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## Short Communication

# Web information for food operators: is it enough to comply with the food safety and public health policy?



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In the recent years, the European Commission (EC) identified food safety as one of its top priorities and established a program of legislative action based on the concept ‘from farm to table’. In 2004, the EC published several regulations called the ‘food package’<sup>1–4</sup> with the aim to harmonize the food safety in the European Union by enforcing the implementation of food safety programs based on the Hazard Analysis and Critical Control Point (HACCP) principles in all food companies.

HACCP implementation must be preceded by the establishment of pre-requisite programs (hereinafter referred only as pre-requisite) as a support network of the HACCP program.<sup>5</sup> Thus, control and maintenance of equipments and facilities, hygienic design, temperature control, pest control, traceability and recall, microbiological control, good hygiene and manufacturing practices, cleaning and disinfection (C&D), food labelling, food safety training or supplier's control are considered the most common pre-requisites.<sup>5</sup> Although the

way they are put in practice is flexible, all of them are mandatory.<sup>2</sup>

Although HACCP become the basis of food safety due to their benefits, food-borne outbreaks still occur. It could be associated to the way that food operators adapt the HACCP and pre-requisites to the food operators (FOs) particularities. Implementation of food safety programs has an important economic cost for the industry,<sup>6</sup> large-sized FOs commonly presented more resources (economical, human and technical) regarding food safety than small- and medium-sized FOs. Thus, outsourcing of food safety services is a common practice in small- and medium-sized FOs. However, the current context of economical crisis conveys that many of these small and medium-sized FOs try to implement their food safety plans using the information available on internet to save money from external food safety consultants. This practice could lead to the appearance of deficiencies in the implementation of the HACCP plan and pre-requisite program. Thus, the lack of a clear understanding by FOs between pre-requisites and HACCP and their respective role in ensuring food safety undermines the implementation of suitable and effective HACCP-based program.

Other factors such as age, scholarship or low literacy on food safety may also contribute to these deficiencies. In consequence, the lack of compliance of food policy involves the application of fines by food inspection authorities, hurting even more the economical situation of these FOs with the negative impact in public health.

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**Table 1 – Score for HACCP and pre-requisites provided by manuals under study.**

	%
<b>1. HACCP</b>	%
• Food operators (FO) are responsible for the safety of foodstuffs	91.25
• FO must implemented a food safety plan based on HACCP methodology	91.25
• Need to assemble a HACCP team	45.00
• Foodstuff description and intended use	47.50
• Construction of flow diagram	57.50
• On-site confirmation of flow diagram	53.75
• Conduct a hazard analysis	73.75
• Determine the critical control points	73.75
• Establish critical limits	73.75
• Establish a system to monitor and control of the CCP	73.75
• Establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control	73.75
• Establish procedures for verification to confirm that the HACCP system is working effectively	73.75
• Establish documentation concerning all procedures and records appropriate to these principles and their application	67.50
• Records must be kept upgrade	66.25
• HACCP plan must be upgraded/modified in case of process modifications and/or development of new foods products	62.50
• FO must demonstrate HACCP program when required by the official authorities	63.75
• Specific identification of physical, chemical and microbiological hazards	30.00
• The manual/guideline presented examples of HACCP plans	41.25
<i>Total</i>	64.44 – <i>medium</i>
<b>2. Pre-requisite: microbiological sampling plan</b>	
• Food operators must perform microbiological analysis to foodstuffs according to the HACCP principles and regulations	13.75
• Must be defined corrective action in case of deviations	7.50
• Food operators producing food ready for consumption which could pose a risk to public health due to the presence of <i>Listeria monocytogenes</i> shall sample of areas and processing equipment for the detection of this bacterium as part of their sampling scheme	6.25
<i>Total</i>	9.16 – <i>not recommended</i>
<b>3. Pre-requisite: good manufacture practices</b>	
• Knowledge an implementation of good manufacture practices	51.25
• Rejection of improper ingredients/foods	45.00
• Fast storage of foodstuffs with specific temperature conservation	46.25
• Ingredients/foodstuffs must be stored properly avoiding contamination	45.00
• Avoid crossing between RTE products and ingredients/raw foodstuffs	45.00
• Separation of processing areas (zoning) for RTE products and raw foods	0
• Keep the “FIFO” rule (always first-in. first out)	45.00
<i>Total</i>	39.64 – <i>not recommended</i>
<b>4. Pre-requisite: suppliers control</b>	
• FO should implement a supplier's control program	70.00
• Foodstuffs from suppliers with non-compliant conditions must be rejected	61.25
• FO should maintain a suppliers' information list always update	58.75
• It is recommended that suppliers ensure the safety of its products by certificates of conformity	53.75
• FO should record all incidents and corrective measures during suppliers' inspections	51.25
• FO should elaborate a suppliers' audit guidelines	53.75
• It is recommended that suppliers provide documents about HACCP implementation. ISO22000. BRC or IFT standards.	38.75
<i>Total</i>	55.35 – <i>medium</i>
<b>5. Pre-requisite: cleaning and disinfection (C&amp;D)</b>	
• The food facilities should be hygienically designed to improve the good hygienic practices	85.00
• FO should elaborate a layout (inventory) of all the areas, equipments, tools, and so forth, to be cleaned and disinfected	86.25
• C&D program must define the frequency of C&D procedures	86.25
• C&D program must define the type of C&D products used	100
• C&D program must specify all the C&D procedures	86.25
• C&D program must define the person in charge to control C&D procedures	82.50
• Control measures of the C&D program must be defined	77.50
• Corrective actions of the C&D program must be defined	68.75
• Records of all C&D operations must be defined	73.75
• Information about technical data sheet of all products used in C&D should be included in the C&D program	57.5
• All C&D products must be authorized for utilization in food facilities	50.00
• C&D products and tool must be stored in a specific room	42.50
• Microbiological verification measures of C&D procedures should be defined	41.25
<i>Total</i>	72.11 – <i>medium</i>

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