

Commission HACCP proposal - Summary of UK Stakeholder comments April 2007

To help inform early discussions on the proposal initial views were sought from stakeholders on 2 April. The Agency was grateful to receive a number of well considered responses from a wide range of stakeholders representing consumers, industry and enforcement bodies. Many had serious concerns that food safety would be compromised and felt moving away from a risk based procedure to one based on business size could not be justified. It was noted that the existing legislation had been developed in light of the Pennington report on an *E.coli* outbreak originating in a small business.

Support was given to the Commission's intention to reduce administrative burdens but not at the cost of food safety. It was felt that the existing legislation contained significant flexibility for small business which would therefore dilute the Commission's proposed savings. Many identified SFBB, Cooksafe, Safe Catering and similar guidance as examples of a flexible approach to risk based food safety management based on HACCP principles that could be successfully operated by small businesses; early experiences showed marked improvements to food safety without a significant administrative burden. The successful introduction of food safety management systems to many business reflected considerable commitment from all sides and none wished to see this progress halted at such an early stage.

Further clarity was sought on a number of issues including definitions, the shift of responsibility from FBO's to enforcers and whether the proposals could result in lower food safety protection than afforded by Directive 93/43. Many noted that the legislation was still bedding in and that any changes should be delayed until the Commission's planned review in 2009.

A formal 12 week UK consultation is planned for week commencing 7 May 2007 to gather further comments.