



**Guidelines for the development of national  
voluntary guides to good hygiene practice and  
the application of HACCP principles in  
accordance with EC food hygiene Regulations**

Food Standards Agency  
Second Edition: February 2007

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## Introduction

1. Regulation (EC) No 852/2004 on the hygiene of foodstuffs (articles 7 and 8) provides for the development of national guides to good hygiene practice and the application of HACCP principles. Food business operators may use these guides on a voluntary basis as an aid to compliance with the food hygiene requirements.
2. The legislation obliges Member States to encourage the development of national guides. Food business sectors will generally be responsible for the development and dissemination of these guides. When food business sectors produce national guides, they must do so in consultation with interested parties, such as competent authorities and consumer groups. In addition, guides must have regard to relevant Codex codes of practice and should take account of relevant guidance issued by the European Commission on the implementation of Regulations 852/2004 and 853/2004 (and the separate guidance on the implementation of procedures based on the HACCP principles). Member States are required to assess national guides to ensure they satisfy the criteria laid down in the EU Regulations. The Food Standards Agency (FSA) will assess and grant recognition to UK guides. The European Commission will oversee the development and dissemination of any Community Guides.
3. This document gives advice to the food industry on the preparation and development of national guides within this legislative framework. It describes the process and responsibilities for drafting and consulting, includes advice on scope, content and structure and outlines the criteria and process for obtaining recognition of guides by the FSA. In addition, this document explains the status of recognised guides and offers suggestions for publication and dissemination. Food industry sectors wishing to develop a recognised guide to compliance with the hygiene requirements should follow these guidelines.

## Process for developing a Guide

### Submission and consideration of initial proposal

4. The food industry is responsible for taking the initiative for developing guides. Any industry sectors wishing to develop a guide for which official recognition is to be sought should discuss their proposals with the FSA at the earliest opportunity. Notifications should be sent to the FSA contact point (see 'FSA Contacts' below). Once an industry sector decides to proceed with development of a guide, it should formally notify the FSA. This should specify the scope of the guide, i.e. the sector and types of businesses to be covered (including ethnic businesses) and whether it will be UK-wide or country-specific (see 'Scope' below) and provide an overview of the proposed coverage, content and structure. The notification should also include a timetable for the works.
5. Industry should also notify at this stage the proposed make up of the working group that will oversee drafting of the guide. Working groups should, as far as possible, be representative of the sector for which the guide is intended and include appropriate representation from the areas within the UK where the guide will apply. It is expected that working groups will include representatives of small

and ethnic business interests, where possible. The involvement of consumer groups should be considered where appropriate.

6. The FSA will endeavour to participate in working groups where resources allow. Representatives of enforcement bodies, e.g. Local Authorities Co-ordinators of Regulatory Services (LACORS) and the Scottish Food Enforcement Liaison Committee (SFELC) as appropriate, should also normally be invited to attend.
7. Some industry sectors may not have a widely representative body to draft the guides. In such cases, an initial period of consultation may be necessary in which the rest of the industry sector is notified by the party proposing to draft a guide. The FSA is able to give advice on suitable organisations to be consulted. Any other organisations may then declare an interest in the issue before work on the guide gets under way. This process may not be necessary in cases where the sector clearly has one representative body.
8. The FSA will consider whether the proposed scope and content of the guide, make up of the working group and arrangements for consultation are appropriate and inform the industry accordingly. The FSA is responsible for encouraging the development of guides and will endeavour to look favourably on relevant proposals. The Agency may ask the industry to revise a proposal and will explain its position in the event that it disagrees with a proposal.
9. The FSA cannot specify precisely how many guides should be developed or in which sectors, but will encourage industry bodies to work together where appropriate to increase the coverage of each guide so as to limit the potential for duplication and inconsistencies between guides covering similar sectors. Depending on the level of industry demand for guides, the FSA may have to prioritise the order in which it considers and becomes involved in the development of guides. Priority will normally be given to guides for high-risk sectors/foodstuffs and/or with wide coverage.

#### Development and informal consultation

10. The working group should finalise the project timetable on the commencement of work and send this to the FSA as soon as possible. Annex A contains an indicative timetable for guidance. The project plan should include arrangements for version control of drafts as they emerge.
11. Working groups may entrust the drafting of a guide to external expertise. The legislation also permits guides to be developed under the auspices of the British Standards Institute (BSI). Any decision to involve external expertise, including BSI, in the development of a guide is a matter for the relevant industry working group who must retain overall responsibility for the final output. The industry working group should discuss involving external expertise with the FSA at the outset.
12. The FSA and representatives of enforcement bodies, e.g. LACORS and SFLEC, should be consulted as draft guides develop. Working groups are also advised to consult relevant stakeholders during the development stage. Efforts should be

made to secure input from small, ethnic or remote business interests who may be unable to participate directly in working groups. The Agency can advise on appropriate consumer organisations to be consulted. Reasonable time should be allowed for comments.

### Public consultation

13. Once a working group has produced the final pre-consultation version, it should send a copy to the FSA confirming its intention to commence public consultation and specifying the consultation period. This notification should also include a proposed consultation list. A period of two weeks should be allowed before consultation commences for the FSA to make any final comments or observations on the draft and proposed consultation list.
14. The working group is responsible for managing the consultation process, including distribution/dissemination of consultation documents, the evaluation of comments received and any resulting amendments to the guide. Consultations should be open and transparent and invite comments from relevant stakeholders, including those whose interest may be affected by the guide. The final draft of a guide should be available for general consultation, normally for 12 weeks. Any proposal to shorten the consultation period should be agreed with the FSA in advance. Copies of all consultation documents should be available to any interested parties on request.
15. When the final guide is submitted to the FSA for recognition, the working group should confirm what consultation has taken place and who has been consulted. It should also provide a brief summary of the nature of the comments received and how these have been reflected in the final version. This should draw attention to any contentious issues that were raised and how the working party has resolved them. The presumption is that written responses to consultations will be treated as open and publicly available unless the respondent has indicated to the contrary. In the latter case the comments need, nevertheless, to be made available to the FSA and in turn to its Assessment Panel as appropriate.

### **Recognition of Guides**

16. The FSA will assess national guides to ensure
  - they have been developed in accordance with these guidelines, which reflect the criteria laid down in article 8 of Regulation (EC) 852/2004,
  - they are practical for the sectors and foodstuffs to which they refer, and
  - they are suitable as guides to compliance with the relevant hygiene requirements.
17. The FSA will formally recognise guides that satisfy these criteria and forward copies to the European Commission, who will set up and run a registration

system for such guides and make details available to the Member States. The FSA will maintain and publish a list of recognised national guides.

18. The final decision on recognition will rest with the FSA, assisted by an Assessment Panel. Membership of the Assessment Panel has been drawn from industry, consumers, enforcers and central Government. Special expertise may be brought in where necessary. Representatives of the working group may be invited to answer questions or meet the FSA and the Assessment Panel to discuss a draft before recognition is granted.
19. The FSA may recommend that adjustments be made to a guide before granting recognition.
20. Many food business sectors already have their own guides or codes containing advice on best hygiene practice and regulatory compliance and they may wish to retain them. There is no mechanism for the FSA to recognise any industry guidance that has been developed outside the process described in this document and food authorities are under no obligation to take such guidance into account during enforcement activity. However, this would not preclude such guides or codes being considered for Agency recognition provided they satisfy the criteria set out in these guidelines. Any food business sector wishing to seek recognition for an existing hygiene guide or code should discuss this with the FSA in the first instance (see 'FSA Contacts' below).

## **Status of Guides**

21. Guides that are officially recognised by the FSA have a special status under the law. Where a food business is using a recognised guide the enforcement authority must take this into account when assessing compliance with hygiene requirements<sup>1</sup>. Therefore, recognised guides may be used with confidence by food businesses as a practical guide to compliance with the relevant hygiene legislation. Only guidance on compliance with the relevant legal requirements (and not any additional material included, for example, about quality standards) has this special status for enforcement purposes. However, such guides are voluntary and food businesses may demonstrate compliance with the legislation in other ways.

## **Scope of Guides**

22. Any sector of the food industry, including food business operators engaged in primary production, may develop a guide. Each guide should state clearly the food business sector and types of businesses covered. If the focus is to be on a specific foodstuff, this should be specified. A guide may cover more than one part of the food chain where this would contribute to a more complete understanding of the legal requirements and promote a continuum of food safety, e.g. primary production through to distribution of fresh produce.

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<sup>1</sup> Article 10(2)(d) of Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules. OJ L 191, 28.5.2004, p. 1-52

23. The presumption is that national guides will apply across the UK. National guides should, where appropriate, reflect any variations in legal requirements between UK countries. The development of separate guides for England, Scotland, Wales or Northern Ireland may be considered where necessary to address specific country needs and circumstances. Industry sectors wishing to propose the development of a country-specific guide should discuss this with the FSA in the first instance (see 'FSA Contacts' below). Country-specific guides will need to be developed in accordance with these guidelines.

## **Content of Guides**

### General requirements

24. Each guide must satisfy the general requirements set out below with regard to content. Any suggestion that more rigorous or prescriptive standards than those in the legislation are necessary for regulatory compliance will be strongly tested. It is accepted that guides may need to provide more detailed explanations of how broadly framed requirements in the legislation relate to the industry sector and how they are generally to be interpreted.

25. Guides should contain appropriate guidance on compliance with the following legislation:

- Regulation (EC) No 852/2004 of the European Parliament and of the Council on the hygiene of foodstuffs
- Regulation (EC) No 853/2004 of the European Parliament and of the Council laying down specific hygiene rules for food of animal origin
- Requirements of the Food Hygiene (England) Regulations 2005 (as amended) and the corresponding regulations in Scotland, Wales and Northern Ireland, as appropriate, e.g. on temperature control.

26. Only those requirements applicable to the sector need to be covered.

27. Where reference is made in the EC Regulations to other Community and national legislation or Community and national programmes, for example, the use of veterinary medicines in primary production or requirements relating to food waste, these should be referenced and, where appropriate, elaborated in the guide. Consideration should also be given to including, where appropriate, advice on compliance with secondary legislation, such as Community rules laying down microbiological criteria for foodstuffs. The guidance should also refer, as appropriate, to European Commission guidance on the implementation of Regulations 852/2004 and 853/2004.

28. The guidance should distinguish clearly between:

- Legal obligations for food business operators (i.e. what they must do to comply with the legislation), and

- Other aspects, such as best practice and quality issues, which are not legal requirements but are likely to contribute to the overall achievement of food safety
29. The guidance should be appropriate to the types of food businesses within the identified sector. The guide may refer to other guides where appropriate, but should contain adequate guidance for the sector concerned, be technically sound and evidence based where appropriate.
30. It is suggested that the guide include an introductory section that:
- Explains the scope of the guide, its status and how it should be used
  - Provides an overview of the legislative framework and a summary of food business operators' obligations under the hygiene law, e.g. in relation to the Articles in the Regulations
  - Outlines the role of the guide in relation to food law enforcement, and
  - Includes a list of working group members and other acknowledgements.
31. EC Regulation 852/2004 requires food business sectors to have regard to the relevant codes of practice of the Codex Alimentarius when developing national guides. The Codex General Principles of Food Hygiene<sup>2</sup> contain more specific advice on some food hygiene issues and may be used, where appropriate, to supplement advice in a national guide. Other Codex hygiene codes have been produced for specific sectors of the food industry and these may also provide useful information. Working groups should assess the need to incorporate guidance from any Codex code into national guides on a case by case basis. Copies of current versions of Codex hygiene codes are available on the Codex Alimentarius web site at [www.codexalimentarius.net](http://www.codexalimentarius.net). The FSA can provide further information on relevant Codex codes if needed.
32. The guide should contain specific guidance relevant to the sector whenever legal requirements are qualified by the terms "where necessary", "where appropriate", "adequate", "sufficient" and "unless food business operators can satisfy the competent authority that other materials used are appropriate". These terms imply some flexibility in addressing a legal requirement. However, the guidance should emphasise that the approach taken by the food business operator must nevertheless be consistent with achieving the objectives of the hygiene legislation, principally food safety and consumer protection and informed by an assessment of the associated hazards. Many food businesses may find it helpful in making such assessments if the guide has already considered the issues for typical food businesses in the sector. Guides will need to give full reasons wherever they say that particular conditions are not necessary for such businesses or suggest alternative approaches.

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<sup>2</sup> Recommended International Code of Practice: General Principles of Food Hygiene, CAC/RCP 1-1969, Rev. 3-1997, Amended 1999.

## Guidance on HACCP procedures

33. The guide should include guidance on how food business operators in the sector can comply with the requirements of article 5 of EC Regulation 852/2004 to put in place, implement and maintain a permanent procedure or procedures based on HACCP principles. The importance of effective HACCP-based procedures in managing food safety should be emphasised here and in relevant sections throughout the guide. The guidance should take account of and refer to, where appropriate, guidelines issued by the European Commission on the implementation of procedures based on HACCP principles.
34. The Regulation permits a flexible approach to the application of food safety management procedures based on HACCP principles. Businesses are not required to follow a classical HACCP approach, but such an approach is not precluded. Therefore, the guide should contain advice on HACCP-based procedures that is appropriate and proportionate to the size and nature of the types of businesses covered but which, nevertheless, would enable businesses to demonstrate compliance with the specific requirements of article 5 if the advice is followed.
35. It is suggested that guidance should include advice on
- how to put in place procedures that control food hazards
  - how to carry out the controls, monitor them and take appropriate corrective action when necessary
  - how to review procedures and keep them up to date
  - the kind of documentation needed to describe the procedures and appropriate records to demonstrate that they are working effectively.
36. Guides are expected to provide appropriate advice on relevant food hazards in a given sector. The level of detail provided will depend on the range of activities and processes covered by the industry sector and is for each working group to determine.
37. The use of generic examples identifying typical common hazards and controls in the sector may be particularly helpful for small businesses. The guide should explain the provenance and/or basis on which any generic examples used have been prepared. Consideration should also be given to including advice by which a food business operator may go about identifying relevant hazards and establishing appropriate controls in their own premises. Worked examples relevant to the sector could be included for illustration where appropriate and reference may be made to other expert advice and material on the operation of effective HACCP-based food safety management procedures, including from Government, industry, professional, scientific and academic sources.
38. The approach to identifying and controlling food hazards need not be complex, especially for low risk products and businesses with a small range of products or

products with similar characteristics. Advice on the type and extent of documentation and record keeping should be proportionate to the nature and size of food businesses and reflect the range of businesses covered by the sector as a whole. Model documentation and records may be included where appropriate.

### Guides for Primary Production

39. Industry should have regard to the recommendations in Annex I, Part B of Regulation (EC) 852/2004 when developing guides for primary production activities. Such guides should include appropriate information on hazards that may arise in primary production and associated operations and actions to control them. Annex I, Part B of Regulation (EC) 852/2004 contains a non-exhaustive list of such hazards. Although the requirement to operate HACCP-based procedures does not apply to primary production, the advice in paragraphs 37 and 38 above on the use of generic and worked examples, provision of sample documentation and record keeping and on the proportionality of hazard control regimes, is also relevant here.

### Advice on food safety training and instruction

40. Guides should provide appropriate guidance on how food businesses can satisfy the requirements for training and/or instruction, as appropriate, in hygiene and procedures based on HACCP principles. Guidance should also be included on the supervision of food handlers. Further advice on these aspects is set out in Annex B.

## **Structure and Style**

41. There are no set requirements on the structure and style of guides. However, information should be set out in a clear and accessible way and it must be clear to which part of the legislation the advice relates. The structure employed must clearly distinguish between what businesses must do to comply with the law and any additional advice on best practice and quality, which are not express legal requirements. Where practicable, working groups may wish to use the structure and order of the legislation as a model for organising guidance. Annexes may be used to provide more detailed information, such as safe methods, worked examples of HACCP procedures, including model documentation and records. Consideration may be given to the use of devices for emphasis and to aid presentation and understanding, such as boxed text, shading and simple diagrams or illustrations.

## **Publication and Dissemination**

42. The working group and the FSA should discuss publication arrangements at an early stage. Guides may be published by the industry sectors that have developed them. Decisions on pricing are a matter for the working group. Where guides are not to be made available free of charge, the FSA would encourage working groups to ensure that guides are reasonably priced and readily available to promote the widest possible dissemination. The working group should keep

the FSA informed of the publication arrangements and any associated publicity. The FSA has set up a framework agreement with The Stationary Office to help facilitate the publication of guides.

43. Guides should be dated with edition and amendment details, state a mechanism for revision or withdrawal consistent with these guidelines and include details of where to obtain more copies.
44. Responsibility for dissemination of guides rests primarily with the industry sectors that have developed them. Dissemination would include raising awareness of the existence of a guide within the sector and encouraging its use by food businesses. Working groups should discuss their proposals for dissemination with the FSA at an early stage in the development of a guide. The FSA will also assist with dissemination by promoting the use of guides among food authorities, encouraging their use by food businesses at appropriate opportunities and publishing a list of all recognised guides.

### **Revision and Amendment of Guides**

45. Working parties should keep guides under periodic review. Where representatives of a food business sector judge there is a need to revise a guide, they should contact the FSA in the first instance (see 'FSA Contacts' below). Similarly, the FSA may ask the working group to review and update a guide. Other stakeholders should liaise directly with industry working groups if they feel a guide should be reviewed. If a guide needs to be amended this should be undertaken by the working group. The same development process should be followed as with a new guide, although it should be possible to agree minor or relatively straightforward amendments within a shorter time scale. The FSA may withdraw recognition if a guide becomes out of date or is amended outside the process described in these guidelines.

### **Community Guides**

46. Article 9 of Regulation (EC) 852/2004 makes the European Commission responsible for developing and disseminating Community Guides. The Commission must act in liaison with Member States and other European stakeholders and consult the EU Standing Committee on the Food Chain and Animal Health on the need for Community Guides, their scope and content before starting work. The Standing Committee will be responsible for assessing Community Guides according to criteria similar to those for national guides. Where Community Guides are developed, existing national guides covering the same sector may need to be reassessed to ensure consistency or withdrawn. Industry sectors interested in proposing a Community Guide should contact the FSA in the first instance.

### **FSA Contacts**

47. All enquiries on guides and these guidelines should be addressed in the first instance to:

General Food Hygiene Branch  
Primary Production Division  
Food Standards Agency  
Room 816B  
Aviation House  
125 Kingsway  
London  
WC2B 6NH

Telephone: 020 7276 8973

Fax: 020 7276 8908

Email: [ppd1@foodstandards.gsi.gov.uk](mailto:ppd1@foodstandards.gsi.gov.uk)

**ANNEX A****INDICATIVE TIMETABLE FOR THE DEVELOPMENT OF A NATIONAL GUIDE**

The following indicative timetable is for general guidance only and is not intended to impose a maximum or minimum time limit for the development of a national guide. Each working group should determine its own timetable based on the scope of work and any relevant factors specific to the sector for which the guide is being developed. More time may be needed at each stage to resolve unforeseen issues or disagreements.

ACTION	TIME SCALE
<p><b><u>Proposal stage</u></b></p> <ul style="list-style-type: none"> <li>• Industry sector forwards proposal for a guide to the FSA</li> <li>• FSA notifies the industry of its opinion</li> </ul> <p>(If necessary, the industry body proposing the guide invites others in the sector to register an interest in the guide)</p>	<p>Day 1</p> <p>Allow up to 4 weeks</p> <p>(Allow up to 4 weeks – may run concurrently with above)</p>
<p><b><u>Development stage</u></b></p> <ul style="list-style-type: none"> <li>• Industry sector confirms its intention to develop a guide and confirms membership of working group and project timetable to FSA</li> <li>• Drafting of guide</li> <li>• Informal consultation with stakeholders as draft develops</li> </ul>	<p>Within 2 weeks of FSA opinion</p> <p>Allow up to 4 months from date of FSA opinion</p> <p>Ongoing during this stage</p>
<p><b><u>Public consultation stage</u></b></p> <ul style="list-style-type: none"> <li>• Working group sends pre-consultation draft of guide to FSA notifying intention to consult and inviting any comments</li> <li>• FSA will consider draft guide and, where appropriate, send comments to the working group</li> <li>• Public consultation</li> </ul>	<p>When ready</p> <p>Allow 2 weeks from date of receipt in FSA</p> <p>Minimum 12 weeks Within 4 weeks of the end of public</p>

<ul style="list-style-type: none"> <li>Working group examines consultation responses, amends draft guide as appropriate and submits final guide to FSA requesting Agency recognition</li> </ul>	consultation
<p><b><u>Recognition stage</u></b></p> <ul style="list-style-type: none"> <li>FSA assesses guide and notifies the working group of its decision regarding official recognition</li> </ul>	Allow 6 weeks from receipt by FSA of the post-consultation version of the guide
<p><b>Publication and Dissemination stage</b></p> <ul style="list-style-type: none"> <li>Working group (with FSA assistance as appropriate) arranges publication and dissemination activities</li> </ul>	Suggested target date for publication, 2 months from date FSA recognition confirmed

## ANNEX B

### ADVICE ON REQUIREMENTS RELATING TO FOOD SAFETY TRAINING AND INSTRUCTION

#### Summary of legal requirements

1. The package of EU hygiene Regulations contains the following training-related requirements:

#### Regulation (EC) 852/2004

- Annex I, paragraphs 4(e) and 5(d)
  - food business operators engaged in primary production and associated operations must ensure that food handlers undergo training on health risks;

- Annex II, Chapter XII

Food business operators covered by Regulations (EC) 852/2004 and 853/2004, except primary producers, must ensure:

- (paragraph 1) that food handlers are supervised and instructed and/or trained in food hygiene matters commensurate with their work activities; and
- (paragraph 2) that those responsible for developing and maintaining procedures based on HACCP principles or for the operation of relevant guides have received adequate training in the application of the HACCP principles.

#### Regulation (EC) 853/2004

- Annex III, Section IV, Chapter I – lays down specific hygiene training requirements for hunters of wild game only.

#### Issues to be covered in Guides

2. Working groups should take into account the following issues when drawing up training guidance for inclusion in a guide.
3. Food business operators are responsible for identifying any training and instruction needs of food handlers and for determining how these needs are met. Training and/or instruction provided should ensure that food handlers have sufficient knowledge and competence to enable them to handle foods safely. Decisions about training and/or instruction should have regard to the nature of the food handler's duties, the types of foodstuffs handled and associated food hazards and the risks to food safety presented by the food operations for which

the food handler is responsible. What is appropriate in one business may not be appropriate in another.

4. Those responsible within a business for the development and maintenance of the HACCP-based food safety management procedures, or for the operation of relevant guides, should receive adequate training in the application of the HACCP principles. The type and level of training provided should relate to the nature of the food operations in the business, the HACCP-based procedures in use and the extent of the employees' responsibility for them. The training should result in an understanding of the hazards in the particular business and how to operate the HACCP-based procedures effectively commensurate with their responsibilities.
5. The hygiene Regulations do not specify methods, nor do they stipulate that attendance on a formal instructional course or attainment of a qualification is necessary to achieve compliance. The methods of instruction and/or training are a matter for the food business to determine. The relevant competencies may be obtained in a number of ways, including professional courses, short courses, on the job training, self-study through expertly produced guidance materials or prior experience. In some cases, a combination of these approaches may be necessary to ensure that staff are sufficiently competent in food safety for the job that they do. Where a food business decides that structured training would aid compliance, the training content should reflect the appropriate level of the National Occupational Standard in Food Safety for the sector covered by the guide. Such training can be delivered through appropriate in-house or external courses.
6. Consideration should be given to the timing of training/instruction delivery. This is a matter for each food business to determine. As a general guide it is suggested that staff should receive information and awareness on the essentials of personal and work area hygiene and on safe storing, handling and preparation of food before starting work for the first time. Any formal training, where appropriate, should be provided within 3 months of starting employment.
7. Food business operators should consider how to satisfy the training-related provisions for those whose first language is not English or with learning or literacy difficulties.
8. Working groups may wish to include advice on appropriate hygiene and HACCP awareness for those within a food business who are not directly responsible for the food operations. Such people are outside the scope of the training-related requirements, but their roles and activities may influence food safety. Examples might include more senior supervisors or managers, food buyers, quality control and production managers, or ancillary personnel such as cleaners and site and maintenance engineers who may enter food preparation areas in the course of their duties.
9. Training and/or instruction regimes should be reviewed regularly and updated as appropriate to ensure they remain relevant to the nature of the food operations and the needs of the staff. The need to ensure that staff maintain appropriate

and ongoing food safety competence in the job that they do, should also be borne in mind.

10. Advice on appropriate levels of supervision to underpin safe food handling practices should be included. The nature and type of supervision necessary will depend on the number of food handlers within the establishment, the nature of their work and current training and competence levels. Good instruction and effective supervision are likely to be particularly important in businesses with a high turnover of casual staff.
11. Guides should advise on the extent to which it would be useful and appropriate for businesses to have instruction/training and management plans and records. These may be particularly relevant in helping to demonstrate compliance with the requirements in Article 5 of Regulation (EC) 852/2004.
12. Although the legislation does not define food handler, working groups may wish to use the following definition in the Codex General Principles of Food Hygiene:<sup>3</sup>

“Any person who directly handles packaged or unpackaged food, food equipment and utensils, or food contact surfaces”.
13. Advice on training for wild game hunters should reflect the relevant legal requirement (see above).

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<sup>3</sup> Recommended International Code of Practice: General Principles of Food Hygiene, CAC/RCP 1-1969, Rev. 3-1997, Amended 1999.