PROVISIONS ON FLEXIBILITY PROVIDED IN THE HYGIENE PACKAGE

CHALLENGES FOR SMALL-SCALE DAIRIES IN SPAIN

Preserving and Marketing Farmhouse Artisan Cheese

Food and Safety Tips and Guidelines for Regulations of Artisan Cheese Establishments (FAST AND GRACE)

Erasmus+

QUESERÍAS DE CAMPO Y ARTESANAS
RED ESPAÑOLA

THE HYGIENE PACKAGE

- Reg. (EC) Nº 178/2002, laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety

- Reg. (EC) Nº 852/2004, on the hygiene of foodstuffs
- Reg. (EC) Nº 853/2004, on the hygiene of food of animal origin
- Reg. (EC) Nº 854/2004, laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption

- Reg. (EC) Nº 882/2004, on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules

PROVISIONS ON FLEXIBILITY

FLEXIBILITY

TO ACHIEVE THE GOAL OF FOOD SAFETY BY ALTERNATIVE MEANS

DEPENDING ON THE SPECIFIC CIRCUMSTANCES

OF EVERY ESTABLISHMET, REGION

OR FOODSTUFF

FLEXIBILITY AT TWO DIFFERENT LEVELS

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

- **Decided by the Food Business Operator**
- **Granted by the Competent Autohority**

FLEXIBILITY ON THE HACCP-BASED PROCEDURES

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

Decided by the Food Business Operator

✓ ***Where the words "where necessary", "where appropriate", "adequate" or "sufficient", are used, it is up to the FBO to decide whether a requirement is necessary, appropriate, adequate or sufficient to achieve the objectives.***

Guidance document on the implementation of certain provisions of Regulation (EC) No 852/2004 on the hygiene of foodstuffs

- **"*Adequate* working *space* to allow for the hygienic performance of all operations"**
- **"Storage conditions of *sufficient capacity* for maintaining foodstuffs at *appropriate temperatures* and designed to allow those temperatures to be monitored and*, where necessary*, recorded"**
- **"An *adequate* number of flush lavatories"**
- **"An *adequate number* of washbasins and*, suitably* located "**
- **"*Adequate* provision is to be made, *where necessary*, for washing food"**
- **"*Adequate* facilities are to be provided, *where necessary*, for the cleaning, disinfecting and storage of working utensils and equipment "**

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

Decided by the Food Business Operator

- ✓ **Working document: 25 points**

QUESERÍAS DE CAMPO Y ARTESANAS
RED ESPAÑOLA

aecosan
agencia española de consumo, seguridad alimentaria y nutrición

- ✓ **Primary production of raw milk**

"Premises for the storage of milk and colostrum must be protected against vermin, have adequate separation from premises where animals are housed and, ***where necessary*** **to meet the requirements laid down in Part B, have** ***suitable refrigeration equipment*****."**

If milk must be cooled after milking, cold tanks are generally used for this purpose. However, this same goal can be achieved by alternative means, as long as they ensure the storage temperature and hygienic conditions (eg .: churns in cold running water, etc.)

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

Decided by the Food Business Operator

- ✓ **Working document: 25 points**

QUESERÍAS DE CAMPO Y ARTESANAS
RED ESPAÑOLA

aecosan
agencia española de consumo, seguridad alimentaria y nutrición

- ✓ **Primary production of raw milk**

"During transport **the cold chain must be maintained** and, on arrival at the establishment of destination, the temperature of the milk and the colostrum **must not be more than 10º C"**

If it is necessary to transport raw milk from the farm to the cheese dairy, different types of receptacles suitable for food contact may be used . Isothermal tanks are often used , but other containers can also achieved the objective. Transportation can be done by car, on foot, by bicycle, draft animal, etc.

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

Decided by the Food Business Operator

✓ **Working document: 25 points**

QUESERÍAS DE CAMPO Y ARTESANAS
RED ESPAÑOLA

aecosan
agencia española de consumo, seguridad alimentaria y nutrición

✓ **Premises for processing cheese and dairy products**

"Food premises are to provide ***adequate working space*** to allow for the hygienic performance of all operations"

- Several activities (manufacture, handling, packaging, labeling, packaging, etc.) can be made in the same premises , provided that these all are carried out separately, either in time or in space
- It´s adequate the storage of packaged or not packaged cheese, rennet , coagulants ant cultures in the same cooling equipment, provided that the temperature required for each of them is respected
- Ingredients and packaging material can be stored in a closet or other means located in the processing room or other separate room (the house of the producer), as long as the storage conditions are met (dry place separate from chemicals, etc.)

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

Decided by the Food Business Operator

- ✓ **Working document: 25 points**

QUESERÍAS DE CAMPO Y ARTESANAS
RED ESPAÑOLA

aecosan
agencia española de consumo, seguridad alimentaria y nutrición

- ✓ **Premises for processing cheese and dairy products**

"An ***adequate number of flush lavatories*** are to be available and connected to an effective drainage system"

It's adequate if toilets are available at nearby facilities, as the cheesemaker's house, and all the workers have access to it

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

Decided by the Food Business Operator

✓ **Working document: 25 points**

QUESERÍAS DE CAMPO Y ARTESANAS
RED ESPAÑOLA

aecosan
agencia española de consumo, seguridad alimentaria y nutrición

✓ **Premises for processing cheese and dairy products**

"An ***adequate number of washbasins*** is to be available, suitably located and designated for cleaning hands. ***Where necessary***, the facilities for ***washing food*** are to be ***separate from the hand-washing facility***. Adequate facilities are to be provided, ***where necessary, for the cleaning, disinfecting and storage of working utensils and equipment"***

- It's sufficient the provision of a single water point for washing hands, tools and food. Cheeses may be washed when no other operation is being done
- Churns and other milk receptacles can be washed and dried on the outside, as long as the entry of dirt is prevented

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

Granted by the Competent Authority

DEROGATIONS/EXEMPTIONS

ADAPTATIONS

EXCLUSIONS

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

Granted by the Competent Authority

DEROGATIONS/EXEMPTIONS

Food business operators are authorized to <u>not apply</u> specified requirements of the Hygiene Package in specified circumstances

These situations are usually introduced by wording, such as:

- ✓ ***"if the competent authority so permits",***
- ✓ ***"unless otherwise authorized by the competent authority",***
- ✓ ***"with authorization of the competent authority", etc***

EXAMPLES

DEROGATIONS/EXEMPTIONS

RAW COW'S MILK

- ✓Herds free/officially free of Brucellosis
- ✓Herds officially free of Tuberculosis

- ✓Cows that do not show (+) reaction o tests for BRC/TBC
- ✓Nor any symptoms of these diseases

May be used with the authorization of the competent authority if comes from:

R.D. No 640/2006
art. 5.1

Heat treatment such as to show (-) reaction to the alkaline phosphatase test

DEROGATIONS/EXEMPTIONS

RAW MILK FROM SHEEP/GOATS

Herds free/officially free of Brucellosis

- ✓ Sheep/goats that do not show (+) reaction to tests for BRC, or
- ✓ Have been vaccinated as part of an approved eradication programme, and
- ✓ Nor any symptoms of BRC

a) Heat treatment (-) reaction to the alkaline phosphatase test, OR

b) Manufacture of cheese with a maturation period ≥ 2 months

May be used with the authorization of the competent authority if comes from:

R.D. No 640/2006 art. 5.1

DEROGATIONS/EXEMPTIONS

RAW GOAT'S MILK

- ✓ Herds regularly checked for TBC under a control plan approved by the competent authority
- ✓ If kept together with cows, goats must be inspected and tested for TBC

- ✓ Goats that do not show (+) reaction to tests for TBC, and
- ✓ Nor any symptoms of TBC, but
- ✓ Belong to a herd where TBC has been detected

Treated to ensure its safety

May be used with the authorization of the competent authority if comes from:

R.D. No 640/2006
art. 5.1

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

Granted by the Competent Authority

DEROGATIONS/EXEMPTIONS

CHEESES WITH TRADITIONAL CHARACTERISTICS

Reg. (EC) No. 2074/2005. art. 7

- ✓ Specific derogations for premises and the type of materials of which the instruments and the equipment are made
- ✓ Spain has granted some derogations for a few traditional cheeses, as requested from some Regional Goverments
  - ➢ Natural caves for ripening of cheeses
  - ➢ Wooden shelves for cheese ripening
  - ➢ Cotton cloths to mold the curd

aecosan
agencia española
de consumo,
seguridad alimentaria y nutrición

- ✓ All farm and artisan cheese an dairy products are food with traditional characteristics (Manufactured according to traditional production methods)
- ✓ Specific derogations must be granted for all of them

QUESERÍAS
DE CAMPO
Y ARTESANAS
RED ESPAÑOLA

Wooden Shelves

Cotton Cloth
Wooden Shelves

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

Granted by the Competent Authority

ADAPTATIONS

Member States may adopt national measures in order to adapt requirements laid down in Annex II (Reg. 852/2004) and III (Reg. 853/2004:

a) **To enable the continued <u>use of traditional methods</u> of production, processing or distribution of food, or**

b) **To accommodate the needs of food <u>businesses</u> situated in regions that are subject to <u>special geographic constraints</u>**

c) **In other cases, they shall apply only to the <u>construction, layout and equipment</u> of establishments**

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

Granted by the Competent Authority

ADAPTATIONS

- ✓ **The placing on the market of raw milk intended for direct human consumption** (Reg. No. 853/2004, art. 10.8.a)

aecosan
agencia española de consumo, seguridad alimentaria y nutrición

- ✓ **Royal Decree No. 640/2006:**
  - ➢ **Selling of small quantities of raw milk for direct human consumption from the producer to the final consumer or local retailers: Not permitted**
  - ➢ **Selling of raw milk for direct human consumption from dairies: Permitted**

QUESERÍAS DE CAMPO Y ARTESANAS
RED ESPAÑOLA

- ✓ **Make it possible the selling of raw milk intended for direct human consumption from the producer to the final consumer**

FLEXIBILITY ON THE GENERAL AND SPECIFIC HYGIENE REQUIREMENTS

Granted by the Competent Authority

EXCLUSIONS

a) The Hygiene Package excludes certain activities from its scope

b) Member States may authorize or not these activities with national rules

✓ Cheese manufactured and sold entirely at the farm or at a local market to final consumers, RETAIL

Excluded from Reg. 853/2004

Must comply:

a) Reg. 852/2004

b) Only the requirements for raw milk of Reg. 853/2004

1. <u>Sale area for the cheese not specified</u>: final consumer, local retailer, national, etc.

2. It's confusing about the mandatory controls on milk farms

R.D. 1728/2007
R.D. 752/2011

FLEXIBILITY ON THE HACCP-BASED PROCEDURES

- **The HACCP methodology is flexible by its very nature**
- ***FBO doesn't have to ask for it***
- **FBO is not compelled to comply with rules or to implement procedures not relevant or adapted to the specific context for their activity**

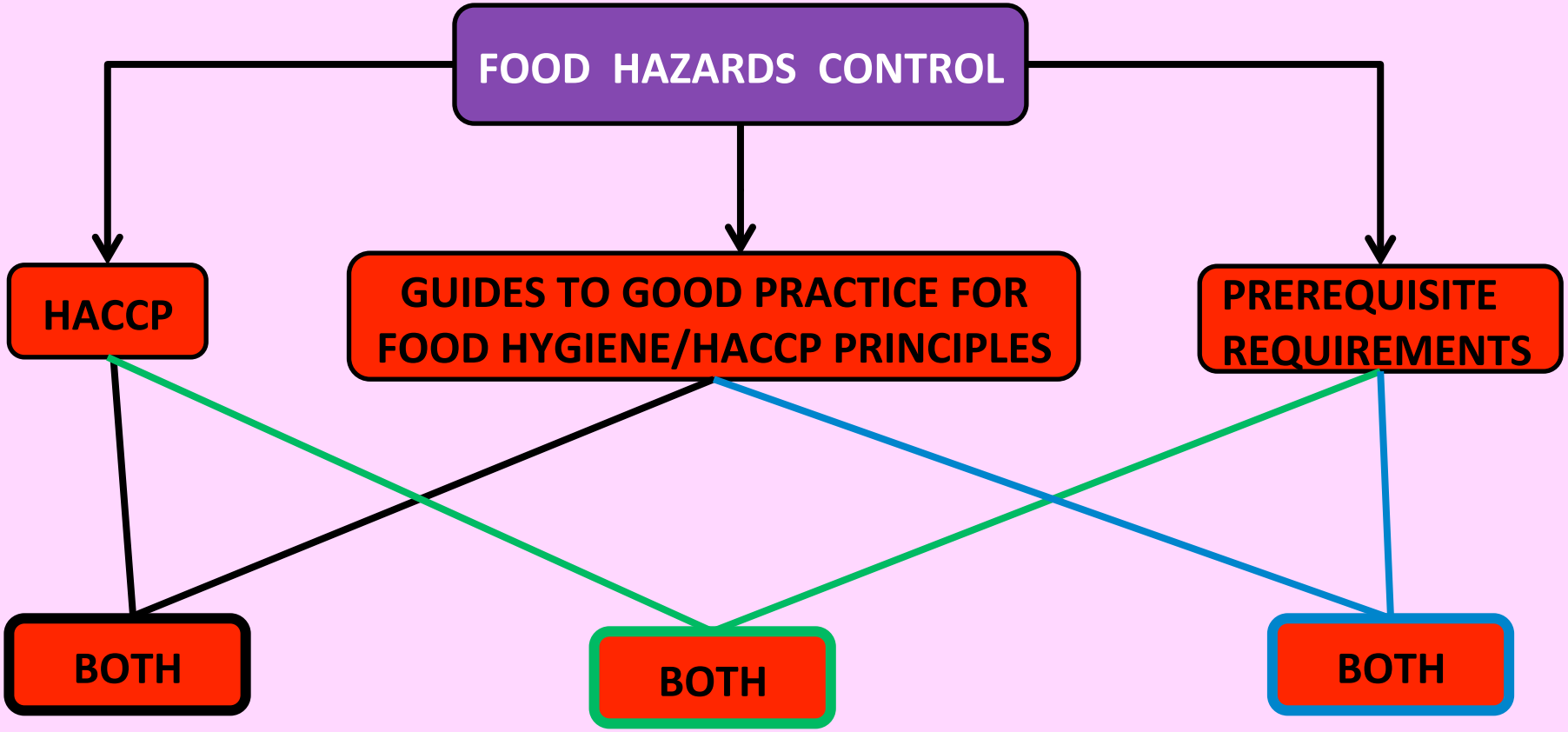
Guidance document on the implementation of certain provisions of Regulation (EC) No 852/2004 On the hygiene of foodstuffs

ALL FBO MUST

Put in place a system to identify and control significant hazards on a permanent basis and adapt that system whenever necessary

This can be done by different ways

FLEXIBILITY ON THE HACCP-BASED PROCEDURES



Farmhouse and Artisan Cheese and dairy producers' European Guide for Good Hygiene Practices

FACE NETWORK - QUERED

Farmhouse and Artisan Cheese & Dairy Producers European Network

QUESERÍAS DE CAMPO Y ARTESANAS RED ESPAÑOLA