

The scope of hazard analysis in food processing establishments according to Codex Alimentarius standards and requirements of private food safety management systems

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Given that food safety problems and issues related to quality cannot be discussed separately, many FBOs (food business operators) implement non-obligatory standards that are referred to as private food law. The implementation of private standard implies the extension of the scope of a hazard analysis, from hazard analyses exclusively for stage-specific hazards to hazard analyses also for non-stage specific hazards. The situation gives rise to increasing uncertainty regarding the extent of official controls. It results from two facts: 1) private standards apply modified nomenclature, 2) private standards frequently impose higher or new requirements. The question therefore arises whether an official veterinarian may control the activities planned under the provisions of voluntarily implemented standards or whether they may control only the correctness of activities resulting from the generally applicable provisions of law. A voluntary implementation of private standards may lead to a wrong assumption that FBOs do not necessarily have to, but only may comply with the guidelines laid down by the implemented standard and that official veterinarians have no legal basis to request the achievement of assumptions concerning the implementation of a specific standard. Reg. 882/2004 contains the guidelines concerning the examination of all systems implemented in the plant, irrespective of the legal basis for their implementation. Furthermore, the basic requirements towards food companies set by private systems is that they must satisfy any and all provisions of the generally applicable law adopted in the producer's country and on the target market. The requirement related to implementation of the HACCP system principles resulting from the Reg. 852/2004 forms an integral part of private systems, such as ISO, BRC and IFS. During the performance of an official control, instead of focusing exclusively on the HACCP procedures, it is reasonable to apply an integrated approach comprising both prerequisite programmes and the HACCP principles.

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Biography

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