



Countdown to HACCP

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Introduction **Hazard Analysis of Critical Control Points (HACCP)** has its origins in engineering and then in the NASA space program where it was used to assure the microbiological quality of space food. It was first used by mainstream food industry in the 1970's (in low acid canning processes) and has gradually become the pre-eminent technique used for risk assessment and risk management. **Now HACCP is a regulatory requirement for businesses in the feed, feed ingredients and feed additives industry.** How did this come about and what does it mean for business? In this brief paper we will explore the timeline that brought HACCP into the mainstream of prescribed techniques whilst keeping a weather eye on the clock - for all feed businesses must be operating HACCP systems by 2008 at the latest and must already be registered with local authorities.

1990's

The 1990's saw a number of **crises related to animal nutrition** and food safety. These were:

- BSE (UK and all Europe)
- Dioxins (Belgium)
- Antibiotic use (for growth promotion) and resistance problems

Consequently there was grave social, political and economic impact along with an overriding belief that animal nutrition was responsible for the perceived food safety crisis.

2000

The **Commission White Paper on Food Safety** was the response to the preceding crises and the seeds of all the following legislation can be found here. It introduced:

- High standards in consumer health
- The precautionary principle
- Risk-analysis - risk assessment, risk management and risk communication
- Horizontal and vertical harmonisation of feed and food legislation
- Separation of risk assessment from risk management
- Inclusion of non-scientific parameters (societal, animal welfare, environmental, consumer expectations etc)
- Make food chain operators (e.g. feed, feed ingredient and feed additive businesses) responsible for safety

- 2002** **European Food Safety Authority** Established (Regulation 178/2002). Responsible for:
- Safety evaluation of all matters relating to the feed-food chain (e.g. feed additives)
 - Safety evaluation of al GMOs
 - Review of feed additives (2004-2014)
 - Assisting Commission with Rapid Alert System Food and Feed (RASFF)
 - Opinions on undesirable substances
- 2002 onwards** “Voluntary” quality and safety **Codes of Practice (e.g. FEMAS, UFAS, GMP+)** introduce a requirement for **HACCP systems**
- 2003** **Feed Additive Regulation (1831/2003)** introduced a requirement for all additives on the market to be notified with full approvals to be granted following submission of a dossier by 2010. In “Section 2” of the dossier concerning the Identification and Characterisation of the additive and its methods of control HACCP principles will prove useful in providing the necessary assurances of purity of both active ingredients and the additive itself.
- 2005** **Feed Hygiene Regulation (183/2005)**
- **Feed-food operators must be registered/approved by competent authorities**
 - **HACCP systems are required for all except primary producers (farmers) - who must work to best practice guidelines**
 - **Personnel must be trained in hygiene issues (and HACCP)**
 - **There must be a formal complaints procedure**
 - **Traceability must be in place**
 - **Documentation and other records must be retained an available for inspection**
- 2006** **Feed businesses must register with local authorities**
- 2006 - 8** **Feed businesses must develop and implement HACCP systems within their operation**
- The time required to implement HACCP varies depending upon:
- The number of products
 - The number of processes
 - The nature of materials, processes and products
 - The degree to which HACCP Prerequisites are in place.

A typical approach to implementing HACCP requires the following steps

1. HACCP Prerequisites Gap Analysis
2. (Implement Prerequisites if Missing)
3. HACCP Team Training
4. Assemble HACCP Team
5. Formulate Product Specifications (wrt HACCP)
6. Establish intended uses
7. Construct process diagrams and plant / premises schematics
8. Verify process diagrams
9. Identify hazards at each process stage
10. Determine control measures and critical control points (CCPs)
11. Determine monitoring of CCPs
12. Determine corrective actions
13. Verify the system
14. Draw up necessary documentation

Management Forum Conference No. V4-8106 (BASIC PRINCIPLES OF PROCESS HYGIENE AND HACCP FOR THE ANIMAL FEED INDUSTRY) addresses all of these topics.

2008 **Feed businesses must declare that the conditions laid down by the Regulations are being met (which will include a demonstrably effective HACCP systems)**

In Conclusion If you are an implicated business (feed, feed ingredients and feed additives) and you have not yet registered with your local authority you should do so immediately.

You should undertake to establish a HACCP team within your business.

You should ensure that your HACCP Team receives appropriate training.

You should undertake HACCP studies now in order to ensure that the appropriate systems are in place by 1st Jan 2008.