

THE LATEST ON EU AGRI-FOOD POLICIES IMPACTING LOW-INCOME & MIDDLE-INCOME COUNTRIES

Updated Commission guidance on Good Hygiene Practices and HACCP

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European Commission publishes new version of guidance on good hygiene practices/HACCP, in particular on food safety culture and allergens

<u>Commission Notice</u> on the implementation of food safety management systems covering Good Hygiene Practices and procedures based on the HACCP principles, including the facilitation/flexibility of the implementation in certain food businesses

Update

On 16 September 2022, the European Commission published an updated version of its guidance on good hygiene practices/HACCP. The aim is to integrate tools and examples for operators, in particular on new requirements such as food safety culture, food donations and allergens.

What is changing?

The updated guidance (Commission Notice) provides tools or examples to all food business operators on how to implement EU hygiene requirements. It may be supplemented by guidance at sectoral and national level that is directly applicable in specific establishments.

This Notice aims to promote a common understanding of legal requirements among competent authorities, and to help food business operators implement EU requirements.

It provides:

- definitions (agreed at Codex Alimentarius level or already existing in the EU legislation)
- the relevant legislation, the link between Good Hygiene Practices (GHP), prerequisite programmes (PRP) and HACCP-based procedures within a food safety management system, the use of guides to GHP, and relationships with international standards and training
- implementation of GHP, including the flexibility provided for certain food establishments by EU legislation related to their implementation (Annex I)
- implementation of HACCP-based procedures, including the flexibility provided for certain food establishments by EU legislation related to their implementation (Annex II)
- auditing of food safety management systems (Annex III).





Why?

The Commission Notice has been reviewed in order to integrate new elements from the Codex Alimentarius; from EU legislation (including on allergens, food redistribution and donation, and food safety culture); and from EFSA.

Timeline

The new requirements on food safety culture and allergens are already in application via Regulation (EU) 2021/382.

The reviewed Commission Notice was finalised in March/April 2022 and was published on 16th September 2022.

What are the major implications for exporting countries?

Opportunities

The Commission Notice clarifies how to understand and implement the EU legislation (including Good Hygiene Practices, HACCP, food safety culture, etc). It covers flexibilities for small companies.

Challenges

Integrating some new requirements, such as "food safety culture", and the corresponding monitoring and control, may pose a challenge as, unlike other requirements, it deals with management issues (how to ensure worker awareness of food safety issues).

Note that the requirements dealing with HACCP and food safety culture do not apply to primary production.

Background

Since 2016, there have been a number of revisions to:

- the hygiene legislation, Regulations EC/852/2004 and EC/853/2004.
 - e.g. Regulation (EU) 2021/382 introduced allergen control and food safety culture as requirements
- international standards





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 e.g. the revision of ISO 22000, the Codex Alimentarius General Principles of Food Hygiene (CXC 1-1969), and the Code of Practice on Food Allergen Management (CXC 80-2020).

A revision of the 2016 guidance was therefore considered appropriate.

Sources

Commission Notice C/2022/5307

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