



International Coffee Organization  
Organización Internacional del Café  
Organização Internacional do Café  
Organisation Internationale du Café

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Hazard analysis

Private Sector Consultative Board  
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**European Coffee Federation**

**Note on HACCP and E.U. legislation**

## **Background**

The attached note from the European Coffee Federation contains information on Hazard Analysis and Critical Control Points (HACCP) and European legislation.

## **Action**

The PSCB is requested to consider this document.



## NOTE ON HACCP AND EU LEGISLATION

### 1. INTRODUCTION

HACCP stands for Hazard Analysis and Critical Control Points. This is a control system to ensure food safety in the chain from raw material to final consumption. It is a global concept, embodied in Codex Alimentarius guidelines<sup>1</sup>. It has also been adopted in EU legislation<sup>2</sup>.

The reason for bringing the subject to the attention of the PSCB is twofold:

- Increasingly strict interpretation and application of HACCP principles by European food safety authorities, resulting in requests for information (for instance regarding the use of pesticides) being transmitted up the chain of production
- Discussions in the EU on a revision of the food hygiene legislation, with the possibility that HACCP obligations are extended to primary production

### 2. HACCP IN EU LEGISLATION

A *hazard* is a biological, chemical or physical agent in, or condition of, food or feed with the potential to cause an adverse health effect<sup>3</sup>. “Biological” covers bacteria, viruses, moulds and such, “chemical” refers to for instance pesticide residues and “physical” includes stones, wood, glass etcetera.

The latest proposal<sup>4</sup> (established after a first round of intensive discussions between European Commission, Council and Parliament) sets out the main obligations for trade and industry:

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<sup>1</sup> See document CAC/PCP 1-1969 rev 3, accessible through [www.codexalimentarius.net](http://www.codexalimentarius.net); go to Official Standards, Special Publications, Food Hygiene Basic Texts, page 33

<sup>2</sup> Directive 93/43/EEC of 14 June 1993, OJ L175 of 19 July 1993

<sup>3</sup> Art 3, par. 14 of Regulation 178/2002 of 28 January 2002, OJ L31 of 1 February 2002. The main provisions of this regulation will become applicable on 1 January 2005

<sup>4</sup> European Council document 9240/2/02 of 21 June 2002

## Article 5

### **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 principles of hazard analysis and critical control points (HACCP).
2. The HACCP principles referred to in paragraph 1 are:
  - (a) to identify any hazards that must be prevented, eliminated or reduced to acceptable levels;
  - (b) to identify the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels;
  - (c) to establish critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards;
  - (d) to establish and implement effective monitoring procedures at critical control points;
  - (e) to establish corrective actions when monitoring indicates that a critical control point is not under control;
  - (f) to establish procedures to verify that the measures outlined in subparagraphs (a) to (e) are working effectively. Verification procedures shall be carried out regularly; and
  - (g) to establish documents and records commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined in subparagraphs (a) to (f).

When any modification is made in the product, process, or any step, food business operators shall review the procedure and make necessary changes to it.

To give a practical (but hypothetical!) example from another sector: in frozen food a too high temperature is a **hazard** because bacteria may develop that cause indigestion. Loading and unloading during transportation is a **critical control point** because the product is being exposed to higher temperatures. It may be determined that the temperature of frozen food must not rise above – say – minus 10° C. This is the **limit value**, which can be **monitored** by putting thermometers in the shipment. If this limit value is exceeded, **corrective action** can be taken in the form of (for example) insulating covers.

A HACCP system furthermore requires that it is documented in a HACCP plan, and also that any discrepancies found and the counter-measures taken are registered.

### **3. FOR WHOM?**

The current EU Hygiene Directive<sup>5</sup> specifies that the HACCP principles must be applied by the responsible persons in undertakings, carrying out any or all of the following: preparation,

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<sup>5</sup> Directive 93/43/EEC of 14 June 1993, OJ L175 of 19 July 1993

processing, manufacturing, packaging, storing, transportation, distribution, handling or offering for sale or supply of foodstuffs.

Green coffee is included in the definition of foodstuff: "... any substance or product, whether processed, partially processed or unprocessed, intended to be, or reasonably expected to be ingested by humans."<sup>6</sup>

At the moment the EU institutions are involved in a major discussion whether HACCP obligations also apply to primary production. The latest compromise proposal can be summarised as "possibly, but not yet". The discussion evidently focuses on primary production within the EU. However, this does not mean that primary producers in third countries will not be affected. According to existing legislation<sup>7</sup>, food imported into the EU must meet the EU food safety requirements or equivalent:

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<sup>6</sup> Art 2 of Regulation 178/2002, see note 3

<sup>7</sup> Regulation 178/2002, see note 3

## Article 11

### **Food and feed imported into the Community**

Food and feed imported into the Community for placing on the market within the Community shall comply with the relevant requirements of food law or conditions recognised by the Community to be at least equivalent thereto or, where a specific agreement exists between the Community and the exporting country, with requirements contained therein.

According to the latest proposal for the new HACCP legislation, the HACCP requirements will also apply to imported food.

#### **4. CLOSING REMARKS**

The “from farm to fork” policy of the EU means that non-EU suppliers of foodstuffs or raw materials are unavoidably affected by EU legislation on food safety and HACCP. It is in the interest of the entire coffee chain, from growers to exporters, traders and roasters, to be aware of these developments. All documents quoted are available in electronic format from the ECF secretariat ([ecf@coffee-associations.org](mailto:ecf@coffee-associations.org)).

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