

Response from Sweden to QUESTIONNAIRE

TO EVALUATE OFFICIAL CONTROLS ON PROCEDURES BASED ON HAZARD  
ANALYSIS AND CRITICAL CONTROL POINTS (HACCP) PRINCIPLES

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**The Swedish response is separated into food and feed control respectively. The reason is that there are two Swedish CCAs, the National Food Agency (NFA) for food control and the Swedish Board of Agriculture (SBA) for the feed control.**

Please indicate in the table below the contact details of the main person completing this questionnaire, who can be contacted if we need further clarification.

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### 1 Implementation of HACCP (including flexibility)

1.1 What do you understand by flexibility in the implementation of procedures based on the HACCP principles and how do you approach implementation? Are there national harmonised criteria defining what kind of establishments may apply flexibility in the implementation of the procedures based on the HACCP principles? Please provide the link to the information or the documents electronically.

There are no criteria defining any special **food** establishments where flexibility on implementation and control of HACCP-related question is applicable. Generally, that simple operations/small business/few staff involved – you make yourself an opinion whether hazards are properly prevented or not. If the hazards are properly prevented and if there is an awareness of those potential hazards the full paperwork or the framework round all HACCP principles is of minor importance.

When the hygiene and control EC-regulations were introduced in 2006 the position on HACCP was quite strict. Full hazard analysis as well as the rest of the HACCP was required to be documented. This was, at that time, the CAs common approach to control on FBOs HACCP system. However when the Commission guidance document on the implementation of procedures based on the HACCP principles, and on the facilitation of the implementation of the HACCP principles in certain food businesses became spread a flexible approach has been more and more implemented. Now the official guidance on implementing HACCP is that the flexible approach is to be used by the CAs.

There are about 300 CAs in Sweden and there are differences in how the CAs use the possibility to a flexible approach on HACCP. It depends on the competence and experience of both the FBO and the inspector on HACCP based procedures.

National Food Agency (NFA) has published an overall guidance on official **food** controls at all types of food businesses operators.

[http://www.slv.se/upload/dokument/livsmedelsforetag/vagledning/Offentligt\\_kontroll\\_livsmanl.pdf](http://www.slv.se/upload/dokument/livsmedelsforetag/vagledning/Offentligt_kontroll_livsmanl.pdf).

In pages 8 and 9 it is briefly defined what the prerequisites are, with reference to EU Commission guidance HACCP (SANCO/1955/2005 Rev. 3) and article 5 in regulation (EC) No 852/2004 and that hazards often can be controlled through simplified HACCP based procedures.

Chapter 9.2 (pages 22-24) is about requirements for planned procedures and the possibility of flexibility concerning documentation of own checking performed by the food businesses. Chapter 11 (pages 37-39) is about HACCP based procedures and the possibility for companies to use a guide to good practice, or generic guides, if there is a suitable such available.

Flexibility is not only for small establishments, but it is rather type of activity that is crucial (page 23).

There are also special control handbooks designed to provide support for the official control of specific types of food establishments – so far one control handbook for shops and one for restaurants.

1) Retails/Shops

<http://www.slv.se/upload/dokument/livsmedelsforetag/vagledning/KONTROLLHANDBOK%20Butik%20-%20slutlig%20version.pdf>

HACCP is mentioned in particular in pages 40-42. Here flexibility is described for different types of shops depending on whether they handle packaged food or not and if they have more or less complicated handling procedures or if they handle e.g. meat or fish.

2) Retails/Restaurants

<http://www.slv.se/upload/dokument/livsmedelsforetag/vagledning/Kontrollhandbok%20storhush%c3%a5ll%20Del%202.pdf>

HACCP is mentioned in particular in pages 58-61.

In both these handbooks it is pointed out that there is the possibility and importance of flexibility concerning HACCP.

HACCP is mentioned of course also in other guidance written by the NFA, but the ones mentioned above are the most relevant ones.

In Sweden we see the requirement for flexibility as the possibility to not require a formal HACCP for certain types of **feed** companies or small size such companies. It shall be noted that with a no formal HACCP Sweden still requires a risk based approach by the feed business operator and at least on production sites written documentation of risks and handling of risks but not the formal part of the HACCP system i.e. HACCP-team, meeting reports, etc.

The assessment of HACCP and the need for a formal HACCP or not, are done by the feed control inspectors. A recommendation on which types of feed business operators where a not formal HACCP can be accepted is given in the guidance to the feed control inspectors (Guidance to the Board of Agriculture's checklist for the control of feed establishment in official control, ver. 6: <http://www.jordbruksverket.se/download/18.1b8a384c144437186ea46c3/1392978995821/V%C3%A4gledning+%C3%B6vriga+ver.+6+140220.pdf>). The guidance to the feed control inspectors is regarding the HACCP-flexibility making a reference to the Commission guide "Guidance document, Implementation of procedures based on the HACCP principles, and facilitation of the implementation of the HACCP principles in certain food businesses".

The guidance to the feed control inspectors also indicates some types of establishment where a formal HACCP is not required, i.e.

- Primary production
- Importers/stocks of packed compound feed
- Shops
- Transporters of
  - o Packed feed
  - o Bulk transports of
    - Non animal origin feed material
    - Premixtures and compound feed without medicine, coccidiostats and histomonostats
- Establishment that only perform "blandartjänst", i.e. production of compound feed from complementary feed and feed materials, which are provided by owner of the animals for his own use
- Establishment that only packing compound feed

- Other types of animal by-product establishments than those referred to in regulation (EC) No 1069/2009
- Establishment with small volumes, i.e. with small volumes referred to as producers of feed material or compound feed with a volume factor of 0.25 according to annex 4 in SJVFS 2007:21

It shall be noted that for some feed risks Sweden use the same risk approach as for dioxin in regulation (EU) No 225/2012, i.e. regulated self-control (a fixed number of samples that the companies need to take) for salmonella (import and production) and aflatoxin (import).

1.2 Do you have any suggestions for improvement at EU level for encouraging implementation of HACPP and flexibility? If yes please describe.

We really support the initiative to the BTSF training activity on Food hygiene and flexibility which also includes flexibility of HACCP.

For many FBO it is difficult to understand full HACCP, so they buy a HACCP program from a consultant but they still do not understand. There is a need for a more simple approach than full HACCP. The FBO can have control of the hazards without calling it a HACCP system. FBO often has a resistance to the term HACCP and think it means to introduce a lot of paper work and continuous supervision. Our proposal is to introduce a new term at EU level for procedures to control the hazards. HACCP refers to full HACCP according to Codex standards.

To harmonize the approach in all member states a **feed**-specific guidance document (cf. the one mention above with focus on food business operators) could be produced by the Commission with a clear indication that the need for HACCP should be focused on production, not on storage, transport and selling. This guidance document could also underline the need for traceability even if no HACCP are required.

1.3 Indicate examples where good practices have been observed to date. Please describe the main factors accounting for good performance by FBOs in relation to the implementation of procedures based on HACCP principles.

There are cases where the **food** business operators have prepared the system themselves, and FBO do understand the system, which gives flexibility in the everyday work. The head of the FBO take responsibility and is of the opinion that quality system is important in the process. They are also clear in their communication with the staff which gives a high understanding of the system. FBO's training and/or experience are both important for understanding where the hazards are and how to handle them in the process.

The **feed** business operators have applied a well-functioning safety management system according to HACCP principles in order to ensure the absence of Salmonella in the feed, including:

- Control of feed materials: Feed materials classified as risk materials are sampled and analyzed for salmonella before they can be used in feed production.
- Control of salmonella in the production line and production environment: Sampling in the processing line and feed production environment. A minimum of five samples from feed mills manufacturing compound feeding stuffs for poultry and a minimum of two samples from those manufacturing compound feeding stuffs for other food-producing animals must be collected in the processing line on a weekly basis. The feed business operators take additional voluntary salmonella samples.
- Heat treatment: Feed for poultry is heat treated according to the national legislation. Most feed to other species is heat treated as well.

The feed business operators are developing a code of good practice for salmonella.

In the recent years, and particularly in years with unfavorable weather conditions, there have been serious problems with high levels of fusarium toxins (deoxynivalenol = DON and zearalenol = ZEA) in Swedish cereals. For this reason the **food and feed** business operators have applied a well-functioning safety management system according to HACCP principles in order to ensure that the product is safe regarding these toxins. In their risk assessment feed and food business operators have identified fusarium toxins as a potential risk and a series of control measures are put in place, including:

- samples are collected from crops in the fields for analysis of fusarium toxins in order to map the problem even before harvest in order to enable rapid and appropriate actions, and
- samples of oats are collected in connection with the delivery to feed or food business operators and analyzed for DON content as a basis for sorting and payment. The guidance benchmarks for DON in cereals is applied and the cereal that does not fulfill the requirements is downgraded to “fuel”.

In addition the business operators have, in consultation with the National Food Agency and the Board of Agriculture, developed a national guide to good cultivation practice for producing cereals with as low levels of fusarium toxins as possible.

1.4 Are national guides to good practice being used correctly by those FBOs which implement procedures based on HACCP principles? Is flexibility properly addressed in guides (both for GHP and any other guides)?

Guides to good practice are used by the FBOs to some extent. They are seldom used as check list, more like a list of references or a dictionary/encyclopedia. The FBOs tend to use sections and parts of the guides to good practice that are topical for their own special activity. The guides to good practice differ to some extent in their approach on flexibility in implementing HACCP. However, the quality of the guides varies a lot. If the guidelines are of lower quality they can mislead the FBO.

Many guides are too complicated for many small FBO. Ambition to create comprehensive guides has often resulted in guides with too many pages and too difficult to understand for small FBOs. Even if the CA informs the FBOs the knowledge that the guidelines exist among FBOs varies a lot.

Even if there are guides to good practice CA cannot require the FBO to use them, since they are not part of the legislation. Thus CA cannot require FBO to “use them correctly”. It is only when FBO says “this [the guide] is the way I/we implement HACCP (or other requirements)” that CA can compare what FBO does with what the guide says (provided the guide contains HACCP-based procedures). The responsibility of the FBO is to follow the rules, not the guides. The guides, if adequate, are a help for the FBOs to implement the rules for instance article 5 in 852/2004, as long as FBO comply with the requirement in question.

Example of national guidelines to good practice where flexibility is correctly addressed, **food** sector:

- Guide for hygienic production of milk products:

[http://www.slv.se/upload/dokument/livsmedelsforetag/branschriktlinjer/Branschriktlinje\\_mejeri\\_100823.pdf](http://www.slv.se/upload/dokument/livsmedelsforetag/branschriktlinjer/Branschriktlinje_mejeri_100823.pdf)

A short description of GHP and HACCP, pages 21-26.

- Guide for safe food in fast food sector:

<http://www.slv.se/upload/dokument/livsmedelsforetag/branschriktlinjer/Branschriktlinjerejtskr091110.pdf>

- Guide for safe food in public sector:

[http://www.slv.se/upload/dokument/livsmedelsforetag/branschriktlinjer/Saker\\_mat.pdf](http://www.slv.se/upload/dokument/livsmedelsforetag/branschriktlinjer/Saker_mat.pdf)

Page 41-75: The industry's interpretation of how the food business operator can act to achieve the objectives of the legislation. Includes examples of GHP, HACCP and documentation with some degree of flexibility.

- Guide to outdoor cooking:

[http://www.slv.se/upload/dokument/livsmedelsforetag/branschriktlinjer/branschriktlinjer\\_utomhusmat\\_lagning.pdf](http://www.slv.se/upload/dokument/livsmedelsforetag/branschriktlinjer/branschriktlinjer_utomhusmat_lagning.pdf)

Page 111-112: Provides a simple and clear description of GHP and HACCP with a large degree of flexibility.

-Food supplements:

[http://www.slv.se/upload/dokument/livsmedelsforetag/branschriktlinjer/Sakra\\_kosttillskott\\_till\\_konsument\\_oktober\\_2009\\_slutversion.pdf](http://www.slv.se/upload/dokument/livsmedelsforetag/branschriktlinjer/Sakra_kosttillskott_till_konsument_oktober_2009_slutversion.pdf)

On page 37 there is a description of the flexibility depending of FBOs different activities. At pages 121-129 HACCP is described.

For production of **feed** two national guides to good praxis occur. One for the feed material producers and one for compound feed producer with focus on salmonella.

The guide for feed material producers "[Branschriktlinjer för foderråvaruproducenter](#)" are for the moment under reconstruction and the guide declare that HACCP are the basis for a safe feed production and that the construction should give sufficient flexibility to be applicable in different situations, the guide covers in brief terms the HACCP-system.

[http://webred.intern.jordbruksverket.se/download/18.32b12c7f12940112a7c80002650/1277818388350/Branschriktlinjer+f%C3%B6r+foderr%C3%A5varuproducenter+-+version+2010-06-17\\_2.pdf](http://webred.intern.jordbruksverket.se/download/18.32b12c7f12940112a7c80002650/1277818388350/Branschriktlinjer+f%C3%B6r+foderr%C3%A5varuproducenter+-+version+2010-06-17_2.pdf)

[The guide for the compound feed producers with focus on salmonella](#) only indicate the feed producers responsibility for the feed production and that the production should built on the HACCP-principles.

<http://www.jordbruksverket.se/download/18.1b8a384c144437186eacc94/1393926984245/Nationella+riktlinjer+salmonella.pdf>

The Swedish guides to good practice have the same lack of practical hints or tips/solution as the EU:s guides and in general terms are a rewriting of the regulation, the exception are the more practical guide on salmonella control and actions to be taken if salmonella are found in the feed or feed production line.

1.5 Describe activities or initiatives with FBOs/industry to implement procedures based on HACCP principles (e.g. specific project or control programme on HACCP, training for FBOs, Committees with industry representatives, and issuance of periodic documents to create awareness by FBOs). Please provide any further information electronically or the link.

In "Matlandet Sverige" there is Governmental financial aid to apply for development of e.g. guides to good practice, training etc. for small FBO.

There are private companies which offer HACCP-training including also a more flexible approach.

There are fishery product retail associations which have a person appointed and employed to work with support to their members.

The National Veterinary institute (NVI) has conducted courses on HACCP for the FBOs and CAs. The latest courses on HACCP for the FBOs was held 2012 and 2013 (HACCP in practice). For the CAs, the latest course was held 2010 (HACCP with focus on sampling according to regulation 152/2009). In 2013 NVI also held a workshop on HACCP in practice for the CAs.

## 2 Official controls

2.1 Describe the procedures, instructions, tools used by CAs to assess the FBOs procedures based on HACCP, including those focusing on establishments applying flexibility. Please, provide information electronically or indicate the link to the documents.

See response to 1.1 with link to different guidance documents for **food** control.

The implementation of flexibility varies among the almost 300 CAs for food control. Example from two local food control CAs procedures for assessment of FBO procedures based on HACCP can illustrate this. One CA focuses on the FBO hazard analysis and that it will be documented in order describe the source of the hazard. The other one accepts that the FBO can handle the hazard in different ways and the main point is that the hazard really is handled in some relevant way.

NFA has presented the flexibility in the procedures based on the HACCP principles at different NFA training courses in recent years. This is illustrated with examples on PP-slides used at the courses (Annex 1). The courses were offered to municipal politicians, chief civil servants, municipal food inspectors and inspectors at the central competent authority, NFA.

The main tool through which NFA approaches auditing HACCP-based procedures is through teaching NFA own inspectors in 3 steps:

1. HACCP in accordance with Codex Alimentarius (could be step 2)
2. Auditing methodology (could be step 1)
3. Auditing HACCP-based procedures including application of flexibility in accordance with article 5 of Reg. 852/2004 (step 1 and 2 are required as well as having independently performed audits of GHP in establishments).

The role of the CA is to audit the HACCP-based procedures. When doing so CA should not beforehand have decided how the company is expected to control hazards and what procedures they need to have. Instead it is to assess what they are doing and decide if it is good enough.

The **feed** control division of the Swedish Board of Agriculture has a written guide "[Guidance to the Board of Agriculture checklist for the control of feed establishment in official control, ver. 6, http://www.jordbruksverket.se/download/18.1b8a384c144437186ea46c3/1392978995821/V%C3%A4gledning+%C3%B6vriga+ver.+6+140220.pdf](http://www.jordbruksverket.se/download/18.1b8a384c144437186ea46c3/1392978995821/V%C3%A4gledning+%C3%B6vriga+ver.+6+140220.pdf)", where risk based production and HACCP are described in the chapter "risk based production" (page 112) and the control questions 800 – 980. In question nr 800 the flexibility and requirement on a formal HACCP are described.

## 3 Main difficulties encountered by FBOs

3.1 Please, indicate by sector, what are the main difficulties encountered by FBOs implementing HACCP principles? Please place an "X" on the relevant boxes in Table 1 (together with any comments).

It is hard to say anything for a whole sector of FBOs, every FBO is unique.

However, in general the main difficulties in the **food** area are associated with the hazard analysis and verification. Often the FBO does not have sufficient skills/competence to carry out a systematic hazard analysis. Even if e.g. larger retailers/shops have a hazard analysis they not always verify the system. There is less competence about the chemical hazards compared to the microbiological or physical hazards.

The experience is that when the FBO buy the HACCP program it is not always used in the everyday work and it is not a “living” document.

There are specific problems in some cases:

It is impossible to assess HACCP-based procedures in production of fresh poultry meat with respect to the hazard *Campylobacter* without a national or an EU-wide harmonised process hygiene criteria since there is no way to know if the company has reached an acceptable level through their HACCP-based procedures.

There are no HACCP-based procedures described to control the high-risk-hazard *Listeria* in soft cheeses with high pH made from raw (not heat treated) milk.

For **feed** control there are main difficulties with the hazard analysis. The main problems for feed business operators to implement HACCP principles seem to be to make a correct hazard analysis. It is not uncommon to see the hazard and the cause mixed up, or that only the type of hazard (microbiological, chemical or physical) is identified rather than the specific hazard.

#### **4 Non-compliances observed**

4.1 For the outcome of the official controls, please complete Table 2 or indicate the internet address where data could be found.

See Table 2 attached.

#### **5 Any other comments**

5.1 Please provide any other comments concerning the implementation of procedures based on HACCP principles, (for example, in relation to EU guidelines, Codex Alimentarius Guideline etc).

When making HACCP-audits on **food** business operators we do not look at Codex at all, since all HACCP-controls refer to article 5 of Regulation (EC) 852/2004 as the legal basis (and some other specific HACCP-requirements mainly in Regulation (EC) 853/2004).

The general HACCP-requirements in regulation 852/2004 are not as strict as Codex, for example:

**5.1 (refers to art. 5 Regulation (EC) 852/2004)**

CA cannot require more from a FBO than is required in the legislation, regardless of what is said in Commission guides or guides to good practice. Conversely the FBO can expect that flexibility described in commission guides should be accepted.

There is no requirement in the legislation to have a written own-check-program in general or a written HACCP-plan in particular (as required in Codex, where it is said that it is a document). In the legislation there is a requirement for procedures in general and HACCP-based procedures in particular, thus all own-checks cannot be required to be documented.

The only horizontal requirement for documentation is in article 5 of regulation 852/2004, but there it is said that consideration can be taken (5.2.g), and then not only to the size of the company.

In the Commission guides it says that HACCP is a system to control the main hazards, i.e. the ones posing the highest risk. Hence, the higher risk, the stricter the procedures, the lower the risk, the more flexibility can be accepted.

The requirement is that the procedures shall be based on the HACCP-principles, there is not a requirement that the principles must be followed strictly (article 5.1 is the main requirement, article 5.2 is a description of the method that the procedures should be based on), thus simplified procedures can be applied as long as they fulfill the purpose.

In some cases it may even be enough to follow the general requirements in the hygiene legislation.

## 5.2

### 5.2a

There is no requirement for a formal hazard analysis as in Codex, as long as the hazards can be identified without doing it. The requirement is to identify the hazards which very often can be done in other ways.

Only the hazards that must be identified in order to be controlled must be identified “by name” (i.e. VTEC, Salmonella, Campylobacter etc.), which generally are the hazards posing the highest risk. If it is not necessary to identify all of the hazards they can be identified as a group of hazards as long as they have common properties and are being controlled in the same manner in the process, for example “vegetative pathogens” when making heat treated products.

### 5.2b

Only when it is necessary to control a high-risk-hazard it is necessary to identify a CCP. If the risk is not so high that it is necessary to take corrective actions against product that has been produced under uncontrolled conditions normally a CCP is not required, a simplified HACCP-based procedure is enough when regaining control is good enough.

### 5.2c

There must be a critical limit (CL) in a CCP. If it is “common knowledge” or put down in for instance a guide to good practice it is not necessary for the FBO to prove that the critical limit eliminates or reduces the hazard to an acceptable level.

If the process as such by far eliminates the hazard (for instance when cooking a soup at 100° C) there is no need to identify a CL, hence it is not necessary to identify that step (cooking at 100°C) as a CCP.

### 5.2d

If there is a high risk hazard that needs to be controlled there is no flexibility in monitoring the hazard, but the requirement for records or documented procedures can vary (see 5.2.g), the latter mainly depending on the size of the company (how many persons that are monitoring the CCP), see 5.2.g.

The requirement in 5.1 is to have permanent procedures meaning continuous monitoring (if a high-risk-hazard that needs to be addressed is present)! Continuous (permanent) monitoring is not necessary when the risk associated with the hazard that is controlled in the step is not higher than it is sufficient only to restore process if the step is not under control. In such cases it is not necessary to identify the step as a CCP, a simplified HACCP-based procedure is enough.

### 5.2e

All the operators monitoring the CCP must be able to tell (if there is only one person in the company that monitors the CCP) or show instructions (documented procedures) on what is to be done if the CL is not met in a CCP.

But if a simplified HACCP-based procedure is enough (see description under previous principles) the procedures often need not be documented, it is enough that the company can tell us what they are doing and show us that it works.

#### *5.2f*

There can be many ways to verify, the most important features of verifying procedures are that they show that the hazards are permanently under control.

Generally on-line-verification is superfluous in one-man-companies.

#### *5.2g*

Flexibility with respect to documentation should be allowed when there are no high risks at hand. In small companies flexibility can be allowed also when there are high risks, if the FBO can show that it works anyway.

A HACCP-plan is seldom necessary to show that the procedures work and shall not be required unless it is deemed completely necessary.

a) If there are high-risk-hazards that need to be addressed in the process some kind of “list” is required in order to “know the enemy”.

d-e) In most companies instructions (documented procedures) showing how to monitor in accordance with c-e are necessary at a CCP, but in small companies where only one or very few persons are monitoring it could do without instructions if the CA can make sure that it works without it.

The flexibility is not for small companies only. More documentation than is necessary to make the procedures work effectively shall not be required. When it comes to requiring documentation that is important, the company must have enough documentation to make sure it works. It must be secondary what the CA would prefer or wish for.

In some types of production it could be accepted that not all monitoring is recorded if deviations from CL is recorded instead (for instance slaughter), but then a higher degree of on-line-verification is expected.

#### *5.4a*

There is no requirement that the documentation should have a specific form/fulfill some formal criteria. When auditing one should consider if there is enough documentation to make it work and if the documentation is where it is needed, for instance at the step where the monitoring takes place (or in a shelf in the office)?

There can be other ways to prove/show the CA that the HACCP-based procedures works than through documentation for instance by showing on the spot that it works – be open minded!

It is not up to the CA to decide what are proper procedures in a certain process – auditing means assessing what is done and comparing it with what is required – is the goal in 5.1 met, are the hazards brought under control by the procedures?

In general we are more interested in what the companies are doing and what the result is than formalities, such as if they call it as a CCP as long as they are doing what should be done there, or if they have a HACCP-plan or not as long as they can describe their procedures and show us it works and is effective in the sense that hazards are under control.

### **Feed, regulation (EC) No 183/2005**

In the **feed** sector the industry has normally not used the Codex guidelines when approaching the HACCP since the basic principles are outlined in regulation (EC) No 183/2005. At the start of implementation, a lot of the HACCP-plans were quite overloaded and the SBA had also stricter requirements for a complete HACCP, even if the recommendation was a simple approach (compared with the heavy consultant approach used by some companies).

Over time the HACCP plans have been slimmer and more focused with fewer CCP's, and the SBA has adjusted to the Commission recommendation on flexibility.

In the control the SBA focuses on the documentation of hazard analysis and the identification of risk with different feed material and handling/processing at the establishment, i.e. are the main hazards identified and controlled. From the SBA horizon the focus is on microbiological criteria i.e. salmonella and the heat treatment are normally the only required CCP. The industry quite often have some more CCP:s with focused on reception of feed material, mycotoxins and physical objects. The SBA does not oppose this or comment on that in the control. It's the choice of the feed operator, but the SBA has generally accepted this points as CP:s.

The critical limits are based on directive 2002/32/EG and the commission's recommendation. The challenge has been to convince the industry to set their own limits (based on the recommendations) that can be used by both the industry and the control authorities. A problem is also to keep the hazard analysis updated, i.e. an ongoing intelligence of the market (the aflatoxin in maize from southeast Europe last year is a good example).

Concerning the documentation of the whole HACCP the flexibility approach are used and adapted to the type of establishment that are controlled, no documentation are not accepted but it can for simple productions be quite slim as long as the main hazards are identified and controlled.