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Report on:

Final report - Review on the current guidance available for small food manufacturers in the UK on the implementation of HACCP principles as required by the Food Hygiene Regulations

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Current Available Guidance on HACCP for Small Food Manufacturers

Executive Summary

The review has shown that there is a considerable amount of guidance available on the implementation of HACCP principles, much of which is free of charge. Comparing the volume of guidance offered (Appendix III) to that actually used (Table 1) it appears that only a small amount of this guidance is utilized by food manufacturers with a size of less than 50 employees.

The average rating of guidance actually used by the interviewees is high (overall average rating of 8, where 10 = excellent). However 58% of these businesses perceive there to be problems with guidance in general (for example some stating it is hard to find guidance and others that it is not specific enough).

The majority of small food businesses interviewed used Environmental Health Practitioners as a resource for advice and guidance on the implementation of HACCP principles as required by the Food Hygiene Regulations. Many interviewees commented on the positive nature of this relationship.

Background to project

Following initial communication with Mr Marc Wormald of the Food Standards Agency a review specification was issued, a completion date of 05 December 2012 was agreed. The project was segregated into two sections.

Part 1

Research into the general and food specific guidance on HACCP and its implementation, this was carried out by the Information Officer from the Information and Legislation Department.

Part 2

Determination of whether the guidance available is sufficient, useful and being used was reviewed by the staff from the HACCP and Quality Management System Section of The Food Manufacturing Technologies Department.

PART 1 - General and food sector specific guidance on HACCP and its implementation

A review was conducted to identify general and food sector specific guidance that is available on Hazard Analysis and Critical Control Point (HACCP) and its implementation. Publications relating predominantly to primary production and associated assurance schemes or to specific food management accreditation schemes were not included.

The sources of information utilised included the websites and publications of:

- Regulatory authorities:
Food Standards Agency, Food Standards Agency Scotland; Food Standards Agency Wales; Food Standards Agency Northern Ireland.
- Those organisations aimed at assisting small and medium enterprises:
Regional Food Groups
GOV.UK (Replacing Business Link)
SALSA
- Trade associations and organisations - both food and hygiene related.
- Other relevant organisations
- Campden BRI internal resources

Websites were searched using the search facility, where this was available and utilising the terms HACCP, Hazard analysis, Food Safety, Food management. In addition, and where a search facility was not available, particular attention was paid to the areas of the websites relating to publications, services, training and to those sections describing 'What we do'. The following were noted:

- Publications or other information available
- Availability – i.e. If the information was freely available (to download or order) or whether it had to be purchased or was restricted to members only
- The format of the information (Publication, DVD)

In addition the relevant regulations were identified.

Findings

Regulations

EU Food Hygiene legislation was consolidated and simplified in 2004/5. The overall aim was to create a single, transparent hygiene policy applicable to all food and all food business operators, together with effective instruments to manage food safety and potential food crises, throughout the food chain. Thus, whilst this review focuses on guidance available for small – medium enterprises, the regulations apply to all food business operators irrespective of size. Similarly guidance can also be applicable to all sizes of food business operators.

- Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs as amended.
- Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for on the hygiene of foodstuffs as amended.
- Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption as amended.
- The Food Hygiene (England) Regulations 2006, SI 2006 No. 14 as amended by the Food Hygiene (England) (Amendment) Regulations 2007, SI 2007 No 56 and the Food Hygiene (England) (Amendment) Regulations 2010, SI 2010 No 534 provide for the execution and enforcement of the above regulations.

Parallel legislation is also in force in Scotland, Wales and Northern Ireland.

Food business operators are required to put into place procedures which manage food safety within their establishment. Article 5 (1) of Regulation 852/2004 requires that the procedure or procedures be based upon the HACCP (Hazard Analysis and Critical Control Point) principles set out in Article 5 (2). The regulations allow flexibility and whilst the procedures are required to be based on HACCP principles food business operators do not necessarily have to implement a HACCP system, if this is not appropriate. In the case of small businesses the concept of 'proportionality' is also applied.

Guidance

European and National

Guidance has been published at both the European and National level to the regulations and their implementation both generally and in relation to particular products and / or sectors. National guidelines were developed and a register of such guidance is available on the European Commission website:

(http://ec.europa.eu/food/food/biosafety/hygienelegislation/good_practice_en.htm).

The European Commission published the following guidance document:

Implementation of procedures based on the HACCP principles, and on the facilitation of the implementation of the HACCP principles in certain food businesses, 2005.
http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidance_doc_haccp_en.pdf

This document is mainly directed at food business operators and competent authorities, and aims to give guidance on the implementation of procedures based on the HACCP principles and on flexibility with regard to the implementation of such procedures, especially in small and/or low risk businesses.

Within the UK a number of national guides have been developed in association with the relevant trade bodies and other organisations. These industry guides give advice to food business operators on how to comply with the regulations on general food hygiene. They are officially recognised by the Food Standards Agency. The guides are not legally binding and their use is voluntary. Many of the guides are in the process of being revised and updated and new guides are being developed. The newer guides are available for purchase from the TSO website www.tsoshop.co.uk.

The older guides (published by Chadwick House) relate to compliance with the legal framework that applied before 2006. Those still available are considered valid until updated versions become available so long as the guidance they contain is compatible with the objectives of the new hygiene legislation.

UK Industry Guides:

- Baking 2008, TSO
- Bottled water 2008, TSO
- Flour Milling 2008, TSO
- Mail order food 2007, TSO
- Retail 2009, TSO
- Vending and Dispensing 2008, TSO
- Wholesale distributors 2007, TSO
- Catering 1997, Chadwick House

- Catering – Ships 2004, Chadwick House
- Fresh Produce 1999, Chadwick House
- Markets and Fairs 1998, Chadwick House

Similarly Community guidance has also been published and is available to download from the Europa website http://ec.europa.eu/food/food/biosafety/hygienelegislation/good_practice_en.htm.

Food Standards Agency guidance:

The Food Standards agency publishes a large number of guidance documents which are available to download from the Food Standards Agency website (some of which are listed in Appendix III).

In addition the Food Standards Agency has published Food Hygiene: A Guide for Businesses for restaurants, cafés and other catering businesses, as well as shops selling food.

The Food Standards Agency has also published guidance aimed at small and medium enterprises in the form of:

England and Wales

Safer Food for Better Business (SFBB)

This is described as “An innovative and practical approach to food safety management developed to help small businesses put in place food safety management procedures and comply with food hygiene regulations”. There are a number of SFBB packs available designed to meet the specific needs of different food businesses: small catering businesses; small retail businesses; restaurants and takeaways serving Chinese or Indian, Pakistani, Bangladeshi and Sri Lankan cuisines; childminders; care homes. These are available to download or to order and are also available in various languages and as a training DVD.

Scotland

Cooksafe: Food Safety Assurance System Food Standards Agency, Scotland

This publication assists catering businesses in Scotland understand and implement HACCP-based systems and develop HACCP-based procedures that fit their needs. E-cooksafes have been developed as additional tool to the hard copy version. It is also available in Chinese, Punjabi, Urdu and Bengali

Retail Safe Food Standards Agency, Scotland

This was designed for retailers handling unwrapped high-risk foods and follows the CookSafe approach and structure.

Northern Ireland

Safe Catering Guide (Issue 4) Food Standards Agency, Northern Ireland

This was designed to help catering businesses produce a food safety management plan based on HACCP principles and to keep records appropriate to their business.

Trade Associations

A number of trade associations produce Codes of Practice and guidance relevant to their particular sector. These vary in their consideration of HACCP. Some offer detailed guidance whilst others include a general consideration of the principles and others refer to the relevant Food Standards Agency guidance. A list of those publications of particular interest is given in Appendix III.

Regional Food Groups and Technology Centres

The regional food groups assist small and medium enterprises. From their websites the Regional Food Groups appear to be predominantly aimed at the promotion / marketing of regional food. Some however offer particular technical advice, training or consultancy either in the form of courses or one-one advice and consultancy including in the area of food safety and HACCP.

Those in particular offering such advice include:

Heart of England Fine Foods (HEFF) where members are required to comply with HEFF's own hygiene and food safety standard. HEFF also offer technical advice and consultancy.

Food and Drink Forum (East Midlands) which provides technical advice and consultancy.

Delicious Yorkshire offer assistance with HACCP and supply Chartered Institute Of Environmental Health food safety publications.

Similarly in Wales the Food Technology Centres offer advice, technical services, support and training to business start-ups, small and medium sized companies and existing food manufacturers.

SALSA – Safe and Local Supplier Approval

www.salsafood.co.uk

SALSA is a nationally recognised food safety certification scheme specifically developed for small and micro producers. SALSA is an approval scheme but also offers technical support and assistance

throughout the approval process and training in the form of HACCP courses. The SALSA HACCP courses are also referred (and linked) to by other associations.

General Government Information – GOV.UK

This central resource of government information replaces Business Link and has a section on Food, catering and retail which contains a short summary of the requirements of a HACCP plan (with links to the Food Standards Agency website) and food safety.

Other sources

A variety of other organisations, trade associations and bodies as well as individual consultants produce publications and also offer training and consultancy services including:

- British Soft Drinks Association
- British Sandwich Association
- Campden BRI
- Chartered Institute of Environmental Health (CIEH)
- Food Innovation at Abertay
- Institute of Food Science and Technology (IFST)
- Food Solutions
- Leatherhead Food Research International
- Society of Food Hygiene and Technology (SOFHT)
- Royal Society for Public Health (RSPH)
- Royal Environmental Health Institute of Scotland (REHIS)

A list of publications is given in Appendix III.

Summary

Guidance is available on HACCP in both a general and food sector specific context in the form of publications, training courses, technical advice and consultancy. This is not all aimed at small and medium enterprises (SME) specifically. That provided by the Food Standards Agency is aimed at SMEs, is generally available in a variety of formats and usually free of charge. Guidance provided by the Regional food groups, by their nature, would be aimed at SMEs but is typically in the form of consultancy and advice and training. SALSA itself is an accreditation scheme but offers HACCP training aimed specifically at SMEs.

National industry guides (developed in association with the relevant trade bodies and other organisations) are available for certain sectors and are available for purchase. Trade Associations differ in the services that they offer and not all therefore offer assistance with HACCP. Of those that

do, this is often in the form of Codes of Practice, which differ in the extent of their consideration of HACCP, and / or training. Access to these Codes of Practice is sometimes restricted to members only but where generally available may be accessible to download or be available for purchase. Similarly guidance and training provided by other organisations varies in the detail of its consideration of HACCP, is not necessarily particularly aimed at SMEs and is often available for purchase.

PART 2 - Is guidance sufficient, useful and being used by small food manufacturers?

A list was compiled of small food manufacturers (employing fewer than 50 people). Companies were obtained from a variety of sources these include SALSA, Local Authority Environmental Health Officers, Regional Food Groups, Heart of England Fine Foods, Local Farm Shops, Budgens, Campden BRI, Food and Drinks Forum. The specification was used to devise questions for a series of telephone interviews and was emailed to Marc Wormald for approval (01/10/12). Following Marc’s suggestions amendments were made and a questionnaire formulated.

Telephone calls were made to approximately 600 companies to meet the requirement of 100 interviews. Interviewees were questioned without prejudice. Continual monitoring of participating companies was made in an attempt to gain a broad sample of region, size and sector categories.

Figure 1 The regional distribution of companies interviewed.

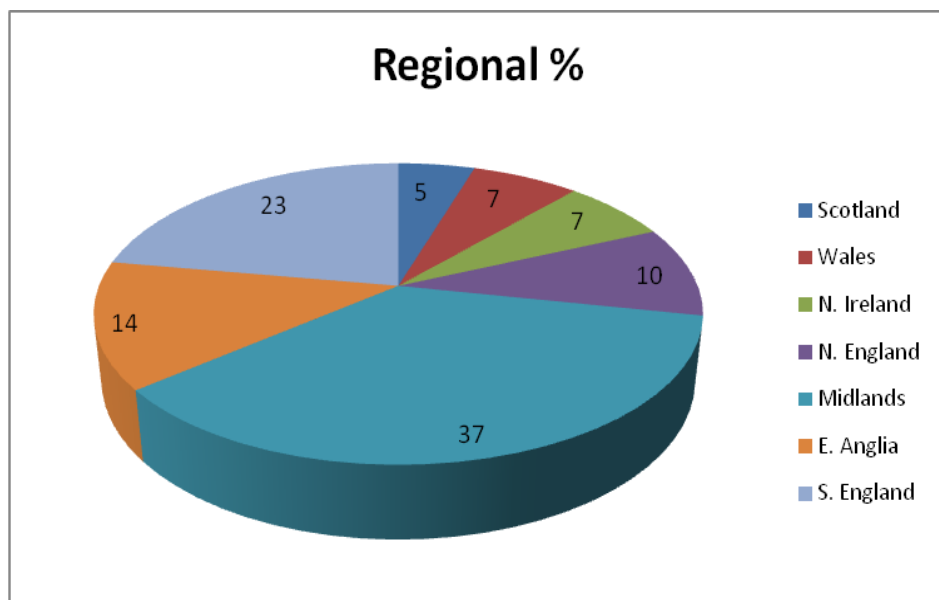


Figure 2 The size of the companies participating in the interview (number of full-time equivalent employees).

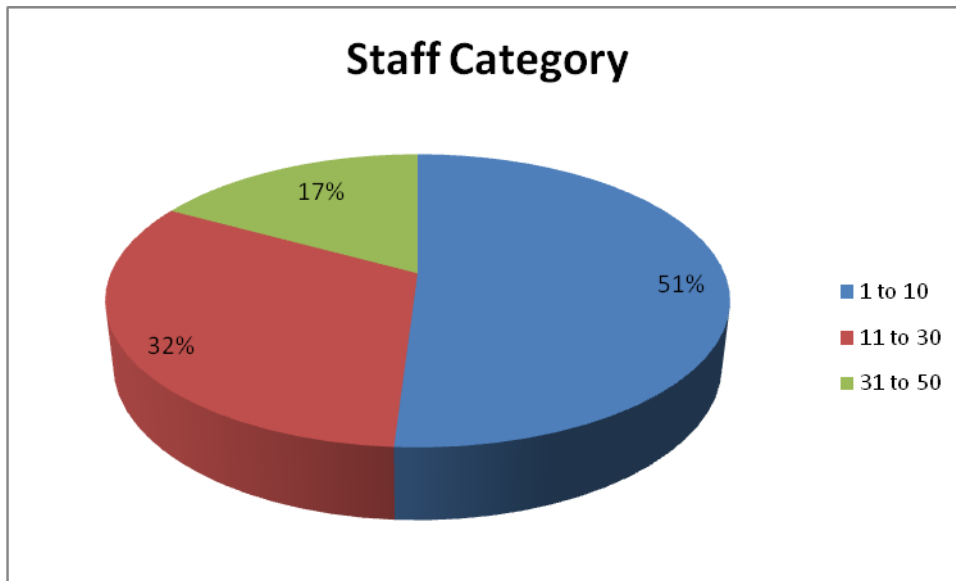
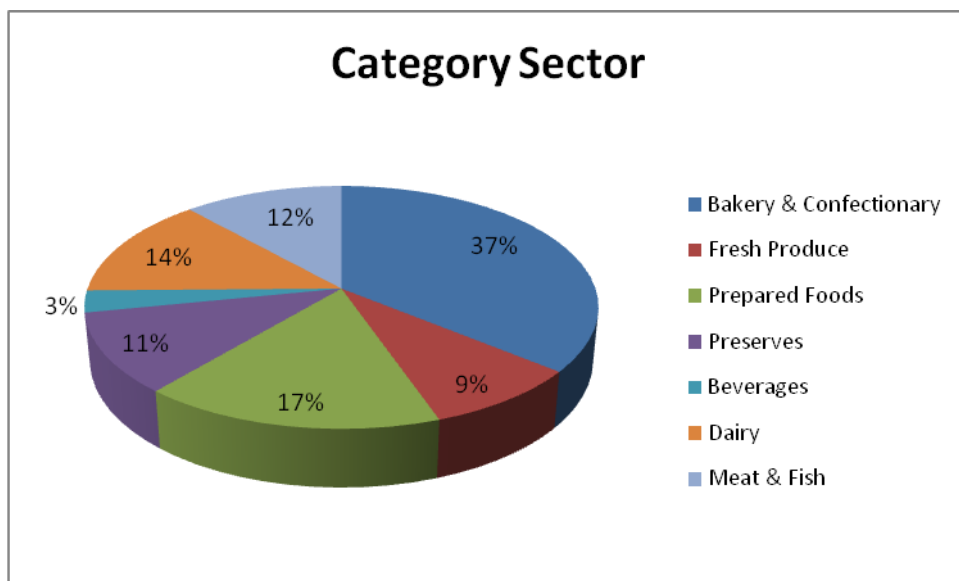


Figure 3 The percentage of companies interviewed in each of the food manufacturing sectors.



Questions drawn up from the review specification supplied by the Food Standards Agency.

1	Do you have any problems with guidance that is available?
2	Are there any gaps in available information?
3	Do you actually require guidance on HACCP, its implementation and the requirements of Article 5 of Regulation (EC) 852/2004 on the hygiene of foodstuffs?
4	Are requirements imposed on you by your customers?
5	If requirements are imposed <ul style="list-style-type: none"> a) are they beyond the scope of the regulation? b) if so, do they find this over-burdensome? c) do they understand the difference between legal requirements as part of the food hygiene regulations and those required by their suppliers?

Firstly interviewees were asked to state the guidance they used, how frequently they reviewed the guidance and rate the guidance on a scale of 1-10 (1= not useful/10=excellent). The table below shows the results.

Table 1 The number of companies using a particular source of information, how frequently it is reviewed and the average rating of the guidance.

Note: A company may use more than one source of guidance.

	Total usage	HACCP / Information review frequency					Average rating of guidance
		Ongoing and as and when required	Every six months	Annually and as and when required	As and when required	Less than annually	
Environmental Health Practitioner	52	6	8	22	10	6	8
SALSA	33	7	4	13	9		7
Consultant	23	4	1	1	14	3	8
Other *	19	3	2	5	7	4	9
Courses	14			1	13		9
Safer Food for Better Business	13	1		5	4	3	7
Food Standards Agency	13	7	1	2	3		6.5
Trading Standards Officer	12			9	3		8
British Retail Consortium	6			3	3		7
Campden BRI	5	2		2	1		8.5
Heart of England Fine Foods	5	1			4		6
Internet	5		1		4		8
Codex Principles	3	1		1			8
Nat. Assoc. of Master Bakers (NAMB)	2				2		9
Total	205	32	17	64	77	16	Overall Average 8

* Other category includes:- Business mentor from Prince’s Trust, EDWCA (European Drinking Water Cooler Association), Ice-cream Alliance, Leatherhead, Organic Soil Association, RSA Standard review, SAI Global, Sainsbury’s guidelines, Tesco guidelines.

Figure 4 The number of companies using a particular source of guidance.

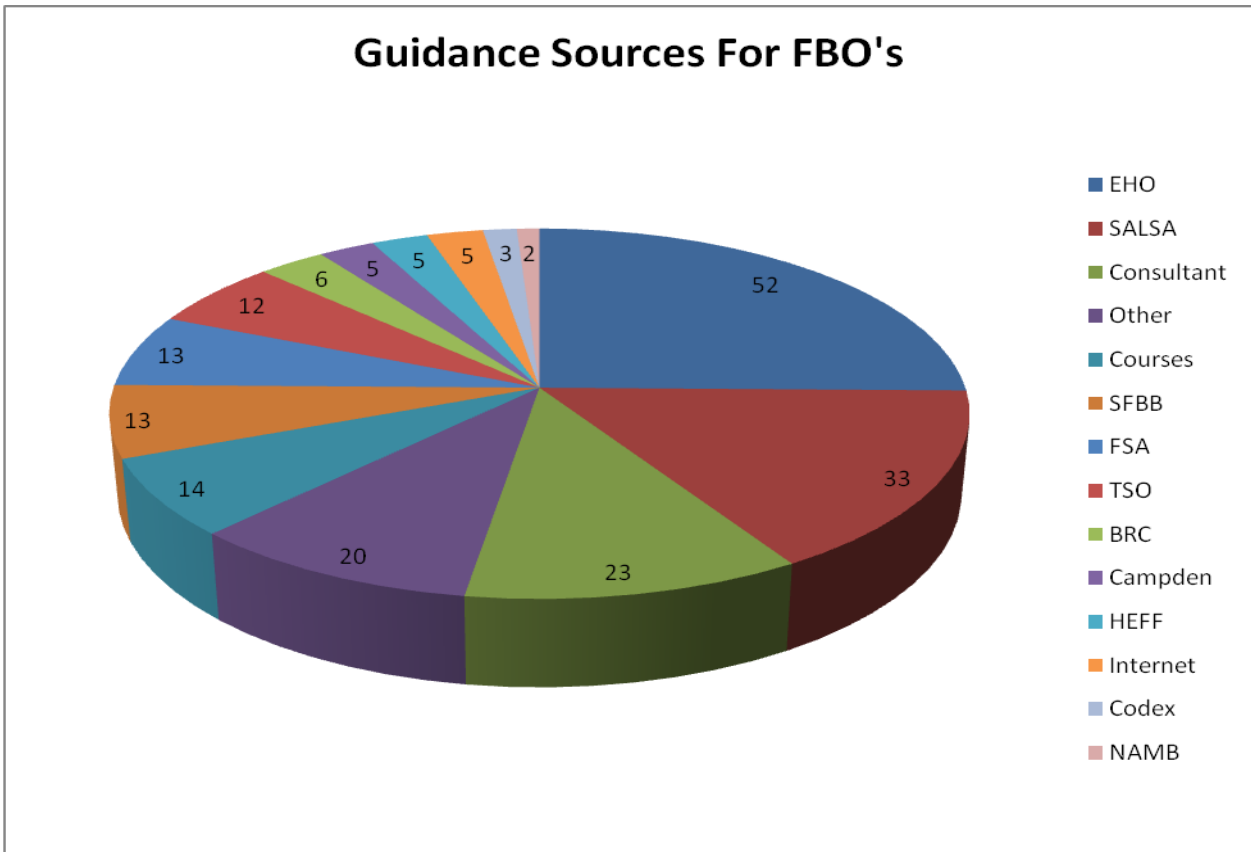
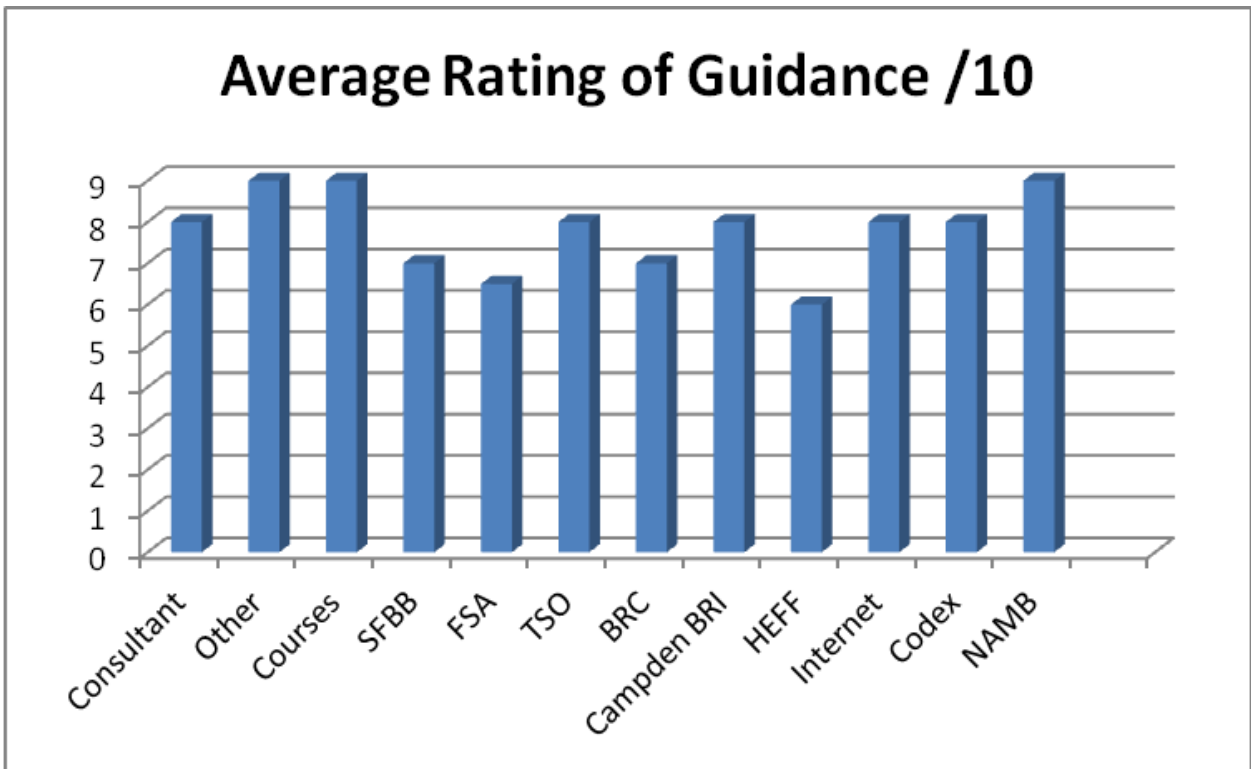
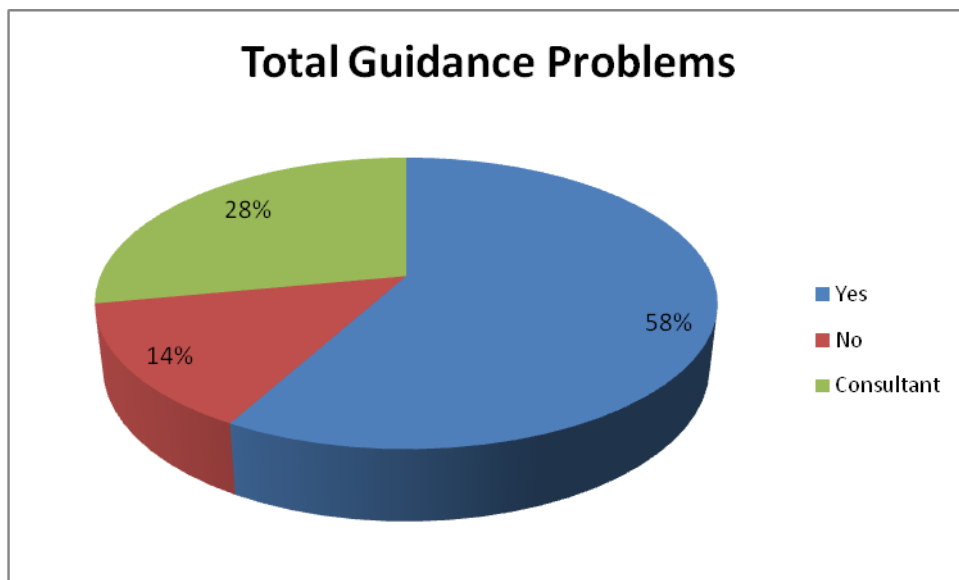


Figure 5 The average rating of guidance / 10 (1=poor, 10=excellent).



QUESTION 1 - Do you have any problems with guidance that is available ?

Figure 6 The percentage of interviewees that have a problem with guidance that is available. A full list of comments received can be found in Appendix II.



The category of consultant equates to the companies that did not commit to either yes or no.

Many stated that “they were not aware of any problems with guidance because they don’t deal with that, they hire a consultant to deal with anything to do with HACCP”.

QUESTION 2 - Are there gaps in available information?

Table 2 The main types of problems experienced with information.

Raw data made available on a separate report. All comments can be found in Appendix II.

Form of information	Not sure where to go for information or get updates	Difficulties experienced searching for information	Insufficient time to look at information/guidance too detailed	More information required as a small business grows but still under 50 employees	Information not clear / poor advice given	More specific information required	Reference made to cost
Internet						1	
Food Government		2	1			1	
BRC			5		1	1	
SALSA							2
HEFF							
Campden BRI						1	
Codex Alimentarius			1				
EHP				1	4	3	1
SFBB						3	
Consultant	2				4		2
TSO					2		
Food and Drinks Forum							
General	4		5	2	2	7	9
Total	6	2	12	3	13	17	14

Main gaps identified

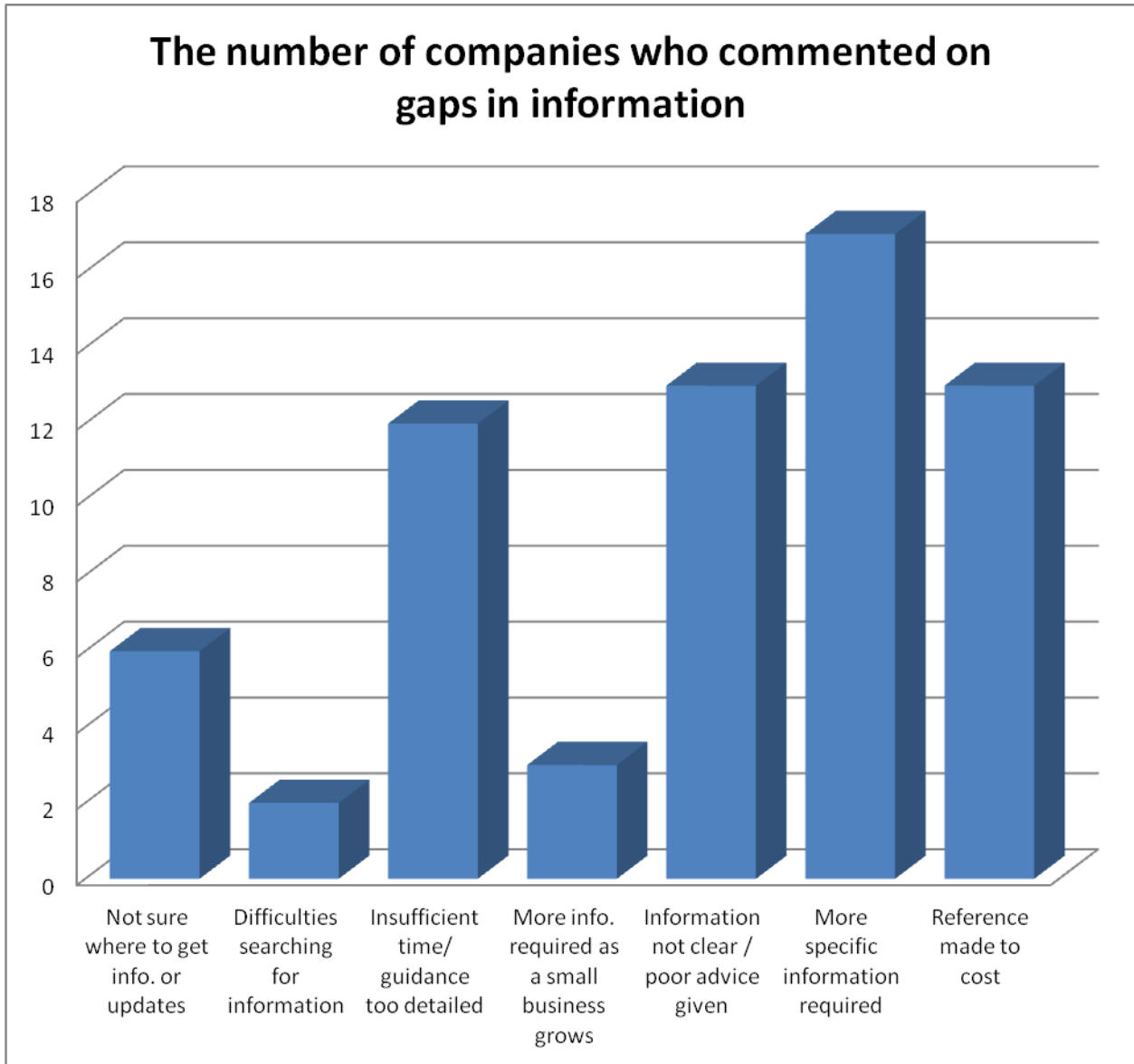
More category specific information required by small food manufacturers, relating to the nature of their business.

The cost implications in obtaining information are considered to be a concern.

Information not clear / poor advice given.

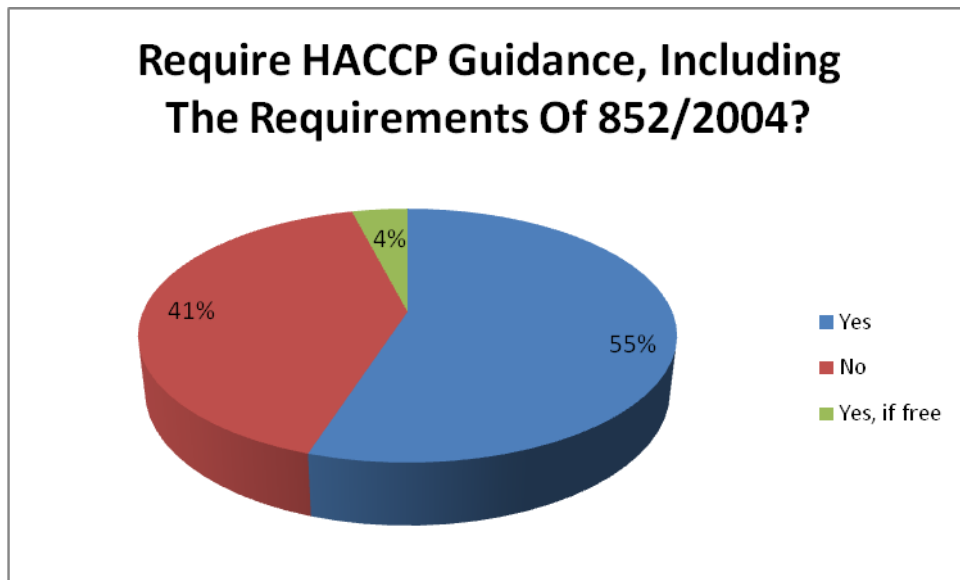
Insufficient time for a small food manufacturer to look at information/ information too detailed, particularly the guidance provided by BRC.

Figure 7 The main type of problems experienced by a number of companies.



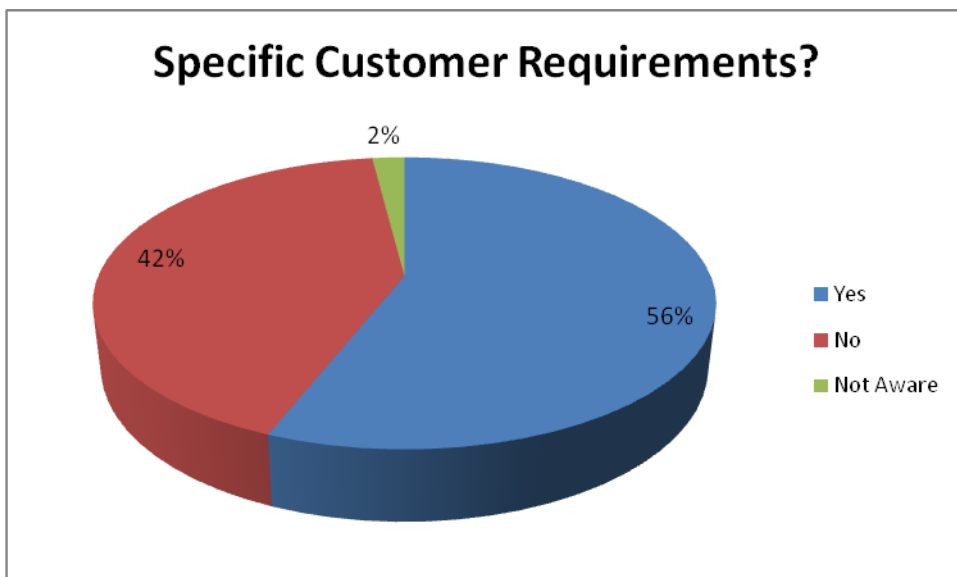
QUESTION 3 – Do small food manufacturers actually require guidance on HACCP, its implementation and the requirements of Article 5 of Regulation (EC) 852/2004 on the hygiene of foodstuffs.

Figure 8 The percentage of interviewees that require more guidance on HACCP, its implementation and the requirements of Article 5 of Regulation (EC) 852/2004 on the hygiene of foodstuffs.



QUESTION 4 - Are requirements imposed on small food manufacturers by their customers?

Figure 9 The percentage of small food manufacturers questioned where customers impose specific requirements.

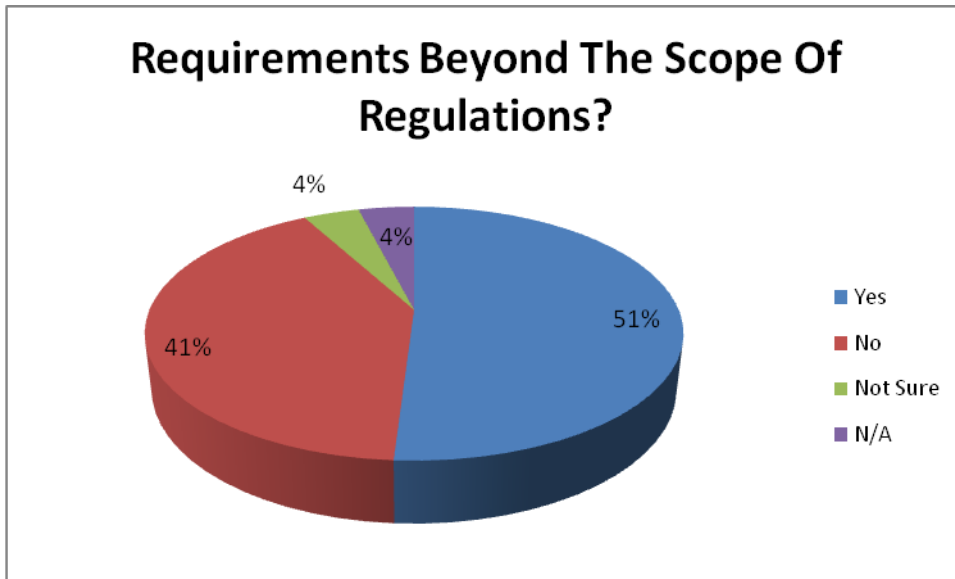


QUESTION 5 ONLY APPLIES TO THOSE STATING **YES** TO QUESTION 4.

QUESTION 5 - For companies where requirements are imposed.

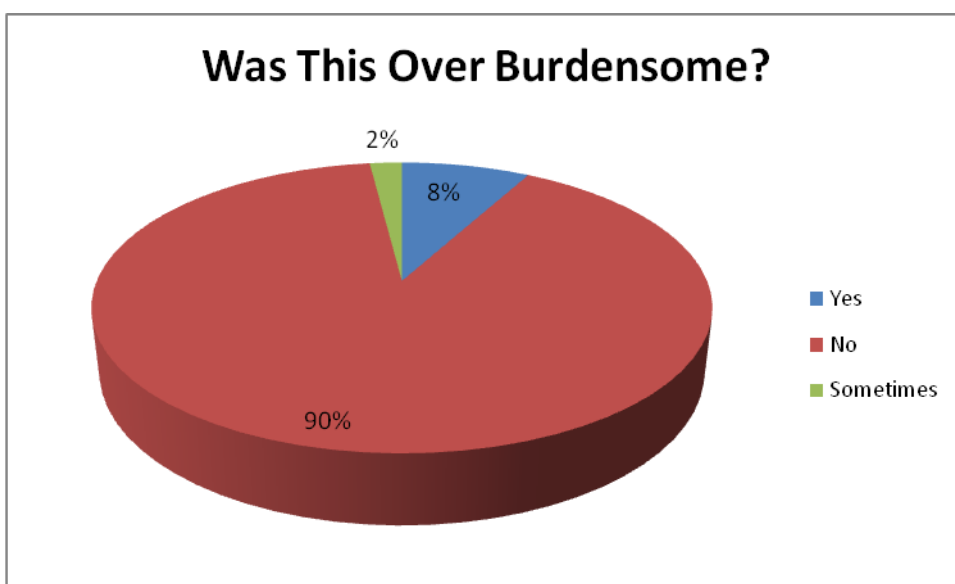
a) Do they perceive that the requirements are beyond the scope of the regulation?

Figure 10 The percentage of companies who perceived the requirements to be beyond the scope of the regulation.



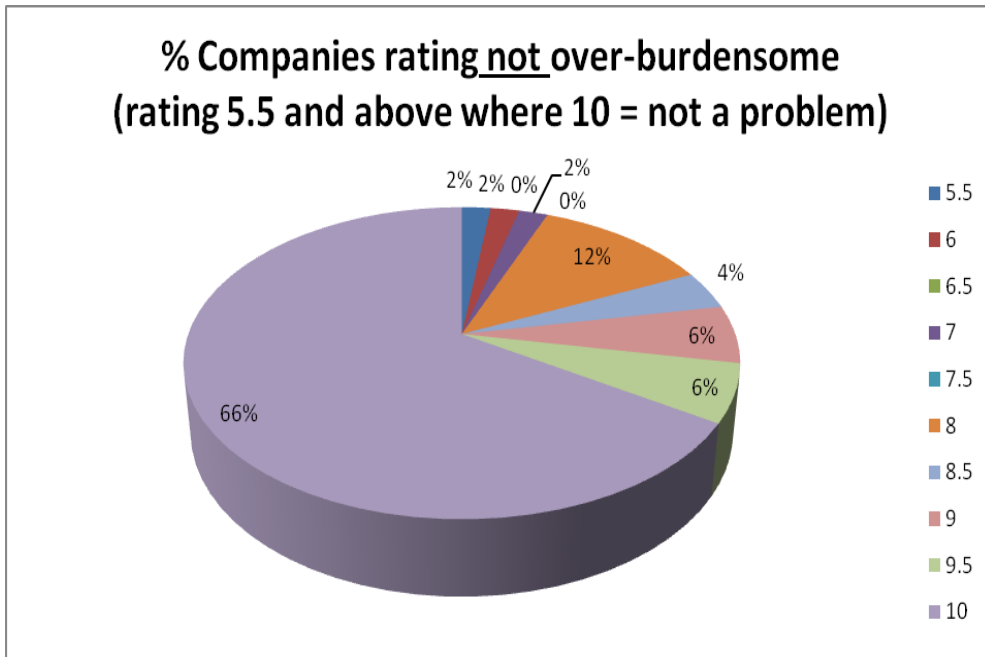
b) If so, do small food manufacturers find this over-burdensome?

Figure 11 The percentage of interviewees who find this over-budensome.



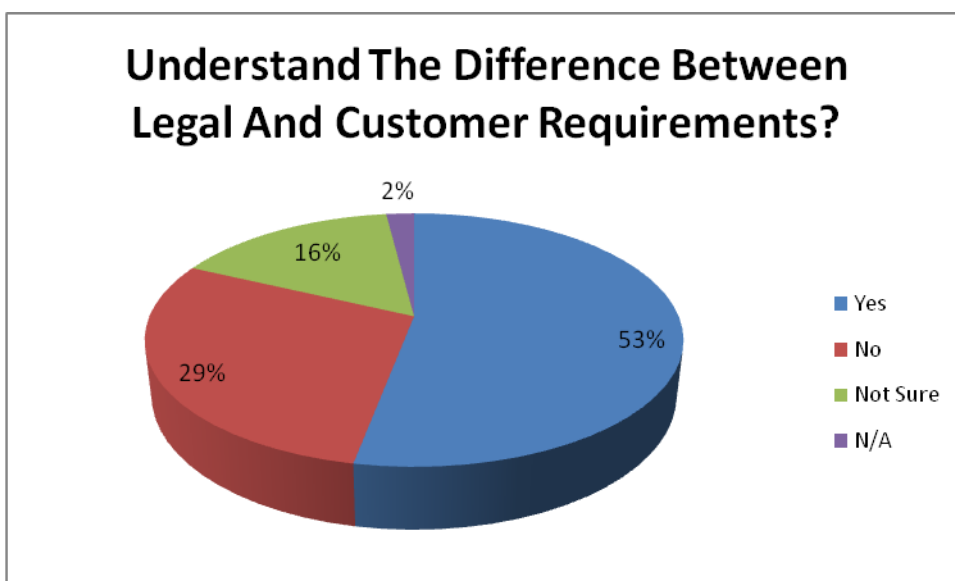
No refers to a rating of 5.5 and above (where 1 represents over-burdensome and 10 not a problem)
Yes refers to a rating below 5.5.

Figure 12 The illustration below shows a further breakdown of companies that stated the customer requirements were beyond the scope of the regulation but that this was not over-burdensome (i.e. those stating no to question 5b).



c) Do small manufacturers understand the difference between legal requirements as part of the food hygiene regulations and those required by suppliers?

Figure 13 The percentage of interviewees who understood the difference between legal and customer requirements.



Summary

To conduct the review, small food business manufacturers were interviewed over the telephone and questioned without prejudice. It was felt a telephone call would elicit more information and generate a greater response in a shorter time than an email or paper survey. Approximately 600 companies were called of which 103 completed a telephone questionnaire. Although over 100 businesses co-operated it is a small sample and represents a snapshot. An equitable mix of regions, type of business and size of company, were taken into account on a regular basis when conducting the review, these were adjusted accordingly to obtain a mixed sample of organisations participating (Figures 1-3).

The number of companies using a particular source of information, how frequently it is reviewed and the average rating of the guidance (Table 1)

50% of companies make use of their local Environmental Health Practitioner (EHP). The general feedback from interviews on the usefulness of an EHP was very positive. Many relying solely on the EHP for keeping them up to date with changes in legal requirements. SALSA and Independent Consultants were shown to be a popular choice of guidance. The average rating of guidance used was high, all scoring an average of 6 or above (10 = an excellent) resource. The frequency of reviewing guidance on the whole was relatively low. The majority of companies review their guidance only when they review their Food Safety Management System or their HACCP. For many this was annually or as and when required e.g. new equipment installed. Where a consultants advice was the only source of guidance used, the frequency of reviewing the guidance is not known. Consultants were not interviewed. Companies in this instance stated how frequently the consultant reviews their food safety management system. Companies falling into the 'higher frequency' category (ongoing and as and when required) appeared to be either pro-active in their approach, fairly new to the business or working towards certification.

The amount of guidance available compared with that used (Figure 4)

The sources of guidance used appears to be quite limited compared to that available (Appendix III).

Rating of guidance **used** by a company (Figure 5)

Guidance actually used by a company was found to be very helpful. The average rating for each type of guidance used was 6 and above (where 10 = excellent), the overall average rating for all guidance used was 8 (Table 1).

Perceived problems with **available guidance** (Figure 6)

58% of interviewees perceived there to be a problem with guidance that is available. On assessment it would appear that there are difficulties obtaining the appropriate guidance specific to the nature of the business (Table 2).

28% of responses highlight that a consultant dealt with all guidance, as a company they were either totally unaware or had very little knowledge of what guidance was available. A small percentage (14%) stated that there were no problems with available guidance.

The main types of problems experienced with information (Table 2 and Figure 7)

A review of the problems experienced exposed the following concerns:

- More specific information is sought by small food manufacturers relating to the nature of their business, comments included: BRC standard is not product specific; insufficient information available relating to chocolate; request for models or templates to suit a particular business.
- Small companies lack the financial resources to purchase various forms of guidance (e.g. support offered from larger membership based companies).
- Information is not always clear and some businesses reported they had received incorrect advice.
- Small food manufacturers felt they didn't have sufficient time to look at available information and / or guidance was too detailed.
- Not sure where to go to get information or updates.

In obtaining the information for Table 2 the following considerations must be taken into account. The above is based on a very small number of interviewees who made a comment about gaps in information. Comments have been assigned to a category based on the researchers interpretations; these may not be exactly what the interviewee intended; often interviewees were not aware of any guidance issues as a consultant deals with this information on their behalf. The consultants were not interviewed.

Three of the larger companies commented that there is very little guidance to support a micro company as it grows to a larger size (but still under 50 employees) dealing with larger clients. Gaps in available guidance were reported at each stage in that development.

Do small food manufacturers require guidance on HACCP its implementation and the requirements of Article 5 of Regulation (EC) 852/2004 on the hygiene of foodstuffs (Figure 8)

55% of companies interviewed required guidance on HACCP, its implementation and the requirements of Article 5 of Regulation (EC) 852/2004 on the hygiene of foodstuffs, this figure rose to 59% if it was available for free). Many commented on wanting specific information relevant to their business, bulletins with amendments only and better updates.

Requirements imposed on small food manufacturers (Figures 9 -12)

Customers impose requirements on 56% of the small food manufacturers interviewed. For those companies 51% perceived the requirements to be beyond the scope of the regulation and 41% didn't think they were. A few were not sure if they were beyond the scope (4%). Of the companies that stated the customer requirements were beyond the scope of the regulation the majority (90%) didn't feel the requirements were over-burdensome (rating above 5.5 on a scale where 1 represents over-burdensome and 10 not a problem). 66% of interviewees who thought the requirements were not over-burdensome gave a score of 10.

Understanding the difference between legal and customer requirements (Figure 13)

53% of small food manufacturers stated that they understood the difference between legal requirements as part of the food hygiene regulations and those required by suppliers. 29% didn't understand the difference between legal and customer requirements and 16% were not sure. 2% stated that this question did not apply to them commenting "we supply "free from products" everything is there already as a prerequisite, feel question is not applicable".

Appendix I

Acknowledgements

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Bristol City Council
Cardiff Council
Eden District Council
Harrogate Borough Council
Lewes District Council
Powys County Council
Southampton City Council
South Lakeland District Council
South Northamptonshire Council
Stroud District Council
Surrey County Council
The Highland Council
Wigan Metropolitan Borough Council
Worcestershire Regulatory Services

British Frozen Food Federation
British Sandwich Association
British Soft Drinks Association
Chilled Food Association
National Association of Master Bakers

Budgens (Visit and internet)
Heart of England Fine Foods
SALSA
Sustainweb
Taste of Anglia
Taste of the West
The Food & Drink Forum

Appendix II

Responses made to whether the interviewee considers there to be gaps in available information

Are there any gaps in available information
Yes, there are some deficiencies but can't think at the moment.
On websites particularly Food.gov lots of information is aimed at small catering companies not a lot of information on the processing side.
BRC documentation is over complicated, too detailed for a small company. Don't have the time or resources to go over everything.
Not that I am aware of but consultant deals with FSA and they could confirm this.
EHO's keep changing and changing the specification. They insist on standards well above what they have to. Involves a significant cost to the company.
Independent consultant devised a food management system but they have had to rewrite the whole document.
Private consultant seemed ok but EHO were not happy with the advice they had provided.
Don't know if problems exist I haven't reviewed the sources of information of 1 1/2 years.
Guidance is too detailed, too many words.
Found it very hard to find guidance at the start. Had a consultant quote £6000 - far too expensive. They highlighted lots of problems to scare you into going with them. FSA provided useful information but not very much on HACCP. SFFBB CD very useful particularly for employees where English is not a first language.
There are large gaps in guidance as you progress as a company. As you get larger EHO's are not the best source as not experienced enough in all fields. You are left to the next steps. Advice on risks involved is too broad based.
N/A as had an independent consultant.
More guidance needs to be available to get to the next stage as the company grows. We are BRC certified but getting there has not been easy.
Guidance is not clear, open to interpretation, always contradictions.
We are a small business, very conscientious and want to improve. Try our best to keep up with everything but TSO expects us to change things which we struggle to do (e.g. label changes), big cost to us and time issues. Feel not fair, some people produce food in their own kitchens where animals and babies present and it isn't a problem, but we are inspected and feel we are punished.
Moved from BRC to SALSA certified as better suited to small businesses. BRC too detailed particularly for a small organisation with a fairly large range of products offered.
Difficult to find advice on how the HACCP guidelines have been changed, how do you know? Require a way of notifying companies, only find out when EHO states. Lots of people selling guidance on how a HACCP system should look but these are way too costly for a small food manufacturer.
EHO have telephoned but haven't visited, they wanted clarification of how we were operating. We could ask them for advice if required.
Too much red tape.

When setting up HACCP initially there was no advice on what form to do HACCP in, use check sheets but nothing to say this is the correct way. No advice on how to implement on a day to day basis.
Guidance often over the top for their needs. Not happy joining organisations with audits you have to buy into - large cost implications for a small business.
SALSA - not required by customers they supply, feel too costly.
Different advice offered from people in the same organisation i.e. advice relating to allergens or labelling.
SFBB - few links to HACCP information. EHO provided incorrect advice stating HACCP not important to a low risk product, audited by HEFF found HACCP essential.
SFBB have to tweak it to suit, not specific so don't use it that frequently.
Used to be BRC certified, used BRC guidance found principles very good but beyond what was necessary or appropriate for their company.
HEFF lack quality and expertise, more of a marketing organisation.
Not aware of any other guidance.
Feel between SALSA and the EHO we don't require any other guidance.
SFBB-use covers basics i.e. what is recorded rather than being about providing safer food. FSA - useful website for updates, new legislation but would be better if easier to search. EHO has a real understanding of what is achievable and realistic to a small business. SALSA - not necessary and wish to avoid additional cost.
Don't always agree with TSO, open to interpretation. Very difficult for small businesses to keep up with changes as insufficient staff/money.
Lots of information and not all relative.
No choice - We have no choice over the guidance we use as we have an EU licence
BRC standard is not product specific. Have to work out your own stuff and mix in your legislative requirements as well, also non-European rules to add in.
Some too expensive i.e. Campden BRI.
SFBB - good as a starting point. EHO helpful when visits, all verbal information which is useful. Aspiring to use BRC guidance.
Difficulty to actually obtain information that is relevant.
EHO very useful in keeping them up to date.
There is a requirement for more guidance in pre-requisites. Codex Alimentarius is very detailed, you have to pick out what is relevant.
Reason for not using guidance is we are a small firm of 25 employees, we concentrate on making the product not on looking at all the guidance, and it's a waste of time and money.
Don't wish to use SALSA, no shifting them and not all what they say applies to us.
We are very low risk, on a project with the Regional Food and Drink Forum.
Pre-requisite programme in guidance is vague, could do with more clarification.
Experienced many problems as company grew going from a small private organisation to the next stage then onto trading with multiples. Steps have not been easy, each stage incurs lots of time and money investment and it is not made easy. Think it could be a lot easier with guidance available.
Guidance available is far too lengthy; you just require information that relates to your business. Too time consuming sifting through lots of information.

We wouldn't choose BRC guidance as we offer a large range of products and it simply wouldn't suit, SALSA guidance is far more manageable for our company.
It can be hard to find exactly what you are looking for in the FSA guidance. The food law and email alerts provided by Campden BRI are very useful.
Felt EHO lacks specific knowledge.
Disparity between different EHOs has caused us issues particularly when nothing has changed.
A lot of the guidance is geared to large companies and not small.
It would be very beneficial if local EHO's offered more help such as workshops.
Technician shared with two other companies provides adequate guidance.
For Safer Food for Better Business it would be good if there were models for different kinds of business.
We gained approved premises in 2010. We used "A guide to applicants for approval of meat product premises" Recently came to look at this and couldn't find up to date information and it took ages to find. The FSA "Meat Industry Guide" document is approx 375 pages long which is too detailed. I am usually very proactive but find with the length of this document, and being a small business, I don't have the time to go through it. I will have to wait and be told something is wrong and respond to it.
Both people who guide us on our food safety management system are very reactive as opposed to proactive. There is insufficient information available relating to chocolate, not enough specific advice available.
Not aware of any problems as consultant deals with it all.
Lack of information of what guidance is available to small food manufacturing businesses. Also lack of assistance provided, external advice has large cost implications to a small business. Are there grants available if so where would you go to find out?
There is grant funding towards advice available but this is not made clear enough. The guidance can be confusing, ambiguous and it's not clear what is expected of every type of business. There are forums but these confuse you even more. An on-line guidance system would be very beneficial.
The company provided us with advice on anything technical. The only problem we experience is due to the size of our company, being small we have to buy in expertise to keep us up to date.
Feel BRC is for larger companies this has site constraints. SALSA more applicable to our size company.
Not aware of any guidance but has an independent advisor that informs them and helps them do what they need to do.
No specific guidance available to manufacturing chocolate. Very time consuming looking for information. SFBB too basic in many ways. It would be useful to have a template to follow.
Found the guidance provided by my consultant led to a food safety management system that was too lengthy, I have since used SALSA to help reduce it.
We are BRC certified (EFSIS SR Global?) Haven't experienced problems with guidance. Interviewee has a large amount of experience working for larger food manufacturers.

Whilst the guidance provides help in supporting you with your food safety management system it doesn't help with the actual application of putting what you have learnt into practice. Another problem was the time delay in Campden BRI getting back to me with technical advice, when I had to act on something quickly.
No microorganism specification guidelines for specific products.
In this region if you are aware of The Food and Drinks Forum and use guidance from the EHO there shouldn't be a problem , feel fully supported.
No, fully supported by the Food and Drinks Forum, they provide all the information required.
Felt advice given in developing a food safety management system led to an over complicated HACCP system which needs to be simplified.
Feel fully supported by The Food and Drinks Forum, there is always someone you can call to help you.
We do not produce food but are frequently classed in the same category in terms of guidance, much of which doesn't apply to us bottling water only. The TSO are very pinikity and often misinformed for what we produce.ie. vermin control - expected to put bating trays down, we are a non-food organisation and feel this encourages vermin.
So much information, also don't know if looking at most up to date information.
It would be useful if there were free templates available in some of the guidance that is available for small food business operators. These could be used and adapted to suit the business and save a lot of time and money for everyone.
Small companies are treated the same as the large, I'm the owner and I'm in their cooking all the time. For advice provided by the EHO it has been difficult to decipher what is a recommendation and what is a legal requirement. EHO's insist on things which are not practical on site here "where practical and where possible" doesn't always get through to the EHO's.

Appendix III

HACCP Guidance – Publications list

HACCP Guidance – Publications list

Publications listed are available for free download from the links given unless indicated otherwise. In this case a link is provided, where available, or supplier details and an indication of current cost (October 2012). The Chadwick House guides are not readily available but can be located via various booksellers.

Regulations:

European regulations are available via the EUR-Lex website (simple search facility)

<http://eur-lex.europa.eu/en/index.htm>

Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs as amended by Regulation (EC) No. 1019/2008. Official Journal of the European Union, L139, 1-54

Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for on the hygiene of foodstuffs. Official Journal of the European Union, L139, 55-205

Regulation (EC) no 854/2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption. Official Journal of the European Union, L139, 206-320

Codex Alimentarius and European Guidance

Codex Alimentarius, Food hygiene. Basic texts. 4th edition, 2009

ftp://ftp.fao.org/codex/Publications/Booklets/Hygiene/FoodHygiene_2009e.pdf

European Commission, Guidance document on the implementation of certain provisions of Regulation (EC) No 852/2004 on the hygiene of foodstuffs

http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidance_doc_852-2004_en.pdf

European Commission, Guidance document on the implementation of certain provisions of Regulation (EC) No 853/2004 on the hygiene of food of animal origin

http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidance_doc_853-2004_en.pdf

European Commission, Guidance document: Implementation of procedures based on HACCP principles and facilitation of implementation of the HACCP principles in certain food businesses, 2005

http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidance_doc_haccp_en.pdf

National Guidance

Department of Health, Guidelines for the safe production of heat preserved foods, 1994

(This publication is rather old and when available can be ordered via TSO. Although it is currently out of print it is still referred to by industry for this type of product)

<http://www.tsoshop.co.uk/bookstore.asp?FO=1159966&Action=Book&ProductID=9780113218011&From=SearchResults>

Food Standards Agency: Butchers – webpage

<http://www.food.gov.uk/business-industry/butchers/#.UIQ7Z4FaCP4>

Food Standards Agency, Food Hygiene a guide for businesses, June 2011

<http://www.food.gov.uk/multimedia/pdfs/publication/hygienebooklet.pdf>

Food Standards Agency, Food Industry Guide to good hygiene practice: Bottled water Published by TSO November 2008 (Available to order from TSO Cost: £10.00 + p&p depending on delivery option):

<http://www.tsoshop.co.uk/bookstore.asp?FO=1242081&DI=608159>

Food Standards Agency, National Association of British and Irish Millers (nabim)

Food Industry Guide to good hygiene practice: Flour milling

Published by TSO March 2008 Available to order from TSO Cost: £10.00 + p&p depending on delivery option):

<http://www.tsoshop.co.uk/bookstore.asp?FO=1242081&DI=596076>

Food Standards Agency, Mail Order Fine Foods Association
Food Industry Guide to good hygiene practice: Mail order food
Published by TSO February 2007 (Available to order from TSO Cost: £10.00 + p&p depending on delivery option):

<http://www.tsoshop.co.uk/bookstore.asp?FO=1242081&DI=579938>

Food Standards Agency, British Retail Association Food Hygiene Group
Food Industry Guide to good hygiene practice: Retail
Published by TSO July 2009 (Available to order from TSO Cost: £10.00 + p&p depending on delivery option):

<http://www.tsoshop.co.uk/bookstore.asp?FO=1160000&DI=614331&trackid=002654>

Food Standards Agency, Food Industry Guide to good hygiene practice: Sandwich Manufacturing
Published by TSO January 2011 (Available to order from TSO Cost: £10.00 + p&p depending on delivery option):
<http://www.tsoshop.co.uk/bookstore.asp?FO=1242081&Action=Book&ProductID=9780112432920&From=SearchResults>

Food Standards Agency, Automatic Vending association (AVA)
Food Industry Guide to good hygiene practice: Vending and dispensing
Published by TSO July 2008 (Available to order from TSO Cost: £10.00 + p&p depending on delivery option):
<http://www.tsoshop.co.uk/bookstore.asp?Action=Book&ProductID=0112430996&trackid=002300>

Food Standards Agency, Food Industry Guide to good hygiene practice: Wholesale distributors
Published by TSO November 2007 (Available to order from TSO Cost: £10.00 + p&p depending on delivery option):
<http://www.tsoshop.co.uk/bookstore.asp?FO=1242081&Action=Book&ProductID=0112431011&From=SearchResults>

Food Standards Agency, Guidance on producing, harvesting and importing terrestrial edible snails for human consumption, February 2011
<http://www.food.gov.uk/multimedia/pdfs/snailguidance.pdf>

Food Standards Agency, HACCP guidance for those producing wild game meat for human consumption either at an approved game handling establishment or under exemption allowed by the food hygiene regulations, October 2008
<http://www.food.gov.uk/multimedia/pdfs/gamehaccpplan.pdf>

Food Standards Agency: HACCP in meat plants webpage
<http://www.food.gov.uk/business-industry/meat/haccpmeatplants/#.UIRZJIFaCP4>

see also

A short guide to completing a HACCP plan
<http://www.food.gov.uk/multimedia/pdfs/guidehaccpplan.pdf>

Food safety management diary for meat producers
<http://www.food.gov.uk/multimedia/pdfs/foodmandiary2008.pdf>

Model documents 2005
<http://www.food.gov.uk/multimedia/pdfs/foodmandiary2008.pdf>

Food Standards Agency: Introduction to HACCP webpage
<http://www.food.gov.uk/business-industry/caterers/haccp/#.UIQVs4FaCP4>

Food Standards Agency, Meat Industry Guide (MIG) food hygiene and other regulations for the UK meat industry, Last updated May 2012 (Part 3 – HACCP) Available to download
<http://www.food.gov.uk/business-industry/meat/guidehygienemeat#.UIQ8I4FaCP4>

Food Standards Agency: Safer Food Better Business (SFBB) webpage
<http://www.food.gov.uk/business-industry/caterers/sfbb/#.UIQWEYFaCP4>

Food Standards Agency: Safer Food for Better Business (SFBB) for caterers, April 2012

Available as:

Introduction - <http://www.food.gov.uk/multimedia/pdfs/sfbbhowto.pdf>

Full pack - <http://www.food.gov.uk/multimedia/pdfs/sfbbfullpack0109.pdf>

Training - Available in 16 languages to watch online <http://www.sfbtraining.co.uk/> or as DVD ordered via FSA publications by email foodstandards@ecgroup.co.uk or telephone 0845 606 0667

Food Standards Agency: Safer Food for Better Business (SFBB) for retailers, November 2009

<http://www.food.gov.uk/business-industry/caterers/sfbb/sfbbretail/#.UIQYtoFaCP4>

Available as:

Introduction - <http://www.food.gov.uk/multimedia/pdfs/sfbbrrhow.pdf>

Full pack - <http://www.food.gov.uk/multimedia/pdfs/sfbbrrpack.pdf>

Training - Available in 16 languages to watch online <http://www.sfbbrtraining.co.uk/> or as DVD ordered via FSA publications by email foodstandards@ecgroup.co.uk or telephone 0845 606 0667

Food Standards Agency: Safer Food for Better Business (SFBB) for different cuisines (Chinese, Indian, Pakistani, Bangladeshi and Sri Lankan)

http://www.food.gov.uk/business-industry/caterers/sfbb/sfbbcuisines/#anchor_2

Chinese - <http://www.food.gov.uk/multimedia/pdfs/sfbbchinesehow.pdf>
(November 2009)

Available in different languages (Traditional Chinese and Welsh)

<http://www.food.gov.uk/business-industry/caterers/sfbb/sfbblanguages/#.UIQcflFaCP4>

Indian, Pakistani, Bangladeshi and Sri Lankan - <http://www.food.gov.uk/multimedia/pdfs/sfbbindianhow.pdf> (June 2010)

Training - Available in 16 languages to watch online <http://www.sfbbrtraining.co.uk/>

Food Standards Agency: Safer Food for Better Business for childminders, 2009

<http://www.food.gov.uk/business-industry/caterers/sfbb/sfbbchildminders/#.UIQc7YFaCP4>

Full pack - Download from website <http://www.food.gov.uk/multimedia/pdfs/sfbbcmcomplete.pdf> or order from FSA publications by email foodstandards@ecgroup.co.uk or telephone 0845 606 0667

Food Standards Agency: Safer Food for Better Business supplement for care homes, 2009

<http://www.food.gov.uk/business-industry/caterers/sfbb/carehomes/#.UIQeF4FaCP4>

Available for download <http://www.food.gov.uk/multimedia/pdfs/sfbbcarehomes1009.pdf> or from FSA publications by email foodstandards@ecgroup.co.uk or telephone 0845 606 0667

Food Standards Agency, Small and low throughput establishments: examples of EU hygiene regulations flexibilities

<http://www.food.gov.uk/business-industry/guidancenotes/hygguid/euhygieneregulationsflexibilities/#.UIRH8oFaCP4>

Food Standards Agency, Wild game guide: A guide to food hygiene legislation

<http://www.food.gov.uk/business-industry/farmingfood/wildgameguidance#.UIRLeoFaCP4>

Food Standards Agency, The wild game guide, June 2011

<http://www.food.gov.uk/multimedia/pdfs/wildgameguide0611.pdf>

Food Standards Agency, Northern Ireland:

Safe Catering (webpage) including Safe Catering Guide (Issue 4 2007)

<http://www.food.gov.uk/northern-ireland/safetyhygieneni/safecateringni/#.UIRKYFaCP4>

Food Standards Agency, Scotland

Food Standards Agency Scotland, Cooksafe – Food safety assurance system for Caterers, 2006 (as amended June 2012)

Available to download from webpage:

<http://www.food.gov.uk/scotland/safetyhygienescot/cooksafes/#.UIRQeoFaCP4>

and as e-Cooksafe

<http://www.food.gov.uk/scotland/safetyhygienescot/cooksafes/ecooksafes/#.UIRRS4FaCP4>

also available in Chinese, Punjabi, Urdu and Bengali

Food Standards Agency Scotland, Retail Safe for retailers handling unwrapped high risk food, 2006 (webpage)

<http://www.food.gov.uk/scotland/safetyhygienescot/retailsafe/#.UIRRyoFaCP4>

Available as whole document: <http://www.food.gov.uk/multimedia/pdfs/retailsafe.pdf>

Food Standards Agency Scotland, Scottish Association of Farmers' Markets (SAFM),

Food Safety and labelling guide for farmers markets in Scotland, March 2012

<http://www.food.gov.uk/multimedia/pdfs/farmermarketscot.pdf>

European Community Guidance

European Commission, Community Guide to the Principles of Good Practice for the Microbiological Classification and Monitoring of Bivalve Mollusc Production and Relaying Areas with regard to Regulation 854/2004, 2012

http://ec.europa.eu/food/food/biosafety/hygienelegislation/good_practice_en.htm

EC / European Federation of Bottled Water, Guide to good hygiene practice for bottled water in Europe, 2012

http://ec.europa.eu/food/food/biosafety/hygienelegislation/good_practice_en.htm

EC / European Natural Sausage Casings Association, Community guide to good practice for hygiene and the application of the HACCP principles in the production of natural sausage casings, 2012

http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidelines_good_practice_haccp_en.pdf

EC / World Union of Wholesale Markets Community, Guide to Good Hygienic Practices Specific to Wholesale Market Management in the European Union, 2009

http://ec.europa.eu/food/food/biosafety/hygienelegislation/docs/wholesale_guide_original_en.pdf

Industry Guidance

Association of the industry of nectars from fruits and vegetables (AIJN), Hygiene code, 2010

Contact AIJN for further details <http://www.aijn.org/pages/papers/juice-safety.html>

AIJN Code of Practice is a subscription service 300 € per year

British Frozen Food Federation (BFFF), Guide to the handling and storage of frozen food, 2012 Available for free download:

<http://www.bfff.co.uk/about-us/publications/guide-storage-handling-frozen-foods>

British Meat Processors Association (BMPA),

Guide to food hygiene and other regulations for the UK meat industry, 2006

Meat Industry Guidance – A guide to food hygiene and other regulations for the meat industry, 2010

http://www.bmpa.uk.com/attachments/Resources/2681_S4.pdf

also see BMPA Guidance <http://www.bmpa.uk.com/Content/guidance.aspx?g=77>

British Sandwich Association (BSA) (Access is for Members only)

http://www.sandwich.org.uk/information_centre/index.shtml

- Code of practice and minimum standards for sandwich bars and those making sandwiches on the premises, 2012
- Code of practice and minimum standards for sandwich manufacturers (producers), 2007

The following however is available for purchase via TSO:

- Food industry guide to good hygiene practices – Sandwich manufacturing (TSO), 2011

(Available to order from TSO Cost: £10.00 + p&p depending on delivery option):

<http://www.tsoshop.co.uk/bookstore.asp?FO=1159966&Action=Book&ProductID=9780112432920&From=SearchResults>

British Soft Drinks Association (BSDA)

- Hazard analysis and critical control point system, 2005
Free downloadable leaflet Hazard analysis and critical control point system
<http://www.britishtsoftdrinks.com/pdf/HACCPleafletlowres.pdf>
- Good hygiene practices, 2006
Free downloadable leaflet
<http://www.britishtsoftdrinks.com/PDF/GoodHygienePractices.pdf>
- Code of practice for the production of apple juice, 2005
Free to members. Non members: Available to purchase £59.00
- 2010 Guide to good bottled water standards

Free to members. Non members: Available to purchase £99.00

<http://www.britishtsoftdrinks.com/Default.aspx?page=996>

Chilled Foods Association (CFA), Best practice guidelines for the production of chilled foods. 4th edition, 2006
Available for purchase via TSO Cost: £100.00 + p&p depending on delivery option:

<http://www.tsoshop.co.uk/bookstore.asp?Action=Book&ProductId=9780117022836&trackid=002448>

CAOBISCO, Guide to good hygiene practices, 2011

Contact Caobisco to place order

<http://www.caobisco.com/page.asp?p=222>

CAOBISCO, HACCP Guide, 2011

Available for purchase 30€ + p&p Contact Caobisco

<http://www.caobisco.com/page.asp?p=222>

Euroglace, Code for edible ices, 2006

Available for free download from website:

http://euroglaces.eu/en/upload/docs/Edible_ices_codes/English%20-%20Code%20for%20Edible%20Ices%202006.pdf

European Chilled Foods Federation (ECFF), Recommendations for the production of pre-packaged chilled foods, December 2006

Available for free download from ECFF website:

http://www.ecff.net/images/ECFF_Recommendations_2nd_ed_18_12_06.pdf

European Herbal Infusion Association, Guidelines for good agricultural and hygiene practices for raw materials used for herbal and fruit infusions, 2012

Available for free download from EHIA website:

http://www.ehia-online.org/fileadmin/EHIA/publications/GAHP-EN_ISSUE_5_18-JANUARY-2012.pdf

Fresh Produce Consortium (FPC), Food Hygiene Guide, 2009

Available for purchase by contacting FPC (or free to members)

<http://www.freshproduce.org.uk/publications.php>

Ice Cream alliance (ICA), Code of practice for the hygienic manufacture of ice cream, 2004

Available to order from Icecream Alliance see website

<http://www.ice-cream.org/ice-cream-books-and-merchandise.htm>

Ice Cream Alliance (ICA), A guide to the safe handling and service of scoop and soft service ice cream, 1997

Available to order from Icecream Alliance - see website

<http://www.ice-cream.org/ice-cream-books-and-merchandise.htm>

Meat Training Council, HACCP review and guidance manual for retail butchers

Available for purchase from the following link Cost £45.50 per manual

<http://www.meattraining.org.uk/links/Review%20Guide%20order%20form.pdf>

Pizza, Pasta and Italian Food association (PAPA) (Information, legal and technical advice available to members only)

- Code of practice and minimum standards for pizza, pasta and Italian restaurants, takeaways and delivery outlets
- Code of practice for home delivery operators and drivers

<http://www.papa.org.uk/>

Seafish

- HACCP guidelines for bivalve despatch and purification centres
- Good Practice Guide for demersal fishermen
- Good Practice Guide for Nephrops fishermen
- Good Practice Guide for Pelargic fishermen
- The good practice guide to handling and storing live crustacean

<http://www.seafish.org/publications-search?search=%22good+Practice+Guide%22&category=Guidelines>

Specialist Cheese Makers Association, Code of best practice. 3rd edition, 2011

Available for purchase (reduced rate for members) via the website. Cost £90.00 non members, £15.00 Members +p&p

http://www.specialistcheesemakers.co.uk/best_practice/index.htm

Other publications:

British Retail Consortium (BRC), Global Standard for Food Safety Issue 6

Available for purchase via BRC shop /TSO website. Cost £95.00

<http://www.tsoshop.co.uk/brcbookshop/>

Campden BRI, Guideline No 42 HACCP: a practical guide. 4th edition, 2009

Available for purchase via Campden BRI Cost £50.00 Members; £75.00 Non members

<http://www.campden.co.uk/publications/pubDetails.php?pubsID=427>

Chadwick House Group (National Association of Master Bakers, Biscuit, Cake Chocolate and Confectionery Alliance, Federation of Bakers, Scottish Association of Master Bakers),
Industry guide to good hygiene practice – Baking guide, 1997

Chadwick House Group, Industry guide to good hygiene practice – Catering guide, 1997

Chadwick House Group, Industry guide to good hygiene practice – Catering guide: Ships, 2004

Chadwick House Group, Industry guide to good hygiene practice – Fresh produce, 1999

Chadwick House Group, Industry guide to good hygiene practice – Markets and Fairs, 1998

International Life Sciences Institute (ILSI), Europe Food Safety Management tools, 2nd edition, 2011

Available for free download from ILSI website:

<http://www.ilsi.org/EUROPE/Pages/ViewItemDetails.aspx?ListID={0348eb34-df85-49dd-9ade-77ed136643f1}&ItemID=252&URL=http://www.ilsi.org/Europe/Publications/Food%20Safety%20Management%20Tools%202nd%20edition.pdf>

International Life Sciences Institute (ILSI), A simple guide to understanding and applying the hazard analysis critical control point concept, 2004

Available for free download from ILSI website:

http://www.ilsi.org/EUROPE/Pages/ViewItemDetails.aspx?ListID={0348eb34-df85-49dd-9ade-77ed136643f1}&ItemID=122&URL=http://www.ilsi.org/Europe/Publications/C2004Simp_GuiEng.pdf

Institute of Food Science and Technology (IFST), Food and drink manufacture - good manufacturing practice: a guide to its responsible management. 5th edition, 2007

Available for purchase from IFST website: Cost£51.00 Members £96.00 Non members +p&p

<http://www.ifst.org/publications/guides/>

Leatherhead Food Research / RSC Publishing, HACCP – A toolkit for implementation. 2nd edition, 2010

Available to order via LFI website Members £60.00 Non members £70.00

<http://www.leatherheadfood.com/haccp-toolkit>