

Reducing Risks in the Agri-Food Supply Chain – Co-Recognition of Food Safety Systems or a Single Global Scheme

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Abstract

Governments and institutions have laid down safety standards for the international trade in food products; these are mainly based around the Codex principles for HACCP. Although at present standards are not fully harmonized internationally, they may be used to provide a set of core guidelines.

At the same time various sectors of the food supply chain in different regions have developed schemes to 'assure' the supply chain and eventual consumers that their products are safe. Analysis of many schemes, some of which are reported here, indicates that many of these do not fully comply with core international guidelines. Schemes that embrace these guidelines enable members to reduce the risk and hence liability resulting from a food breakdowns. Such schemes also reduce the costs of assessing food safety for the whole chain and for public regulation.

We would argue that the development of schemes that are seen to have a common standard for food safety, irrespective of country of origin, would benefit the whole food chain and consumers. This may be achieved through co-recognition of schemes or the adoption of schemes in more than one country. However, an essential pre-requisite for an international industry scheme, or schemes, is the urgent need to harmonize international standards.

A model for food safety management is outlined based mainly on the innovative work carried out in Australia in recent years in terms of the development of safe quality foods as in SQF 2000 Quality Code.

Introduction

The main force behind the development of food assurance has been, and remains, the legal requirement to demonstrate that food is safe. For example, many incidents of food safety have focussed on the UK; this has led to various legislative instruments and the establishment of the Food Standards Agency (Howells *et. al.* 1990; Baines & Davies 1999). Currently the EU is considering ways of harmonising food safety laws as outlined in the EC White Paper (COM (99) 719) including a proposal to establish an independent European Food Authority. These developments reflect earlier initiatives in Australia and New Zealand to harmonise food safety legislation and the setting up of ANZFA, the Australia, New Zealand Food Authority (ANZFA 1999). As Governments play an important role in creating the legal and policy frameworks that the industry has to operate within, and as Australia and New Zealand have addressed harmonisation of food safety in advance of the EU, this review will focus on these two regions. It is also interesting to compare these regions, as the EU is the World's largest producer, importer and exporter of food and drinks while Australia and New Zealand rely heavily on export of food products.

The food supply industry is required to operate within national and international frameworks for food safety, unfortunately these frameworks are not fully harmonised and this creates problems

for those involved in the global trade in food products. The sector of the supply chain that is exposed to potentially the greatest liability in the event of a food safety breakdown is the sector where food safety law has the greatest effect. This is generally at the consumer interface with the supply chain, in other words, at the retail stage. In response to this, food retailers have developed their own quality and safety (QS) systems to demonstrate 'due diligence' in their distribution, handling and the sale of food. The term due diligence is used here within its legal context where the protection of the customer from defective food is balanced with the right of the supplier not to be held liable for an offence they have taken all reasonable care to avoid - see Howells *et. al.* 1990. This approach to consumer protection contrasts markedly with administrations where strict liability is applied to food safety. A logical development of these retail schemes was for individual retailers or groups to examine supplier activity. As conditions of supply, retailers now require suppliers to demonstrate due diligence to meet the retailer's own QS requirements along with legal and the normal contractual requirements of supply. This process has been repeated down the supply chain with food processors and manufacturers requiring their suppliers to implement QS systems that meet their requirements and those of the retailer. The demand for food safety has progressed down supply chains at varying rates, in part depending on the length of the chain. For example, the fresh produce chain is relatively short, so producers got involved in due diligence issues at an early stage. Cereals and livestock supply chains are more complex, and many producers are only now beginning to appreciate the significance of demonstrating due diligence (Baines *et. al.* 1999).

In response to these demands from the supply chain, primary producers in a number of industry sectors and in particular regions developed their own farm assurance schemes. Such industry led schemes are prevalent in both Europe and Australia but are less well developed in the US (mainly as a result of the strong Federal regulatory and inspection systems and the use of strict liability for food safety). Although nationally recognised schemes are present, the globalisation of the food industry has raised an important concern for producers who are members of such schemes. Compliance with farm assurance makes production more expensive. It does this directly, via capital works and membership fees, as well as indirectly, through increased management costs. Do producers potentially incur greater costs than their overseas competitors who are supplying the same retail outlets? Would producers benefit from knowing how their schemes measure up to those of competing producers, or would working to a common scheme be more advantageous?

There are also related problems for processors and retailers, this is mainly associated with the cost of evaluating whether supplier quality and safety schemes meet appropriate quality and safety standards. In addition to auditing these QS systems, a significant amount of management and technical resources is taken up by the assessment of various schemes to determine what is being assured and how this is achieved – in effect an analysis of the equivalence of schemes. Would the supply chain benefit from independent evaluation of equivalence of schemes? Or would a global scheme better suit the industry?

Research Objectives

This paper develops the findings of an initial review carried out by the Royal Agricultural College for AGWEST Trade & Development to consider the equivalence of representative Australian and European assurance schemes. The research objectives of the initial study were:

- ❑ To develop a template for compliance with current international trade requirements for food safety and to assess schemes against this matrix.
- ❑ To evaluate the perceived costs and benefits to the supply chain and consumers of the current situation and to assess the potential for developing the template for use in equivalence analysis by the supply chain.
- ❑ To consider the benefits and disadvantages to international food trade and supply of developing a global scheme based on the template.

The approach taken to meeting the study objectives were:

- ❑ The development of a template based on a review of current food safety rules for international trade in agricultural commodities.
- ❑ Equivalence analysis of representative farm assurance schemes in the EU and Australia. Schemes were assessed by reference to scheme manuals and audit/verification forms and by extrapolation from previous research. Verification of findings by scheme managers and verifiers who were contacted and asked to confirm our evaluation of their schemes.
- ❑ An assessment of the value of the template for equivalence analysis and the potential for co-recognition between schemes or a single industry standard for food safety.

The full findings of the initial study form part of a commercial research contract; however, the main conclusions and sample schemes are reported here to underpin the concepts we are exploring in this paper.

International Standards for Food Safety

International standards underpinning international trade will become a key feature of the global food system. The creation and recognition of a 'harmonised' system, or the better understanding of equivalence of standards (Baines 1999) will become increasingly important. In stating this fact it is recognised that standards will evolve over time. However, at the present time knowledge and recognition of 'other peoples standards' is poor generally (Busch *et. al.* 2000). This is reflected in increasing number of disputes over barriers to more free trade, for example, hormone enhanced beef production, BST enhanced milk and the adoption of GM crop technology. In order to overcome these disputes, there is an urgent need to harmonize international standards. The relationship between the activities of two international bodies, the World Trade Organisation (WTO) and the Codex Alimentarius Commission (Codex), will have a significant impact on the development of effective and equitable policies and food safety standards for international food trade.

The Codex Alimentarius Commission was established in 1962 under the Food & Agriculture Organisation (FAO) and the World Health Organisation (WHO). It is probably the most important international body concerned with food safety standards. The main objectives of Codex are to protect the health of consumers while ensuring fair trading practices. Although Codex Standards are not compulsory, they are increasingly being embraced in national rules and guidelines and are referenced by WTO arbitration activities. Two main approaches to developing Codex standards are evident from member countries and the Codex regional committees. The first is based on scientific evidence that the product is 'safe' if it conforms to toxicological and microbiological limits set by expert committees. The second approach is more aligned to the WHO definition of human health which includes 'additional factors' such as consumer expectations and information, risk management, cultural and religious beliefs, the preservation of social and economic balances, the health and welfare of animals and protection of the environment. The implications for international trade raised by these 'other factors' are discussed in a complimentary paper (Baines & Davies 2000). This paper will focus consumer protection on the following:

- ❑ Scientific evidence that the food product is safe, and,
- ❑ Risk management in the production, distribution and sale of the food product.

In other words, the application of Hazard Analysis and Critical Control Points (HACCP) to food supplies chains (Codex 2000).

The World Trade Organisation evolved out of the GATT agreements of 1994, which also included the Sanitary and Phytosanitary (SPS) and the Technical Barriers to Trade (TBT) agreements. The SPS agreement sets the limits within which countries can produce measures on animal health and food safety of consequence to international trade. This agreement also considers that the Codex Standards are sufficient to ensure food safety and the protection of consumer health. Indeed Codex Standards are the only SPS reference for the WTO in

arbitration during trade conflicts. The TBT agreement covers regulatory areas not covered in the SPS agreement, and includes product composition or specification and labelling.

Template for Food Safety

In developing a template for a food safety system, we have built on earlier proposed models (Baines & Davies 1997; 1998) and have drawn on good practice examples from the food and other industrial sectors. In particular, we have identified the value of the ISO 9000 series for quality management systems and the Codex application of the seven principles of HACCP. The template developed and used for equivalence analysis is detailed (Figure 1).

Ref	Food Safety Management Template			
1.1	Scheme Name	Inspection Organisation <i>[where appropriate]</i>		
1.2	Scope of Scheme - Products Covered <i>[please tick]</i> Fruit and Veg [], Cereals and Grains [], Pigs [], Poultry [], Eggs [], Beverages [], Wine [], Beef/Sheep [], Milk [], Fibre [], Food Processing [], Food Distribution [], Other <i>[state.....]</i>			
1.3	Number of Producer Members in Scheme -			
1.4	Estimated % of domestic market covered by the Scheme -			
1.5	Purpose of Scheme - has the Scheme been set up to provide evidence: Of compliance with food laws and regulation yes [] no [] That the food product is safe yes [] no [] That the food product is of a stated quality yes [] no []			
	Attributes of Scheme	Yes	No	Comments
2	Does your scheme contain the following or equivalent			
2.1	Reference to Codex Alimentarius Commission	[]	[]	
2.2	Reference to Hazard Analysis & Critical Control points (HACCP)	[]	[]	
2.3	Reference to ISO Management Standards ISO9000 or ISO14000 series	[]	[]	
3	Definitions, does scheme define the following :			
3.1	Type of business covered by scheme	[]	[]	
3.2	HACCP	[]	[]	
3.3	Procedures for applying HACCP	[]	[]	
3.4	A plan for HACCP	[]	[]	
3.5	Training in HACCP or other risk assessment procedures	[]	[]	
3.6	Skilled HACCP practitioner	[]	[]	
4.1	Quality Scheme – Commitment			
4.1.1	Is owner/Director/Manager of business required to make a commitment to quality/safety in a policy statement and is this communicated to employees and consumers	[]	[]	
4.1.2	Is business required to identify who has operational responsibility for quality/safety	[]	[]	
4.1.3	Is there a training requirement for employees with operational control eg HACCP training or legal training	[]	[]	
4.2	Quality Scheme – Suppliers			
4.2.1	Is there a requirement to document the specifications of purchased products which may affect food safety	[]	[]	
4.2.2	Is there a requirement to record inspect of raw materials [inputs] in relation to safety And quality prior to use	[]	[]	
4.3	Quality Scheme – Control of Production			
4.3.1	Is HACCP, or a similar risk assessment, procedure applied to the production process and are records kept	[]	[]	
4.3.2	Are procedures in place to take corrective action if HACCP identifies breakdown in safety/quality. Are records kept	[]	[]	
4.3.3	Are raw materials, intermediate and final products handled, stored and transported to minimise risks of food safety/quality breakdown. Is this documented.	[]	[]	
4.3.4	Is the business required to ensure that food products comply with food safety regulations	[]	[]	
4.4	Quality Scheme – Inspection & Testing			
4.4.1	Is equipment used in the production process regularly calibrated to manufacturers specifications and records kept	[]	[]	
4.4.2	Are sub-standard raw materials and products removed from the process and final product.	[]	[]	
4.4.3	Are internal audits systematically carried out by suitably skilled staff	[]	[]	
4.5	Quality Scheme – Document Control & Records			
4.5.1	Is there a requirement to maintain a list of documents that describe the safety/quality scheme	[]	[]	
4.5.2	Is there a requirement to maintain records that demonstrate that the production process, inspection and testing have been carried out according to the HACCP, or similar plan.	[]	[]	
4.6	Quality Scheme – Product identification & Traceability [Tracking]			
4.6.1	Is the final product identified in such a way that it may be recalled if necessary, are records kept of identification and destination of product.	[]	[]	
4.7	External Audit, inspection or verification			
4.7.1	Is the safety/quality scheme subject to external inspection by the purchaser	[]	[]	
4.7.2	Is the safety/quality scheme subject to external inspection by an independent appointed Body	[]	[]	

Figure 1: Template used to compare existing schemes to a model system. Adapted from SQF Quality Code, AGWEST Trade & Development, WA.

This template was then applied to European and Australian primary producer schemes as well as schemes developed for suppliers to retail consortiums. Over 20 schemes have been analysed to date; however, this paper will only compare selected schemes from the fresh produce and red meat sectors plus two schemes that can potentially cover all products (Annex 1).

Conclusions

Without evaluating each scheme in detail, the following general conclusions may be made in relation to European schemes currently in operation:

- ❑ The supply chain without the direct involvement, or investment, from Government has developed UK schemes. Schemes are mainly based on producer protocols and conformance with these is assumed to address the risks to food safety. The schemes do not fully meet the guidelines for international trade, as producers are not required to evaluate the risks to food safety using HACCP or equivalent. There are plans, however, to introduce HACCP type assessments to the Assured Produce scheme.
- ❑ The European schemes evaluated generally differed from those in the UK in that HACCP, or equivalent, risk assessment and the link between safety and quality were more evident. The European schemes also differ from UK schemes in terms of the main drivers for development. There is evidence of Government support for the development of farm assurance schemes e.g. Denmark and Sweden or alternatively, existing agricultural co-operatives have undertaken development of safety and quality marks for their members e.g. France and Spain.
- ❑ The proposal by the European Commission to recast horizontal and vertical Directives on hygiene of food of plant and animal origin and the proposal to introduce systematic implementation of HACCP at all levels of the food chain, including primary production, will require all of these industry schemes to be revised. It appears that mainland European schemes are better placed to adapt to such legislative changes.

Two European retail led schemes that are applied to suppliers from more than one country were evaluated. The main conclusions drawn from these schemes were as follows:

- ❑ On November 17th 1999 a new European standard was launched for fresh produce. This standard has been developed and piloted by a group of 14 European Retailers (EUREP) and is entitled GAP 2000 (Good Agricultural Practice 2000). EUREP would like this to become the European, and eventually global, standard for the supply of fresh produce. Initial analysis of this scheme would indicate that it is very similar to the UK's Assured Produce scheme with additional social and conservation requirements. This is probably due to the fact that many of the UK retailers who were actively involved in the Assured Produce scheme are members of EUREP. GAP 2000 does not specifically reference HACCP or training in risk assessment. Suppliers must either adopt the scheme or demonstrate that their systems of assurance are equivalent to GAP 2000.
- ❑ The British Retail Consortium Scheme is a technical standard for suppliers to meet in order to supply retailers under the Retailer's own label. The majority of suppliers are involved in food processing that has a history of applying both ISO 9000 and HACCP (see Varzakas & Jukes 1997; Caswell & Henson 1997). It is therefore understandable that these aspects are included. The BRC is currently promoting their scheme as being the most appropriate European and global scheme for food retail.
- ❑ European retailers generally believe that it is a legal imperative to audit supplier activities and their schemes. They recognise that there is a significant cost to this activity. The

benefits they perceived to come from an internationally recognised safety and quality scheme included:

- ❑ Assured (minimum) level of safety and quality and a levelling of standards across product groups. Could lead to an industry driven global standard or at least a consistent standard within the EU but would be dependent on harmonization of legislation.
 - ❑ A more consistent approach to managing food safety and quality and an opportunity to provide a level playing field in relation to these attributes. It would also remove the accusation of having dual standards. Uncertain of the use of this for quality as this varies according to customer needs and perceptions.
 - ❑ A reduction in costs of managing food safety and quality systems and better traceability along the chain and better communication with suppliers.
- ❑ The main disadvantages Retailers perceived were:
- ❑ A possible lack of flexibility that may manifest itself as a lack of customer choice (in terms of quality), reduced product differentiation and difficulties in revising 'best practice' guidelines. There may also be different 'best practice' standards operating in different countries that may affect implementation.
 - ❑ Different countries may have specific requirements (for safety) which may make an international scheme difficult to implement.
 - ❑ Possible language/interpretation difficulties.
 - ❑ Concerns over who would own the scheme – this was discussed further and relates to the current politics and power bases within supply chains operating within Europe.

Australia and New Zealand have gone through a process of food safety legislation harmonization and are currently implementing changes. For example, in Australia there is a debate as to whether HACCP should be applied down to the primary producer level. Two schemes were evaluated as being indicative of food safety management:

- ❑ CattleCare is one example of a group of on farm assurance schemes (others include flock care, grain care etc) that address food safety only. Although HACCP is addressed, this is done in a similar way to the UK schemes where conformance with production protocols is assumed to reduce risks to food safety breakdowns. This group of schemes does benefit from having common modules and the opportunity for a whole farm assessment as opposed to individual enterprise assessments. Should on farm HACCP be implemented in Australia, these schemes will need to be modified, perhaps with the introduction of a HACCP guide for on farm use and on farm training in risk assessment.
- ❑ SQF 2000 has been developed to address food quality as well as food safety for a range of food products at all stages in the supply chain. It also differs from other schemes evaluated in that there is a requirement for individual business risk assessment to be carried out by trained and competent practitioners. The initial assessment of a business aims to assess whether the HACCP system in place is capable of controlling the risks specific to that business (technical assessment), subsequent surveillance is to check whether the internal audit system is operating effectively. In other words, the scheme fully meets the intended legislation in Australia and the international guidelines outlined in this paper. Producers, suppliers, retailers and consumers in are already experiencing the value of this scheme over 11 countries around the world.

Summary

This paper has explored the concept of a common food chain standard for food safety. The Australian experience, as a result of harmonizing food laws, provides a good model of what may be achieved when there is a common legal framework. In order for this to spread globally, there is a need to agree international food safety standards. Thereafter, industry led schemes should

seek to demonstrate these standards. This would then lead to co-recognition of schemes that meet these common standards and would facilitate some schemes (such as the SQF 2000 scheme) becoming fully international. We would welcome views of the model proposed in this paper from those involved in managing food safety.

References

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Annex : Sample of Schemes Assessed against Food Safety Management Template (Adapted from SQF Quality Code, AGWEST Trade & Development

Ref	Food Safety Management Template				
1.1	Scheme Name	A.P	GAP 2000	SQF 2000	BRC
1.2	Scope of Scheme - Products Covered <i>[please tick]</i>	F.P.	F.P	All	All
1.3	Number of Producer Members in Scheme -	3000	New	768	N.A.
1.4	Estimated % of domestic market covered by the Scheme	68% UK	? EU	? Global	50% Global
1.5	Purpose of Scheme - has the Scheme been set up to provide evidence: Of compliance with food laws and regulation That the food product is safe That the food product is of a stated quality	✓ ✓	✓ ✓	✓ ✓ ✓	✓ ✓ ✓
Attributes of Scheme					
2	Does your scheme contain the following or equivalent				
2.1	Reference to Codex Alimentarius Commission			✓	
2.2	Reference to Hazard Analysis & Critical Control points (HACCP)	✓	✓	✓	✓
2.3	Reference to ISO Management Standards ISO9000 or ISO14000 series			✓	✓
3	Definitions, does scheme define the following :				
3.1	Type of business covered by scheme	✓	✓	✓	✓
3.2	HACCP	✓	✓	✓	✓
3.3	Procedures for applying HACCP			✓	✓
3.4	A plan for HACCP			✓	✓
3.5	Training in HACCP or other risk assessment procedures			✓	✓
3.6	Skilled HACCP practitioner			✓	
4.1	Quality Scheme – Commitment				
4.1.1	Is owner/Director/Manager of business required to make a commitment to quality/safety in a policy statement and is this communicated to employees and consumers	✓	✓	✓	✓
4.1.2	Is business required to identify who has operational responsibility for quality/safety	✓	✓	✓	✓
4.1.3	Is there a training requirement for employees with operational control eg HACCP training or legal training	✓	✓	✓	✓
4.2	Quality Scheme – Suppliers				
4.2.1	Is there a requirement to document the specifications of purchased products which may affect food safety	✓	✓	✓	✓
4.2.2	Is there a requirement to record inspect of raw materials [inputs] in relation to safety And quality prior to use	✓	✓	✓	✓
4.3	Quality Scheme – Control of Production				
4.3.1	Is HACCP, or a similar risk assessment, procedure applied to the production process and are records kept	✓	✓	✓	✓
4.3.2	Are procedures in place to take corrective action if HACCP identifies breakdown in safety/quality. Are records kept	✓	✓	✓	✓
4.3.3	Are raw materials, intermediate and final products handled, stored and transported to minimise risks of food safety/quality breakdown. Is this documented.			✓	✓
4.3.4	Is the business required to ensure that food products comply with food safety Regulations	✓	✓	✓	✓
4.4	Quality Scheme – Inspection & Testing				
4.4.1	Is equipment used in the production process regularly calibrated to manufacturers specifications and records kept	✓	✓	✓	✓
4.4.2	Are sub-standard raw materials and products removed from the process and final product.	✓	✓	✓	✓
4.4.3	Are internal audits systematically carried out by suitably skilled staff			✓	✓
4.5	Quality Scheme – Document Control & Records				
4.5.1	Is there a requirement to maintain a list of documents that describe the safety/quality scheme	✓	✓	✓	✓
4.5.2	Is there a requirement to maintain records that demonstrate that the production process, inspection and testing have been carried out according to the HACCP, or similar plan.	✓	✓	✓	✓
4.6	Quality Scheme – Product identification & Traceability [Tracking]				
4.6.1	Is the final product identified in such a way that it may be recalled if necessary, are records kept of identification and destination of product.	✓	✓	✓	✓
4.7	External Audit, inspection or verification				
4.7.1	Is the safety/quality scheme subject to external inspection by the purchaser	✓	✓	✓	✓
4.7.2	Is the safety/quality scheme subject to external inspection by an independent appointed body	✓	✓	✓	Some
<p>Comments – A.P. = Assured Produce Scheme for Fresh Produce ; GAP 2000 = The new European Retailer led scheme for Fresh Produce entering member retail chains; SQF 2000 = Scheme for range of food products that operates in several countries; BRC = Technical standards for suppliers of food products into member retailer chains under their own labels.</p>					

Ref	Food Safety Management Template				
1.1	Scheme Name	SQB	VPC	NV	CC
1.2	Scope of Scheme - Products Covered <i>[please tick]</i>	Beef Lamb	Beef	Veal	Beef
1.3	Number of Producer Members in Scheme -	8500	110	3	?
1.4	Estimated % of domestic market covered by the Scheme	70% SCO	1% SPA	50% NL	? AUS
1.5	Purpose of Scheme - has the Scheme been set up to provide evidence: Of compliance with food laws and regulation That the food product is safe That the food product is of a stated quality	✓ ✓	✓ ✓ ✓	✓ ✓ ✓	✓ ✓
Attributes of Scheme					
2	Does your scheme contain the following or equivalent				
2.1	Reference to Codex Alimentarius Commission				
2.2	Reference to Hazard Analysis & Critical Control points (HACCP)			✓	✓
2.3	Reference to ISO Management Standards ISO9000 or ISO14000 series			✓	✓
3	Definitions, does scheme define the following :				
3.1	Type of business covered by scheme	✓	✓	✓	✓
3.2	HACCP			✓	✓
3.3	Procedures for applying HACCP			✓	
3.4	A plan for HACCP			✓	
3.5	Training in HACCP or other risk assessment procedures			✓	
3.6	Skilled HACCP practitioner	✓		✓	✓
4.1	Quality Scheme – Commitment				
4.1.1	Is owner/Director/Manager of business required to make a commitment to quality/safety in a policy statement and is this communicated to employees and consumers	✓	✓	✓	✓
4.1.2	Is business required to identify who has operational responsibility for quality/safety	✓	✓	✓	✓
4.1.3	Is there a training requirement for employees with operational control eg HACCP training or legal training		✓	✓	
4.2	Quality Scheme – Suppliers				
4.2.1	Is there a requirement to document the specifications of purchased products which may affect food safety	✓	✓	✓	✓
4.2.2	Is there a requirement to record inspect of raw materials [inputs] in relation to safety And quality prior to use	✓	✓	✓	
4.3	Quality Scheme – Control of Production				
4.3.1	Is HACCP, or a similar risk assessment, procedure applied to the production process and are records kept		✓	✓	
4.3.2	Are procedures in place to take corrective action if HACCP identifies breakdown in safety/quality. Are records kept	✓	✓	✓	
4.3.3	Are raw materials, intermediate and final products handled, stored and transported to minimise risks of food safety/quality breakdown. Is this documented.	✓	✓	✓	
4.3.4	Is the business required to ensure that food products comply with food safety Regulations	✓	✓	✓	
4.4	Quality Scheme – Inspection & Testing				
4.4.1	Is equipment used in the production process regularly calibrated to manufacturers specifications and records kept		✓	✓	✓
4.4.2	Are sub-standard raw materials and products removed from the process and final product.	✓	✓	✓	
4.4.3	Are internal audits systematically carried out by suitably skilled staff		✓	✓	
4.5	Quality Scheme – Document Control & Records				
4.5.1	Is there a requirement to maintain a list of documents that describe the safety/quality scheme	✓	✓	✓	✓
4.5.2	Is there a requirement to maintain records that demonstrate that the production process, inspection and testing have been carried out according to the HACCP, or similar plan.		✓	✓	✓
4.6	Quality Scheme – Product identification & Traceability [Tracking]				
4.6.1	Is the final product identified in such a way that it may be recalled if necessary, are records kept of identification and destination of product.	✓	✓	✓	✓
4.7	External Audit, inspection or verification				
4.7.1	Is the safety/quality scheme subject to external inspection by the purchaser	✓		✓	
4.7.2	Is the safety/quality scheme subject to external inspection by an independent appointed body	✓		✓	✓
Comments – SQB = Scotch Quality Beef & lamb Association; VPC = Vadella dels Pirineus Catalans; NV = Navobi Ekro Milkfed Veal ; CC = Cattle Care.					