HACCP and Food Hygiene in Small Businesses

Background:

In 1997, the Codex Alimentarius Commission revised the Code of International Practice - General Principles of Food Hygiene to include Guidelines for the application of the Hazard Analysis and Critical Control Point (HACCP) System. This underlined the importance that the international community placed on the incorporation of HACCP principles into industry food safety management programmes to achieve better consumer protection from food borne hazards. While the Commission noted the importance of HACCP-based systems for improving food safety management throughout the food chain, it also noted that some businesses, particularly in developing countries could encounter difficulties in applying HACCP systems.

Since 1997, the Codex Committee on Food Hygiene has extensively discussed obstacles related to the application of HACCP, particularly in Small and Less Developed Businesses (SLDBs) and approaches to overcome them. The term ‘small and/or less developed businesses’ refers to businesses which, because of their size, lack of technical expertise, economic resources, or the nature of their work, encounter difficulties in implementing HACCP. Developing countries are not explicitly mentioned because it was acknowledged that less developed businesses exist both in developing and developed countries.

In 1999 WHO held an Expert Consultation on Strategies for Implementing HACCP in Small and/or Less Developed Businesses (SLDBs) (see: 'Strategies for Implementing HACCP in Small and/or Less Developed Businesses: Report of a WHO Consultation' [.pdf], in the Support Documentation area of this Section) that aimed to provide guidance to governments and organizations on assisting small and less developed businesses. The recommendations of this Consultation were also considered in the CCFH deliberations on obstacles to applying HACCP in SLDBs. The revised Codex text on HACCP and Guidelines for its Application, adopted in 2003 (see: ‘Draft revised guidelines for the application of the HACCP system’ [.pdf], found in the Support Documentation area of this Section), recognises the obstacles faced by this category of food enterprise and the continued need for additional guidance to governments and to the management of SLDBs on dealing with this issue.

FAO and WHO have offered to elaborate the requested guidance paper on ‘Obstacles to the application of HACCP, particularly in small and less developed businesses, and approaches to overcome them’. FAO and WHO are analysing the experience gained in various countries in developing HACCP-based programmes so as to distil practical guidance for food businesses and to governments seeking to provide better support to the SLDBs in their countries.
**Flexibility in applying HACCP:**

The Codex text on ‘HACCP and guidelines for its implementation’ (2003 rev.) states that, “While it is recognized that when applying HACCP, flexibility appropriate to the business is important, all seven principles must be applied in the HACCP system. This flexibility should take into account the nature and size of the operation, including the human and financial resources, infrastructure, processes, knowledge and practical constraints.”

The recently published EU Regulation (Regulation (EC) No 852/2004) (see: ‘Corrigendum to Regulation (EC) No 852/2004 (OJ L226, p3, 25/06/2004) of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs (OJ L 139, 30.4.2004)’ [.pdf], in the Support Documentation area of this Section) on the hygiene of foodstuffs, echoes the need for flexibility in HACCP requirements so as to be applicable in all situations, including small businesses. Specifically the Regulation notes:

- Flexibility is also appropriate to enable the continued use of traditional methods at any of the stages of production, processing or distribution of the food and in relation to structural requirements for establishments;
- It is necessary to recognise that, in certain food businesses, it is not possible to identify critical control points;
- In some cases, good hygienic practices can replace the monitoring of critical control points;
- The requirement of establishing ‘critical limits’ does not imply a numerical limit in every case;
- The requirement of retaining documents needs to be flexible in order to avoid undue burdens for very small businesses;
- Primary producers should not be required to establish procedures based on HACCP principles at this stage. They should, however, be encouraged to apply these principles as far as possible.

The Regulation emphasises, however, that flexibility should not compromise food safety objectives. It also underlines the need for full transparency in exercising the flexibility provided for by the law.

**Making sure that flexibility does not compromise food safety:**

The main purpose of food safety regulations is to ensure that public health is protected. While flexibility is needed in the approach that is taken to meet food safety goals – there is no option for disregarding the acceptable level of public health protection. This has several implications, including:

- The establishment of performance standards would facilitate the judgement of the acceptability of hygiene measures in some cases;
- Being flexible in the application of hygiene systems often requires a mastery of the HACCP principles: an important consideration especially since one of the acknowledged problems facing many SLDBs is difficulty in accessing expertise in developing and implementing HACCP;
- Introducing flexibility may require an increased amount of initial checking to make sure that the hygiene objectives are being met.
It seems that governments may need to play a major role in assisting SLDBs develop systems of hygiene control to suit their particular situation. There is also a greater burden on verifying that innovative approaches to food safety management do not comprise food safety.

Technical support to SLDBs in establishing hygiene systems:

In many countries, national food safety authorities have large programmes of technical assistance to SLDBs. These are often based on initial surveying of the businesses involved to provide a clear idea of their working context, their problems and their needs.

The general approach is then to develop ‘packaged’ food safety management systems that are well suited to the situation in which they must be implemented and are technically sound. Follow up to ensure that the programmes are indeed well matched to the production system and are achieving the acceptable level of public health protection, is necessary.

Provision of such technical support has a cost. Given the resource limitations facing many developing countries, priorities – based on public health and economic considerations – have to be established in developing an effective programme of technical assistance. Cooperation among government agencies, industry bodies, academic/research institutions, non-governmental and international organizations will be necessary if sound programmes of technical assistance to SLDBs in many developing countries are to be realised.

The Brazilian experience:

In 1998, a national Programme on Food Safety was created in Brazil with the support of various sectors, including government, academia and the food industry. The purpose of this Program is the assurance of the production of safe food ‘from farm to fork’. The Program aims at disseminating the concepts of Good Manufacturing Practices (GMPs) and Hazard Analysis and Critical Control Points (HACCP) in Brazil and at supporting food businesses in implementing Good Practices and HACCP in primary production.

In 2002, within the framework of this Programme a project on the application of HACCP to the coffee sector was initiated. As part of this project a manual on the improvement of coffee quality based on HACCP was developed (see: 'Coffee quality and safety manual – Embrapa Informação Tecnológica, Brazil’ [.pdf], in the Support Documentation area of this Section). It is used as the basis for training of all stakeholders within the sub-sector on good agricultural practices and good manufacturing practices that are consistent with internationally recognised principles of food hygiene.

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1 See for example: [http://cleanup.food.gov.uk/data/new-business.htm](http://cleanup.food.gov.uk/data/new-business.htm)