles were applicable to all businesses including SMLD businesses
- HACCP Principles should remain untouched but to add limited text to certain parts to provide flexibility (adopted 2003)
- Now new work to update RCP1 (including HACCP annex)

Use of Codex RCP1 (Including HACCP Annex)

- Survey on use of Codex standards in different regions showed:
 - RCP1 and its HACCP annex is widely used by 60% of respondents in 4 regions (to date)
 - Of which approximately 90% have their national legislation aligned with RCP1 and 60% aligned with HACCP
 - Indicates the importance placed on this text and that care should be taken in the update of the text to avoid discrepancy / added burden to harmonize legislation

Issues

- Showing clearer link with main body of RCP1
- Retain the current HACCP principles
- How to reflect new developments
- Difficulties experienced by small and/or less developed businesses

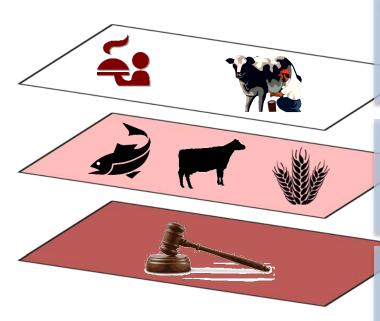
CCFH needs to carefully consider the update of RCP 1 and its HACCP annex (implications for other Codex texts / national legislation) can we address all the concerns for SLDB or should be addressed through capacity development?

Part 1, Section 3: History of HACCP and FAO Involvement Adopting and Implementing the GPFH/HACCP: How FAO provides support to countries

Sarah Cahill, FAO



Adoption of GHP/HACCP in Developing countries



Weak adoption by food businesses (domestic market)

Varied levels of adoption for food sectors

Some adoption into general food legislation

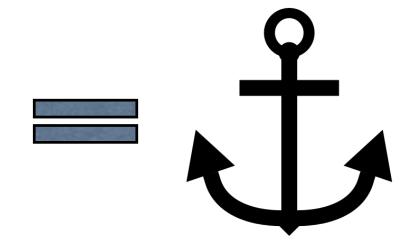
The Codex GPFH/HACCP Enable Us to Speak a Common Language

GENERAL PRINCIPLES OF FOOD HYGIENE CAC/RCP 1-1969

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APPLI	3500110.	
	CATION	



Having a Common Standard Is Key, But ...

Training on GHP and HACCP – one part of the solution



Documentation is a challenge

Lack of/insufficient infrastructure

Lack of food safety policy, riskbased legislation, legislation based on their context

Two examples of success stories

In Zanzibar

- Trainees realised that their food legislation was not adequate
- They have worked with the government to develop a new food safety legislation
- It has been adopted and implementation is ongoing

In Mwanza

- Trainees understood that infrastructure for butchers was inadequate
- Petitioned local government for funds
- Have built new small butcher shops according to GHP

Working With Countries – Building Sustainable Systems



Selection of participants was done together with the relevant ministries

Geographic representation was ensured

Important value chains considered (meat, cashew, maize, fruit & veg)

The FAO team visited each of the organizations for which the participants work

Tanzania Food Safety Team Members: Collaborating Since 2010 with a Common Goal



Food safety is part of their day-to-day jobs

They shared their training knowledge with their work colleagues

Organizations committed to have their staff participate

Working With FAO = Reporting To Us

Practical Training Logbook

Non-Meat Value Chain Group (T2)
Training of Trainers (TOT) project on 'Food Hygiene
and Quality Assurance' in Tanzania

The purpose of the Practical Training Logbook is to

- provide participants in the training programme with a template to record the food safety activities that were undertaken after the Workshop in Dar-es-Salaam from 7 – 15 May 2012;
- help each participant to show how she/he has used the knowledge gained from the last workshop; and,

to enable the FAO and the National Food Safety Task Force to assess the impact of the training and to identify areas for improvement.

It is important that you clearly understand the learning objectives that you are expected to achieve during your practical training and set out your own programme for achieving them.

Your planning should involve your supervisor at the institution you work for.

Completion of the Logbook is an important step towards attaining a certificate to confirm successful and satisfactory completion of the training programme. Guidance on how to complete the Logbook can be found on Page 4.

If you need any further information or guidance, please contact: (T1: patrick.otto@fao.org, for T2: cornelia.boesch@fao.org).

[Please complete the following table]

Personal Details		
Name:		
MRS-SCOLLA J.	MARCUS	
Employer's Na	me	
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Tel No: 0715-5	20641/0769231034	
Tel No: 0715-5	20641/0769231034	
lob Title	120641/0769231034 TRITION OFFICER	

Total Number of farms/food businesses advised or visited in the last 9 months (since the workshop): 15 food businesses were advised

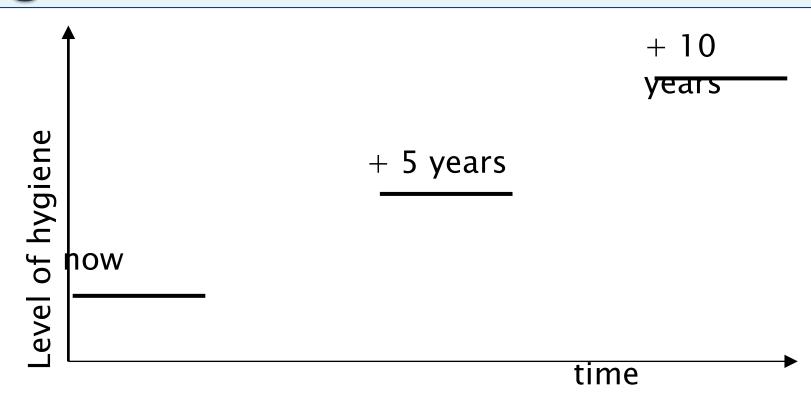
Submitting logbook for review

Receiving feedback from training team/colleagues

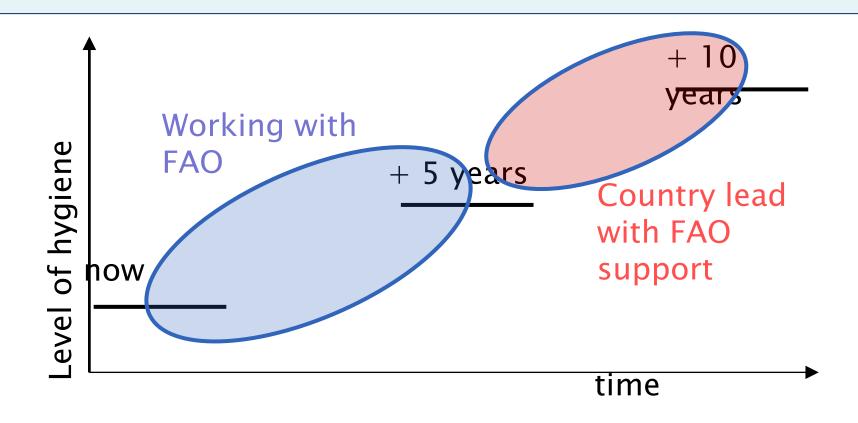
Interacting with their colleagues – WhatsApp



Considering Their Reality: Change Will Take Time



Working Over a Longer Period of Time



FAO Is Building A Webpage Good Hygiene Practices (GHP) Toolbox



Closely follows Codex GPFH/HACCP

Based on FAO training experiences

Materials available for download

Three (3) Sections Each With a Number of Modules



Foundation: putting food safety into context

Applying GHP

The modules of this section provide practical guidance on how to implement and manage Good Hygiene Practices (GHP) in food businesses. The modules cover areas of concern that are outlined in the Codex General Principles of Food Hyoiene and illustrate the relevance of its provisions.





Applying GHP



HACCE

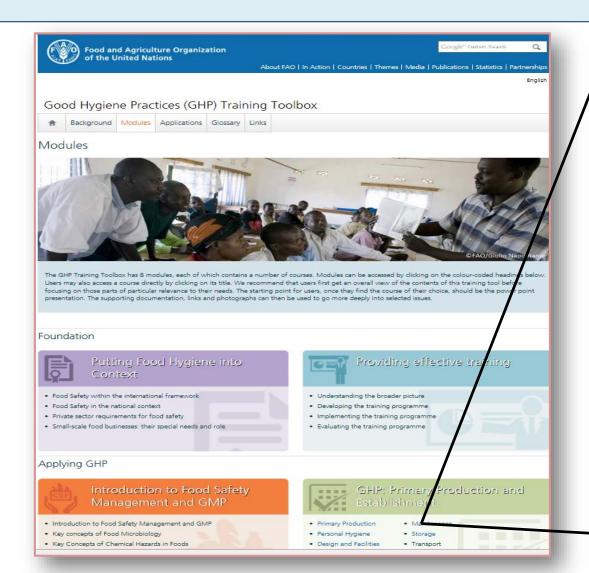
This section introduces HACCP as the preventative system to control food safety in a food operation. The modules of this section explain how HACCP can be applied and are aimed at trainers with a solid understanding of GHP.

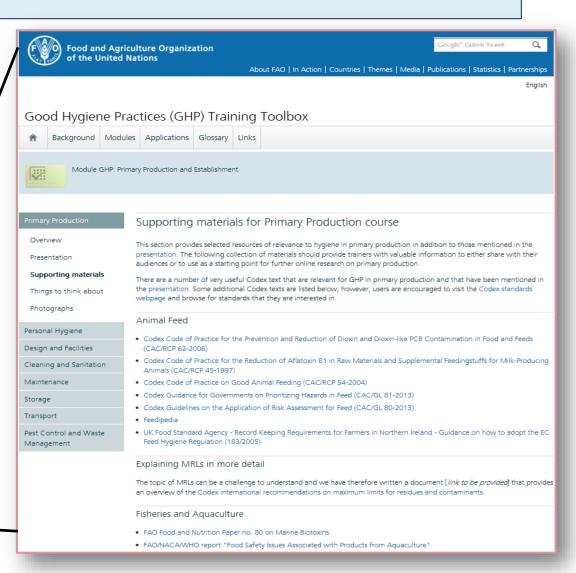




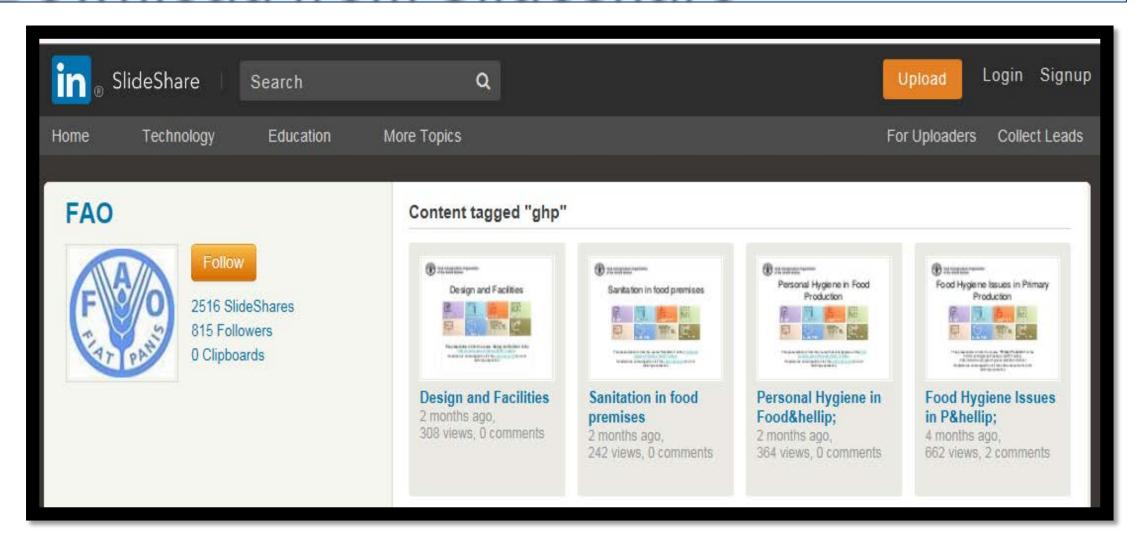
Applying HACCP

Each Module Contains Courses





GHP Toolbox Slides are Available for Download from Slideshare



We Are Working on Getting Our Materials Out There

January 2017 going live for webpage

http://www.slideshare.net/FAOoftheUN/tag/ghp

Questions: Food-quality@fao.org



Part 2, Section 1: HACCP - The Road Ahead Issues Raised at the Finland Meeting June 2014

Jenny Scott Senior Adviser, Office of Food Safety US Food and Drug Administration USA

Reason for the Colloquium

- Colloquium held in Majvik, Finland held 4-6 June 2014
- Proposed by Finland at the 45th Session of CCFH in Hanoi, Viet Nam (2013)
- Need to update the *General Principles of Food Hygiene* (CAC/RCP 1-1969), and especially its Annex on HACCP, in light of implementation experience and other ongoing initiatives
 - Need to retain usefulness and relevance
 - Need to clarify, provide more guidance

Issues

- Consistent understanding and practical implementation of some aspects of HACCP have proven to be difficult
- Especially true for small and less developed businesses (SLDBs), as well as for developing countries, which often lack access to appropriate technical assistance in the practical application of all the principles

Conclusions of Majvik Colloquium

- Need to clarify the relationship of GHPs and HACCP in light of commonality of many activities to both, e.g., verification, corrective action, documentation.
- Hazard analysis should precede determining whether hazards are addressed within GHP or as HACCP CCPs.

Conclusions of Majvik Colloquium

- More guidance is needed on how to conduct a hazard analysis.
- 4. More focus is needed on chemical hazards(e.g., food allergens) and physical hazards.
- More guidance is needed on CCP determination, defining critical limits, corrective actions (e.g., preventive actions for reoccurrence).

Conclusions of Majvik Colloquium

- 6. Need to more clearly distinguish validation from verification.
- 7. Figures need to be more "user-friendly."
- 8. Consider including examples rather than empty tables to clarify expectations for what is expected in a HACCP plan.

Overall Conclusion

- The current HACCP text is essentially adequate and is well accepted internationally.
- The seven principles of HACCP should remain intact, as they are widely recognized and well established.
- Full support to better clarify the relationship between the General Principles of Food Hygiene and HACCP by restructuring and supplementing the existing HACCP guidance text where necessary.

Key Recommendations to CCFH

- Review the GPFH and its HACCP annex in terms of providing more guidance for many of the key parts of the current HACCP text.
- Consider an approach that clarifies the relationship between GHPs and HACCP as part of a Food Safety Management System (FSMS).

Key Recommendations to CCFH

Consider the amount and nature of guidance proposed for many aspects of the current HACCP texts, mechanisms to better disseminate guidance, and successful approaches implementing the current HACCP texts to promote consistency of application across the food chain, user-friendliness and proportionality to size of business.



Part 2, Section 2: HACCP - The Road Ahead Issues Raised by the First CCFH electronic Working Group

Louise Dangy, France

Following up on the Finland meeting

- ▶ Worldwide use of the HACCP system as described in CAC/RCP 1-1969
- Nevertheless, some issues need to be clarified:
 - The relation between the 2 parts (GHPs and HACCP)
 - Some HACCP Principles are horizontal in nature (not specific to the implementation of the HACCP part)
 - Diverging interpretations of some concepts: *validation vs. verification, condition of food* in the definition of « hazard », etc.
 - The scope: is primary production involved? What about the management of quality?

Following up on the Finland meeting

- Some gaps have been identified:
 - The need to elaborate guidance to allow for a better implementation of the hazard analysis
 - Additional guidance could help actors to elaborate critical limits for validation
 - The need to take into account non-microbiological hazards
 - Specificity of emerging hazards (mycotoxins, bioterrorism)
- Efforts should be made to actively imply all stakeholders:
 - Respective function of competent authorities and food business operators
 - Flexibility for innovative businesses
 - Specificity of emerging & developing countries
 - Improve the tool by making it more user-friendly

Initiating the revision of CAC/RCP 1-1969

- CCFH 46 agreed to undertake the revision of GPFH and its HACCP Annex
- Objectives:
 - Provide further guidance for the implementation of the HACCP system
 - Encompass all types of businesses/hazards
 - Improve the redaction to be more user-friendly
- Requirement: keeping unchanged the definition of CCP and the seven pinciples of HACCP

Initiating the revision of CAC/RCP 1-1969

- CCFH 46 established an eWG:
 - Led by France and Thailand & working in English
 - Terms of reference:
 - Review the General Principles of Food Hygiene (GPFH) and identify any need for updating (e.g. clarification on the use of potable water vs clean water);
 - Review its Annex on HACCP and recommend updates, as necessary;
 - In doing so, consideration should be given to the appropriateness and possibility of combining the GPFH and its HACCP Annex into one document;
 - In addition, to look at current food hygiene texts (e.g. the validation, micro-criteria, MRM documents) and their relationship to the above, and recommend appropriate references to relevant adopted texts.
- ▶ First year of work: prepare, if appropriate, the revision of CAC/RCP 1–1969

The First Round of the Revision Process: The Achievements

- Worldwide interest and involvement:
 - 30 Codex MS, 1 Codex member intergovernmental organization,
 8 Codex observer organizations
- Agreement between CCFH members:
 - To undertake the revision of GPFH & HACCP
 - To reorganize the document: One general introduction (encompassing horizontal aspects), Part I- GPFH, Part II-HACCP
 - To begin with the revision of the General introduction (i.e. to focus on definitions and concepts common to both parts)
 - In recognizing that the management of certain CCPs can be challenging

The First Round of the Revision Process: The Pending Issues

- Some technical questions were pointed out:
 - Significance of « clean water » => FAO assistance required
 - Meaning of the words « condition of food » (hazard definition)
 - Relevance of the HACCP system for primary production
- Discussion on the timely application of the HACCP system:
 - Is it always possible to implement a sequential process while in FBOs, GHPs and HACCP take place at the same time?
 - Need to have a first HA, then consider the implementation of GPFH, and address a short list of relevant hazards when elaborating HACCP.
- Need to examine existing concepts:
 - · Corrective actions, critical limits, validation vs. Verification

Where are we now?

- CCFH 47 initiated the actual revision in November 2015
- An innovative eWG was established to that goal:
 - Working in English, Spanish and French and active through the Codex eplatform
 - Co-chaired by Chile, France, Ghana, India and the United States of America
- The co-chairs elaborated and distributed a proposal submitted for comments in June 2016
- Wide participation: 35 Codex members, one Member organization, and 8 Observer Organizations
- Focus on the General Introduction (definition and concepts)

Part 3: Implementing HACCP in Small Business: A Developing Country Perspective

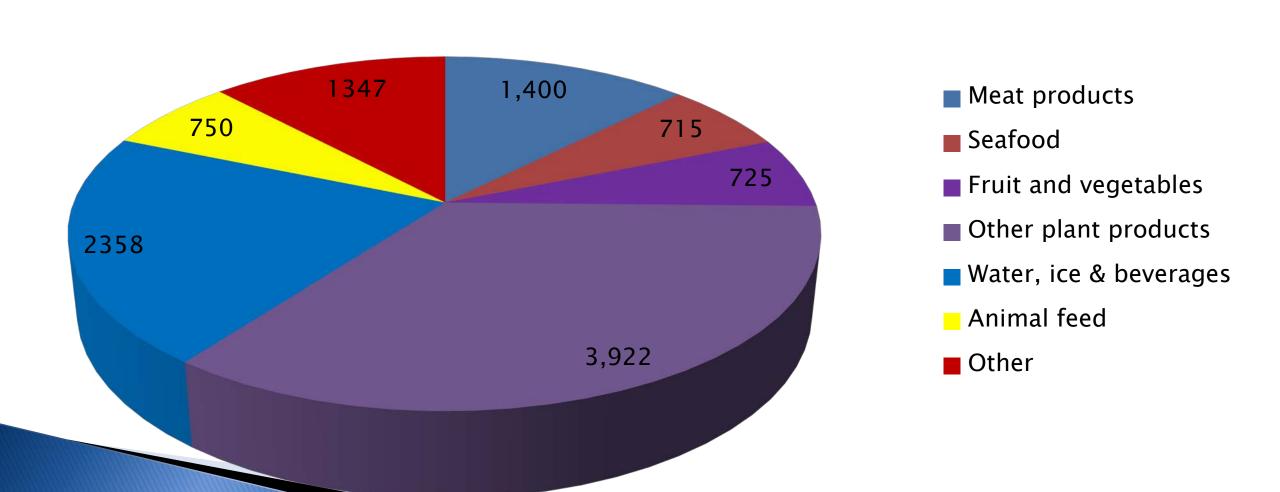
Pisan Pongsapitch and Food Standards.

National Bureau of Agricultural Commodity and Food Standards,
Ministry of Agriculture and Cooperatives,
Thailand

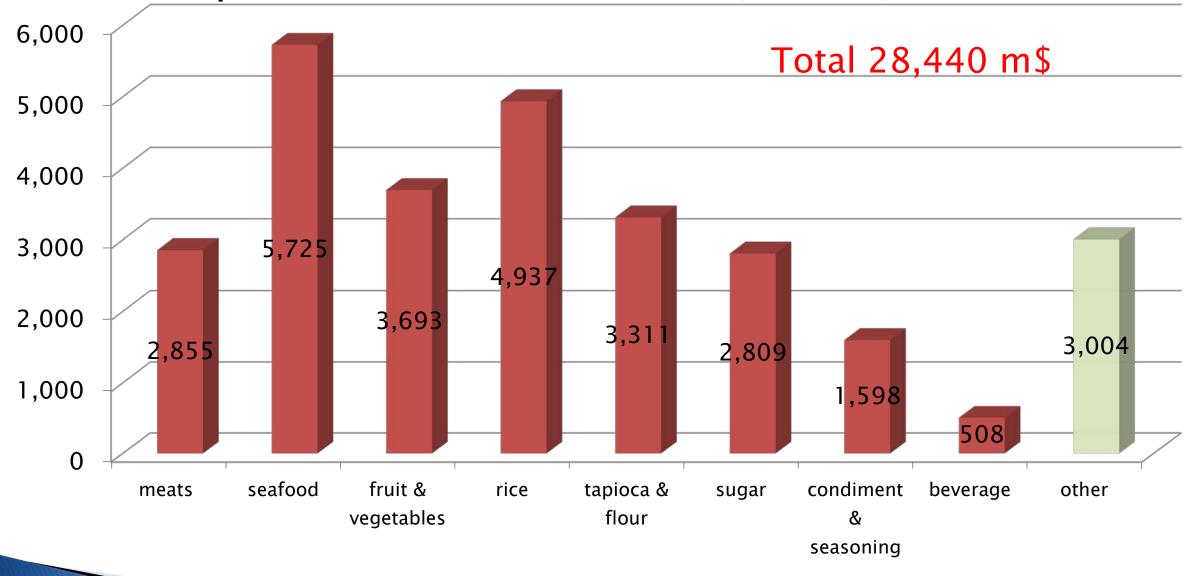
Number of Thai Food Producers and Processors

- Food & drink industries: 10,500
- Rice mills: 38,500
- ▶ Feed industries: 750
- SMEs not categorized as industry: several thousands
- Farms: 6.5 Million

Number of Food & Feed Industries



Export Value of Thai foods in 2015 (million \$)



Thai GHP/HACCP Regulation: Mandatory

- Basic Good Hygienic Practice (modified from General Principles of Food Hygiene; RCP1) is a mandatory standard for most of food industries in Thailand
 - 1. Establishment
 - 2. Equipment
 - 3. Control of operations
 - 4. Sanitation
 - 5. Maintenance and cleaning
 - 6. Personnel and personal hygiene
- Enforced by Thai FDA

Thai GHP Regulation: Mandatory

Required for processing of 54 types of foods such as:

- Infant formula
- Dairy products
- Canned foods
- Frozen foods
- Meat products

- Beverages
- Tea, coffee
- Fish sauce, seasoning
- Chocolate, jam, jelly, marmalade
- Confectionary

Thai GHP/HACCP Standard: Voluntary

Codex GHP and HACCP (General Principles of Food Hygiene and its HACCP Annex; CAC/RCP1) is largely used for larger sized food business operators, specifically those manufactured products for export.

Codex GHP & HACCP

- Codex GHP and HACCP is translated to Thai
- Adopted identically to Thai standards
 - Thai Agricultural Standard (TAS): Code of Practice
 General Principles of Food Hygiene (TAS 9023 2007)
 - Thai Agricultural Standard (TAS): Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for Its Application (TAS9024-2007)
- Voluntary basis (implementation and certification)

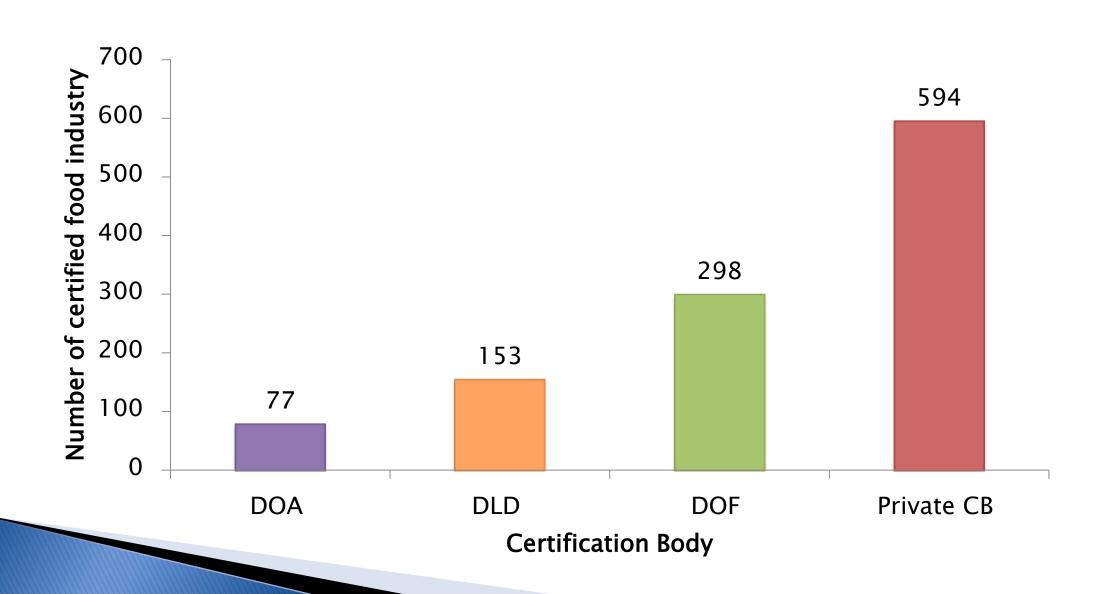
Start of HACCP at International Level

- ▶ 1988: ICMSF Microorganisms in Foods 4: Application of the HACCP System to Ensure Microbiological Safety and Quality
- ▶ 1993: The first version of Codex Guidelines for the Application of the HACCP System
- ▶ 1993: EU Directive on the Hygiene of Foodstuffs
- ▶ 1995: US Seafood HACCP Regulation
- ▶ 1997: HACCP incorporated as Annex to RCP1
- ▶ 1998: FAO Training Manual on Food Hygiene and the HACCP System
- ▶ 2003: Revision of Codex HACCP Guideline

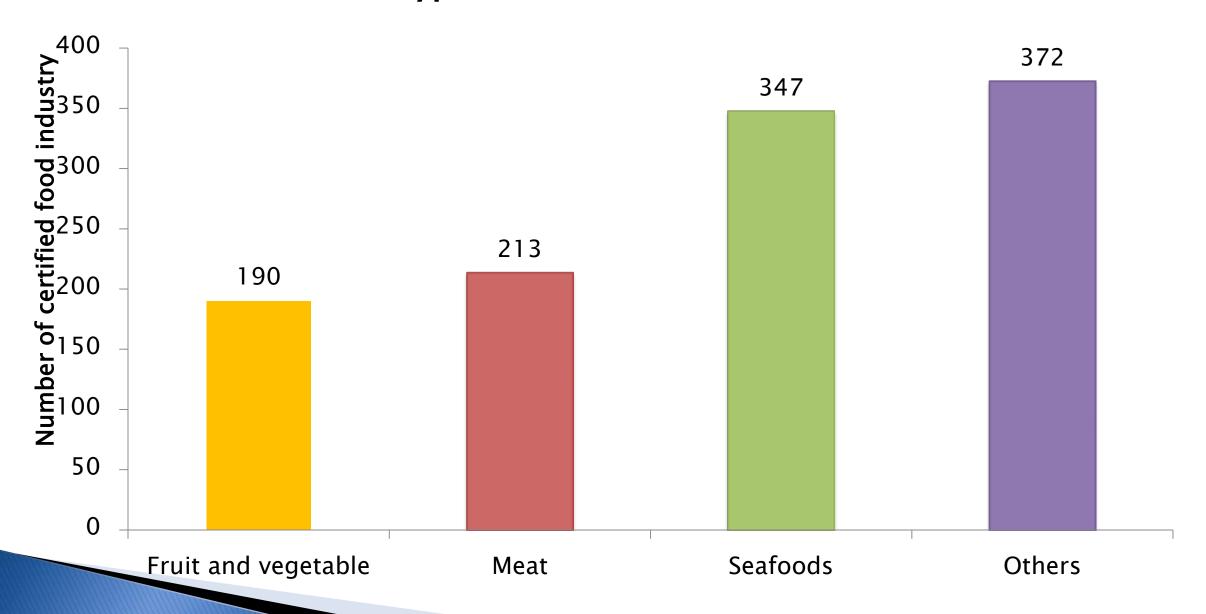
HACCP Implementation in Thailand

- Before 1990: What is HACCP?
- ▶ 1990–1993: HACCP is good <u>but</u> How????
- ▶ 1993-1995: We need to start HACCP!
- 1995: FAO Training-of-Trainers in the Application of HACCP in Thailand
- ▶ 1995-2010: A number of training programmes, training providers (government, private, academics)
 - CBs start HACCP certification programmes
- ▶ 1996-2010: Thousand of food industries got HACCP certification
- 2010-present: Expansion/improvement of HACCP implementation/certification

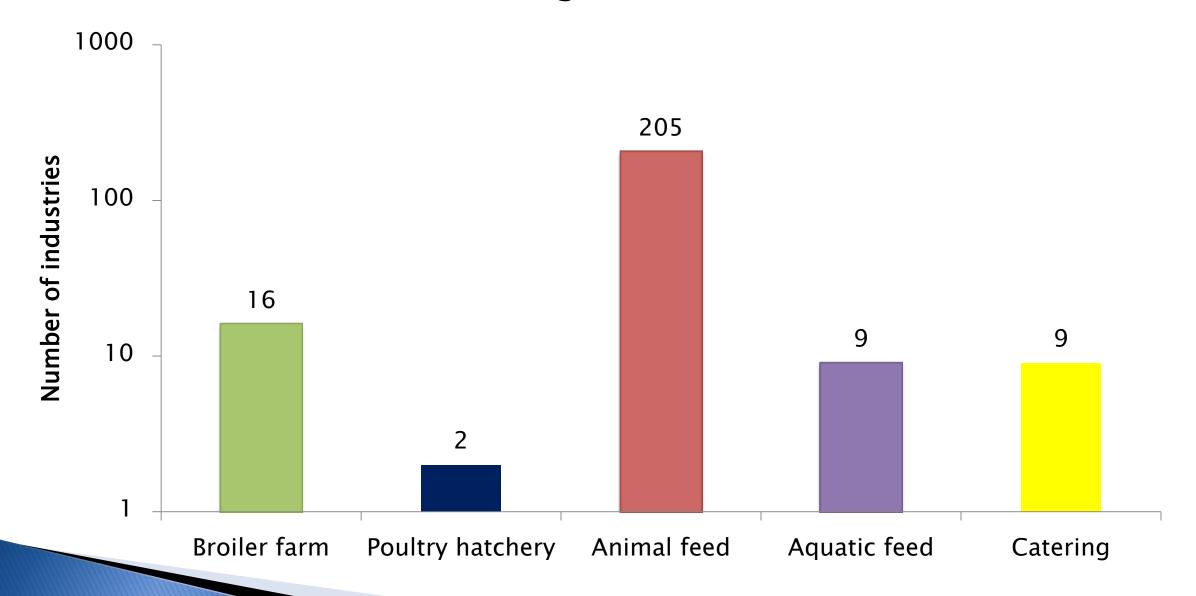
Number of food industries with HACCP certification



Number of different types of businesses with HACCP certification

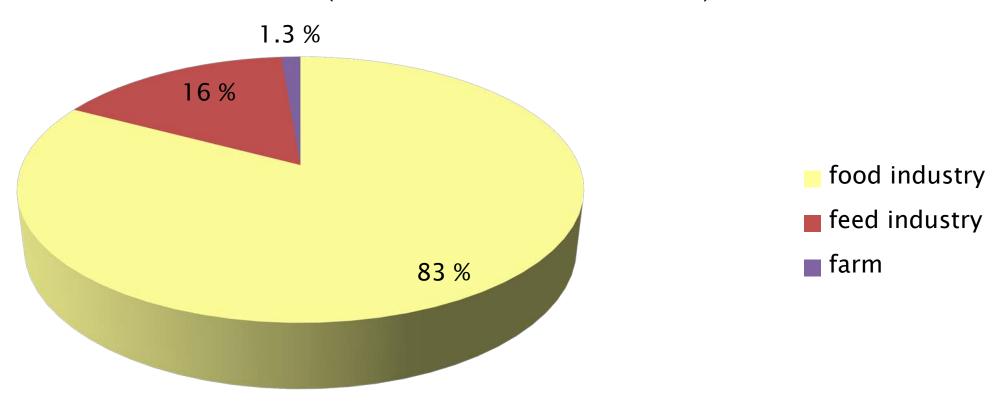


Number of farms /feed /catering industries with HACCP certification



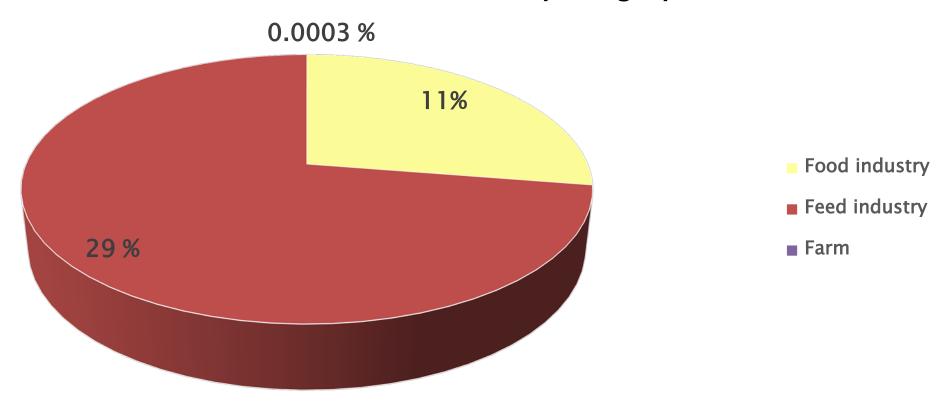
HACCP Certification: Food/Feed/Farm

HACCP certified (% of all certified industries)



HACCP Certification: Food/Feed/Farm

HACCP certified (% of each industry category)



HACCP Certification (continued)

of food business operators (FBO) certified under ISO 9000, ISO 22000 compared with FBO certified under HACCP

Standard	Number of FBO
Codex HACCP	1,122
ISO 9000	128
ISO 22000	7

Certification Bodies

Number of certification bodies (CB)

	СВ		
	Government	Private	
		Accredited	Non accredited
Number of CB	3	9	8

Implementation of HACCP

- ▶ Basic GHP is a starting point --- mandatory standard
- ▶ HACCP under the TAS 9024 --- voluntary
 - 5 Preliminary steps
 - Assemble HACCP team
 - Describe product
 - Identify intended use
 - Construct flow diagram
 - On-site confirmation of flow diagram
 - + 7 Principles
- Codex HACCP is currently well-understood and wellimplemented

After a Few Decades of HACCP Implementation

- GHP/GMP must be a starting point/well established
- HACCP was market driven (export vs. domestic)
- Trainings & Trainings
 - x,xxx FBOs and xx,xxx individuals have been trained (public and in-house courses including xxx inspectors/auditors)
- The understanding has been much improved for both food business operator and certification bodies compared to the first few years
- The adequate of CBs (numbers and quality) including accreditation/recognition system

Challenges

- Most SMEs still find HACCP difficult to apply
 - · Lack of food safety personnel, knowledge, technical information
- Using the HACCP principles in some specific areas outside of food manufacturers, such as:
 - Primary production (e.g. farms, collecting/packing house, fish peeling sheds)
 - Food services (e.g. restaurants, hotels, food catering, retailers)
- * GAP/GMP/GHP may be more appropriate choices
- ▶ A simplified, user-friendly HACCP guideline/guidance for SMEs?
- Integration approach (GMP/HACCP/ISO 9000/ISO 22000/private standards) for large/international FBOs?



Part 4: Implementation/Use of HACCP in Industry



Sara Mortimore Vice President, Product Safety, Quality & Regulatory Affairs Land O'Lakes

Context: Land O'Lakes, Inc. overview

Fortune 500 #215



PRESENCE IN

50 states

60+ countries

10,000 EMPLOYEES

290 U.S. facilities



3rd LARGEST

U.S. member-owned Cooperative

The Land O'Lakes, Inc. Farm to Fork portfolio









Ag services, crop inputs, precision agriculture

Animal nutrition and feed

Dairy foods and ingredients

Sustainability

HACCP in Industries in the United Sates and Other Countries

The HACCP principles are a concept and some useful related tools assist with implementation

- HACCP is used :
 - For both animal and human food safety
 - In large and small companies
 - Through all areas of the supply chain
- ▶ This is a way of thinking and working
- Tools such as worksheets and CCP decision trees are very helpful in the right hands. They are problematic when misunderstood.
- It requires effective education and support efforts

HACCP is best implemented as a program but commonly observed beliefs include:

Having a HACCP Plan = HACCP
Or
Having HACCP = a Food Safety Program

i.e. no real consideration of environmental hazards or continued analysis of new hazards or learning from failures

Seeing a certificate of compliance as the end goal

Product design safety can be a disconnect

- It is critical to understand the product intrinsic safety factors before starting a HACCP study
 - What is making the product safe and what would cause it to be unsafe
- Understanding the role that the consumer plays in food safety has to be taken into consideration
 - Is the product ready to eat versus requiring cooking
 - How might the product be used and abused

In both large and small companies we see opportunities

- Poorly implemented HACCP systems
 - Incomplete process flow diagrams and therefore incomplete hazard analysis
 - Inability to do hazard analysis (needs thoughtful application of scientific knowledge)
 - Lack of time on the plant floor many companies think they know what goes on
 - Lack of transparency up and down the supply chain
 - Validation poorly understood
 - Monitoring and corrective action procedures rarely adequate
- Heavy reliance on prebuilt HACCP program templates
 - Resulting in lack of ownership
- Failure to maintain systems once implemented
 - Lack of a continuous improvement mentality and "prepping for the test"
 - Make changes because auditors/inspectors ask for them

Attention to detail is key to a robust Hazard analysis but can be lacking

- Generalization Hazards
 - Type of pathogen
 - Specific organism where known
 - Resistant forms (e.g. spores, cysts)
 - Toxin producers
 - Vegetative (non spore formers)
 - Hazard manifestation
 - · Presence, Contamination, Survival, Growth
 - Behavior under different conditions
 - Chemical and physical hazards
 - Frequently considered in less detail than Microbiological
- Generalization Control measures
 - "GMPs"
 - Limited thought regarding likely failure modes



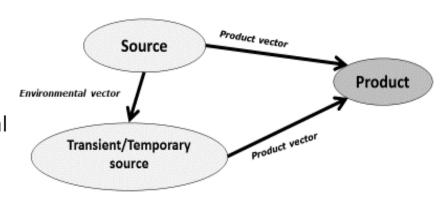
A simple change in thinking can be impactful, including the approach taken to doing hazard analysis

- Twenty years ago many companies had decided on way too many "CCPs" and pulled back perhaps too far
- Using the United States NACMCF Hazard definition* can be helpful in ensuring that practitioners grasp when control measures are truly needed
 - * A biological, chemical, or physical agent in, or condition of, food with the potential to cause an adverse health effect *in the absence of control*

How does industry address key food safety controls that do not fit the HACCP CCP approach very well?

Historically industry has failed to make a systematic connection between HACCP and PRPs

- Required PRPs are rarely determined through systematic application of *environmental* hazard analysis and risk assessment
- Poor plant infrastructure and poor practices = significant environmental hazards
- Using a hazard analysis approach can identify sources and vectors of contamination through the process
 - Highlights where PRP hygiene controls are **essential** for food safety e.g. post pathogen reduction step
 - Using HACCP in this way brings HACCP and PRPs closer together as opposed to them being separate, often unconnected programs



Applied in this way HACCP can help drive organization culture change

Plant operator level comments

"We were introduced to a risk based approach to focus on the **environmental risks** that could adversely affect the finished product rather than just focusing on the product itself."

"This in itself is a big change, in the past the approach was focused on the equipment and the product with a very limited look at the affects of the environment it was processed and packaged in."

Addressing key food safety controls that do not fit the HACCP CCP approach

- Internationally, Operational PRPs can be helpful and are increasingly used
 - ☐ Bring needed attention to programs that would not fit the model for CCPs
 - ☐ But are also an added confusion when we add PCs into the mix within the US
- The approach taken varies considerably: metal detection and allergen control come to mind – some treat those as CCP's, others as OPRPs and for others they are PRPs
- Here in the US, companies are determining whether Preventive Controls (PCs) are needed e.g. for Sanitation
- The best HACCP programs are ones that call out the specific pre-requisites that are controlling hazards and manage them as part of the overall food safety program
 - Do this for all types of hazards
 - ☐ Elevate where these controls are **essential** for food safety

We increasingly recognize that effective food safety management requires a rock solid **interdependency** between HACCP, PRPs and Organization Culture

particularly those environmental hygiene measures that control sources and vectors of contamination. This requires hazard analysis skills too

hazard analysis and confirmation of safe product design and **HACCP** effective critical control **points** in the process Organization **PRPs** Culture

more than
management
responsibility,
this is how ALL
employees think
and behave and
for food safety
behavior this
requires
education and
training

Types of training/assistance provided by larger companies in implementing HACCP and how effective is it?

Typical training/assistance in implementing HACCP

- •Primarily aimed at the HACCP team as opposed to broader senior managers
- •Overview high level HACCP training is conducted **once a year** in most facilities and because it is required
- •Knowledge and skills within HACCP teams is variable in both large and small companies, and in developed and less developed countries
- •Most other employees don't have an in depth understanding of food safety controls
- •Training is frequently conducted by 3rd party and typically unless the trainee has a HACCP Subject Matter Expert at their facility the new trained will struggle to implement the knowledge
- •Training often seen as a one time activity with limited support to educate and support beyond the initial class

Limited oversight of the quality of HACCP education and training certainly contributed to its ineffective use

- Leads to variable standard of HACCP "trainers" and therefore the effective transfer of accurate knowledge
- No common curriculum, with a few exceptions
 - In the US, the Food Safety Preventive Controls Alliance curriculum development was well done
- Lack of training validation
 - Rarely is there evidence of understanding or the ability to apply what was taught
 - The UK does have a long established approach to oversight of curriculum, trainers, training centers, and validation processes
- The result is that inadequately educated people are too often responsible for operating food businesses

Best practice training/assistance in implementing HACCP

- The most successful approaches are to require all HACCP practitioners as well as members of a wider food safety committee to attend a variety of food safety training to include PRPs and more advanced focus on e.g. hazards, risk assessment, validation
- HACCP teams need a network of experts they can reach out to for support, mentorship, and guidance
- Larger companies often develop internal HACCP guidance documents and conduct regular support meetings
- Small and medium sized companies may be best served by committing time for their food safety people to join forums, and best practice share groups to gain mentorship or partnership approach
- The practitioner succeeds best when they have been to a recognized HACCP course and practices what has been learned under expert guidance

In Land O'Lakes, we improved our approach both to HACCP and broader food safety education and it had an impact

- Introductory level workshops
 - 3 days for all Plant Managers, HACCP teams, and all R&D
 - Certified through Royal Society Public Health (UK)
 - In house trainers attached to a third party training center
- Developed Hazard Analysis guidance documents
- Followed by coaching at plant level and platform (e.g. butter) on site meetings, and discussions.
 - Training for hygienic plant behaviors as well as education for why we were making such changes.
 - Senior leadership education for culture change

In 2008 Land O' Lakes HACCP and PRP programs passed all customer inspections as well as third party audits

- Looked pretty good
- Today our systems look VERY different and I fully expect that they will (and should) look very different in another 5 years
- HACCP now being used primarily to reduce food safety risk as opposed to meeting regulatory requirements and passing a customer audit
- We continue to go deep and look for opportunities to do better

Nothing much wrong with HACCP as a set of principles but it needs much more emphasis on it being just one element of an authentic 24/7 more encompassing food safety program used to reduce food safety risk (outcome based), not just to get a certificate of compliance.

A significant amount of training, education and ongoing support is needed to accomplish this.

Thank you

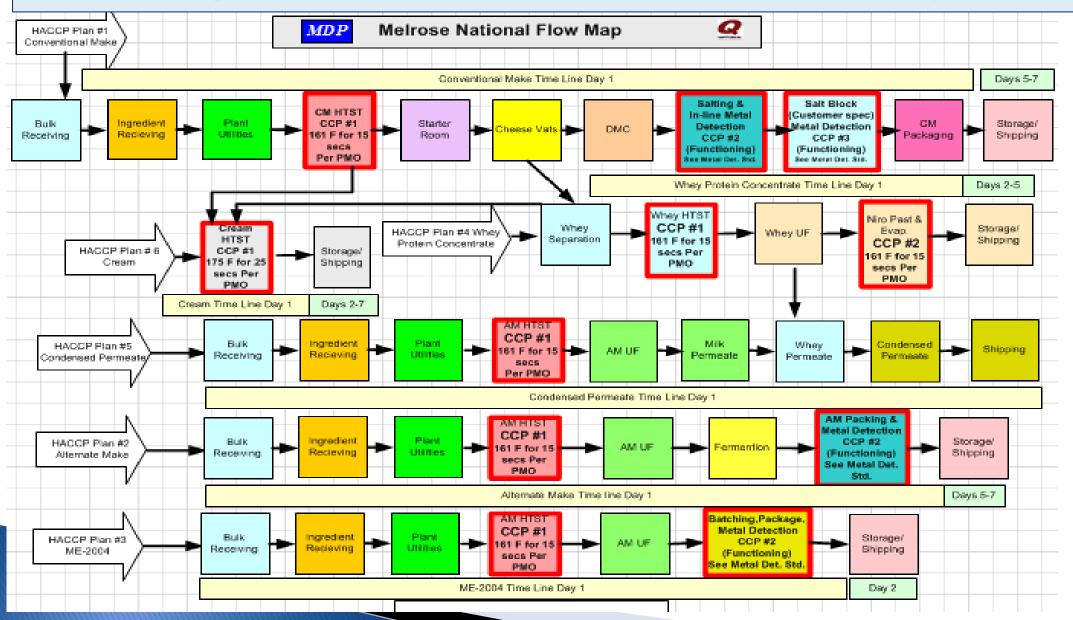


Appendix Process Flow Diagrams

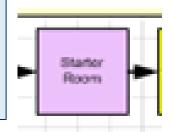
Rethinking the approach taken to process flow diagrams

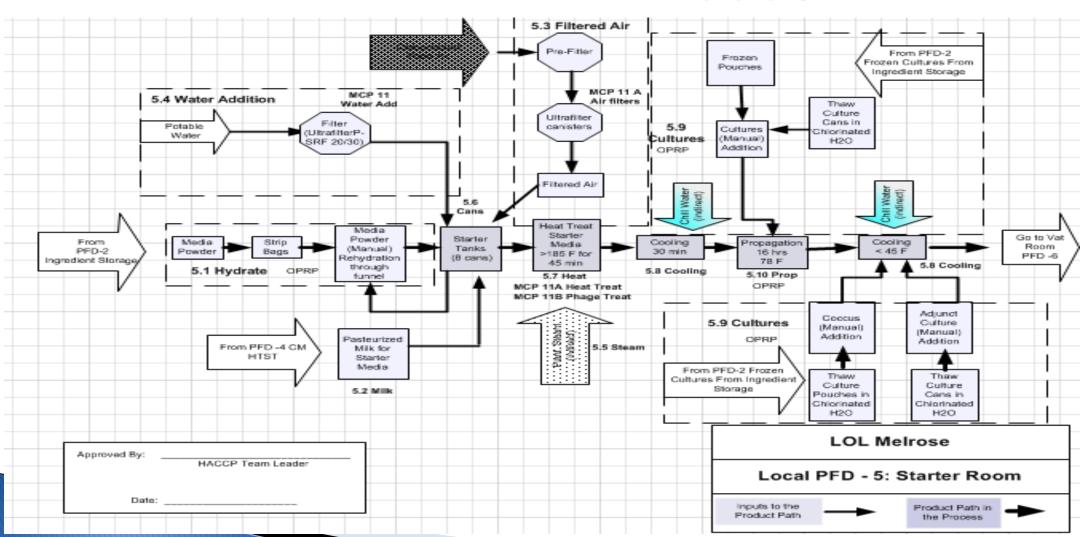
- Process flow diagrams must be painstakingly team reviewed in the plant
 - This can easily be achieved with good quality training
 - Incomplete diagrams = incomplete hazard analysis
- HACCP plans can be extended to include all 'process interventions'
 - This helps to ensure a connection between the operating environment and the process
- "Google earth" approach to process flow mapping used in Land O'lakes

Dairy Foods Flow Chart Example



Dairy Foods Flow Chart Example: Starter Room





Part 5: The Task and Accomplishments to Date of the CCFH eWG



Olivier Cerf, France

In this Draft

- A modest ambition
- An attempt to achieve an agreement on the basics

Mission

- A new document in three parts
 - 1. Introduction including horizontal aspects (common to Good Hygienic Practices and HACCP)
 - 2. Good Hygienic Practices (GHP)
 - 3. HACCP System
- No managerial aspects
- Priority to the clarification of the third part (HACCP)
- Keeping unchanged the CCP concept
- Introduce hazard controls measures at steps that are not CCPs as currently defined

Introduction (1)

- Foreword
- The need to provide consumers with food that is suitable (acceptable for human consumption) and safe (harmless) through a food safety control system
- The prerequisite first phase/component is the implementation of GHPs to achieve a reduction of the contaminant burden
 - Always
- The second phase/component is the implementation of specific measures to control the contaminants that could compromise food safety, the *hazards*
 - When appropriate and feasible

Introduction (2)

- Objectives
- Scope
- Use by governments, food business operators and consumers
- Basic principles for a food safety control system
- Definitions applying within the whole document (Introduction, GHPs and HACCP)
- Definitions specific to the HACCP system

Keeping Unchanged the CCP Concept

- Among potential hazards, the hazard analysis indicates those that are as significant
- Hazard control measures, essential against the significant hazards, are implemented
- The steps where there are applied are deemed *critical*
 - Hence the name "Critical Control Point/CCP"

The Control of a Hazard is Essential (1)

- The application of the control measures must be monitored
- Current Codex monitoring approach
 - A measuring technique is available,
 - The measurement result has to comply with a critical limit that separates acceptability from unacceptability with respect to safety,
 - Non-compliance has to be detected in time to make
 - adjustments to ensure control
- "Real time monitoring"

Measurement
Critical limit
Deviation detected in time

The Issue: What Does Happen When ...







The Control of a Hazard is Essential (2)

- Yet
 - One or more keywords are not applicable
 - No "real time monitoring"
 - The step where the control measure is applied is critical, yet the monitoring does not comply with the current Codex description
- What is it about?
- ▶ ISO 22000 answer:
 - The control measure is called OPRP
 - No name is given to the step

Moving Forward

The revised text should incorporate both types of control measures and their monitoring

At this Committee, it is Suggested to Discuss

- The general introduction
 - Sections 3 to 5 and Principles
- The incorporation in the revised document of the two types of control measures.
 - For the time being we should focus on the concepts, not on the names given to the steps
- The inclusion of the primary production

Thank you