

STRATEGY FOR WIDER IMPLEMENTATION OF HACCP

Executive Summary

1. This paper sets out a strategy and detailed Action Plan to achieve the wider application of HACCP based controls by the UK food industry, to achieve implementation in 30 per cent of UK food businesses by April 2004. It provides a summary of estimated HACCP implementation levels in the UK, discusses benefits of and barriers to effective HACCP implementation and proposes action to increase uptake levels. A short background note on HACCP is attached at Annex 1. A detailed HACCP Action Plan is attached at Annex 2.
2. The paper also considers the role of licensing in widening HACCP implementation and concludes that, given the time scales involved, licensing should not form part of the immediate HACCP Action Plan but would merit further detailed consideration at a later stage.
3. The Board is asked to:
 - **note** the current position regarding UK implementation of HACCP based food safety management systems;
 - **agree** the key elements of the HACCP strategy outlined in paragraph 15 below and the detailed Action Plan attached at Appendix 2.

Contacts:

Local Authority Enforcement (Policy) Division

John Barnes Tel: 020 7276 8416 (GTN 7276 8416)

Microbiological Safety Division

Kieran Power Tel: 020 7276 8978 (GTN 7276 8978)

STRATEGY FOR WIDER IMPLEMENTATION OF HACCP

Issue

1. The Board is asked to:

- **note** the current position regarding UK implementation of HACCP based food safety management systems;
- **agree** the key elements of the HACCP strategy outlined in paragraph 15 below and the detailed Action Plan attached at Appendix 2.

Background

2. The Food Standards Agency has set itself a Service Delivery Agreement (SDA) target for 30 per cent of food businesses to be operating documented HACCP based controls by April 2004. This target will complement and assist wider Agency action to reduce food-borne disease by 20 per cent by April 2006, and will help UK food businesses prepare for new EC legislation which is scheduled to extend the requirements for documented HACCP based management controls. Further background on HACCP and the proposed changes arising from new and proposed EC hygiene legislation are contained in Annex 1.

Current UK implementation of HACCP based systems

3. HACCP based 'own-checks' provisions in current UK hygiene legislation and the required official approval of certain types of establishments has led to many UK manufacturers implementing HACCP controls. Many industry assurance schemes and commercial supplier contracts also require HACCP based controls, even where these are not yet required by legislation. Since 1995 **retail and catering businesses have been required to complete a hazard analysis, which covers 5 of the 7 HACCP principles** - businesses are not expressly required to document or formally verify the controls.
4. These commercial and legal demands, together with significant local authority enforcement initiatives, have meant that considerable inroads with HACCP implementation have been made. As such **the UK application and regulation of**

HACCP based food safety controls compares very favourably with other EU member states and internationally. However, there remain issues about the effectiveness of some of the systems in use, and concerns about the comparatively low level of awareness and application of HACCP based controls in smaller food businesses, particularly independent catering and retail establishments.

- Data on HACCP implementation levels in the UK is currently very limited. Central and local government bodies have not routinely collected this type of information. A questionnaire was sent to UK local authorities in September 2001 seeking local information on the numbers of businesses operating HACCP based controls, including documented and undocumented (i.e. 'hazard analysis') systems. The results of the survey are summarised in Table 1. The figures are based on valid returns from approximately 50% of UK local authorities.

Table 1 – Results of Local Authority survey on estimates of HACCP implementation levels (average of combined returns for the four UK countries)

Percentage number of businesses in each category estimated to be operating HACCP based controls (documented and undocumented)					
	Restaurants and other caterers	Retail	Manufacture	Other	Total (adjusted for actual no. of premises)
Documented HACCP in place	19%	16%	59%	27%	20%
Hazard analysis in place (i.e. undocumented)	51%	42%	27%	38%	45%
No formal food safety management system in place	30%	42%	14%	35%	35%

- At this stage the above estimates must be indicative only, as they are more based on local authorities' perceptions rather than objective assessments and records. **However, it is apparent that significant further inroads into the**

catering and retail sectors, which mainly comprise small, independent businesses, will need to be made for the Agency to achieve its 30 per cent target and improve consumer protection generally.

7. The local authority returns suggest that a significant percentage of food businesses are operating undocumented systems to control food hazards, in line with current UK legislation. This provides a good basis from which to encourage these businesses to document their arrangements in a proportionate way. However, action will need to be taken to address those food businesses that appear not to have any satisfactory form of food safety management arrangements in place.
8. To put the above percentages into perspective, local authority enforcement returns for 2000, indicate that there were approximately:
 - 370,000 catering premises (62% of all food premises)
 - 186,000 retail premises (31%).
 - 18,000 manufacturing/processing premises (3%) – of which 5,300 were approved establishments with HACCP based 'own-checks' controls.
 - The 'other' category in the table above includes primary producers, packers, distributors/transporters and manufacturers selling mainly by retail.
9. The above figures do not include fresh meat and poultry establishments separately licensed by the Meat Hygiene Service. According to a MHS survey in 2000:
 - 48% of (359) red meat slaughterhouses and 59% of (130) poultry meat slaughterhouses in England, Wales and Scotland claimed to have full or partial HACCP systems in place. In Northern Ireland the figure was 100%

Discussion

10. There have been a range of government initiatives across the food chain in recent years to increase awareness and uptake of HACCP based controls. These include the production of:
 - **HACCP based training and information materials** for the food industry and enforcement officers;
 - **specific guidance on the enforcement** approach to the existing HACCP based legal requirements;
 - **officially recognised Industry Guides** containing sector-specific advice on compliance with current HACCP based hygiene legislation.

- **sector specific initiatives**, such as video packages and funded consultancy and training, for example in the meat and dairy sectors;

11. These initiatives have helped raise awareness, encouraged food businesses to introduce HACCP based controls and supported the enforcement of legal HACCP requirements. However, **some sectors are difficult to reach, and as a result, levels of HACCP awareness, understanding and uptake remain low.**

Benefits of HACCP based controls

12. The HACCP system has broad support from all major stakeholders. Key benefits are seen to include:

- **a better understanding** of the food operations in businesses and the role of management and staff in maintaining food safety;
- **more focused control** on processes critical to food safety, with the flexibility to accommodate additional changes in production, quality or other specific measures e.g. control of allergens or emerging pathogens;
- **demonstrable improvements to food quality and safety standards**, thereby reducing the potential for food-borne disease, customer complaints, wastage and damage to the reputation of the business, although the Agency strategy will include greater evaluation and monitoring in these areas;
- **a management framework** in which to operate existing or enhanced management controls and provide documentary evidence in the event of legal action.

13. These benefits tend to be most apparent to food processors and larger retail or catering outlets where they can be linked to tangible commercial and marketing advantages over and above the consumer safety benefits. The commercial benefits are less obvious and easy to demonstrate to smaller food businesses, although HACCP based controls do offer enhanced consumer protection. As a result, in smaller food businesses **significant barriers remain to the implementation of HACCP based controls and these will need to be addressed by Agency action.**

Barriers to implementing HACCP based controls

14. From UK research, studies and stakeholder feedback, key barriers to HACCP implementation appear to be:

- **perceived complexity and bureaucracy** - many smaller businesses regard HACCP as complex and bureaucratic. This may be because some

businesses have introduced systems which are unnecessarily complex and costly to implement and maintain.

- **lack of knowledge and adequate training** - many small businesses remain unaware of HACCP or lack sufficient in-house knowledge and training about the risks associated with their procedures to put in place or maintain effective HACCP based controls. The costs of ongoing training against a backdrop of high staff turnover, typical in the industry, can also be prohibitive for many smaller food businesses.
- **poor communication and a lack of simple, authoritative information on HACCP** - information and guidance on HACCP can be quite technical and often reflects an approach more relevant to larger food processors. HACCP can also be difficult to implement effectively where there are literacy or language issues. The catering sector, for example, employs 90% of the Bengali working population and 70% of the Chinese working population and training/guidance materials or approaches are not always developed with the needs of ethnic communities in mind.
- **enforcement difficulties** - the practical enforcement of HACCP based requirements, particularly in smaller businesses, has been problematic. The lack of explicit requirements for documentation, the case in catering and retail (except butchers) makes effective enforcement difficult and has probably contributed to inconsistency. The dual role of educator and enforcer has also created difficulties and resource problems in some cases. Clearer Government advice on what constitutes legal compliance underpinned by further HACCP training for enforcement officers would help here.

Key elements of the Agency strategy

15. The Agency HACCP strategy will need to address these practical barriers. The strategy therefore includes the following key elements:

- **A sustained campaign**, linked with the planned Food Hygiene Campaign, to raise awareness and improve understanding of HACCP, particularly aimed at independent catering and retail businesses. The emphasis will be on demystifying HACCP and focusing on its benefits as an effective and practical approach to improving food safety management and consumer protection. The campaign will also serve to inform businesses of the Agency action on HACCP and practical support available.
- **Developing better Agency HACCP guidance and support mechanisms** to provide relevant and practical information and assistance, to encourage and help businesses to put in place effective food safety management controls.

New materials will aim to provide more authoritative guidance on compliance with existing legal provisions and good practice, and reduce the emphasis on the HACCP acronym and jargon. However, as the HACCP name has been universally used by regulators and the food industry for some time, it would be confusing and counter productive to replace it altogether. Materials for caterers will be developed and distributed as part of the planned Food Hygiene Campaign and the potential for establishing regional HACCP advisory centres is to be explored.

- **Maximising the role of local authorities in helping businesses** apply centrally developed guidance in a practical way. In partnership with local authorities action will be taken to improve the efficacy and consistency of enforcement of current legal requirements for HACCP. Local authority enforcement officials, through their enforcement and advisory role, have a major part to play in increasing the knowledge and regulating HACCP based controls, particularly in smaller businesses. Enhanced guidance and further Agency training will be provided to help enforcers assess the effectiveness of HACCP based controls which have been put in place or are planned.
- **Increasing levels of food hygiene training**, recognising the importance of adequate training for food handlers and managers as a pre-requisite for effective HACCP based controls. The Agency is working with other Government bodies, such as the Learning & Skills Council, to explore possible sources of funding for training, and mechanisms to improve access to appropriate training where there are literacy or language issues. Specific evaluation of the impact of food hygiene training, including HACCP training, on hygiene practices in businesses will be carried out.
- **Priority action in the catering and the fresh meat sectors**, recognising the need to improve HACCP implementation levels in the context of achieving the foodborne disease reduction target and the proposed EU HACCP requirements. Action in the catering sector will be linked to, and be part of, the planned Food Hygiene Campaign.
- **Establishing effective project management** arrangements to co-ordinate and drive HACCP action. This will include gathering better data on implementation levels and the efficacy of the HACCP systems in place. Local food authorities are best placed to provide routine data on a national basis as part of their enforcement returns to the Agency. Specific surveys will also be used to assess both the level and efficacy of HACCP based controls in food sectors.

16. **An Action Plan for taking forward the strategy is attached as Annex 2.** The actions are primarily aimed at addressing the key barriers to HACCP application through a range of new or enhanced initiatives to provide better, and more practical, support for food businesses and enforcers. The plan contains a mix of initiatives aimed at achieving the SDA target and elements to support more sustained HACCP action beyond the initial target date of April 2004. Relevant stakeholders from industry and enforcement organisations have agreed to work with the Agency to take forward action in these areas.

17. This initial phase of the HACCP strategy also provides the opportunity to explore the potential of different and more radical approaches to help businesses with particular needs or difficulties introduce effective food safety controls. A number of such initiatives are included in the Action Plan for consideration on this basis.

Licensing and other strategic options

18. HACCP implementation was accelerated and regulated in butcher's shops by linking conditions requiring effective and documented HACCP systems to an annual licensing requirement. As such this strategic option is open to the Agency. **Licensing is supported by a number of stakeholder organisations as a mechanism to improve food safety standards generally.**

19. There are, however, a number of reasons why, **at this stage, licensing is not seen** as a practical means through which to increase the application of HACCP based controls:

- Introducing licensing, conditional on a documented HACCP requirement, could in practice take up to 2 years and is not consistent with the need for early action to increase HACCP uptake in order to achieve both the food-borne disease and HACCP targets;
- The draft EU Regulations already propose a documented HACCP requirement, which would limit the freedom for the UK to act ahead of any agreement on a harmonised EU approach;
- Licensing would have significant resource implications for local authorities and food businesses;
- Wider licensing should take account of ongoing Agency research on the costs and benefits of the butcher's scheme. One local authority study put the inspection and administrative costs at approximately £700 per premises. On that basis the enforcement cost alone of licensing UK caterers would be in

excess of £200m, although economies of scale could be predicted as could lower costs after the first round of licensing;

- The need for **licensing to widen HACCP implementation should be considered at a later stage in the light of the progress arising from the HACCP Action proposed** in this paper.

20. Other strategic options include:

- A centrally funded UK **consultancy and training programme**, similar to the accelerated HACCP initiative in butchers.
- A **national Award scheme**, linked to hygiene standards and incorporating HACCP as a requirement for the top award.

21. **The Agency currently does not have sufficient funds available to support a consultancy and training programme** on a similar scale to that provided to butchers, which was generally rated a success. It is doubtful also whether there is sufficient training and consultancy capacity to deliver such a consultancy based programme within reasonable time-scales. However, the attached Action Plan does provide a range of improved support and guidance and identifies local authorities as the main vehicle for reinforcing the messages contained in these materials.

22. **Food safety Award schemes** incorporating a hygiene scoring element with the upper award dependent on effective HACCP based controls being in place, are already operated by many local authorities. The Agency is taking forward work with local authorities to promote Award schemes in Wales and Northern Ireland. **These Award schemes will be monitored to assess their viability and potential for increasing the uptake of HACCP** and for wider UK roll out of a national award scheme endorsed by the Agency.

23. The proposed EU regulation could introduce another option – **prior approval of establishments** - through which the Agency could better regulate food safety standards generally, and HACCP based controls. The EU proposals are currently under discussion. Such a mechanism could help enforcement authorities ensure all new food businesses are up to required standards prior to opening.

Conclusions

24. This paper details a range of Agency actions necessary to achieve the specific Agency HACCP target and the need for early action to help bring about a

reduction in the level of food-borne disease in line with the Agency's separate target for this. It takes account of the present legal requirements for HACCP, the current enforcement framework and the April 2004 SDA 30% target deadline.

25. The proposed EU measures to strengthen the legal basis for documented HACCP based controls will help to focus all sectors of the food industry on the need to introduce or enhance their existing HACCP arrangements, and when in place will aid the enforcement of the food safety controls.

Board Action Required

26. The Board is asked to:

- **note** the current position regarding UK implementation of HACCP based food safety management systems;
- **agree** the key elements of the HACCP strategy outlined in paragraph 15 above and the detailed Action Plan attached at Annex 2.

BACKGROUND ON HACCP

1. Hazard Analysis and Critical Control Point or 'HACCP' is a food safety management system. It provides a framework to identify food safety hazards and the stages in the production process which are critical to their control in order to achieve acceptable levels of consumer protection. Critical controls points are routinely monitored so that if acceptable limits are breached, appropriate and timely action can be taken. Records are kept to enable effective management and to help demonstrate to other parties, where necessary, that food safety controls have been properly implemented and maintained.
2. **Properly applied, HACCP based controls are internationally recognised as one of the most effective approaches to managing food safety.** The system is flexible and can be used effectively to control emerging issues, for example relating to food contaminants or allergens. The wider application of effective HACCP based controls is seen as key to the Agency achieving its wider food borne disease targets.
3. Food safety management controls based on HACCP have been endorsed and actively encouraged by successive UK Governments since the early 1990s. With the exception of primary production, egg products, and the fresh meat and dairy sectors, **HACCP based requirements are already part of UK food hygiene legislation.** Some of the remaining areas, such as fresh meat, will in due course be covered by additional EC measures, as indicated in paragraphs 6 –8 below.
4. Veterinary public health legislation covering the manufacture of products of animal origin, such as meat products, fish products and milk products, **require documented HACCP based "own checks"** controls to be in place and establishments require official approval as a condition to trade.
5. Since 1995 the UK legislation applicable to food retailers, caterers and manufacturers of non-animal origin products **has required the application of 5 of the 7 HACCP principles in these businesses.** These five principles cover the identification and control of food hazards, but not documentation or verification of the food safety management arrangements.

6. The **EU proposals to consolidate the food hygiene directives** currently envisage the application of all 7 HACCP principles, including documentation and verification, to all sectors of the food chain, with the exception of primary production. While not subject to a full, documented HACCP procedure, primary producers would be required to monitor possible hazards to food safety and to eliminate or reduce these to an acceptable level. **Action to focus on food safety considerations in primary production is seen as particularly important in order to control hazards at this stage to avoid potential food safety problems further down the food chain.** In some cases, controls applied on farm might represent the most effective, and in some cases the only, measures available.
7. The European Commission has scheduled the consolidating Regulations for adoption by the Council and the European Parliament in July 2002, with application in Member States by 2004. Progress with negotiations so far indicates these indicative deadlines are unlikely to be met.
8. A separate **Council Decision 2001/471/EC** requires the implementation of HACCP principles and microbiological testing in fresh meat and poultry meat slaughterhouses, cutting plants and cold stores by June 2002, and for smaller plants, June 2003. This will affect approximately 1,400 establishments in the UK.

HACCP ACTION PLAN

1. HACCP Project Management

Establish a dedicated unit to project manage and evaluate HACCP action. Team to include technical HACCP and training/education expertise. Team to be fully in place by March 2002.

Key Outputs:

- Establish baseline estimate of current UK HACCP implementation levels – **completed October 2001**;
- Establish effective systems to monitor and evaluate progress towards the SDA target - **by July 2002**;
- Review the effectiveness of HACCP strategic actions - **ongoing**;
- Establish a network (10) of small food businesses to provide direct feedback on the efficacy and impact of the HACCP action – **by March 2002**;
- Produce six-monthly progress reports to the Board – **first report for June 2002 Board meeting**;
- Produce an annual report of HACCP implementation levels – first annual report **in March 2003**;
- Identify other actions necessary to raise implementation levels in the light of experience and progress - **ongoing**.

2. HACCP Promotion

Carry out a campaign to raise awareness of the role and practical application of HACCP management controls, and the support available through the Agency's HACCP strategy.

Key outputs:

- Linked to the planned Agency's Food Hygiene Campaign, all UK catering premises to receive simple information on HACCP and sources of further information and advice – **from January 2002 to April 2003**;

- Facilitate HACCP seminars and workshops for industry sectors on Agency actions and practical sector-specific approaches to HACCP application – **commencing March 2002**;
- Publicise Agency HACCP action through trade and professional press – **commencing January 2002**;
- Linked to the Agency's Food Hygiene Campaign, fund selected local authority events to raise food safety and HACCP awareness. Invite expressions of interest with a view to roll out **between January 2002 and March 2003**;
- Identify incentives to encourage food businesses to implement and maintain effective HACCP management controls. Possibilities include:
 - the introduction of industry-led schemes which provide formal recognition of HACCP and hygiene standards, visible to consumers, in retail and catering premises;
 - support for local authorities to promote local award schemes, or inspection arrangements, which include visible recognition of HACCP achievements;
 - with the help of small business representatives, develop simple checklists to help proprietors assess their practices and controls against a list of key food hygiene and safety criteria;
 - explore the potential for increasing direct access to food safety and HACCP advice, including food safety self-assessments, on the Agency's web site. This could pilot schemes which involve placing web connections in locations routinely frequented by small food businesses, e.g. cash and carries;
 - identify and disseminate information on effective approaches to HACCP application, and the potential role of demonstration projects for facilitating this;
 - explore the potential for insurance schemes to recognise risk management arrangements, such as HACCP, in insurance assessments;

3. HACCP Advice

Establish enhanced support mechanisms to help food businesses implement and maintain effective HACCP based controls.

Key outputs:

- Identify and disseminate information on existing sources of free HACCP advice and support available to the food industry – **by May 2002**;

- Carry out a feasibility study into the benefits of setting up a network of regional information centres offering free HACCP and hygiene advice and support to food businesses on practical HACCP implementation – **to report by May 2002**;
- to include the potential for regional liaison officers to work directly with food businesses to help where there are specific needs, e.g. arising from language or literacy issues;
- assess the feasibility of encouraging business to business support arrangements, for example, through trade associations or local business forums.

4. Sector-Specific HACCP Initiatives

4(a). Catering industry

Develop and disseminate a range of HACCP based guidance and support materials to improve HACCP understanding and help businesses put practical HACCP management controls in place.

Key outputs:

- Set up a catering industry working group, involving enforcement and Agency representatives, to oversee action – **by December 2001**;
- Review and revise the Catering Industry Guide to include more detailed advice on the practical HACCP measures needed to comply with existing legislation and good practice. **Aim to consult by April 2002**;
- develop and pilot a range of simple hazard and control sheets, and other support materials, to help catering businesses better understand and manage their food safety arrangements, to include consideration of literacy and language needs – **between January and July 2002**.

4(b). Licensed fresh meat & poultry meat plants

Take action to ensure all relevant UK establishments are in a position to comply with the Commission Decision 2001/471/EC by June 2002 and, for smaller plants, June 2003.

Key outputs:

- Consult on and make necessary legislation across the UK **by 7 June 2002**;

- Produce guidelines for meat plants on implementation of HACCP principles **by December 2001**.
- Carry out a pilot study in 7 small/medium UK operators, putting in place and assessing HACCP arrangements with a view to the plants holding open days for the industry **in mid-2002**.
- Produce a plant operator's HACCP Training Manual **by May 2002**.
- Produce guidance for incorporation into the MHS Operations Manual and provide training for enforcement officers **in 2002/2003**.
- Carry out research to establish performance criteria to support approval for an alternative microbiological testing method used in the **UK by March 2003**.
- Explore with relevant bodies initiatives for the training of plant staff - **current**.

4(c). General commodity areas

Take action to assess and evaluate the effectiveness of existing HACCP arrangements in food manufacturing and processing establishments. Take forward initiatives to address any gaps identified.

Key outputs:

- Commission general industry HACCP survey.
 - Issue tender document **by January 2002** with a view to a **report by end 2002**;
 - With relevant stakeholder groups, take sector-specific action to improve HACCP management arrangements where appropriate – **ongoing**.

Fish, fishery products and shellfish

- Review food safety management arrangements in shellfish depuration establishments, the potential for HACCP based controls and the need for further guidance. **Report by July 2002**.
- FSA Scotland to fund research to include a review of HACCP application in Scottish scallop producers – **research commissioned**.

Milk Products

- provide free food safety management consultancy opportunities for specialist cheesemakers – **from January 2002, due for completion November 2003**;

- review the current enforcement arrangements of dairy hygiene legislation, including the assessment of HACCP based provisions – **review scheduled to commence March 2002.**

Meat products, mince meat and meat preparations

- Provide enhanced guidance and training to local authorities on the enforcement of the current legal requirements for HACCP based systems in meat product, mince meat and meat preparations plants – **pilot training course held September 2001; further roll out planned from January 2002.**

Egg Products

- Commission research to review the current levels of HACCP implementation in approved plants (currently this sector is not subject to HACCP based legal 'own-checks' requirements). **Commission research by March 2002;**

General processing and primary production/farms

- Examine the scope and role of industry assurance schemes for widening and sustaining HACCP application throughout the food supply chain, and their link with on-farm food safety controls. **Report by August 2002;**
- Produce and make freely available a range of simple information sheets on process-specific food hazards and their practical control. This takes forward a recommendation from the Agency Task Force on the burdens of food regulations on small food businesses. **Tenders invited in September 2001 under the Agency's Research Requirements.**

5. Enforcement

Take action to support more consistent and effective HACCP enforcement, and maximise the local authority role in advising and supporting food businesses.

Key outputs:

- Establish Agency/Enforcement Group to review issues relating to practical enforcement and delivery of HACCP, and recommend or take the necessary action to support wider HACCP application. Set up Group **by January 2002.**
 - To include clarification of the role of local authorities in supporting wider HACCP implementation, particularly with regard to small food businesses.

- Review relevant guidance on the enforcement of current legal requirements for HACCP based controls as part of the enforcement Codes of Practice review to ensure more effective and consistent enforcement and advice to businesses – **scheduled for completion by June 2002;**
- Develop a specific training course for enforcers on the assessment of HACCP systems in small food businesses consistent with Agency HACCP policy and objectives. **Run pilot course by October 2002 with a view to wider roll-out nationally from January 2003;**

6. Industry Training

Take action to increase access to and uptake of formal HACCP training.
--

Key outputs:

- A 30 per cent increase on 2001 numbers in attendance on accredited HACCP training courses - **by April 2004:**
 - by asking the Learning & Skills Council to explore the potential for further sources of training funding for the food industry, and effective training mechanisms for persons whose first language is not English, for example supporting ethnic language trainers and mentoring schemes – **review commenced November 2001;**
 - by disseminating to food businesses, food handlers and training centres information on potential sources of training funding – **by March 2002;**
 - by raising awareness and encouraging training through the Agency's Food Hygiene Campaign – **from January 2002.**
- Evaluate the efficacy and impact of food hygiene and HACCP training on food safety practices. To cover training to food handlers with specific language or literacy needs. **Research proposals invited in the Agency's Research Requirements Document published in September 2001.**

7. International

Take action to ensure that internationally agreed requirements for HACCP are appropriate and proportionate, particularly in respect of smaller food businesses.

Key outputs:

- Continue to contribute to, and influence, ongoing EU and Codex Alimentarius (WHO/FAO) discussions on HACCP application - **ongoing.**