

#### WORKSHOP C

A BETTER USE OF THE HYGIENE AND FOOD SAFETY REGULATORY FRAMEWORK FOR SMALL FOOD PRODUCERS







# FROM HACCP TO GOOD AGRICULTURAL PRACTICES: ASSUMPTIONS AND GOALS

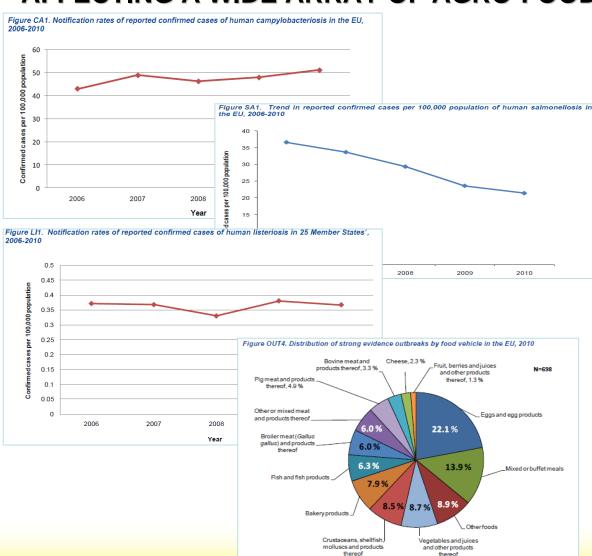
(HOW TO MAKE NASA ENGINEERS AND BRUNELLO'S WINEMAKERS MEET)

Dr. Rolando Manfredini Head of Food Safety Dept.





# FOOD RISK MANAGEMENT IN EUROPE THE EXAMPLE OF ZOONOTIC CONTAMINANT AGENTS AFFECTING A WIDE ARRAY OF AGRO-FOODS



In Europe evidence regarding Zoonotic agents prevalence and trends are not clear, as well as those regarding contaminants in general.

Most of them **are likely** to be controlled over time, with the reduction of Salmonella (EFSA; 2010). Others seem to increase (Campylobacter), but do not represent an immediate food safety/public health issue.

Good Agricultural Practices (GAP) will remain a stable feature and requirement for food safety at EU level in the next years and decades.



# The logic model: ASSUMPTIONS AND GOALS

- ✓ "PREVENTING IS BETTER THAN CURING..."
- ✓ Early intervention in the food supply chain can be the best choice to limit spreading of pathogens and contaminants. Role of farmers is fundamental in this case
- ✓ Elimination or reduction of pathogenic agents (i.e. Salmonella, Campylobacter, E. Coli o157, Lysteria) at the beginning of the food chain.
- ✓ Limiting cross contamination with pathogens from raw to readyto-eat food.
- ✓ Indirect solution to bacteria resistance, limiting the use of antibiotics and the bacteria to be treated later on (i.e. during conservation and processing or before consumption).



### **HACCP**

HOW TO AVOID GETTIN"LOST IN TRANSLATION"?

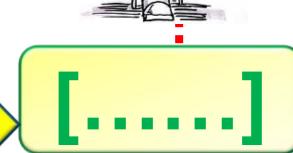


FROM ENGINEERS......
TO FOOD INDUSTRY



"ART. 7-8 Reg. 852/2004"

- ✓ FOR "REAL FARMERS"
- ✓ "ON THE FIELD"
- ✓ UNDER EVER CHANGING CONDITIONS







# The Italian agricultural sector: an OUTLOOK

- ✓ Specificity of italian agricultural productions PDO, products linked to the territories....
- ✓ "Food districts" with geo-local well accrued knowledge, relationships marked by trust and proximity, integrated food chains
- ✓ Average SAU per farm (8 hectares in 2010, increasing)
- ✓ Average Age of the farmers (only 2,5% has less than 30 years, 18,6% less than 45 years, 25.000 new farms in 2011)
- √ 90% are inidividual societies (2011)

HACCP SYSTEM (NASA), CREATED FOR DIFFERENT SITUATIONS, DOES NOT PRODUCE EXPECTED RESULTS IN THE AGRICULTURAL SECTOR

ITS EFFICACY AND ADVANTAGES ARE COMPROMISED DUE TO DIFFICULTIES IN APPLYING IT



NEED FOR
"HARD" FOOD
SAFETY
MEASURES
(i.e.
CHEMICAL,
PHYSICAL, ...)

NEED FOR
"SOFT" FOOD
SAFETY
MEASURES
(SIMPLIFIED
HACCP)







- > LONG FOOD CHAINS
- > HIGH NUMBER OF LINKS
- > 'MASS' PRODUCTION OF PRIMARY INGREDIENTS
- > RISKS OF CROSS CONTAMINATION
- > OPPORTUNISTIC
  BEHAVIORS
  /FRAUDS/CHEATING OF
  HIGH N° OF ACTORS

... do we get the same RESULT?



- ✓ LOW NUMBER OF LINKS
- ✓ LIMITED PRODUCTION OF PRIMARY INGREDIENTS
- ✓ LOW RISK OF CROSS-CONTAMINATION
- ✓ PROXIMITY CONTROL OF THE FOOD CHAINS AND REPUTATION MECHANISMS/TRUST AMONG ACTORS



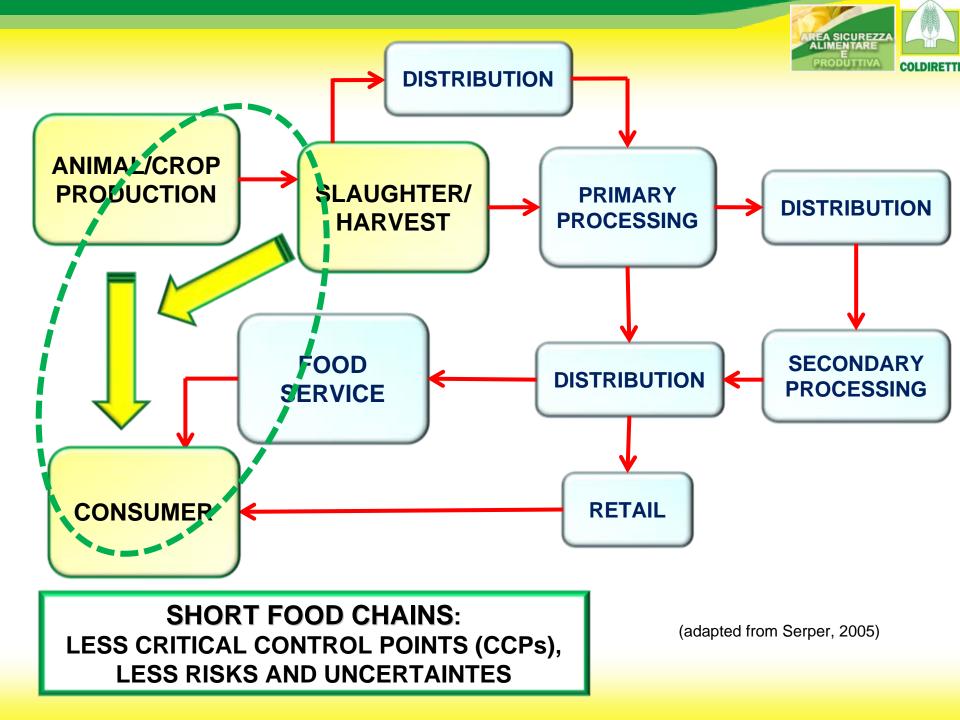
# THE GOAL IS FOOD SAFETY!!.....NOT the instruments and processes to achieve it!

THE **PARADIGM OF COMPLEXITY**: A SOLUTION TO A WELL-DEFINED PROBLEM (RISK) IS LIKELY TO CREATE UNPREDICTED PROBLEMS AT THE BEGINNING

The MORE INVASIVE IS THE SOLUTION, the MORE LIKELY THIS WILL HAPPEN

### **SOME EXAMPLES**

- •HEATING AS A MEANS OF MICROBIAL DECONTAMINATION >> FURANS, FUROSINE, ADVANCED GLYCATION ENDPRODUCTS (AGEs) ... DAMAGING EFFECTS discovered much later....
- •DDT vs. INSECTS DAMAGE (plants and crops) >> CANCER AND GENETIC DEFECTS...discovered much later ...
- •IRRADIATION OF VEGETABLES TO AVOID GERMINATION >>......discovered later ...



SAFETY...
BUT WHAT
ABOUT
QUALITY OF
FOODS?

### SO WHAT...?

QUALITY AND FOOD SAFETY



VERTICALLY
INTEGRATED FOOD
CHAIN
ONE PART CONTROLS
SPECIFICATIONS OF
THE FOOD SAFETY
REQUIREMENTS

**LONG FOOD CHAINS** 

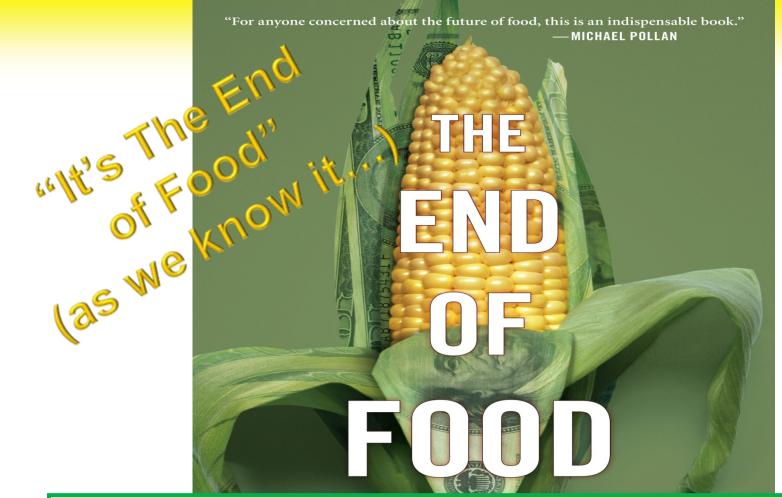
HACCP ART. 7- 8 Reg. 852/2004 SHORT FOOD
CHAIN
LIMITED NUMBER OF
PARTIES ADOPT
COLLABORATIVE
BEHAVIORS TO
ACHIEVE FOOD
SAFETY
REQUIREMENTS TO A
"Simplified World"

SHORT FOOD CHAINS

HANDBOOK OF GOOD AGRICULTURAL PRACTICES (GAP/GFP)







Long food chains have not been able to minimize a number of risks despite the heavy engineered productive processes.

Dioxins in feedingstuffs, E. Coli in sprouts, Salmonella ed MRSA in pigs, frequently linked to long food chains for the high number of links & interconnections.





# Some common misunderstandings on Farmers' commitment as in Reg. 852/2004

- ➢ GAP and GFP are not methods for zoonotic agents reduction and Farmers cannot be blamed for wider environmental problems (presence of pathogens).
- GAP and GFP can mitigate risks but cannot eliminate them
- HACCP is not the only approved solution.
- HACCP is not the only effective solution.
- Domestic consumers still have the final responsability for many known hazards (i.e. cooking raw meat) and they shall be properly informed.







### from HACCP

ART. 7-8 Reg. 852/2004

Annex I Part B Reg. 852/2004

- •Guidelines for primary production (risk mitigation)
- •Guidelines for processing (self control sectorial plans)
- Guidelines for documental management
- ✓ Adoption of a simplified HACCP system.
- ✓ Adoption of general procedures for good practices usable by farms that produce and sell directly to consumers.
- ✓ Management of self-control plans for the processing sector.
- ✓ Checking of activated procedures.
- ✓ "Non conformity" process management.



# ...A HACCP simplified through the use of a Good Agricultural Practices (GAP) Handbook

formally recognised by the Italian
Minister of Health

http://www.salute.gov.it/imgs/C\_17\_pagineAre e\_1187\_listaFile\_itemName\_6\_file.pdf





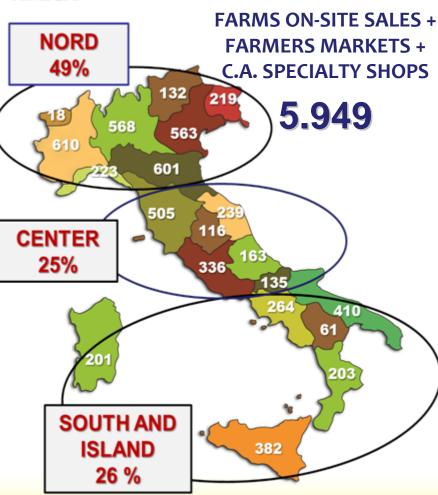
MANUALE DI CORRETTA
PRASSI OPERATIVA
PER LA RINTRACCIABILITA' E L'IGIENE
DEI PRODOTTI ALIMENTARI E DEI MANGIMI

REGOLAMENTI CE N. 178/2002, 852/2004, 853/2004, 183/2005

### PONDAZIONE CAMPAGNA AMICA



COLDIRETT



3<sup>rd</sup> April 2012

### **HANDBOOK**



### **CONSULTANT**





### The Italian GAP HANDBOOK



- ✓ Simplification allows to focus on TRULY RELEVANT critical points, identifying the most suitable pragmatic approach to managing risks "in the farm".
- ✓ Use of biological processes for the containment of contamination, without need for "technological solutions".
- ✓ Responsibility and freedom for Farmers and their consultants to adapt to the specific situation (owners and managers of the process – self-control)
- ✓ Promotion of a real risk management "culture" over risk management "rituals" (bureaucracy).

### **NEXT STEPS**





- ✓ The re-emerging interest of consumers for alternative and short food chains (direct selling, farmers markets, etc) offers the opportunity to further improve the present HACCP simplified schemes as intended by the EU legislation, and to create new ones.
- Coldiretti is taking further action to improve and update the GAP Handbook in light of the accrued experience.





- ✓ Ordinary functioning of modern long food chains can generate a sequence of errors/risks due to complexity of food production cycles. That is where the "normal incidents" take place (Perrow)
- Long food chains, due to complexity, number of interactions of biotic agents, contact materials, vectors, present a natural trade-off between FOOD SAFETY AND QUALITY of the final product: the higher the safety, the lower the quality due to processing mitigation measures
- Correct risk management procedures in small companies in short food chains can minimize food safety risks and preserve food quality of high added value agricultural systems, such as ITALY.

### THIS HAS A POSITIVE IMPACT ON:

- ✓ Lower risk probability
- ✓ Lower risk spreading
- ✓ Limited exposure of population in case of food crisis outbreak.

# ...OH, BY THE WAY... USUALLY NASA ASTRONAUTS DRINK BRUNELLO LIKE THIS!!







### manfredini@coldiretti.it

# THANK YOU FOR YOUR ATTENTION!







**Confederazione Nazionale Coldiretti** 

www.coldiretti.it