



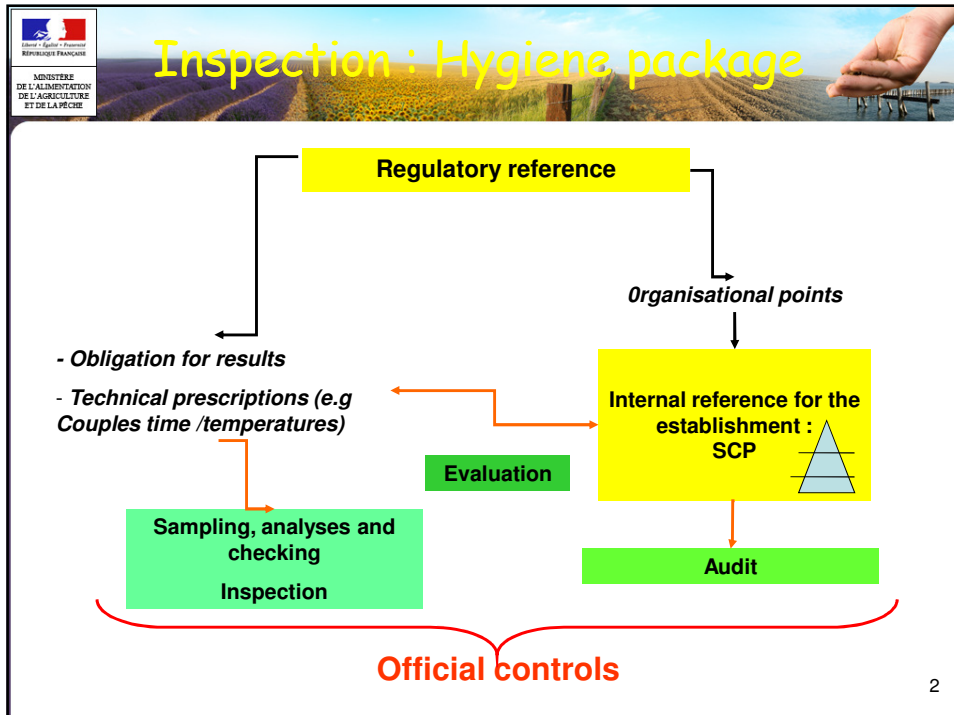
Food policy in France and the strategy to improve food safety

Prevention and optimization of epidemiological surveillance

Symposium of 17 November 2010
Brussels

Pascale BRIAND

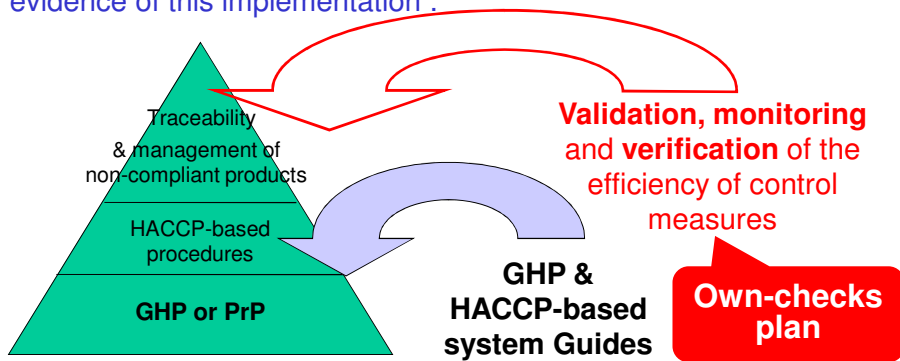
Managing Director - Directorate-general for food



Sanitary Control Plan (SCP)

All the measures taken **by the FBO** to ensure food safety and food suitability of its products towards **biological, physical and chemical hazards**

It includes the items necessary for the implementation and the evidence of this implementation :



Self-monitoring and own-checks

Key-element in hygiene regulations for which **an harmonised definition at EU level does not exist**

- In **France** (definition of the French code of rural and maritime fisheries law)
 - ⇒ any examination, verification, sampling, or any other type of control, **under the responsibility** of a food business operator
- Often linked to the issue of **own-checks analyses**
 - ⇒ any analysis carried out by a laboratory on a sample taken in the framework of own-checks

Current issue : way of **recognition** of own-checks analyses laboratoires (guarantee of data reliability for a relevant processing)

Inspection : Hygiene Package

Respective roles for professionals and control services

Operators

- validate the risk analysis
- validate their control measures
- Apply their sanitary control system and monitor and verify its efficiency

Services in charge of official controls

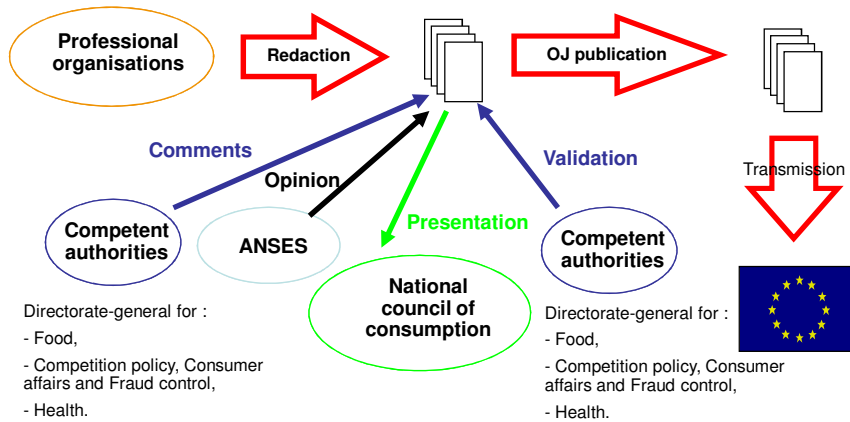
- verify that operators have validated the risk analysis and the means implemented to control hazards
- verify that operators apply their sanitary control plan
- verify that operators have verified the efficiency of their plan

Tools : GHPG, documentation from technical centres,...

methods = guide for audit and evaluation

GHPG : a tool for FBOs and a reference for official controls

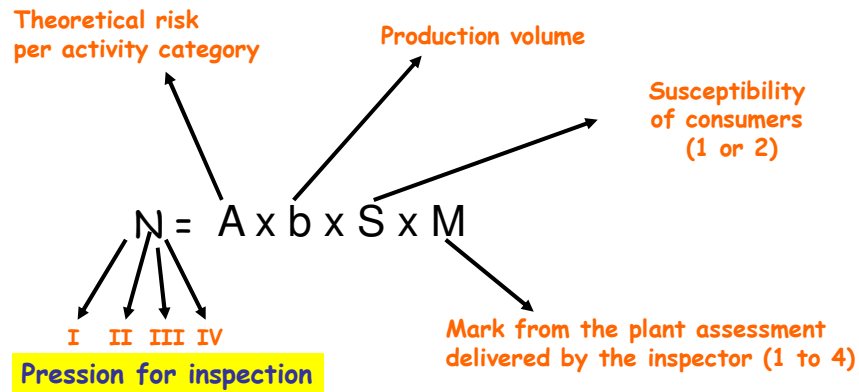
General rule for assessment and validation of GHPG in France



Official controls scheduling 2009-2010

Based on a risk analysis

Calculation of a risk mark for each establishment



7

Official controls scheduling in accordance with the risk mark

- * N= risk mark, 4 categories :
 - I : very low risk
 - II : low risk
 - III : moderated risk
 - IV : high risk
- * One category = same level of inspection pressure
- * Limits set by local inspection services except for cat. IV > or = 480
- * Frequencies set by local services except for cat. IV = twice a year (at least)

8

2011-2015 prospects Multiannual scheduling

Type of action	Objectives	Type of establishments (examples)	Implementation
Prevention	Surveillance of sensitive sectors, on the basis of the risk mark	Risk mark =4 Minced meat =3 Central kitchens =1, 2 and 3	Frequency fixed at national level
Improvement	Improvement at the sector level and assessment of the impact of official services intervention	Pastries, cooked meats Meat products, minced meat Collective restaurants (sensitive population)	Local choice Volume set at regional level
Repression	Sanction for non-compliant establishments, and/or with an important turnover	Commercial restaurants Cold stores	Local choice Volume set at regional level

9

Certification standards and official controls

May 22000 ISO certification be taken into account for official controls ?

In a quantitative way ?

(reduction of inspection frequency case of ISO 22000 certification)

In a qualitative way ?

For the inspection management
(target on specific items)

Use of the 22000 ISO audits results
(audit reports)

Why 22000 ISO standard ?

- certification system **recognized at an international level**
- FBOs organisation towards a **safe food manufacturing**
- implementation of **regulatory requirements (SCP)**

10

How to take into account certification standards ?

A survey in 2 steps :

-a « **theoretical** » survey : end of 2007 → 2008

Comparison between audit / inspection (standards and references, qualification / required skills, implementation and following actions)

-a « **field work** » survey : 2009 → ?

Audit followed by inspection carried out within FBO partners (« retail outlets », « collective restaurants » and « dairy products » sectors)

Working group including competent authority, scientists, certification organisms and FBOs

Consideration of certification standards

Current intermediate conclusions (likely to evolve) :



- **Compatible and complementary approaches**
Audit of « system » and documents
Inspection on site and of product
- **Best knowledge of establishments thanks to audit data**
(in particular information relating to the functioning of head office)



- **Less « technical proficiency » of auditors**
 - the different sectors are divided differently (more targeted for official inspection (e.g. : transformation))
 - for inspection, existence of sectorial experts and sectorial methods
 - actual cases during survey : non-conformities not noticed by the auditor, insufficient knowledge of regulation and GHPG

Legislative provisions in France

Food policy
defined in

Modernisation of agriculture and fisheries act
(n°2010-874 of 27 July 2010)

expressed in the
National programme for food

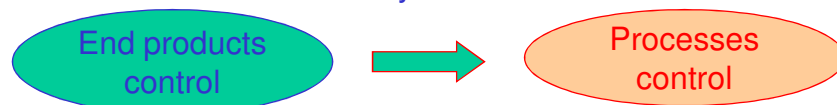
Art. L230-2 : opportunity to make the submission of different type of data by FBOs **mandatory** that provides the legal provision for the **creation of a food safety monitoring centre** (« Observatory »)

⇒ **Objective** : System of **centralised gathering of own-checks analytical results** relating to **biological and chemical hazards**

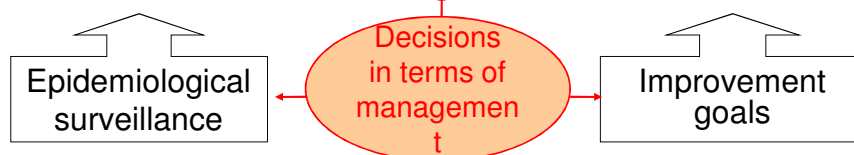
Centralisation of own-checks analyses data

Which objectives ?

Evolution of food safety management systems



Own-checks analyses data
=
Image of **actual manufacturing situation** and of **level of control of food hazards by FBOs**



Advantages of centralised data collecting

Two main purposes

- programming and organisation of official controls based on a **risk analysis linked to quantifiable data**
- on the long view, establishment of **action plans for food safety improvement** directly linked to foodborne diseases incidence

For competent authorities

- Programming of official control strictly based on **risk analysis**
- Constructive actions at prior steps for the different sectors
- Possibility to establish a direct and measurable link between food contamination and human cases of disease

For FBOs

- Setting objectives in terms of improvement of the hygienic quality of their products
- Evidence that preventive control is efficient
- Positioning at national level and adaptation of inspection pressure (lightening, reinforcement)

For consumers

- Positive communication on the real safety status of foods placed on the market
- Aims in terms of reduction of foodborne diseases incidence

15

Conclusion

- **Self-monitoring and own-checks** = crucial system in the Hygiene Package for a more efficient food safety control.
- **Recognition of certification approaches** based on international standards = driving force for food hygiene policy
- **Own-checks data gathering by CA at national level** :
 - ⇒ programming and organisation of official controls based on a **risk analysis really linked to quantifiable data**
 - ⇒ establishment of **action plans with FBOs for food safety improvement**

Current issue
development of a **harmonised approach**
at EU level

16