

"Guide for the official control of food premises by authorities"

1. Introduction - purpose

This guide for the control of food premises can be seen as a manual for authorities of the European Union, for carrying out inspections in food premises on behalf of the official control on foodstuffs.

The base is directive 89/397/EC of the council, concerning the official control on foodstuffs from 14-06-1989 and directive 93/99/EC of the council, holding specific regulations on the control of foodstuffs, from 29-10-1993.

According to the directive 89/397/EC of the council, inspections serve the following goal:

- verification of the compliance of foodstuffs with legislation on foodstuffs.
Whereas such legislation contains provisions on health, rules on composition and rules on quality designed to protect consumers interests as well as provisions on consumer information and fair commercial trading. At the same time as foodstuffs, materials and articles intended to come into contact with such foodstuffs should be controlled.
Purpose of this guide is to harmonise the inspections in food premises within the EU and boost the quality of such inspections. The inspections and the measures taken concerning those inspections, are to be done by well trained inspectors and must be clear and transparent, also for the undertaker involved.

2. Definitions

- *Inspector*: the by the competent authority directed civil servant who is in charge of the control
- *Inspected*: the undertaking or undertaker who is inspected due directive 89/397/EC of the council and is ruled by the laws of foodstuff control.

3. Inspections

To do a good inspection, it is best to divide the inspection in de following segments:

1. planning and preparations
2. physical inspection see flowchart
3. follow up

4. Guide

4.1 planning and preparation

4.1.1 common

Before the inspector starts the preparation and the inspection, it is evident that he has a overview of the work for the day. Important is to know if there are sampleplannings, inspectionfrequencies, appointments etc.

4.1.2 planning of the inspection

The following information prior to the inspection is relevant:

1. inspection frequency
2. inspection method (standard-HACCP-reinspection-sampling)
3. inspection timing
4. sampling plan
5. special measures
6. consumer complaints
7. sampling material and equipment
8. agreements from prior inspections-sampling results from prior inspections

4.1.2.1 inspection frequency

The inspection frequency is aimed towards risk assessment of the potential and the real risks available in the food premises, and the scale of or the importance of the undertaking. Also the year planning of the authority affects the frequency. The authority, and the inspector can steer the frequency of the count of undertakings that are controlled.

4.1.2.2 inspection method

The method of inspection depends of the type of inspection that is to be carried out or foreseen.

Next to the standard inspection, directed on a total vision of the work within a undertaking, there is a choice of certain types of inspections to specific points within the premises, like the implementation of HACCP. Inspections directed towards the implementation of HACCP give a good visual of processes in the undertaking and the risks involved in those processes. Reinspections serve the goal of controlling the appointments made in a prior inspection. Finally it is possible to do a sampling only inspection, in a monitoring program or for inquire purpose, to check on the quality of the foodstuff that is produced. The different kind of inspections are to be written down in procedures.

4.1.2.3 inspection timing

There are some criteria to determine the time of inspection:

- time of opening of the undertaking (bakeries in the morning, restaurants in the evening)
- the time needed for the inspection and the inspection method
- seasonal and meteorological influences, and events
- efficiency of the chosen time (is there production or not)

4.1.2.4 sampling plan

Samples from inspections and from monitoring programs are planned in cooperation with the laboratories.

4.1.2.5 special measures

Special measures can come from regional, national and international measures like enforcements towards a specific undertaking, but also calamities such as the "rapid alert" system of the EU. The priority of these measures can influence the planning of the inspector.

4.1.2.6 consumercomplaints

Consumercomplaints about products or bad hygiene in foodpremises do have highest priority and are to be checked out as soon as possible.

A procedure about handling consumercomplaints has to be at all offices of the inspectorate.

4.1.2.7 samplingmaterial and equipment

Inspectors are to be equipped with sufficient and for the purpose needed samplingmaterial and protective clothing, and the for good functioning needed materials and equipment.

A procedure about the kind of materials used, the way of using the materials, the registration and for example calibration of equipment has to be at all offices of the inspectorate.

4.1.2.8 agreements from prior inspections

In the case of agreements from prior inspections made to clear situations of offendings, like a warning or a protocol, those agreements have to be checked in th eform of a reinspection.

In case the inspector himself is not able to go, he has to make arrangements with collegeas or has to cancel the appointment.

4.2 Data

4.2.1 data

Data about undertakings and companies or persons, including their history are archived.

A procedure about how to archive, and how to use data has to be at all offices of the inspectorate.

4.2.1.1 verification of the data

Prior to the inspection the inspector will verify the data that is available. Changes will be done if necessary. Data is also checked through databases of the Chambre of commerce.

4.2.1.2 history of the undertaking

The data concerning the history of the undertaking serves the preparation of the inspection, especially dat about:

- type and size of the undertaking or company
- people responsible within the company
- the kind of work
- possible foodsafetyplanning
- licenses
- data from prior inspections, measures and ratings
- data about prior samplings and measures
- data about the premises

4.3 The inspection

4.3.1 the inspection

The kind of inspection, the duration, the routing and the specific controlpoints are set by the inspector. These are committed in workingprocedures within the inspecting authorities.

4.3.2 general points of interest

The inspector uses his knowledge and his senses in the foodpremises, to get an idea about the handling of rules towards foodlegislation.

The inspector is subjected to the internal rules of the inspected company or undertaking, and wears if necessary protective clothing. As much as possible, the inspection will follow a inspectionmethod.

If necessary, specific controlpoints, can make alterations possible.

The following controlpoints are to be in a inspection:

1. construction of the premises, including layout, equipment, design and size
2. machinery, materials, equipment, fittings
3. raw materials, intermediate products, additives and ingredients, finished product
4. workingmethods and (technical) workingprocedures
5. personal hygiene
6. qualifications and instruction of personel
7. cleaning and disinfectionmeasures
8. pestcontrol
9. foodsafetyplan based on HACCP

the inspection is directed towards:

- hygienic control (personel, premises, products, pestcontrol)
- productcontrol (sort of product, composition, raw materials, ingredients, additives, intermediate products, finished products, preparations and treatment, use of materials, articles and equipment which can come into contact with food
- control on selfcontrol (HACCP, compositions, quality, identifications)

4.3.2.1 construction of the premises, including layout, equipment, design and size

These inspectionpoints follow the line of obligatories mentioned in directive 93/43/EC of the council, concerning foodhygiene.

All food premises have to have where necessary premises large enough to carry out there business (production- and storageroom, changing facilities, sanitary arrangements, etc.)

In the inspection there are several points of interest (is it or is it available, maintenance, appropriate, hygiene) to be considered.

Inspectionpoints are:

- Floor(s) surfaces
- Wall(s) surfaces
- Ceilings, roofs and overhead fixtures
- Doors, windows and other openings
- Provisions for cleaning foodstuffs
- Provisions for cleaning utensils and equipment
- Provisions for cleaning hands, sanitary arrangements, changing facilities

- Adequate provisions for waste disposal (liquid and solid), effective drainage
- Ventilation and airflow
- Lighting

4.3.2.2 machinery, equipment, materials, fittings

Inspection points are:

- Cleanliness and maintenance of surfaces that can come in contact with food
- The surrounding of equipment has to be reached easily to sanitise and/or disinfect, storage of garbage is not allowed
- Utensils and/or equipment are to be made of easy to clean and/or disinfect materials, including waste disposal systems
- Chances of cross-contamination
- Control of facilities for maintaining temperatures and the control of them

4.3.2.3 raw materials, intermediate products, additives and ingredients, finished product

Inspection points are:

- Raw materials, additives, ingredients, intermediate products and finished products are to be stored and treated at appropriate temperatures and to prevent deterioration and contamination
- (Packages of) raw materials, intermediate products, additives and ingredients are properly labelled to prevent from mistaking
- Labelling has to be appropriate with the content of the raw materials, intermediate products and ingredients
- Raw materials, intermediate products and ingredients are to be protected from contamination
- Raw materials, additives, ingredients and finished products are to be labelled considering to directive
- Labelling of the packaging may not be misleading, including advertisement for the product
- Ingredients, intermediate products and additives, and the packaging used, are to be allowed for the produced finished product (migration)
- (Intermediate) products, presumably for third countries, not complying to regulations of the EU are properly stored and separated, are clearly labelled as such, and there is proof (administration) that these products are allowed as such in that or these third countries
- Hazardous, inedible or poisonous raw materials, intermediate products, (technical) additives and ingredients are labelled as such and are stored or held separate, in closed containers and away from finished products to prevent danger and contamination

4.3.2.4 working methods and (technical) working procedures

Inspection points are:

- Every (part of the) process of preparation, handling, storage and transport of raw materials, ingredients, intermediate products and finished products is monitored for hygienic circumstances
- Every (part of the) process is monitored on risks of (cross-) contamination
- Every (part of the) is checked upon use of procedures, norms and working methods
- Every (part of the) process is, if necessary, checked on temperatures, and if they comply with norms and procedures and legal values

4.3.2.5 personal hygiene

Inspectionpoints are:

- Rules considering the hygiene of personel working in the productionproces (internal or legally based) are to be obeyed
- (If possible) checking upon persons for diseases wich may transmitted through food or infected wounds or sores or skin infections, wich may contaminate food

4.3.2.6 qualifications and instruction of personel

Inspectionpoints are:

- Personel, handling food is properly supervised and instructed and/or trained for handling food
- Personel is instructed for personal hygiene

4.3.2.7 cleaning and disinfectionmeasures

Inspectionpoints are:

- Cleaning and disinfection in the premises are carried out properly
- The used products are legal and allowed for the job
- There is a cleaning- and disinfectionplan as a part of the foodsafetymeasures

4.3.2.8 pestcontrol

Inspectionpoints are:

- There is sufficient control on pests
- There is a pestcontrolplan as a part of the foodsafetymeasures
- The used methods, materials and products are legally allowed for the purpose

4.3.2.9 foodsafetyplan based on HACCP

Inspectionpoints are:

- In all foodpremises there is a foodsafetyplan based on HACCP
- The system is fully operational and updated
- Registration is complete and conform
- Other foodsafetyguarantee systems used

4.3.3 sampling

Part of a inspection can be a samplingprogram, done in cooperation with involved laboratories. Sampling can be done for monitoring purposes, or directed at conclusions for prosecution or enforcement of regulations.

4.4 Results of the inspection

4.4.1 common

After the inspection the inspector makes his conclusions about his findings.

The omissions and infringements found are taken in the ordeal.

The inspector asks himself what the omissions and infringements are worth and if there are threats of food unsafety for the health of the consumer.

4.4.2 conclusions

The conclusion can go in two directions:

1. there are no (major) infringements or omissions
2. there are (major) infringements or omissions

4.4.2.1 there are no (major) infringements or omissions

If there are no (major) infringements or omissions, the inspection can be concluded.

4.4.2.2 there are (major) infringements or omissions

If in the undertaking infringements or omissions are found, the inspector takes necessary provisions to make an end to these.

Therefore he takes the (national) measures and enforcement procedures to force this.

4.5. Communicating the results of the inspection to the inspected

4.5.1 announcement to the inspected

At the end of the inspection, the inspector makes his findings known to the inspected.

- If there are no (major) infringements or omissions, he concludes his inspection, and makes his remarks where necessary to the inspected.
- If there are (major) infringements or omissions, he makes his conclusions about their seriousness and decides about measures and how to enforce them, whereby he informs the inspected about those measures. He will tell the inspected what measures have to be taken to end the (particular) situation.
If necessary the inspector makes a protocol and will tell the inspected that he will be prosecuted and there will be legal consequences; if possible the suspect will be asked for an explanation or reasons, conform national regulations.

4.5.2 agreements

If possible, infringements or omissions are solved immediately.

If this is not possible, agreements are made and terms are set for reinspection and the time that will be given to solve infringements or omissions.

Therefore a reinspection will be done directed towards these agreements.

4.6 Rating

After concluding the inspection, the inspector rates the undertaking, based on his findings and facts.

On those ratings there can be made changes in the inspection pattern.

4.7 Follow up

The follow up generally consists of:

- Registering the data and reports in the archives
- Taking care of correspondence
- Making of warnings and/or protocol
- Bringing samples to laboratories, or checking samples himself
- Register data of sampletakings, and if necessary making warnings and/or protocols from that

5. Remarks

On behalf of the development of systems for inspectionplanning, inspectionsystems and follow up, the inspector is obliged to disposition his knowledge. This also goes for internal qualitysystems and inspectionmethods and the making of qualityhandbooks, wich serve the purpose of harmonising the official control of foodstuffs in the EU.

Flowchart

