

**ACTION PLAN FOR THE IMPLEMENTATION OF FOOD SAFETY MANAGEMENT  
BASED ON HACCP PRINCIPLES****Executive Summary**

1. The Board agreed on 13 February 2003 a paper setting out the Agency's strategy for the wider implementation of HACCP.
2. This paper provides an analysis of the current situation. The Board is invited to:
  - **note** the progress being made,
  - **consider** and **endorse** the revised Action Plan in Annexes A to I, and
  - **request** a further report in a year's time.

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## **ACTION PLAN FOR THE IMPLEMENTATION OF FOOD SAFETY MANAGEMENT BASED ON HACCP PRINCIPLES**

### **Issue**

1. To endorse a revised Action Plan (Annexes A - I) for the implementation of food safety management.

### **Strategic Aims**

2. Progress with the implementation of food safety management procedures in food businesses based on HACCP principles is a key factor in helping to continue to reduce food poisoning.

### **Background**

3. The Board agreed the strategy and initial Action Plan in February 2003. The draft Action Plan in the Annexes reflect the progress made working with a range of stakeholders and the impact of other developments since that time. The Agency's strategy remains based on a general approach agreed at a UK level, and taken forward in England, Scotland, Wales and Northern Ireland in the context of local circumstances and the resources available in those countries. Internal co-ordination mechanisms have been established to pursue common approaches wherever possible, and to share experiences of best practice across the UK.
4. New EU Food Hygiene Regulations, which are expected to apply from January 2006, will require food businesses (except those in primary production) to put into place food safety management procedures based on HACCP principles. In essence, the new Regulations add documentation and verification to the existing requirements. When the new legislation is introduced, the Agency will produce an explanation of the requirements, and produce guidance or instructions for enforcement bodies (Annex A). One option for the Agency is to do no more than this. However, in order to achieve the public health objectives of the legislation, the Agency recognises that many businesses will require further guidance to explain how they might comply with the new legislation. This will benefit both consumers and the businesses themselves. Even with the co-operation of

stakeholders, with current resources full compliance is expected to take a number of years (see Annex I).

5. The overall approach of the Action Plan is to produce these further guidance materials in consultation with the industry, Local Authorities and other stakeholders, and seek to influence both the content of food safety training courses and the provision of assistance and support for food businesses. These aspects are discussed in detail in the Annexes, along with a description of the current projects underway. While the production of guidance materials will be funded from Agency resources, the Agency is working to influence training courses through the mechanism of Government training policy. Some further resource to support implementation of food safety management in food businesses is available in Scotland and to a lesser extent in Northern Ireland, but not in the rest of the UK. It is important to recognise that by no means all the elements of the plan are under the Agency's control, and what is ultimately achieved will depend upon the commitment of other stakeholders. In this regard, it is encouraging to report that co-operation between stakeholders is good, and the benefits of improved food safety management to both businesses and consumers is widely recognised.

### **Monitoring and Evaluation**

6. The Agency will design and carry out a survey of food premises in 2004/05 which will include monitoring progress towards the implementation of food safety management procedures based on HACCP principles across the UK. This will provide robust data on the extent to which the strategy is successful, and has the potential to provide important trend information that will inform future policy considerations.
7. In 2001 the Agency agreed a Service Delivery Agreement target of 30% of food premises having food safety management procedures based on HACCP principles by April 2004. The Agency's 2001 survey of Local Authorities indicated that the adoption of such approaches is highest in food manufacturing premises and lowest in catering premises. An estimate of the prevalence of documented hazard analysis in retail and catering premises was made as a part of surveillance studies carried out by LACORS and the HPA. The six studies carried out since 2001 in over 9000 establishments in England and Wales reveal a wide

variation in uptake of documented hazard analysis, from 8% (take-aways) to 70% (retail premises). The average figure over all establishments was 55%. In addition, recent surveys in Scotland and Northern Ireland indicated that the corresponding figure for catering premises only in these countries is about 35%. There are clearly uncertainties that need to be taken into consideration when interpreting these data, but even taking these into account, it seems clear that the Agency's target has been met. It should be emphasised that the strategy for the implementation of food safety management now looks beyond this target towards eventual full compliance with the forthcoming legislation.

### **The Way Forward**

8. Annexes A - I set out the current Action Plan to take forward the Agency's strategy.

### **Impact**

9. The Agency is committing £3m to the projects that make up the Action Plan in 2004/05, rising to £5m in 2005/06 and £6m in 2006/07.

### **Board Action Required**

10. The Board is invited to:

- **note** the progress being made,
- **consider** and **endorse** the revised Action Plan in Annexes A to I, and
- **request** a further report in a year's time.

## DRAFT ACTION PLAN FOR THE IMPLEMENTATION OF FOOD SAFETY MANAGEMENT IN FOOD BUSINESSES

### Overview

1. New EU Food Hygiene Regulations will replace the existing body of food hygiene legislation with more modern, risk-based requirements, probably from the beginning of 2006. Food businesses (except those in primary production) will be required to put in place food safety management procedures based on HACCP principles. This paper describes the current situation, how the Agency plans to provide support to business to achieve compliance with the legislation, what resources will be used, and gives an estimate for how long it will take.
2. The Agency needs to undertake certain measures in order to introduce the new legislation and fulfil its obligations as a Government Department. These are described in Annex B. Although the Agency could simply leave businesses to comply or face prosecution, it recognises that small businesses (particularly in the catering sector) will need assistance to comply with the new legislation. The Agency has therefore developed a programme of work to support business and Local Authorities with the objective of securing the consequential food safety advantages. The bulk of the Action Plan describes this supportive work which is aimed at helping businesses comply, while at the same time helping to raise skills in the industry, to make businesses more efficient and competitive, and to provide greater public health assurances. Food safety management based on HACCP principles is good for business efficiency because businesses only need to impose controls on the hazards that exist in their operations, and they can exercise that control in any way that works. It is therefore the most effective and at the same time the most cost-effective approach to produce food safely.
3. While negotiating the new EU hygiene rules, the Agency, on behalf of the UK, successfully achieved flexibility in the way HACCP principles should be applied. This will bring the following tangible benefits:
  - The law will not actually require classical HACCP to be applied in food businesses. Rather, businesses will need to develop food safety management procedures *based on* HACCP principles, and

- Documentation and record keeping will be proportionate to the nature and size of the business.
4. The work being done on guidance generally is described in Annex C. Guidance for the raw meat sector has already been produced, and is in use. For the catering sector, guidance materials are being developed in England, Scotland and Northern Ireland, and currently being tested in small catering businesses across the UK. By the end of 2004 the Agency will be in a position to make an assessment of the outcome of these projects, and to judge how future resources should be committed to best overall effect. The Action Plan envisages that these guidance materials will be refined for specific sectors, working with trade bodies and enforcers. The Action Plan also aspires to the materials being available free from the internet or as a CD ROM, supported by a video/DVD and other materials. Food businesses will, however, be free to use other guidance materials produced by local authorities, industry or training companies provided they facilitate the businesses in compliance.
  5. In addition, the Agency is developing further guidance on the operation of food safety management procedures in food businesses. This will advise in general terms on how compliance with the food safety management provisions in the European Regulation is likely to be achieved in practice, with the usual caveat that, ultimately, only the courts can decide what the law requires. This is being developed with advice from Local Authorities and the food industry. This guidance will be available for inclusion in the consultation on the Statutory Instruments and other associated measures by October 2004. It will also indicate what areas guidance materials for particular sectors should cover.
  6. The Agency's approach to implementation is advised by a Consultative Group (which was set up following a workshop with Local Authorities) includes LACORS, Local Authorities, and the Small Business Service.
  7. The Agency's current policy of encouraging, through the statutory Code of Practice, a graduated and educative approach to enforcement will remain unchanged.
  8. The Agency is working with National Training Organisations to influence the National Occupational Standards in the area of food safety for those working in the food industry. The consequence will be that only syllabi for courses that meet

the requirements of these standards (and therefore complement the legal requirements) will be approved. The work underway on training is described in Annex D. The result will be that those in the industry who attend such courses will be taught appropriate competencies.

9. Full compliance in all food businesses with the food safety management provisions of the Regulations is likely to be a long-term process, and take a number of years. Nevertheless, the current policy of appropriate enforcement action against businesses whose operations are considered unhygienic, or which pose an imminent risk to health, will remain unchanged. The approach to enforcement and the work the Agency is engaged in with Local Authorities is described in Annex E. The Agency is also discussing with Regional Development Agencies, Local Authorities and other stakeholders the scope for a degree of regionally based business support in England.
10. An estimate of the costs to businesses of implementing food safety management is in Annex F.
11. A strategy to communicate the requirements to businesses, with information about how they can access information and support, is being developed and is further described in Annex G. Incentive schemes could play a part in promoting implementation of food safety management in businesses, and progress made with schemes in Northern Ireland and Wales is discussed in Annex H.
12. The whole Action Plan will be managed by a Project Board. The detail of individual projects is set out in Annex I.

## **MEASURES REQUIRED TO INTRODUCE THE NEW LEGISLATION**

1. The measures that the Agency needs to put in place can be divided into those it is obliged to do to fulfil the UK's obligations as an EU Member State, those it needs to do as a Government Department introducing new legislation, and those it might wish to do more generally to raise standards and help businesses comply.

### Fulfilling EU obligations

2. Four Statutory Instruments (one each for England, Scotland, Wales and Northern Ireland) need to be put in place to give full effect to the new EU law by 1 January 2006. These need to cover the following broad areas:
  - a) Offences, penalties and powers of entry;
  - b) Revocation of existing implementing legislation;
  - c) Enacting the national measures required or provided for in the EU Regulations; and
  - d) Any consequential amendments (where the revocation of existing legislation requires changed references in other pieces of legislation).

This can be achieved using the Agency's own resources.

### Fulfilling its obligations as Government Department

3. The following need to be produced, to update existing guidance documents:
  - A Plain Man's Guide to the EU Regulations and the Statutory Instruments - by 1 October 2005.
  - Instructions/guidance to those enforcing the legislation. This includes

- a revised S40 Food Safety Act Code of Practice on Enforcement and associated Practice Guidance for Local Authorities (and the equivalent in Northern Ireland),
- a revision of the Meat Hygiene Service Operations Manual (for Meat Hygiene Service enforcement in meat plants), and the equivalent Meat Manual for DARD in Northern Ireland)
- a revision of the operating instructions for the Dairy Hygiene Inspectorate and Egg Marketing Inspectorate (and equivalent inspectorate in Northern Ireland)

- by 1 October 2005.

- Regulatory Impact Assessment(s) for the application of the legislation - final RIA will be completed by 1 July 2005.

All of the above will be produced from within the Agency's own resources. In line with best practice, the Agency will deliver this as a managed project.

4. The revision of the S40 Food Safety Act Code of Practice will set out the general approach by Local Authorities to enforcement of these Regulations. Paragraph 73 of the current Code of Practice No.9, consistent with the Government's Enforcement Concordat, says that,

'Food authorities should adopt a graduated approach to enforcement. As a first step towards securing compliance, the authorised officer should adopt an educative approach and discuss the requirements of the legislation relating to hazard analysis and to supervision and instruction and/or training with the proprietor'.

This general approach will continue.

### PRODUCTION OF GUIDANCE MATERIALS

1. EU General Food Law places the responsibility for safe food production squarely on food business operators. Against this background, delivery of the actions described in Annex B would be all the Agency needs to do to discharge its responsibilities. However, the Agency knows, on the basis of research and experience, that to stop there would generally be insufficient to enable food businesses, and particularly small businesses, to comply with food safety management requirements. The development of appropriate guidance materials is therefore seen as key to the success of the strategy overall. While of course it will be by no means mandatory for businesses to follow Agency guidance, it is being produced to help businesses make progress towards compliance. This will also help to improve the management of food safety risks to the benefit of consumers and the competitiveness of businesses.
2. Large manufacturing, retailing and catering businesses, and many businesses that supply them, will already have documented food safety management systems in place as a matter of commercial expediency. It tends to be the smaller food businesses that will need appropriate guidance materials that will help them progress towards compliance, describing what food safety management procedures actually means in their business. The challenge for the Agency in this area is to work with stakeholders to produce guidance materials that food businesses can understand and follow, that leads them towards compliance with the forthcoming legislation, and succeeds with the level of business support that is available. Guidance materials will need to be made available in a range of ways, which will be piloted to ensure that the eventual blend of delivery is cost-effective.

#### Guidance materials for the raw meat sector

3. The Meat (Hazard Analysis and Critical Control Point) Regulations were introduced in 2002 and require operators of licensed fresh meat and poultry meat slaughterhouses, cutting plants, cold stores, re-packaging centres and re-

wrapping centres to apply hygiene procedures based on HACCP principles. The Agency assisted the industry to comply in a number of ways.

- Guidance material was issued to operators and Official Veterinary Surgeons (OVSs).
  - A booklet (certificated by The Royal Institute of Public Health) that explains the seven HACCP principles and indicates how to comply with the legal requirements.
  - The Meat Plant HACCP Manual was produced providing detailed guidance on applying HACCP principles. The CD-ROM also contains extra material, including 'video clips', sample documentation and model HACCP plans.
  - A series of newsletters with advice and information, including a suggested timeline, were sent out to 'small' plants in the run up to the implementation date.
4. As part of their enforcement role, OVSs were asked to work actively with businesses to advise on and assist with compliance as set out in the Enforcement Concordat. OVSs received some training as part of their continuing professional development programme. The Meat Plant HACCP Manual & CD-ROM have been designed for self-study or for delivery by trainers, and include the syllabus of the two-day 'Meat Plant Manager's Hygiene & HACCP course'. The course has Qualifications and Curriculum Authority and Meat Training Council accreditation and participants are eligible for a qualification.

#### The catering sector

5. The Agency has decided to address the need for guidance materials in the catering sector first, because of the high proportion of catering premises (about 60%), and because it is in this sector that the most progress needs to be made. It is also a particularly difficult sector for which to produce guidance, since it cannot be treated as a manufacturing, production line operation. The nature and size of catering businesses is so diverse that it is highly improbable that any single guidance approach will satisfy the requirements of the whole catering sector. It is intended that the finalised models being developed in England,

Northern Ireland and Scotland will be available to any food business in the UK. This will provide businesses with the option to choose a route to compliance that best meet their business needs and preferred management style from a toolbox of approaches. Businesses will of course also be free to use other models which facilitate compliance.

## England

6. Initial attempts to produce effective guidance for small catering premises were not successful. Further, there is considerable Agency and other research on the barriers to the implementation of food safety management procedures in small businesses. The Agency has drawn on this experience, and has led a multi-disciplinary team (including small catering businesses, EHOs, professional bodies and management experts) at the University of Salford to develop a new model.
7. The outcome is a highly innovative approach (known as '*Safer Food Better Business*') that promotes food safety management in small businesses while requiring minimal additional burdens. It is based on the 4Cs (cooking, cleaning, chilling and avoidance of cross-contamination) of the Food Hygiene Campaign, and avoids the term 'HACCP' and the associated jargon. The emphasis is on making the material simple and practical for small businesses, with minimal documentation.

## Scotland

8. The Agency in Scotland has established a HACCP Working Group through the Scottish Food Enforcement Liaison Committee (SFELC) to develop a draft guidance manual. The members of the Working Group have practical experience and expertise in Local Authority enforcement and in appropriate sectors of the food industry. The Working Group has developed a guidance manual 'HACCP in Practice' that is designed to build upon the promotional and advisory work carried out by Local Authorities and others in Scotland in recent years. It is intended that the approach adopted in the manual will be recognised in Scotland by enforcement officers, businesses and business advisors as being in line with the advice and practice with which they are already familiar and that this will enhance the level of uptake.

9. The model is designed to be flexible enough for use across the whole catering sector, from the smallest business to large catering operations. 'HACCP in Practice' was piloted in Scotland between July to August 2003, in partnership with nine Scottish Local Authorities and 91 catering businesses. The model was also distributed to all other Scottish Local Authorities and the other Agency administrations for their comments. The text is being refined in the light of the pilot exercise and detailed comments received.
10. The Agency in Scotland is currently seeking expressions of interest from suitable organisations wishing to provide an E Learning package to support the guidance manual and from those wishing to provide translation of the document into Cantonese, Urdu and Punjabi.

#### Wales

11. The Agency in Wales did not organise the development of a "Welsh" guidance pack but the joint funding, with the Welsh Development Agency, of the HACCP Local Authority Collaborative Project in 2002-2003 allowed the development of individual local authority packs. The main thrust of the project was training but some Welsh Authorities also enhanced their own HACCP packs. A number of Local Authorities developed and issued their own HACCP packs in multi-lingual formats, whereas others utilised existing materials including the Northern Ireland pack. Some authorities favoured materials which could be used to support formal training courses which food handlers were encouraged to attend.
12. Local authorities are now utilising their routine inspection programmes as a means of evaluating the longer term success of the project and the Agency will meet them to discuss these results together with their support needs.

#### Northern Ireland

13. In the aftermath of the *E.coli* O157 outbreak in Central Scotland in 1995, District Councils in the Southern Group Environmental Health Committee area of Northern Ireland (5 Councils) commenced the development of a generic Hazard Analysis system for butchers in their area. In 1998 the approach adopted for butchers was further developed to suit catering businesses. The resulting guidance pack, 'Safe Catering – Your Guide to Hazard Analysis' was piloted for a 6-8 month period before further refinement into a version which was in use until

2003. Around 20 of the 26 District Councils in NI used that earlier version of the guidance pack to varying degrees. Several Local Authorities throughout GB also adopted the Safe Catering pack.

14. Early last year, FSA NI funded the further development of the Safe Catering pack to include verification and review i.e. generic HACCP as opposed to Hazard Analysis as per current General Food Hygiene legislation. Experience from almost 4 years of use of the pack was also taken into account by the working group of Environmental Health Officers and Caterers set up to carry out the review. For example, the pack was simplified, flow-charts were removed and it was re-designed to be flexible and to allow any size of catering business to use it. FSA NI has already funded the printing of 4,500 of the new packs which all District Councils in Northern Ireland are currently providing free of charge to caterers. The intention is to provide a free copy of the pack, to all caterers who need it, over a three year period. Environmental Health Officers from all 26 District Councils have been trained in the use of the pack.
15. Currently it has been left up to Councils as to how they can make best use of the packs with their caterers. The approach being taken by most Councils is that they introduce the packs as part of their ongoing inspections of the highest risk caterers and those which have made least progress with the hazard analysis requirements. Modest additional funding acquired during the current financial year is being used to fund the commencement of a series of seminars for caterers on the use of the pack.
16. It is also planned to develop version of the pack for Chinese restaurants in the near future.

#### Testing and development of the catering models

17. The English, Scottish and Northern Irish models are currently being trialed in 2000 catering businesses in 40 Local Authorities in England to test the effectiveness of these models in different types of business. The objective is to establish which models work best in terms of effectiveness in different types of business, the degree of understanding of hazards and controls that they achieve, and the extent to which they lead to behaviour change. By the end of 2004 the Agency will be in a position to make an assessment of the outcome of these

projects, and to judge how future resources should be committed to best overall effect. A preliminary assessment will be made in April. In the meantime, work continues to enhance and develop these models. Part of the development of '*Safer Food, Better Business*' is further trialing in Local Authorities drawn from across the UK.

#### Development of guidance materials for other sectors

18. The Agency will build on this experience and use similar approaches for other catering and retail sectors. It is envisaged that guidance materials for small restaurants will begin to be available by the end of 2004, and developed for a range of other food businesses by autumn 2005. In this way, the Agency envisages the production of a range of guidance for various sectors of the food industry over the next 5 years. The Agency is actively working with trade bodies to develop adaptations of '*Safer Food, Better Business*' for different sectors.

#### Delivery of guidance materials

19. All the guidance materials produced by the Agency so far require some level of support for the business to implement food safety management effectively. Local Authorities will be able, as now, to offer advice and support for businesses as part of their inspection programmes. The availability of this support is limited by Local Authority resources, as discussed in Annex E (paragraph 2). The Action Plan includes exploration of further support for business (Annex E, paragraph 6), but it is clear that the resources for one-to-one support for businesses from the public purse is not available. Therefore the Action Plan includes initiatives to develop guidance materials further as self-help resources for businesses, including digitisation of models (to be available as a CD ROM or on the internet), DVDs and videos. This will also provide a resource for enforcement officers, trainers and businesses directly, although the Agency recognises that not all businesses will be in a position to use IT-based materials.

**TRAINING**

1. Many businesses decide to send their staff on training courses, and it is vitally important for the long term that the training provision for food safety management complements the competencies that managers and food handlers need to learn in order to be able to comply with the forthcoming legislation. The content of these courses needs to be reviewed and if necessary changed so that they are consistent overall with the approach to food safety management that the legislation requires. The Agency is working intensively within the Government's overall training policy (giving priority to establishing appropriate competencies to those working in the industry) to achieve this.
2. The National Training Organisations (and in future, the Sector Skills Councils) set National Occupational Standards (NOS) for those working in their industry sector. The Qualifications and Curriculum Authority (QCA) and its equivalents in devolved administrations approve NOS, and accredit syllabi submitted by the awarding bodies that are consistent with the NOS. The Learning and Skills Council (and their devolved equivalents) only fund courses that have QCA accreditation.
3. The Hospitality Training Foundation has been commissioned by the Qualifications and Curriculum Authority (QCA), as part of its on-going review programme, to review the NOS (at levels 1-4) for those working in the catering and hospitality industry, and the Agency is involved in this. Following completion of the revision of the NOSs for hospitality, due in summer 2004, the QCA anticipate that revised syllabi (and therefore courses) should come on stream during 2005. The Agency intends to have similar involvement when the QCA reviews other relevant NOS as part of its rolling programme over the next 5 years. This means that all sectors should have appropriate training provision in food safety management in place by 2008. In this way the training industry should, over this timescale, be offering courses with appropriate content on food safety management that, in turn, underpins the legal requirements. The Agency envisages that, over the implementation timescale of the Action Plan, the demand for training in food safety for those working in the industry is not expected to change significantly. However, those who attend courses will be trained in the competencies that are consistent with the new legal requirements.

## APPROACH TO ENFORCEMENT, COMPLIANCE AND MONITORING

### Working with Local Authorities

1. The Agency is working closely with Local Authorities and their representatives on all aspects of the Action Plan. Many visits have been made to individual Local Authorities. EHOs and LACORS are represented on the Agency's Consultative Group, and currently the Agency is undertaking a series of regional seminars for EHOs to keep them up to date with developments, and to seek their views on the approaches being taken.

### Enforcement resource for food safety

2. At current levels of Local Authority funding for enforcement work, most premises would be inspected once every 1-3 years. The Agency recognises that the level of support available from Local Authorities needs to be taken into account when producing guidance materials, and that they therefore need to be made as simple and user-friendly as possible. Work towards simplifying the existing materials still further will therefore continue, with a view to making them less reliant on support.

### Progress towards compliance

3. When the European Regulations apply from 1 January 2006, the Agency will expect food businesses to make progress towards compliance with the Regulations. Local Authorities are expected to encourage this progress consistent with the educative approach required by the Statutory Code of Practice on Enforcement. One of the tools that will be available to Local Authorities will be Agency guidance materials for the various types of food business. Local Authorities will need to be conversant with the guidance material to enable them to explain clearly what is expected of the businesses. It follows that progress towards compliance for many food businesses will be dependent on,
  - the production of appropriate guidance materials relevant to their business, and

- sufficient time being allowed to assimilate requirements,
- advice to businesses (from Local Authorities or from other sources).

Given that the Action Plan anticipates that a range of guidance materials will emerge over the next few years, and that the level of resource available from Local Authorities is necessarily limited, the Agency anticipates that full compliance in all food businesses with the food safety management provisions of the Regulations will be a long term process, taking a number of years.

4. The Agency does not anticipate that businesses will face formal enforcement pressures just because they do not have documented food safety management procedures on 1 January 2006. The authorities will be expected to continue their graduated and educative approach to enforcement. The statutory Code of Practice that requires this will be revised again before the Regulations come into force, and the Agency will be providing further advice in the associated Practice Guidance on what this means in practice. Equally, the Agency also expects appropriate enforcement action to be taken by enforcement officers, as is the current policy, against businesses whose operations are considered unhygienic, or pose an imminent risk to health.

### Consistency

5. Consistency of enforcement approach will be aided by,
  - the production of national guidance materials,
  - by the revision of the statutory Code of Practice, which will continue to require a graduated and educative approach,
  - by provision of low cost training and continuous professional development to ensure that EHOs are acquainted with the new requirements.

The Agency is also running a series of 7 regional seminars for EHOs to keep them up to date with developments, and seek their views on the approaches to guidance and implementation in small catering businesses being taken. About 250 EHOs have attended the 6 held so far. More seminars will be held as the Action Plan unfolds.

### Further support to Local Authorities and businesses

6. The Agency is also exploring a variety of mechanisms to provide a degree of regional support in England to businesses and Local Authorities, by working with Regional Development Agencies. The Agency envisages support mechanisms specific to the region's needs, for example, helpdesks and internet sites to provide back-up for support networks for businesses (e.g. Local Authorities, Business Link, Chambers of Commerce, etc). To achieve this, the support and commitment of RDAs will be essential. A trial with the North West Development Agency is underway (see Annex I). There is considerable interest in using the implementation of food safety management based on HACCP principles as a way of improving management skills in general in small businesses.

### Monitoring

7. In order to monitor progress of the implementation of food safety management, a survey of food premises with Local Authorities will be carried out in 2004/05. This will provide data on the extent to which the overall strategy is successful. Further, it has the potential to provide important trend information, which will inform the future deployment of resources.

## COSTS TO BUSINESS

1. The costs to business of documenting food safety management procedures will depend on the degree to which establishments are complying with current hazard analysis requirements. If a business is fully compliant, then it will have identified the food safety hazards and will have the appropriate controls in place with corrective actions. For these establishments, documenting current procedures will not be difficult or time-consuming. The main cost burden will therefore fall in the area of record keeping, and this will vary greatly depending on the nature of the operation. The Regulatory Impact Assessment indicated that in premises where record keeping takes about 30 minutes a day, costs for a business would be about £300/year, with proportionately lower costs if record keeping took less time.
2. However, it is clear that many food establishments are not compliant with the hazard analysis requirements of the current legislation. The Agency's 2001 survey indicated that about 20% of food establishments (excluding primary producers) operate a documented HACCP-based procedures and a further 45% operate undocumented procedures. This equates to approximately 390,000 (of the total 600,000) food establishments. The Agency's model '*Safer Food, Better Business*' is designed for small catering businesses, would take an establishment from scratch (i.e. making no assumptions on the degree to which it is compliant with hazard analysis requirements) to full compliance with the HACCP-based requirements of the forthcoming legislation. The cost to business is essentially the time taken to assimilate the guidance and develop food safety management procedures. On the basis of very preliminary work in small restaurants, it is estimated that an average time of 10 hours would be needed, at a cost to the business of £150 based on the cost of a manager's time of £15/hour. The testing that is now underway should help to refine this estimate.
3. On the basis of the Agency's 2001 survey, 120,000 establishments, across all sectors, have documented HACCP-based procedures in place, and it is assumed therefore that these establishments would be compliant with the forthcoming legislation. This leaves 270,000 establishments that have hazard analysis in place and 210,000 establishments that do not. If all of these 210,000 businesses

are assumed to be amenable to an approach based on '*Safer Food, Better Business*', the initial one-off costs for them would be £31.5m. This takes as a starting point that those establishments would be employing the approach from scratch. These costs will be refined as work continues on the applicability of this approach.

4. The on-going costs of record keeping depend upon the nature and size of the establishment, as the legislation acknowledges. The '*Safer Food, Better Business*' approach for small restaurants envisages a simple diary in which the business would keep the appropriate records, and (if necessary) a record of any corrective action taken. The time taken for this level of record keeping is not regarded as significant, and so no cost has been assigned. The cost of the diary itself is currently assumed to be £30/year. The review of procedures could take place at the time of a Local Authority inspection. For larger establishments, or operations where more record keeping is justified, record keeping will take longer.
5. The nature of manufacturing is such that more record keeping is likely to be necessary than in catering or retail operations. Assuming that record keeping takes an average of 15 minutes a day for food manufacturing establishments, this gives a cost of  $7000 \times £150 = £1\text{m}$ . In the retailing sector, it is the establishments that do not currently have documented food safety management procedures and therefore do not keep their own records (155,000) that will newly incur the cost for record keeping (in addition to the costs for documenting procedures). Assuming that 20% are of a size for which a simple diary is not appropriate, and the record keeping takes 15 minutes a day, this implies a cost of  $155,000 \times 20\% \times £150 = £4.6\text{m}$ . Making the same assumptions for the catering and 'other' sectors, implies a record keeping cost of £9.6m. The cost of a diary for the establishments for which it is thought appropriate would be £11.4m. This gives a total annual record keeping cost of  $£1\text{m} + £4.6\text{m} + £9.6\text{m} + £11.4\text{m} = £26.6\text{m}$ , in addition to the one-off cost of producing documented procedures of £31.5m. It is important to emphasise that these costs are expected to be refined as the development and testing of various approaches continues.

**COMMUNICATIONS**

1. Before the new legislation comes into force, expected to be on 1 January 2006, the Agency will communicate the new requirements to industry and explain what they need to do to comply. The aim is to do that in a manner that ensures that the appropriate information reaches businesses through a range of communications channels, both direct and indirect. In England, the banner “Safer food, better business” will provide a central theme to encouraging buy in from businesses to implementation of HACCP as a “win, win” for businesses and the consumer, underpinned by appropriate guidance materials and other communications.
2. Using experience from the Agency’s Food Hygiene Campaign, communications will be both targeted towards businesses directly and through trade associations, trade media etc. Food businesses will also be made aware of the new requirements by Local Authorities as part of an inspection and of how businesses could take advantage of any support facilities that are available.
3. All the development of the communications activity is to be thoroughly tested. This is essential to ensuring that businesses and their needs are taken into account when formulating the materials and communicating approaches.
4. Details of activities currently underway or under consideration are given in the Implementation plan in Annex I.

## **INCENTIVES FOR BUSINESSES**

1. The Agency will be considering how incentives schemes for food businesses could be developed further, drawing on the experiences in Northern Ireland and Wales.

### Northern Ireland

2. The Food Standards Agency Northern Ireland launched the Eat Safe Award Scheme, in June 2003. Eat Safe is a single tier hygiene award scheme initially open only to catering establishments selling food for consumption on the premises and to which the public has unrestricted access. It is proposed to expand the scope of the scheme in the future and to perhaps include nutrition criteria in co-operation with other agencies.
3. In order to qualify for the existing award, caterers must achieve a standard of food hygiene above and beyond that required by current food hygiene legislation. They must:
  - have excellent food safety and structural standards (scoring 5 or less under each of the 'Food Hygiene and Safety', 'Structural' and 'Confidence in Management' headings in the current Food Hygiene Code of Practice Hazard Rating Scheme)
  - have all food handling staff trained to at least the standard recommended in the Catering Industry Guide,
  - have in place a documented food safety management system which fulfils all 7 Codex HACCP Principles (the NI Safe Catering Guidance pack enables them to comply with this criterion)
4. Catering businesses are assessed by District Council Environmental Health Officers during the course of their planned food hygiene inspections of the premises. Additional inspections are not necessary. An award, when granted, remains in place until removed by the awarding District Council for specific reasons, e.g. the business changing hands, or a fall in standards.

5. The Eat Safe scheme, which has been widely welcomed by enforcers and consumers in addition to the industry, provides significant incentive to caterers to implement the Safe Catering pack or equivalent system and hence prepare themselves for forthcoming EU legislation. It recognises excellence in food hygiene standards and is a valuable marketing tool to businesses in receipt of it.

## Wales

6. The Directors of Public Protection in Wales (DPPW) and the Food Standards Agency Wales worked in partnership to produce an award scheme suitable for implementation in all Welsh Local Authorities. Amongst the considerations were a reliable scheme with a local and national identity which was easily understood by businesses, and which could be operated by local authorities within existing resources.
7. The scheme was launched in March 2002 and is being operated by all 22 local authorities. There are three tiers of award which provide incentives to strive to meet higher standards, all of which are beyond those required by current food hygiene legislation. Each level of the award links to scores from Code of Practice 9 and training in accordance with the relevant Industry Guide.
8. All premises for which the local authorities are the food authorities are eligible for consideration of an award and decisions to grant awards are based upon unannounced programmed inspections.
9. The scheme bears the joint logos of Agency Wales and the local authority which has enforcement responsibility for the individual business. In this way the awards have a local identity with the issuing authority, but at the same time they have a national identity provided by the Food Standards Agency. The latter should assist the consumer to recognise the scheme in different authorities across Wales.
10. The scheme subject to ongoing evaluation and the local authorities are finalising a report on its early operation. Preliminary feedback suggests that it has been a positive development which compliments the work of the Agency, particularly in relation to the implementation of food safety management in small businesses. Stakeholders representatives will be meeting shortly to consider the inclusion of nutrition criteria.

**DETAILS OF INDIVIDUAL PROJECTS****England**Scope and Rationale

- There are estimated 480,000 food establishments in England (600,000 in the UK). It is not possible to be precise because of the high level of turnover and start up businesses. 82% of food premises are in England.
- Agency has already implemented food safety management requirements in the raw meat sector, butchers & cheesemakers, but the new requirement is on a much larger scale.
- ~ 70% of food establishments are *very* small – employing 5 people or less.
- There is a wide diversity of different business types. One project aims to ‘map’ the catering industry to develop a clearer understanding of the types of business and their particular needs.
- Contact with trade associations suggests that manufacturing and larger businesses generally understand and apply food safety management and so are already compliant or close to it. A project to check these assumptions about larger businesses is underway.
- Retailing is generally characterised by large businesses that have effective food safety management systems in place, e.g. supermarkets. Retail butchers are already licensed on this basis. Smaller retailers may require assistance but they are not, in the main, complicated businesses.
- Caterers represent the biggest challenge. Most are small businesses with staff who lack technical expertise. The focus of the Agency’s work is therefore on helping small catering businesses. About 60% of food premises are in the catering sector.
- Turnover of managers, staff and businesses are high. The Action Plan assumes that 20% of premises turnover each year.
- The rate of progress that can be made with premises that do not have food safety management procedures in place is dependent on our trials of the effectiveness of different approaches and business support mechanisms. This Action Plan describes likely progress based on current assumptions. This is indicative only. The Action Plan will evolve in the light of the various projects underway through 2004.

## Guidance Materials – Safer Food, Better Business

- Agency has led an expert team to work with small caterers to produce an approach to food safety management that is suitable for smaller businesses, called '*Safer Food, Better Business*'. Caterers were leading members of the team, and the model was further developed in 50 small catering businesses.
- SFBB has been tested using trained up caterers who have visited small catering businesses and coached the manager through the pack. Further refinements will be needed to make the approach more effective with less support to the business.
- It is generic approach, helping the businesses to develop safe methods tailored for their own specific operations.
- The guidance is based on the 4Cs (Cooking, Chilling, Cleaning and avoidance of Cross-contamination) of the Food Hygiene Campaign, to make it simpler for small businesses to adopt.
- Record keeping through a diary is innovative and light-touch, the minimum the Agency believes is appropriate for compliance.
- *Safer Food, Better Business* has generated considerable international interest as a way forward for small businesses.

## Business Support

- The Agency will explore options to provide support for food businesses, working collaboratively with stakeholders.
- This will be a blended approach, reflecting the many ways of helping businesses and the diversity of different food businesses.
- Options for delivery are shown. Alternative options will be presented as the programme develops, subject to the successful outcome of feasibility testing.

## Projects currently underway and planned

### 1. *Safer Food, Better Business* – evaluation and enhancement

1.1 Completion of initial work	<ul style="list-style-type: none"> <li>• Agreed version of content &amp; clearance of advice by The Agency – <i>by March 2004</i></li> <li>• Produced as paper pack – <i>by April 2004</i></li> <li>• Agreement of academic paper comparing Safer Food, Better Business (SFBB) approach to CODEX HACCP &amp; publication of this as an paper – <i>by Summer 2004</i></li> </ul>
1.2 Trials alongside alternative approaches in 2000 small businesses	<ul style="list-style-type: none"> <li>• Continued contract management &amp; liaison with local authorities</li> <li>• Feedback to model developers – England, Scotland &amp; N.I</li> <li>• Agreement &amp; dissemination of interim report – <i>by April 2004</i></li> <li>• Continuing evaluation of models <i>during 2004</i></li> <li>• Agreement of final report &amp; dissemination – <i>by end 2004</i></li> <li>• Continuing contract management &amp; liaison</li> </ul>
1.3 Engagement with catering industry	<ul style="list-style-type: none"> <li>• Agreement &amp; report on ‘mapping catering industry’ – <i>by June 2004</i></li> <li>• Meeting 23 trade bodies with a view to refining the SFBB approach</li> <li>• Establishing fora to meet &amp; communicate with small catering businesses that are not members of trade bodies</li> </ul>
1.4 Pilot adaptation of SFBB for fish & chip shops	<ul style="list-style-type: none"> <li>• Agreement with National Federation of Fish Fryers (NFFF) to develop SFBB for their sector as prototype adaptation – <i>Done</i></li> <li>• Development of SFBB with NFFF – <i>by April 2004</i></li> </ul>
1.5 Further development of SFBB for other sectors and cuisines	<ul style="list-style-type: none"> <li>• development of statement of requirement: working assumption for initial sectors: function catering, fish &amp; chips [continuing], Chinese, Indian, independent pubs and pizza shops – <i>Done</i></li> <li>• procurement of suppliers – <i>by February 2004 – underway</i></li> <li>• post-tender negotiations to describe projects</li> <li>• contract management &amp; review of these (6) research contracts</li> <li>• managing development, prototyping, testing of SFBB variations</li> <li>• reporting and disseminating research results – <i>by March 2005</i></li> <li>• co-ordinating and managing growing best practice guidance / safe methods</li> <li>• distribution of guidance by trade bodies &amp; other stakeholders</li> </ul>

## 2. Production of self-help materials

<p>2.1 work to obtain supplier to develop prototype for electronic version of SFBB</p>	<ul style="list-style-type: none"> <li>• Exploration of scope, market and suppliers</li> <li>• Development of statement of requirement</li> <li>• Competitive procurement for supplier</li> <li>• Evaluation &amp; award of contract</li> <li>• Post-tender negotiations and project definition – <i>by Summer 2004</i></li> </ul>
<p>2.2 development of prototype</p>	<ul style="list-style-type: none"> <li>• Project management of supplier, involvement with stakeholders</li> <li>• Piloting prototype with representative caterers</li> <li>• Further development, final prototype and report – <i>by October 2004</i></li> </ul>
<p>2.3 further work</p>	<ul style="list-style-type: none"> <li>• Decision on cost-effectiveness – <i>October 2004</i></li> <li>• Further project definition to take forward</li> <li>• Development, testing &amp; go-live on web-site</li> <li>• Transfer to electronic media (eg DVD) &amp; distribution</li> <li>• Updates</li> </ul>
<p>2.4 development of other self-help material</p>	<ul style="list-style-type: none"> <li>• Development of self-help packs as ‘stepping stones towards compliance’</li> <li>• Piloting and testing alternative delivery methods like videos, DVDs</li> <li>• Report and consideration of cost-effectiveness – <i>by Summer 2004</i></li> </ul>
<p>2.5 integration with other materials on food hygiene</p>	<ul style="list-style-type: none"> <li>• Branding of SFBB – <i>by Spring 2004</i></li> <li>• Analysis of existing Agency materials supporting food hygiene – <i>by Summer 2004</i></li> <li>• Re-development of materials, website etc. as necessary to integrate with SFBB – <i>by end 2004</i></li> <li>• Integration with future Food Hygiene Campaigns aimed at caterers</li> </ul>
<p>2.6 liaison with other stakeholders</p>	<ul style="list-style-type: none"> <li>• Contact and links with others for government ‘e-agenda’ e.g. ODPM</li> <li>• Contact &amp; links with others undertaking similar programmes eg HSE – <i>Underway</i></li> </ul>

### 3. Working with Local Authorities

<p>3.1 Piloting SFBB through delivery with Local Authorities (LAs)</p>	<ul style="list-style-type: none"> <li>• selection and agreement with LAs – <i>Done</i></li> <li>• agreement on delivery methods – <i>Done</i></li> <li>• Discussions with Scotland &amp; N. Ireland about piloting – <i>Underway</i></li> <li>• projects running in 15 LAs – <i>by March 2004</i></li> <li>• liaison with individual LAs in first tranche</li> <li>• reporting progress – <i>by April 2004</i></li> <li>• report on cost-effectiveness &amp; best-practice – <i>by Summer 2004</i>, dissemination of results</li> <li>• discussion &amp; decision on whether to extend trials – <i>Autumn 2004</i></li> </ul>
<p>3.2 Working with Department of Culture, Media and Sport (DCMS) on their 'Fitness for Purpose' initiative</p>	<ul style="list-style-type: none"> <li>• liaison &amp; engagement with DCMS – <i>underway</i></li> <li>• discussions with individual authorities and their consultants – <i>underway</i></li> <li>• Agency &amp; DCMS stakeholder meeting with LAs – DCMS to organise – <i>expected March 2004</i></li> <li>• projects to trial SFBB with Fitness for Purpose – <i>expected Spring 2004</i></li> <li>• reports on cost-effectiveness – <i>expected Summer 2004</i></li> <li>• discussion &amp; agreement on further work with Fitness for Purpose</li> </ul>
<p>3.3 Partnership working with LAs/enforcers/ LACORS</p>	<ul style="list-style-type: none"> <li>• selecting and managing EHO secondee(s) – <i>Done</i></li> <li>• liaison for presentations to LAs, food groups, conferences etc. – <i>Underway</i></li> <li>• liaison with LACORS &amp; LGA – <i>Continuing</i></li> <li>• seminars / conference organisation to describe results of SFBB trials – <i>by Autumn 2004</i></li> <li>• newsletters and other PR – <i>Underway</i></li> </ul>
<p>3.4 continuing to support professional development of enforcement officers</p>	<ul style="list-style-type: none"> <li>• scoping and agreeing training / continuing professional development required</li> <li>• developing courses / seminars</li> <li>• delivery of appropriate training – <i>beginning 2005</i></li> </ul>

#### 4. Piloting Regional Support Centres and exploring funding options

<p>4.1 Establishing pilot in North West</p>	<ul style="list-style-type: none"> <li>• discussions with North West Regional Development Agency &amp; North West LAs – <i>Done</i></li> <li>• single tender agreement to fund Support Centre – <i>Done</i></li> <li>• statement of requirement for project – <i>Done</i></li> <li>• establishment of support centre &amp; recruitment of staff – <i>by Spring 2004</i></li> <li>• liaison with Support Centre – <i>being planned</i></li> <li>• liaison with LAs involved – <i>being planned</i></li> </ul>
<p>4.2 Developing pilot in North West</p>	<ul style="list-style-type: none"> <li>• establishment of centre and links to businesses, LAs, &amp; other networks (eg Chambers of Commerce, North Manchester Business Link Group)</li> <li>• Establishment of infrastructure – helpdesk, web-site etc</li> <li>• management and monitoring of project activities</li> <li>• liaison with other Regional Development Agencies, GO network &amp; Department of Trade and Industry</li> <li>• interim reports (<i>first Summer 2004</i>) and dissemination – possible set up of other centres</li> <li>• final report on cost-effectiveness and best practice – <i>by March 2005</i></li> <li>• decision on how to proceed &amp; project set up for national network – <i>April 2005</i></li> </ul>
<p>4.3 Project to establish alternative funding streams</p>	<ul style="list-style-type: none"> <li>• statement of requirement – <i>Done</i></li> <li>• research work to identify sources – <i>by Summer 2004</i></li> <li>• establishment of practical projects in NW to tap into these funds</li> <li>• management of individual projects</li> <li>• report <i>by end 2004</i> and dissemination of information</li> </ul>
<p>4.4 National roll-out of Regional Support Centres</p>	<ul style="list-style-type: none"> <li>• If concept is proven, then -</li> <li>• establishment of network of (9) centres mapping onto RDA structure</li> <li>• running, managing and liaison between Centres</li> </ul>
<p>4.5 Liaison with Regional Government</p>	<ul style="list-style-type: none"> <li>• Establishing links to all RDAs – <i>underway</i></li> <li>• Conference or seminar on NW RDA pilot &amp; initial results – <i>by end 2004</i></li> </ul>

#### 5. Training

<p>5.1 Revision of NOS for catering</p>	<ul style="list-style-type: none"> <li>• On going discussions with Hospitality Training Foundation &amp; aspirant Sector Skills Council, with a review of National Occupational Standards – <i>by end 2004</i></li> </ul>
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5.2 Training organisations respond	<ul style="list-style-type: none"> <li>Revised syllabi agreed with Qualification &amp; Curriculum Authority (QCA) – <i>by 2005/06</i></li> </ul>
5.3 Revised courses available	<ul style="list-style-type: none"> <li>Revised courses available <i>from 2006</i></li> </ul>
5.4 Seminar	<ul style="list-style-type: none"> <li>Organise a seminar as a forum to discuss training needs with industry - <i>in 2004.</i></li> </ul>

## 6. Communications Strategy

6.1 Enhancements to Safer Food, Better Business	<ul style="list-style-type: none"> <li>Design &amp; communications for an initial 'self-help' version of SFBB pack – <i>by Summer 2004</i></li> <li>Design &amp; communications for adaptations of SFBB for specific cuisines and sectors – starting with fish &amp; chip shops in Spring 2004</li> <li>Continuing work to be decided</li> </ul>
6.2 Aligning existing publications to SFBB	<ul style="list-style-type: none"> <li>Re-branding existing catering publications into the SFBB 'format' – <i>by end 2004</i></li> </ul>
6.3 Working with trade bodies	<ul style="list-style-type: none"> <li>Liaison with trade bodies from Spring 2004 to develop wide-scale third party communications from Summer 2005</li> <li>Development of media strategies for trade titles (from late 2004 to Spring 2006)</li> </ul>
6.4 Developing support and self-help materials	<ul style="list-style-type: none"> <li>Consideration and development of self-help guidance and support materials in various suitable formats – including videos/DVDs, CD-ROMs, etc. with complementary web-site having downloadable information – <i>work from Autumn 2004.</i></li> </ul>
6.5 Communications involvement with business support	<ul style="list-style-type: none"> <li>Liaison with and help for pilot regional support centre with the NW Regional Development Agency &amp; its <i>Business Link</i> partners – <i>by end 2004</i></li> <li>Consideration and extension to all RDAs – <i>2005 on</i></li> <li>Communications involvement to update and explain new legislation and guidance to enforcement officers – probably through seminars – <i>from early 2005</i></li> </ul>
6.6 Direct communications to businesses	<p>(Consider) direct mail supported by trade association to caterers advising them of legislation, guidance, self-help material &amp; business support – <i>from Autumn 2005</i></p>

## 7. Programme Management

<p>7.1. Set up Programme Structure</p>	<ul style="list-style-type: none"> <li>• Develop Project Initiation Document – <i>Underway</i></li> <li>• Get FDS Project Board &amp; Directors approval – <i>by March 2004</i></li> <li>• Recruit programme advisors – <i>Underway</i></li> <li>• Integrate all existing working and advisory groups</li> <li>• Establish programme management group, budgets, resources &amp; reporting</li> <li>• First meeting of Programme Group – <i>expected April 2004</i></li> <li>• Continuing secretariat &amp; reporting of Programme Group</li> </ul>
<p>7.2 Monitoring uptake of HACCP /</p>	<ul style="list-style-type: none"> <li>• Agree with stakeholders sampling and monitoring programme – <i>Underway</i></li> <li>• 1<sup>st</sup> sample &amp; report – <i>for April 2004</i> – to meet SDA reporting requirements</li> <li>• continuing monitoring &amp; reporting of food safety management implementation in the industry</li> </ul>
<p>7.3 maintaining catering database</p>	<ul style="list-style-type: none"> <li>• Review Food Hygiene Campaign database of caterers</li> <li>• Let contract to keep up to date &amp; enhance</li> <li>• Used by Food Hygiene Campaign &amp; Agency as a whole to communicate with caterers</li> </ul>
<p>7.4 Consider Incentive Schemes</p>	<ul style="list-style-type: none"> <li>• Review effectiveness of incentive schemes in Northern Ireland and Wales by autumn 2004.</li> <li>• consider/ devise a national incentive/ award scheme - by spring 2005.</li> </ul>
<p>7.5 Design and carry out a survey of food premises</p>	<ul style="list-style-type: none"> <li>• Design survey - by June 2004</li> <li>• Conduct survey with Local Authorities - by March 2005</li> </ul>
<p>7.6 Consultation</p>	<ul style="list-style-type: none"> <li>• continuing secretariat for HACCP Consultation Group</li> <li>• input to other Agency consultation groups</li> </ul>
<p>7.7 Senior Stakeholder Liaison / 'selling the approach'</p>	<ul style="list-style-type: none"> <li>• Continuing meetings, conferences, seminars, with:-</li> <li>• enforcement,</li> <li>• food industry,</li> <li>• training Industry,</li> <li>• professional institutions</li> <li>• academics,</li> <li>• WHO &amp; CODEX,</li> <li>• EU Institutions &amp; Member States,</li> <li>• other countries</li> </ul>

## Potential progress toward compliance

- **All figures are highly indicative and will be revised on the basis of the outcome of current feasibility projects.**
- In England there are 480,000 food establishments
- 30% compliance with forthcoming legislation (Agency SDA target) = 144,000 food establishments in 2004
- these are mostly larger businesses, multiples and franchises
- There are therefore 336,000 remaining food establishments that need assistance
- Turnover of establishments is estimated at 20% per year. (Assume a certain % of these “new establishments” will be compliant based on previous year’s compliance level)

Estimated annual conversions:

Project 1: to develop SFBB for different sectors as a pack

Assume 5% of establishments can use this standalone & develop procedures unaided

Project 2: Self-Help into web based or e-learning pack

Assume 5% of establishments can use this to develop their own procedures unaided

Project 3: enforcement officers visits + Project 4 regional support centres

Taken together, assume that 15% of establishments will be helped and encouraged to develop procedures that would not otherwise do so.

Project 5: Training – will contribute to overall competencies in the industry, but will not enable establishments to comply on its own.

Project 6: Communications – will contribute to the overall “push”

Therefore:

### Estimated progress toward HACCP compliance (to nearest thousand)

	2004	2005	2006	2007	2008	2009	2010
Non-compliant Establishments		336000	288000	243000	202000	164000	131000
Add turnover		47000	35000	25000	17000	11000	7000
Establishments helped to comply		383000	323000	268000	219000	175000	138000
<i>Compliance by:-</i>							
Standalone packs	5%	19000	16000	13000	11000	9000	7000
Web site / cd rom	5%	19000	16000	13000	11000	9000	7000
LA advisoryt visits	15%	57000	48000	40000	33000	26000	21000
Total compliant		95000	80000	66000	55000	44000	35000
Non-compliant establishments		288000	243000	202000	164000	131000	103000
Compliance level	30%	40%	49%	58%	66%	73%	79%

These figures are indicative  
actual effectiveness of different methods can only  
be estimated at end 2004 after feasibility studies are completed

## **Scotland**

### Allocation of funding

1. Scottish Ministers have provided additional funding of £2m for 2004/05 and a further £2m for 2005/06, to support Scottish businesses with the implementation of food safety management procedures based on HACCP principles. Work is under way to develop an economic model that will ensure measurable outcomes and value for money for the allocation of funding that has been made available in Scotland.

### 'HACCP in Practice' the guidance model

2. Version 1 of *HACCP in Practice* was completed by the Scottish HACCP Working Group at the end of February. The completed draft of Version 1 will be passed to the HACCP Working Group of the Project Management Board to ensure consistency of Agency Advice across the UK countries. The Scottish Food Enforcement Liaison Committee will consider the final text prior to formulating its independent advice to us on the implementation of the training model.
3. Once agreement is reached, version 1 will go through a process of graphic design and then be printed in hard copy. Data on the size of various ethnic minority components of the catering sector has been assessed in Scotland through Local Authorities. Based on forecast demand, interest has been sought initially from organisations able to translate and interpret the guidance manual into Urdu, Punjabi and Cantonese.

### HACCP in Practice self - learning and training delivery

3. Interest has been sought by the Agency in Scotland from organisations able to develop the guidance manual into an E Learning package. The intended design should enable a greater component of self - learning to further assist Local Authorities, trainers, and food business with implementation of proportionate HACCP based systems.

### Working with Local Authorities

4. The strategy to date has been to involve Local Authorities in the process of development of guidance in order to ensure the greatest degree of Local Authority co-operation with future implementation plans. A workshop of Chief Officers of Environmental Health took place in 23 February to discuss the role of Food Authorities in the implementation plan and appropriate means of assuring value for money in the allocation of Scottish funding. A programme of appropriate training and support will be developed for Local Authorities following completion of version 1, in order to assist them with the delivery of the Agency's models.

### Training and catering business communication

5. FSAS has asked the Scottish Food Advisory Committee (SFAC) for independent advice on how best to engage the catering sector in Scotland. SFAC has organised two conferences in March aimed at small businesses and will provide its advice to FSAS based on their outcome. FSAS officials have had a number of meetings with Visit Scotland, Scottish Enterprise and Highlands and Islands Enterprise to explore communications and assistance to the catering sector.
6. A meeting will take place with the Scottish representative of the Sector Skills Council to explore how FSAS can feed into the Qualifications and Curriculum Authority syllabi.
7. Once version 1 is completed, a targeted Communications strategy will be developed add support to the project.
8. A suitable programme of training seminars for caterers will be further developed based on advice from SFAC and the Agency's liaison with stakeholder organisations and industry.

## **Northern Ireland**

### The Safe Catering Guidance Pack

1. As outlined in Annex C, this guidance pack has been in development in Northern Ireland for approximately 5 years and has enjoyed considerable support by both District Councils and the catering sector. A recent survey showed that about 35% of the catering sector in Northern Ireland currently has in place a documented food safety management system based on the principles of HACCP. This has been largely attributed to use of the Safe Catering pack and equivalent systems. A further 40% of caterers have been determined by EHOs to be complying with the current 'hazard analysis' requirement of the General Food Hygiene Regulations.
2. It is proposed to continuously improve the Safe Catering pack. In particular, the pack will be considered by the HACCP Working Group of the Project Management Board to ensure consistency of Agency Advice across the UK countries. Further revision and refinement may also be necessary following feedback from the pilot exercise currently ongoing in England.

### Work already under way

3. On the basis of this success, FSANI funded, out of 2002/3 budget, the development of the latest version of the Safe Catering pack and the subsequent printing and distribution of some 4,500 copies to all District Councils for use in catering premises (as there are around 9,300 catering businesses in Northern Ireland, there remains a shortfall in the number of packs needed). EHOs have been trained specifically in the use of the pack in addition to a number of more general HACCP auditing courses.
4. In 2003/4, modest additional funding of £20K has been acquired for the purpose of progressing the uptake of HACCP in the catering sector. It is proposed to use this funding for 2 purposes:
  - to commence a series of training seminars for caterers on the use of the Safe Catering pack. A small team of experienced EHOs drawn from right across Northern Ireland will work with local District Councils on this project.

- to develop a Chinese version of the pack. This work will be done by an FSANI led working group comprising District Council EHOs, a Chinese EHO from a Local Authority in GB, a Chinese caterer and an interpreter with extensive food hygiene training experience.

#### Bid for additional funding

5. It is intended to make a bid for significant additional funding of £1.1million, to be spread over 3 years beginning 2004/5, for the implementation of Food Safety Management Systems based on the principles of HACCP. Should this bid be successful, it is planned to:

- Continue the current programme of training seminars for caterers throughout Northern Ireland.
- Print and distribute further guidance packs as necessary.
- Print and distribute the Chinese version of the Safe Catering Guidance pack which may be developed.
- Commence a programme of training seminars for Chinese caterers.
- Develop further versions of the pack for other significant Ethnic minority groups and commence a programme of training seminars as necessary.
- Develop appropriate guidance materials for retailers and other food businesses and programme of seminars as necessary.
- Continue with the approach of using District Council EHOs to deliver the Safe Catering pack, specifically fund employment of additional staff to support food businesses separate from inspection programmes

#### Planned activity should additional funding not become available

6. Should the bid for additional funding not be successful or only be partially successful, it is hoped, as a minimum, to provide a sufficient number of additional guidance packs to ensure that every catering business has access to one if they need it (some larger businesses have their own systems in place). In a scenario where no additional funding is available, District Councils will be encouraged to make best possible use of guidance packs within inspection programmes. It should be noted that the 26 District Councils in Northern Ireland already receive ongoing funding for promotion of HACCP of £180K per year, divided pro-rata.

This is the recurring element of funding made available following publication of the Pennington Group report into the Lanarkshire *E.coli* outbreak of 1995.

## **Wales**

1. There are an estimated 33,000 food establishments in Wales many of which are tourism related. Approximately 21,000 are restaurants and other caterers.

### Projects Underway/Working with Local Authorities

2. For the 2002-2003 Financial Year, FSA Wales identified a budget of £80,000 for the promotion of HACCP and general food hygiene/standards by its 22 local authorities. The main aim of the scheme, entitled the HACCP and Food Hygiene/Standards Collaborative Projects Scheme, was to promote the uptake of HACCP in high risk catering premises. Competitive bids were invited and priority was given to projects that contributed directly to meeting the FSA target of increasing HACCP in caterers. FSAW received 10 project bids involving 18 of the 22 local authorities amounting to a total of £160,000. The WDA Agri-Food division agreed to co-sponsor the scheme and all bids were then approved.
3. There were 7 different approaches to the project providing free training courses to staff from high risk food businesses. The courses were provided by consultants, colleges and food centres and were of various length and intensity. Each was supported by guidance materials. As part of the evaluation process FSAW organised a Project Evaluation Seminar to which all local authorities and WDA were invited. Project co-ordinators highlighted the successes and the problems they encountered during the project, the group then discussed the projects and highlight suggested ways forward.
4. Most authorities found packs to be very useful to EHOs when discussing HACCP during inspections. There was a wide variety on offer and this was thought to a positive development. Some authorities thought that the Agency could usefully help to make standard packs available to LAs. The evaluation to date suggests that the project definitely increased HACCP uptake and increased the awareness and understanding of what local authorities wanted of businesses.

5. The next step is to set up a meeting to update LAs of FSA actions and discuss the provision of guidance materials. Two local authorities have their guidance packs available in electronic format and are sharing them with other authorities.

### Training

6. The FSA Wales is working closely with the CIEH in Wales to provide two training courses in HACCP for enforcement officers from all Welsh local authorities. The courses will be held in March 2004. Two of the three Welsh Food Centres, sponsored by the Welsh Development Agency, took part in this project as they were commissioned by local authorities to develop short courses. Discussions will be held with the Welsh Development Agency in due course to build on this experience.

Contact has been made with ELWa (the Welsh Learning and Skills Council) in anticipation of discussing the National Occupational Standard currently being drafted by the Hospitality Training Foundation.