

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

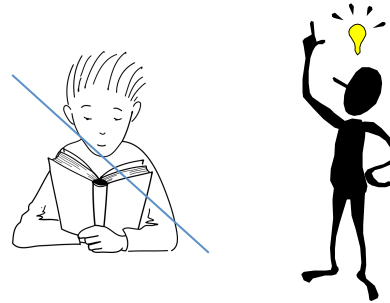
# How will producers use the GGHP?



22 11 2017- Conference GGHP, Brussels

# What is the purpose of the GGHP?

- The GGHP is not a technical manual nor a volume listing the regulatory provisions
- The GGHP has not been thought to be a classic « book », it has been thought to be a « **tool** »



*Definition of a tool = anything used as a means of **performing an operation** or **achieving an end** (source: dictionary Collins)*

In the case of the GGHP, the **end** is: **to allow the user (producer) to be in conformity with his regulatory obligations**

# What are these obligations?

**Regulation (EC) N° 852/2004 – art.4**  
*“Food business operators (...) shall comply with the **general hygiene requirements** laid down in Annex I and in Annex II of Regulation (EC) N° 852/2004 (...) and with **specific requirements** of Regulation (EC) N° 853/2004”*

Layout ; hygienic state of the premises ; staff hygiene ; training ; criteria on the milk to be processed...

= **Pre-requisite Programs PRP**  
= **good hygiene practices & good manufacturing practices**

**Regulation (EC) N° 852/2004 – art. 5**  
*“Food business operators shall put in place, implement and maintain a permanent procedure or **procedures based on the HACCP principles.**”*

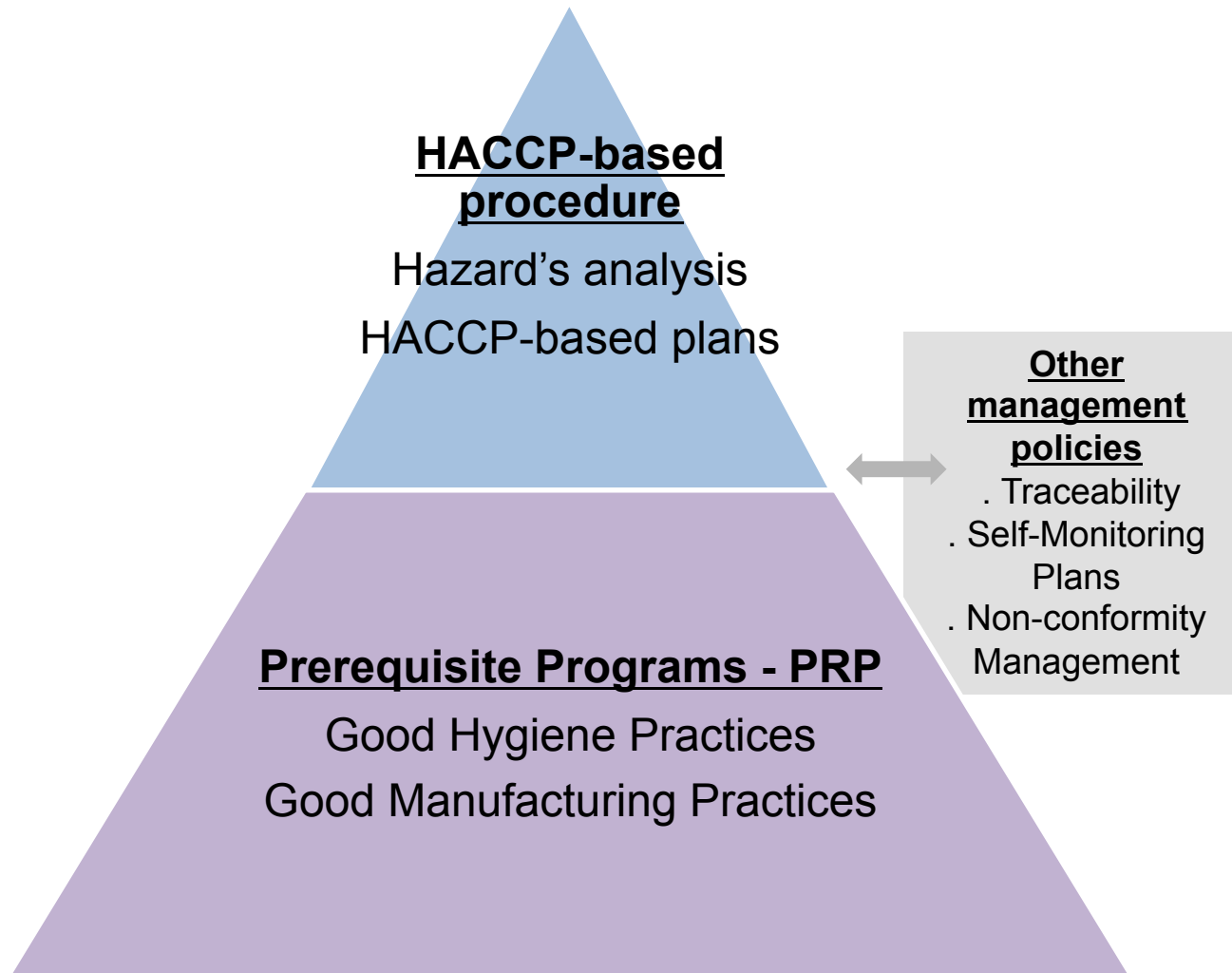
**Regulation (EC) N° 178/2002**

The basic principles are set out:

- **risk analysis approach**
- **primary responsibility of the producer**
- **traceability**

This “pack” of obligations is defined as **Food Safety Management System (FSMS)** by DG Sante’s guidance document for implementation of (...) HACCP

# The FSMS in resume



= Food Safety Management System  
**FSMS**

The regulation requires not only to implement it but also to **formalise it**

**> A guide is necessary!**

# Table of contents of the GGHP

> All the FSMS is there!

## Section I – THE PURPOSE AND APPLICATION OF THE GUIDE

### Section II - GOOD HYGIENE PRACTICES (GHP)

- GHP staff: general hygiene, training and health
- GHP premises and equipment
- GHP cleaning
- GHP disinfection
- GHP pest control
- GHP water quality

### Section III – GOOD MANUFACTURING PRACTICES (GMP)

- GMP cultures
- GMP coagulants: production, storage, use
- GMP additions to the milk and curd
- GMP salting
- GMP product storage and transport
- GMP direct sale

### Section IV – Risk analysis for Primary Production

- Milk production and storage on the farm

### Section V - HACCP-based Plans

- milk collection, storage in the dairy and treatment
- lactic coagulation cheeses
- enzymatic and mixed coagulation cheeses
- cheeses and milk products made by evaporation and precipitation
- pasteurized milk for consumption
- raw milk for consumption
- butter and cream
- fermented milk products
- non fermented dairy products

### Section VI - TRACEABILITY

### Section VII - SELF-MONITORING

### Section VIII - NON CONFORMITY MANAGEMENT

### APPENDIX I- HAZARD ANALYSIS FOR MILK PRODUCTS

### APPENDIX II - GLOSSARY

# In synthesis... how should the producers use the GGHP?

- The GGHP = a FSMS adapted to farmhouse and artisan dairy production
- It is written like a practical tool (tables, examples, ...)
- It covers all the families of products and all the operations made by the producers

Producers can use the GGHP  
as their own FSMS....

... provided that they  
personalise it  
to make it reflecting their  
individual practices

# How « to personalise » the GGHP?

- ▶ **Step 1:** The producer shall take only the sheets useful for him
- The GGHP is made of separate sheets > the user can **select only the sheets related to his products and practices**
- *For example, a producer processing his own cow milk into lactic cheeses will keep only:*
  - *All the GHP and the GMP sheets*
  - *The sheet « risk analysis for primary production »*
  - *The HACCP-based plan « lactic coagulation cheeses »*
  - *The sheets related to traçability ; self monitoring and non conformity management*

## How « to personalise » the GGHP?

### ► Step 2: The producer should adapt THE GHP & GMP to his practices

In each sheet, the producer should:

- Delete the points of the sheet that are not applicable to his practices
- Keep the recommendations that can suit with his practices, and even highlight and detail those that are most relevant for him



# Example of personalising one GHP sheet



## Section II - Good Hygiene Practices STAFF: GENERAL HYGIENE, TRAINING, HEALTH

Hazards posed by food handlers are easily controlled through simple good hygiene practices and the limited risk posed by the small number of personnel typically working in a small dairy/food production business may allow for some flexibility in the interpretation of regulatory requirements. These hygiene requirements apply to all food handlers – either working alone or with others.

### General Hygiene for any Food Handler

Effective handwashing with soap and water is the principal means of infection control in a food production business. Fingernails should be clean and unvarnished and false fingernails should not be worn. Care should be taken to wash the thumbs and between the fingers. Arms should also be washed where they will come into contact with food. In the case of outdoor milking where water is not available, hand-gel or wipes can be used. However, hands should be sanitised by washing with soap and water at the next opportunity.

Staff should wash their hands:

- ~~Before milking animals.~~
- Upon entering the food production area.
- Before handling food or ingredients or starter cultures.
- After going to the toilet.
- After using the phone.
- After handling potentially contaminated material.
- Whenever they are dirty.

Staff should, through their behaviour and practices, seek to avoid contamination and cross-contamination of products. In particular:

- Cuts and abrasions should be covered with a waterproof dressing or glove.
- Food handlers should refrain from smoking, spitting, chewing or eating.
- Food handlers should avoid sneezing or coughing over food products.
- Jewellery should not be permitted in production areas though sometimes exceptions are made e.g. for a plain wedding band or small earrings.
- Where accidental release may pose a risk of contamination, allergens (including cereals containing gluten, crustaceans, molluscs, eggs, fish, peanuts, nuts, soybeans, celery, mustard, sesame, lupin and sulphur dioxide) should not be brought into the food-handling area unless as a declared ingredient.

### Clothing

Staff should wear designated clothing for milking and clean clothes for food production; clothes worn in the dairy should not be the same ones worn for working on the farm. A change of outer clothing (overcoats or aprons) should be provided when entering the food production area and should be removed before leaving the premises or going to the toilet. Clothing should be in good condition - free from rips, fraying and loose buttons.

~~A change of footwear (or a footbath) should be provided when required to prevent dirt being brought into the dairy.~~ Where a disinfectant footbath is used, the contents should be refreshed regularly to ensure their effectiveness.

### Training

All food handlers and milking staff should be trained; this may be by obtaining a formal food hygiene qualification ~~or through direct instruction by a more experienced colleague.~~ Training should address the food safety hazards encountered in dairy production and promote understanding of good hygienic practice.

This sentence says: *“Staff should wash their hands: before milking animals...”*

> A cheesemaker not producing milk, will **delete** *“before milking animals”* in his GGHP

This sentence says: *“[about training] this may be by obtaining a formal food hygiene qualification or through direct instruction by a more experienced colleague”*

> The producer should **circled** *“through direct instruction by a more experienced colleague”* if it is the usual practice in his business.

NB: in the case when formal trainings have been done by some members of the “staff”, certificates can be joined in appendix of the GGHP, as supporting documents

For the rest, provided that the text is in line with his practices, the producer has nothing to add, to delete nor to adapt

# How « to personalise » the GGHP?

## ► Step 3: The producer has to adapt THE HACCP-bases plans to his practices

Process steps to monitor	Why do we have to be careful?	Preventive actions	Checking /monitoring	Corrective actions
<p><i>List of the process steps or operations.</i></p> <p><i>Some rows may be optional and some steps may not apply to a specific product.</i></p> <p><b>The producer must:</b>  <u>. keep only the steps corresponding to their practice</u>  <u>. delete steps which are not applicable.</u></p>	<p><i>Detail on the nature and cause of the hazards (M: microbiological contamination or growth, C: chemical, P: physical).</i></p>	<p><i>Actions to prevent or control the risk = good hygiene practices or other technical advices</i></p>	<p><i>Means to check that the preventive actions were carried out efficiently.</i>            = <u>measurements or <b>more subjective actions, based on the producer's experience</b></u> (eg. "visual or organoleptic inspection"...)</p> <p><b><u>Producers must select at least one of the means proposed</u></b></p> <p><b>Except: legal requirements that must be followed</b></p>	<p><i>Actions in case of failure of the preventive measures in order to restore a satisfactory situation.</i></p>

# Example of personalising a HACCP-based plan

## Extract of the HACCP-based plan « lactic coagulation cheeses »

Process step to monitor	Why do we have to be careful?	Preventive actions	Checking/ Monitoring procedure	Corrective actions
<del>Maturation without inoculation</del>	<del>M: Growth of pathogenic bacteria: Milk can contain undesirable bacteria. When the number of lactic acid bacteria (LAB) is low or conditions for their development are unfavourable, pathogenic bacteria can dominate</del>	<del>Where possible, promote the development of LAB through good animal husbandry (see sheet milk production). Use proper maturation temperature and time to promote sufficiently rapid growth of LAB. (2)</del>	<del>Experience of cheesemaker: organoleptic inspection, measurement of temperature, time and acidity development.</del>	<del>Add dose of acidifying culture. Reject suspect milk (taste, smell, appearance). Adjust production parameters (time, temperature). If it is a recurrent issue, improve milk production practices or change milk supplier.</del>
Maturation with inoculation	M, C: Improper process parameters can allow growth of pathogenic bacteria	Maintain correct temperature, time and dose of cultures. Add cultures as soon as possible.  <b>Evening milking: Why added in the tank just after milking Tank's temperature adjusted at 12°C</b> ...	Experience of cheesemaker: organoleptic inspection, measurement of temperature, time and acidity development.	Adjust production parameters: time, temperature, type and dose of cultures.

If the producer doesn't use maturation without inoculation, he has to **delete** this row

The line is **kept and adapted** (detailed, ...) because it is the usual practice of this producer...

# So, the GGHP, a practical and easy to use tool?

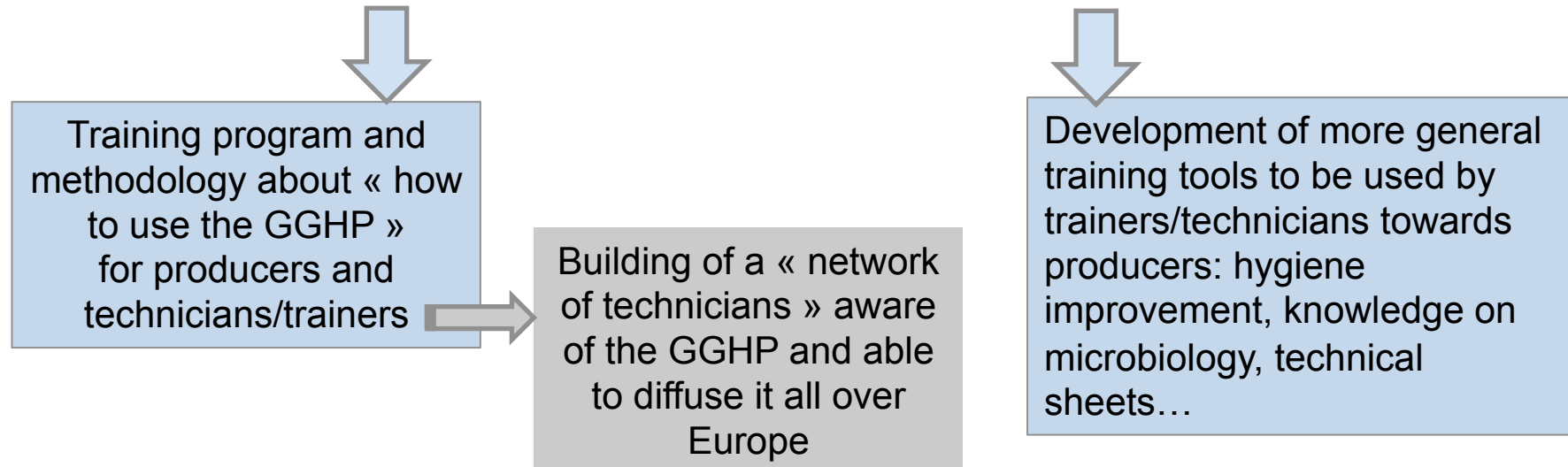
► Practical? YES ; easy to use? YES and NO...

→ need to understand what is the FSMS

→ need to “personalise” the different sheets

→ need to acquire the **words to explain** the practices...

Trainings will be very useful!  
[TEACHEESY program](#) (funded by Erasmus+)  
is in course within FACEnetwork



[www.face-network.eu](http://www.face-network.eu)



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