ADVISORY COMMITTEE ON THE MICROBIOLOGICAL SAFETY OF FOOD

REPORT ON WORK OF THE *AD HOC* GROUP ON RISK CONTROL

Background

1. At its 36th meeting in March 2000, the ACMSF agreed that an *Ad Hoc* Group should be convened, to review why risk control[1] is not being universally applied amongst small and medium sized enterprises in manufacturing and catering, and in the domestic environment and to recommend appropriate action.

2. The composition of the Group, which met on 26 October 2000, and its terms of reference are shown at Annex I.

The current situation

3. The Group noted that HACCP-based controls have been the foundation of ACMSF food safety advice from its inception, and legislation was being increasingly introduced to make the application of HACCP mandatory. Some sectors of the food industry were applying HACCP principles effectively, notably larger food processing companies and especially those subject to regular 'due diligence' audits on behalf of their customers. But the Group also acknowledged that many businesses, particularly among small and medium size enterprises (SMEs), were not.

4. The Group noted that there had been a good deal of Government-funded research to assess current implementation of HACCP in the UK and to identify implementation difficulties. The research was now beginning to move on to seek solutions. The Group concluded that the key reasons for implementation difficulties included :-

- the formal HACCP system is less well adapted for use by SMEs;

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[1] The Group has some concern over the use of the term 'risk control' in the context of HACCP, which is a hazard control system. The Group's work has focused on hazard control.

- SMEs often have difficulties understanding what is required in order to implement HACCP principles effectively. They lack knowledge of the HACCP system itself and they lack knowledge of the underlying technology that could allow them to apply it to their business;

- HACCP plans often become overcomplicated, sometimes as a result of additional control points requested by corporate customers;

- documentation requirements may be burdensome;

- SMEs may find the costs of HACCP training high in relation to their turnover and resources - not just the actual training fees but also in terms of the time investment. This is added to by the problem of retention of the expertise in the business in sectors where there can be relatively high staff turnover.

The way forward

5. The Group noted that most microbiological food safety problems followed very basic failures to control a small number of essential process steps. What was needed were initiatives to promote better understanding of, and focus on, these basic controls.

6. If some food sectors where SMEs have difficulty in achieving this through formal application of HACCP, a more pragmatic application of HACCP is needed to help them deliver acceptable levels of risk control. This would involve the development of a generic model HACCP for particular sectors of the food industry. Such generic models have been promoted by a number of authorities from time to time. Examples appeared in ICMSF[2] and more recently were commended by the WHO sponsored workshop on Strategies for Implementing HACCP in Small and/or Less Developed Businesses held in the Hague from 16-19 June 1999. 'Industry guides' that would serve a similar purpose are

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[2] ICMSF : International Commission on Microbiological Specifications for Foods. Micro-organisms in foods 4 : Application of the Hazard Analysis Critical Control Point (HACCP) system to ensure microbiological safety and quality. Published by Blackwell Scientific Publications – Oxford ; 1988.

advocated in the General Food Hygiene Directive 93/43. To date the group was aware of few initiatives to develop such model guidance in the UK.

7. Models would provide guidance on the application of all HACCP principles. These would include not only the critical points where the essential controls should be focussed, but also guidance on appropriate control measures, monitoring, corrective action, documentation etc. Care would need to be taken to ensure that proprietors use the model as a basis for development of a risk control plan that suits their particular business. They should not be regarded as universal, off-the-shelf risk control plans.

8. We note that the Food Standards Agency is currently reviewing the application of HACCP in the various sectors of the food industry, against the background of the consolidation of the Food Hygiene Regulations. We also note that the Agency has committed itself to reducing foodborne illness by 20% over the next five years, and to improving risk control in small businesses. We believe that it would thus be timely for the FSA to develop a strategy for the development of generic model HACCP guides for particular sectors of the industry.

9. The strategy will need to extend to developing awareness of the model guides once developed, training or instruction of relevant parties, appropriate enforcement follow up and evaluation of their effectiveness.

The essential food hygiene requirements

10. Any model HACCP guide must serve to focus on the small number of points where risk control can be effected. These will include :-

- adequate heat processing;

- appropriate cooling;

- proper time / temperature control in food holding and storage including correct refrigeration and freezer temperatures;

- effective washing of food;

- avoiding contamination of ready to eat food by:

- the separation of raw and ready to eat foods; and

- good personal hygiene.;

Where to direct efforts to best effect

11. The Group identified the following sectors as key targets for action. Notwithstanding more sophisticated businesses in the sector may have their own formal HACCP plans, there are likely to be many other businesses which will benefit from the guidance that will be provided by generic model HACCP guides.

- milk processing and the manufacture of dairy products (specifically on-farm pasteurisation, and raw milk products);

- the processing of ready to eat meats and meat products;

- catering operations in general but especially :-

  - take away operations ;

  - the restaurant and public house sectors;

  - sandwich making (particularly for direct sale to the public through, eg, sandwich bars);

  - institutional catering (eg hospitals, nursing homes, etc) ;

  - catering operations operated from domestic premises;

- delicatessens;

- the production of certain 'high risk' bakery products

- farm shops carrying out catering and food processing/manufacturing.

Who should act, and the role of the ACMSF

12. The strategy suggested would involve a significant amount of work in a number of specialist areas. The Group did not believe that it would be appropriate for the ACMSF to take on this task. This risk control initiative should be taken forward by industry bodies such as Trade Associations, coordinated by the Food Standards Agency, probably with input from enforcement representatives and other relevant expertise.

13. However, we believe that the ACMSF should be ready to respond as the strategy is developed to provide further amplification or advice as requested. The FSA may consider it appropriate to constitute an overall steering committee to ensure consistency of approach across different sectors. The ACMSF or individual members may be asked to play a role at this level.

The domestic environment

14. Aside from regulated food businesses, the Group believes that there is great value in continued delivery of food safety information to the population as a whole. On the one hand, the objective should be to influence behaviour during domestic food preparation and to encourage better risk control. But the same essential life skills will also be invaluable if the 'consumer' becomes, as so many do, employed in commercial food preparation.

15. For the general 'consumer' the same basic risk control messages outlined in paragraph 10 are equally relevant. The Group believes that there is every reason for the Food Standards Agency to re-evaluate Government strategy for communication of food safety risks and controls to the consumer. Clearly, there are many communication options that the FSA may wish to explore. The Group saw very brief but interesting examples of programmes operated by the US government. The Group believed that to provide more specific advice about methods of communication would be outside of the expertise of the ACMSF, but the Group did recommend that both the messages and the target audiences must

be sharply focussed. Again, the ACMSF should express its willingness to provide further advice as the FSA develops its strategies.

Action

16. The Working Group asks the Committee to endorse its recommendations for further action to be instigated by the FSA.

David Clarke
Chairman/*Ad Hoc* Group on Risk Control
November 2000

ANNEX I

ACMSF *AD HOC* GROUP ON RISK CONTROL

Terms of reference

To conduct a scoping exercise on risk control in sectors of the food industry where HACCP principles have not yet been adequately applied, and in the home, and, if appropriate, to formulate terms of reference for consideration by the ACMSF for a formal Working Group to take matters forward.

Membership

Chairman :	Mr David Clarke
Members :	Dr Tom Clayton
	Mr Derrick Kilsby
	Ms Eva Lewis
	Dr Terry Roberts
	Mrs Beti Wyn Thomas*
Departmental assessor :	Dr Judith Hilton (FSA)
Secretariat :	Colin Mylchreest (Administrative Secretary)
	Dr Jonathan Back (Scientific Secretary)*
	Miss Janice Kerr (Secretariat)

* Unable to attend meeting of Group on 26 October 2000.