

# Food safety standards – equivalent or not

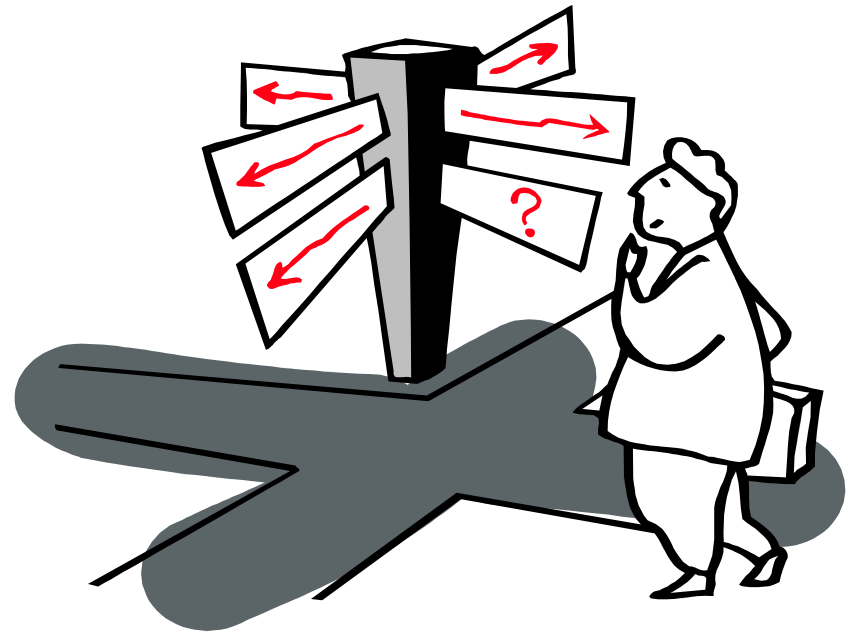
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# Spot test....

~~All roads lead to Rome?~~  
All roads lead to Lisbon



- **Via Schipol – KLM**
- **Via London - BA**
- **Via Paris – SAA**
- **Via Dubai - Qatar**
- **Direct**
- **.....**



# What is the objective of food safety management systems?(FSMS)

- **Safe food**

**Food that does not cause harm to the consumer**

**when it is prepared and / or eaten according to**

**its intended use**

- **How do we manage the risks to ensure safe food?**

# Options

- Several standards available
  - Regulatory and Statutory requirements
  - Private schemes
    - BRC Global standard
    - SQF 2000
    - Dutch HACCP standard
    - International Food standard
    - AIB standard
    - NSF
    - ISO 22000:2005
    - .....

# Which to choose?

- Customer selects for you?
- Cost of implementation?
- The best standard for safe food?
- Cost of audit?
- Easiest audit?
- Politics?

A bit like my travel plans...

- Facilitated by CIESnet – The Food Business Forum
- Food safety is a non-competitive issue
- Key priorities
  - To implement a scheme to benchmark food safety standards worldwide
  - To build and implement an early warning system
  - To encourage co-operation between governments and authorities
  - To communicate and promote consumer education
  - To co-ordinate Good Retailing Practices
  - “Once certified, accepted everywhere”

- Key elements
  - Food safety management systems
  - GMP, GDP, GAP
  - HACCP
- Compliant standards
  - BRC Global Food Standard
  - Dutch HACCP Code
  - SQF 1000 and 2000
  - International Standard for Auditing Food Suppliers



# BRC Global standard – Food

- Introduced in 1998
- Attempt to reduce the number of technical audits for suppliers
- 8067 certificates in 2007
- All British retailers????



# IFS

- German retail standard
- Published in 2002
- Now accepted by French, Italian and Polish retailers
- 8414 certificates in 2007



# SQF

- Owned by Food Marketing Institute, USA
- Originated in Western Australia in 1995
- “Over” 8000 certificates in 2007
- Level 3 recognised by GFSI



# ISO 22000:2005

- Danish recognise that ISO 9001 is not sufficient for food safety
- Request ISO to develop an international standard
- November 2001 critique existing standards by 8 countries
- November 2004 review involved 17 countries
- Voting November 38 countries approved, 3 rejected
- Published September 2005
- NOT GFSI recognised
- Over 4000 companies in 93 countries in 2007(ISO)

# Reaction to ISO 22000

- GFSI
  - “Does not facilitate on-site inspections’ – best manufacturing practices/PRP’s not adequately covered?”
  - Additional document – PAS 2200 must be used to audit in conjunction
  - Areas of difference include accreditation process, ownership – liability, slow process to change the standard
  - Difficult for retailer to accept as equivalent, no reason why a company can’t work to ISO 22000 whilst maintaining certification to a private recognised standard
- BRC
  - “Tailor-made”
  - Due diligence better covered
- Other retailers...



Standard	BRC Global standard –	Dutch HACCP Code	SQF 2000 Level 3 Level 2???	IFS	ISO 22000 Not yet GFSI
Published	1998	1995	1994	2002	2005
Certificates issued 2007	8067	“Over” 2000	“Over” 8000	8414	“Over” 4000
Used by	All British retailers?	Dutch retailers?	American retailers? Australian retailers?	German, French, Italian and Polish retailers	93 countries Not all food processors
Other	Developed by the retailers to reduce number of audits	Developed by Dutch National Board of Experts	Acquired by FMI in 2003, originated in Western Australia	Developed by German retailers	Will require PAS 2200:2008 to be used in conjunction during audit

**GFSI**

**VON HOLY**  
consulting  
making a difference in food safety

**“Once certified,  
accepted  
everywhere”**



# Reaction to private schemes

## Pro's

- “Reduce multiple audits”
- “Taking ownership of product integrity for private label”
- “**Recommendation:**  
Accept certification to all GFSI standards”

## Cons

- Trade barriers?
- “Untransparent”
- “ Not science-based”
- Equivalence – no such thing! - Customer is king
- Why go beyond legal compliance?
- Added cost to supplier



# Strengths

ISO 22000	BRC	SQF
Strong focus on the development of a HACCP system	Improved focus on HACCP in version 5	Well defined PRP's
Well defined requirements for communication	Pre-requisite programmes clearly described	More guidance than BRC on facility requirements, better than PAS 2200
Scope includes support industries to the food manufacturing sector	Incident management clearly defined	Strong focus on business continuity planning and site security
Objectives intended to integrate food safety as a business activity	Control of operations highlights the need for food safety to have daily focus	Validation of PRP's required
	Address laboratory testing of product	Allows for a progressive approach to system development with recognition at each level.

# Weaknesses

ISO 22000	BRC	SQF
No specific requirements for adequacy of PRP's – read between the lines...	Some fundamental requirements overstated. Fundamental requirements imply certain requirements of secondary importance	HACCP requirements one page – even less than Codex...
Tone of the standard does not promote understanding that FSMS should be maintained	Preventive action not defined	Preventive action not defined
Day to day process control related to food safety omitted	Quality aspects may dilute the focus on food safety	Requires a certified SQF practitioner involvement – extra cost?

# Overview and comparison

## Management requirements

REQUIREMENT	ISO 22000	BRC	SQF
Food safety policy	5.2	3.1	4.1.1
All require review and continual improvement	Business objectives Communication	Food safety and quality objectives	
Responsibility and authority	5.4	3.3	4.1.2
	Defined and communicated responsibilities. Food safety only All personnel have responsibility to report problems with food safety	Organisation chart Key cover Documented responsibilities for food safety, quality and legality General duties for ALL staff	Organisation chart Key cover Job descriptions

# Overview and comparison

## Management requirements

REQUIREMENT	ISO 22000	BRC	SQF
Food safety team leader	5.5	2.1.2	4.1.2.2
	Manage food safety team, report to top management	HACCP team activities only	Communication Lead development of system Validation
Communication	5.6	1.2 3.4.1 3.11	4.1.2.2 4.1.6
	Defined focus for communication requirements	Not as extensively covered	Not as extensively covered

# Overview and comparison

## Management requirements

REQUIREMENT	ISO 22000	BRC	SQF
Management review	5.8	1.5-1.9	4.1.4
Senior management in all cases	Continued suitability and effectiveness of the FSM system <ul style="list-style-type: none"> <li>•Changes, Emergencies, objectives, audits, customer feedback</li> <li>•Specifies requirements for records</li> </ul>	Critical evaluation of the Food safety plan and HACCP system effectiveness <ul style="list-style-type: none"> <li>•Records to be updated on completion of actions</li> </ul>	Policies Internal audit findings Corrective actions Customer complaints Annually

# Audit criteria

REQUIREMENT	ISO 22000	BRC Version 5	SQF 2000 version 6
Management responsibility	5	1	4.1
Human resources	6.2	7.1	4.1.2.2
Pre-requisite programmes	7.2	4,5,7	4.4.2, 6
Preliminary steps to enable hazard analysis	7.3	2.1-2.5	9
Hazard analysis	7.4	2.6	9
OPRP's	7.5		
HACCP plan	7.6	2.7-2.12	4.4.3
Verification planning	7.8	2.11	4.5.1 4.5.6
Traceability	7.9	3.9	4.6.2
Control of nonconformity	7.10 7.10.2	5.6 – all products	4.4.7(all products)
Validation	8.2	2.8.3	4.1.4.4 4.5.2
Control of measuring and	8.3	6.3	6.4
FSMS verification	8.4	2.11	4.5.1 4.5.3.1 4.5.4
Internal audit	8.4.1	3.5	4.5.5

# Audit criteria

REQUIREMENT	ISO 22000		BRC Version		SQF 2000 version 6
				Contract service	4.3.4
<i>Incoming material requirements</i>	<b>5.3</b>		4.12	Incoming goods and services	4.4.5
			4.2	Site security	4.7
<i>Personal hygiene Training</i>	<b>7</b> <b>10</b>	Access control Personnel hygiene	7	Personnel practices	6.1
<i>Maintenance and cleaning</i>	<b>6.1</b> <b>6.2</b>	Housekeeping and hygiene	4.9	Cleaning and sanitation	6.7
<i>Physical and chemical contamination</i>	<b>5.2.5</b>	Chemical and physical product contamination	4.8.3 4.8.4 5.3	Control of physical contaminants	6.9
		Purchasing	3.6	Supplier approval	6.10
		Materials containing allergen			
<i>Control of operations</i>	<b>5.2</b>	Process control			

**PARTIAL AUDIT**

PAS 2200:2008 not yet published, Codex Alimentarius  
**CAC/RCP 1-1969, Rev. 4 (2003)**

# Results of the audits

- Could you pass one and fail another?
  - Yes and no...





# Results of the audits

- BRC
  - Non-conformances linked to the “intent” of the requirements, particularly Fundamentals
- SQF
  - Nonconformances linked to food safety risk
- ISO 22000
  - Nonconformances linked to conformance to the requirements
  - All requirements carry equal weighting

# Results of the audits

- BRC
  - Nonconformances relating to HACCP caused failure
- SQF
  - HACCP requirements would suffice
- ISO 22000
  - Nonconformances relating to Hazard analysis caused failure

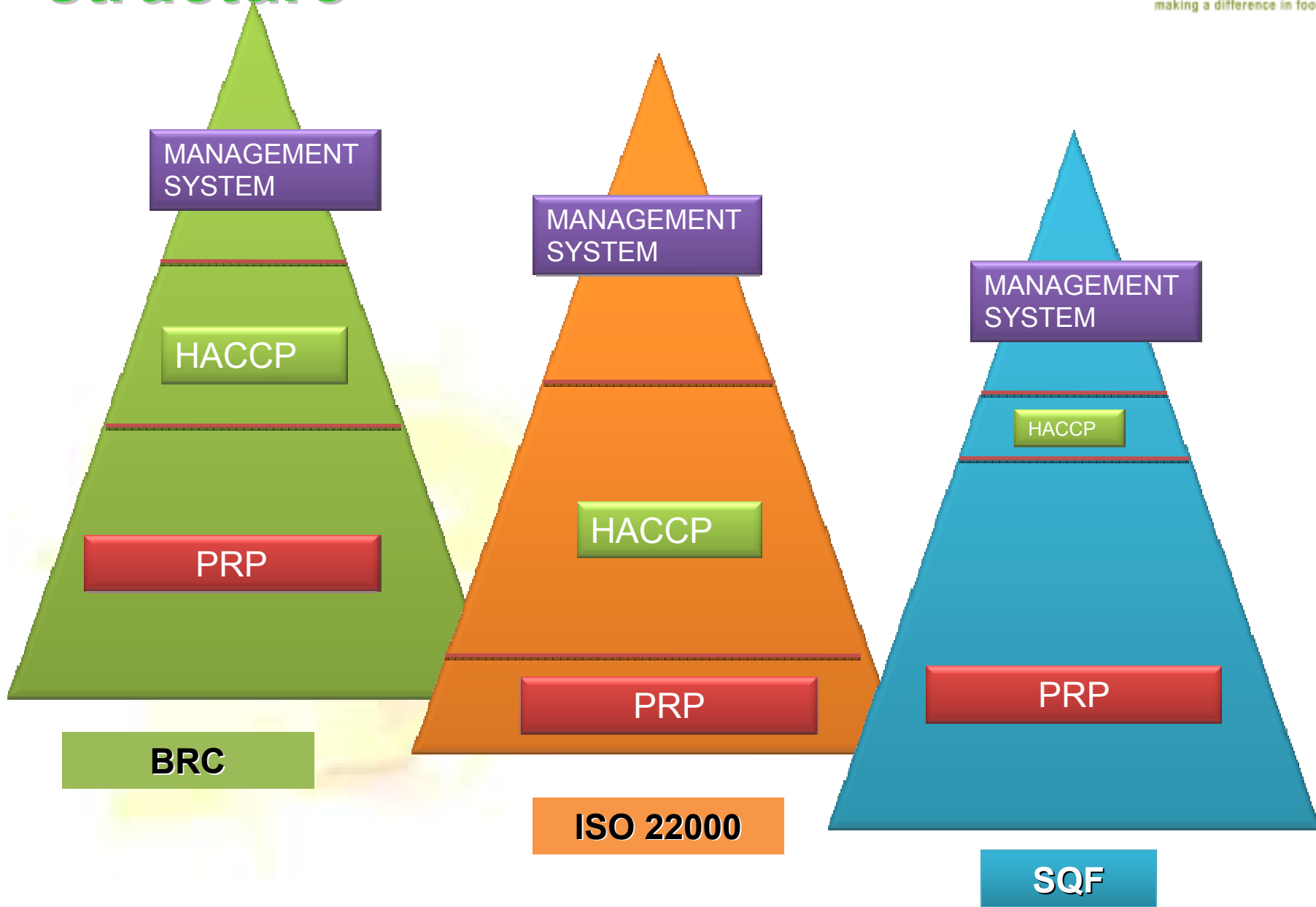
# Results of the audits

- BRC
  - Failure for
    - Current issue of standard not being available
    - Planning of re-certification
    - Senior management not at opening meeting
- SQF
  - No findings – 60 day window
- ISO 22000
  - No findings – certificate automatically suspended without audit


# Analysis of audit results

- BRC
  - Nonconformances relating to HACCP caused failure for BRC certified companies
  - Nonconformances relating to HACCP and PRP's caused failure for non-certified companies
- SQF
  - Existing HACCP requirements would suffice
  - Any HACCP plan would do...
- ISO 22000
  - Nonconformances relating to detail of Hazard

# Summary of the standard structure



# Results of the audits



Could you pass  
one audit and  
fail another?



Yes... And  
No....

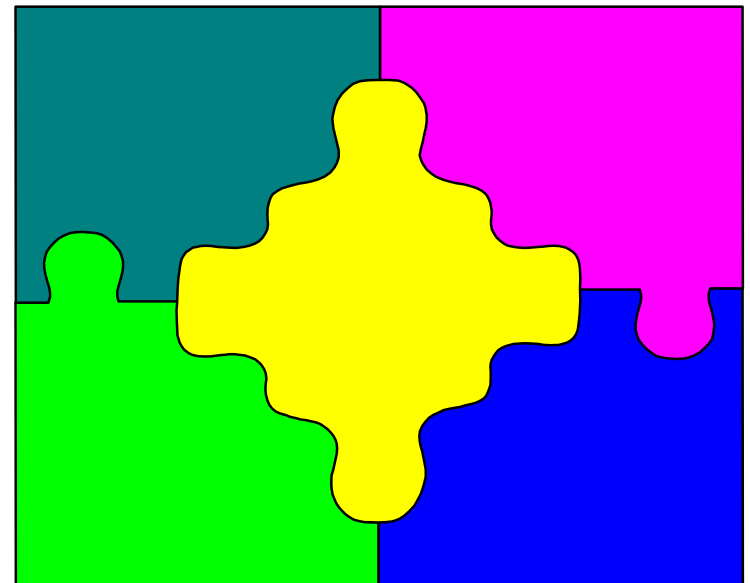
# Auditing requirements

- Accreditation requirements
- Auditor competence requirements
- Audit scope – multi-site implications?
- Audit duration
- Audit frequency – increase/decrease
- Audit outcome – major/minor/critical
- Grading outcome – does this foster the wrong approach?
- Corrective action – time frames
- Audit costs



# What provides safe food?

- HACCP?
- Pre-requisite programmes?
  - All equally important in all cases?
- Management commitment?
- Quality?





# Conclusions

- **The devil is in the detail?**
- **The “have to have’s” versus the “nice to have’s”?**
- **Is the content sufficient guidance for developing countries?**
- **Conformance vs. “compliance” – implied vs. prescribed?**

# Conclusions

- Auditor interpretation can still influence the outcome
- Auditor competence can create havoc...
- Any improvement is better than none!
- Best practice should not be confused with “one-upmanship”....
- Mandatory review results in more

# Acknowledgements

- **Rymco Africa**
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- **Lancewood Cheese**
- **QK Meats**
- **Kees Beyers Chocolates**
- **The Coca Cola Company**



Thank you for your  
attention

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