- Farmhouse and
- Artisan
- Cheese & Dairy Producers
- European Network

European Guide for Good Hygiene Practices in the production of artisanal cheese and dairy products

Target: Farmhouse and Artisan producers





22 11 2017 - Brussels

Why this project of « European guide »?



- Hygiene Package (see Regulation 852/2004-art.5) requests the realisation and application of permanent procedures based on HACCP principals for all the food operators.
- Guides for good hygiene practices are presented as useful tools to help the operators to fulfill this regulation (see Regulation 852/20014 – art.1§1)

Why this project of « European guide »?



- Many problems, in different countries with the implementation of the hygiene package in small dairies
- National administrations "putting the blame" on European Union
- In many cases, a clear choice to keep us in a derogative status
- Not enough implementation of flexibility
- We wanted to be totally in the field of the EU regulation
- Recognition of our specific knowledge on food safety management in our sector
- A simple tool to help the producers to improve their Food Safety Management
- Flexibility and adaptations...

The objectives of this GGHP



Our aim was to provide to the producers a reference document:

- to help them to prepare their Food Safety Management System (risk analysis, HACCP based procedures,)
- taking into account their <u>real practices</u>
- giving practical examples regarding <u>flexibility</u>, <u>derogations</u>, <u>adaptations</u>

The specificity and the strength of the GGHP:

- drafted by producers and specialists of the sector
- endorsed by the public authorities of the 28 Member States, and European Commission

Back to the history of the project: « from the idea... .. to the endorsement »



- > 2010: first exchanges within FACEnetwork about this project.
- ➤ 2010 2014: several contacts/meetings with the European Commission, and with the European Parliament to explain the project and ask for subsidies.
- March 2015: thanks to the support of several European Deputies, DG SANTE granted <u>subsidies</u> to FACEnetwork (« pilot project »).
- ➤ March 2015 March 2016: writing of the GGHP.
- ➤ March 2016 December 2016: assessment by EC and the 28 MS > amendments, negociations
- ➤ 16th September 2016: Standing Commity PAFF (with FACE's participation).
- > 13th December 2016: official endorsement.
- > 2017: translation into the 23 official languages of EU.
- > 22th November 2017: conference in Brussels official presentation.

The spirit of the GGHP



- The expertise of technicians and producers is the basic principle
- ▶ The overall approach is preventive and based on good practices implementation
- ▶ The HACCP principles are completely applied and adapted to our products, through:
 - a generic hazards analysis
 - ▶ HACCP-based plans: they make the link between the hazards and each type of products.

The GGHP is a PRACTICAL TOOLS for the producers

The spirit of the GGHP



- Other pillars of the GGHP:
 - No CCP (not adapted to our type of production)
 - **▶ Flexibility examples** (presented as references)
 - "Records" only if non conformity
 - Responsibility of the producer = the producer is the "skilled person" > No fixed standard plans or indicative values, in order to let the producer decide of his own practices

What is the meaning of an « officially endorsed guide »?



« Officially endorsed » means that:

- ➤ The GGHP is a **highly relevant reference** on food safety management in small scale cheese and dairy making
- > The GGHP has been approved by each of the 28 MS of EU:
 - ➤ It is not possible to prevent a european producer from using the GGHP if he wants to
 - During inspections, the local <u>inspectors must take into account</u> the GGHP if it is applied
 - ➤ The inspections must consist in checking the efficiency of the implementation of the FSMS, but should not question the practices
- ➤ The GGHP is public > published in 24 languages on the web site of European Commission and in the Official Journal of EU

What is the meaning of an « officially endorsed guide »?



BUT

- ➤ It is not « a Regulation » (its recommandations are not enforceable before a court)
- ➤ The GGHP is not compulsory, but **voluntary**

AND

Each producer or producers' organisation can use it according to its needs

- > To replace or complete a previous national guide
- ➤ To <u>argue</u> with their competent authorities for the implementation of flexibilty provisions or specific regulation in their country

In each country, the producers must decide HOW they want (or need) to use the GGHP

In resume:

What we wanted? What we obtained!



- ▶ To be totally in the field of the EU regulation
- A recognition of our specific knowledge on food safety management in our sector

► The FACE GGHP has been endorsed!





In resume:

What we wanted? What we obtained!



A simple tool to help the producers to improve their Food Safety Management ► More or less obtained...

The GGHP is not so easy to understand and to use for the producer.

We will create more adapted tools with the

"Teacheesy" program

FACEnetwork's new program funded by Erasmus+ to prepare the <u>diffusion</u> of the GGHP to European producers all over Europe through <u>trainings</u>



In resume:

What we wanted? What we obtained!



▶ Flexibility and adaptations...



► Flexibility has been set in the stone of FACE-GGHP!...

... But still, it has to be asked for in each member state



Teacheesy and FACEnetworks actions will help for that

www.face-network.eu



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