

## Questions and Answers on hygiene requirements for food

*The “hygiene package” of 5 laws just recently adopted by the EU aims to merge, harmonise and simplify very detailed and complex hygiene requirements currently scattered over seventeen EU Directives. The overall aim is to create a single, transparent hygiene policy applicable to all food and all food operators, together with effective instruments to manage food safety and potential future food crises, throughout the food chain. The new hygiene law will be applicable as of 1 January 2006.*

### General rules

#### Which products are covered by the hygiene rules?

General hygiene rules are laid down for the production of all food, while specific rules are laid down for meat and meat products, bivalve molluscs, fishery products, milk and dairy products, eggs and egg products, frogs' legs and snails, animal fats and greaves, gelatine and collagen.

What are the HACCP principles?

The hygiene package introduces HACCP principles in all sectors of the food business except for the primary sector (farms). HACCP stands for Hazard Analysis Critical Control Points and consists of seven principles:

- hazard analysis to identify potential food safety risks (hazards),
- the identification of critical control points to prevent such hazards,
- the establishment of critical limits,
- monitoring of the critical control points,
- corrective actions if something goes wrong,
- verification to assess whether monitoring occurs correctly, corrective actions are taken in time and effectively, etc.
- documentation.

For example, two important critical control points in slaughterhouses are the prevention of faecal contamination of carcasses and ensuring the correct temperature of carcasses during storage. Such critical control points must be identified and monitored by the slaughterhouse operator. HACCP is a vital system to guarantee proper hygiene conditions.

### **Do farm operators need to introduce HACCP?**

Although farmers should be encouraged to apply the HACCP principles as far as possible, there is no formal obligation for them to implement the HACCP system. Instead, the farming sector may develop guides to good practice, which specify the obligations for the operators in that sector with regard to food hygiene.

These obligations may include, for example, rules on hygiene, the quality of animal feed, animal welfare standards, pest control and records on animal health.

### **Who has the primary responsibility for hygiene and how is this verified?**

The food establishment operator has the primary responsibility to ensure that hygiene rules are respected, while the competent authority (government) verifies the situation by regular inspections. All food business operators need to be registered. Some businesses, such as slaughterhouses and cutting plants, need approval before they can operate. Requirements for the construction and installation of slaughterhouses and cutting plants are less detailed than in previous legislation, but they increase the responsibility of the food business operator who must ensure, for example, the welfare of live animals, humane killing procedures, hygienic working conditions, the prevention of cross-contamination and a safe end product. The competent authority in each EU Member State has to verify that the rules are correctly implemented, for example by checking that production occurs according to the hygiene rules and that the end-product is not contaminated, is stored properly and is safe for human consumption.

### **Who will develop the guides to good practice?**

The legislation foresees the development of guides to good practice. In general, usually bodies such as Product Boards will develop guides to good practice, possibly together with operators from the sector concerned, consumer groups and competent authorities in the Member States. In some cases, guides to good practice may be established at EU level, if necessary. This will be done by or in consultation with representatives of European food business sectors and other interested parties such as consumer groups and in co-operation with the competent authorities. The Standing Committee of the Food Chain and Animal Health, consisting of representatives of the Member States and the European Commission, shall assess the draft guides.

### **How is traceability and marking guaranteed?**

According to the hygiene rules, all meat shall be marked with a health mark. All food products shall have an identification mark. Both marks will allow for traceability. Furthermore, animals delivered to a slaughterhouse need to be preceded (in exceptional cases accompanied) by food chain information, which contains for example details of animal identification, animal health and medical treatments.

### **How do the hygiene rules affect imports of food of animal origin?**

Imported products of animal origin have to live up to the strict EU food safety standards, including the hygiene rules. The import of such products is therefore only allowed from countries and establishments that appear on a Community list managed by the European Commission on behalf of the EU Member States.

## **Rules on inspections and controls**

### **Who is responsible for meat inspection?**

The inspection of live animals and dead animals occurs under the responsibility of the official veterinarian, who may be assisted by official auxiliaries and, under specific circumstances and only for poultry and rabbit meat, by slaughterhouse staff. Extensive and detailed training requirements are necessary for veterinarians, auxiliaries and slaughterhouse staff involved in meat inspection. At least one official veterinarian needs to be present in the slaughterhouse throughout the inspection of live and dead animals (the so called ante-mortem and post-mortem inspection respectively). The same applies for game-handling establishments during the post-mortem inspection.

### **Is inspection of live animals possible on the farm?**

Inspection on the farm by an approved veterinarian is possible. In the case of pigs, for example, the animals must be accompanied by a health certificate and need to be slaughtered within 3 days of inspection.

### **How will meat inspection change with the new rules?**

The new rules allow for a more modern approach based on risk assessment, which means that under certain conditions it is possible to limit the post mortem inspection to a visual examination, except of course when abnormalities are detected. For example, fattening pigs kept under controlled housing conditions in integrated production systems would qualify for such an inspection procedure.

The traditional meat inspection tasks of the official veterinarian will in the future be increasingly replaced by auditing tasks. For example, the official veterinarian will have to verify the implementation of the HACCP system, which will include assessment of critical control points, checking daily records, verification of the proper application of hygiene procedures, etc. Meat inspection will not, however, be privatised. The official veterinarian is ultimately responsible for meat inspection, although he or she can be assisted by properly trained auxiliaries. In establishments where poultry and lagomorphs (eg rabbits) are slaughtered, the veterinarian can also be assisted by slaughterhouse staff, under specific conditions. Slaughterhouse staff cannot, however, carry out exactly the same tasks as auxiliaries. For example, slaughterhouse staff may not carry out any auditing tasks.

### **How is the inspection of wild game organised?**

The initial inspection of the hunted animal will be performed by a person in the hunting team who has been specifically trained for this task. If the meat is placed on the market, a second post-mortem inspection will in most cases be performed by the official veterinarian at the game-handling establishment.

### **What are the farmer's obligations when sending animals for slaughter?**

The farmer will have to register all health related problems and interventions and send the relevant information to the slaughterhouse 24 hours before sending the animals for slaughter. In return he will receive from the official veterinarian information on any abnormalities detected following the slaughter of the animals.

### **What is the level of supervision in cutting plants?**

There must be supervision by an official veterinarian or an official auxiliary in cutting plants when meat is being worked upon, but the frequency is flexible and can be determined by the competent authority based on the risks involved.

### **Flexibility built in**

#### **Is there flexibility for small businesses or traditional products?**

Flexibility in the rules is possible, for example for small businesses, for traditional food production methods and for businesses in isolated areas. This includes flexibility regarding the presence of the veterinarian during post-mortem examination and the content and delivery of food chain information. This flexibility did not exist in previous legislation.

#### **Are there any exemptions from these hygiene rules?**

The Regulations shall not apply to primary production for private domestic use nor to the direct supply by the producer of small quantities of primary products to the final consumer or to local retail establishments. For example, apples or eggs sold directly at the farm gate or in local retail shops are not covered by the Regulations.