In response to information provided by the competent authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.
Executive Summary

This report describes the outcome of a fact-finding mission of the Directorate-General for Health and Food Safety in the Netherlands carried out from 7 to 15 November 2017, as part of its planned work programme.

The objective of the mission was to gather information on the way and the extent to which the competent authorities take account of results of own-checks systems and third party certification schemes in organising official controls in food of animal and non-animal origin.

The competent authority started almost a decade ago to explore the possibility of synergies between private certification schemes in the hospitality sector and official controls. At the same time there were attempts to establish synergies also in other segments of the food sector. The horsemeat scandal, which surfaced at the end of 2013, accelerated efforts and has led to the establishment of the 'Food Chain Custody' initiative, which forms the basis on which synergies between third party certification schemes in the transformation sector and official controls can be exploited.

Third party certification schemes for the hospitality or the food transformation sector undergo a rigorous and thorough assessment process by the competent authority prior to being accepted to be taken into account to reduce the extent and frequency of official controls of the scheme members. The criteria against which the schemes for the transformation sector are assessed and benchmarked were established by the 'Food Confidence Taskforce' and can be accessed at Ketenborging.nl. One of the requirements to which the competent authority pays particular attention concerns the measures to eliminate predictability of controls carried out by third party certification schemes; the competent authority expects a number of audits under a scheme to be carried out unannounced. The performance of accepted schemes is monitored by the competent authority and there are measures in place for accepted schemes for the transformation sector, which aim at improving the performance of the schemes and enhancing the co-operation with the competent authority.

From the experience gained and the analysis of data collected until now, food business operators certified for one of the accepted schemes are perceived by the competent authority as better performers with a higher level of compliance with the legal requirements. As regards the accepted schemes for the transformation sector, the competent authority noted that the differences are relatively small between the three accepted schemes.

The major food retail chains have in place their own standards for their suppliers of own-label brand products, which are subject to frequent laboratory analyses for food safety and verification by means of second party audits to their suppliers.

Existing synergies in the hospitality sector have had a negligible impact for the competent authority in terms of saving resources, due to the very low number of food business operators who are currently certified under hospitality sector schemes. Exploitation of the synergies with schemes for the transformation sector though have resulted, based on the preliminary results of a pilot project implemented in 2017, in almost 30% of savings in time spent on official inspections. Considering though the time spent by the competent authority on scheme assessments, monitoring and verification of their performance, the actual net saving is probably lower. However, the introduction by the competent authority in 2018 of information technology software will increase the benefits to be achieved from the synergies and lead to increased saving of resources.
# Table of Contents

1 Introduction .................................................................................................................................................. 1
2 Objective and scope .................................................................................................................................... 1
3 Legal Basis ................................................................................................................................................... 2
4 Background ................................................................................................................................................... 2
5 Findings ......................................................................................................................................................... 4
   5.1 Existing third party assurance schemes (IFSS and PFSS) ................................................................. 4
   5.2 Synergies between PFSS, IFSS, CBs, own-checks and official controls ............................................ 7
      5.2.1 Types of synergies ......................................................................................................................... 7
         5.2.1.1 Synergies with B2C schemes of the HORECA sector .......................................................... 7
         5.2.1.2 Synergies with B2B schemes for the primary production sector ........................................... 8
         5.2.1.3 Synergies with B2B schemes for the transformation sector .................................................. 8
         5.2.1.4 Synergies with IFSS ................................................................................................................ 9
         5.2.1.5 Synergies for the monitoring of residues of plant protection products .................................. 9
      5.2.2 Cooperation arrangements and mechanisms in place for information sharing ....................... 10
         5.2.2.1 Third party certification schemes ............................................................................................ 10
         5.2.2.2 Individual firm food safety standards and own-checks systems ......................................... 10
      5.2.3 Mechanisms to ensure suitability and reliability of the information ........................................... 11
         5.2.3.1 B2C Schemes in the HORECA sector .................................................................................... 11
         5.2.3.2 B2B Schemes in the transformation sector ......................................................................... 13
   5.3 Impact of synergies ............................................................................................................................... 15
      5.3.1 Impact on planning and prioritisation of official controls ......................................................... 15
      5.3.2 Impact on food business operators and impact on compliance ................................................ 17
   5.4 Experiences gained - lessons learned ................................................................................................. 17
   5.5 Planned/proposed developments as regards potential synergies between third party assurance schemes, own-checks systems and official controls .................................................. 18
6 Overall conclusions ..................................................................................................................................... 19
7 Closing Meeting .......................................................................................................................................... 20
ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>B2B</td>
<td>Business to business</td>
</tr>
<tr>
<td>B2C</td>
<td>Business to consumers</td>
</tr>
<tr>
<td>BRC</td>
<td>Brand Reputation Compliance</td>
</tr>
<tr>
<td>CB/s</td>
<td>Private Certification Body/ies</td>
</tr>
<tr>
<td>COKZ</td>
<td>Netherlands Milk and Milk Products Control Authority (Centraal Orgaan voor Kwaliteitsaangelegenheden in de Zuivel)</td>
</tr>
<tr>
<td>DG Health and Food Safety</td>
<td>Directorate-General for Health and Food Safety of the European Commission</td>
</tr>
<tr>
<td>FBO</td>
<td>Food Business Operator</td>
</tr>
<tr>
<td>FNAO</td>
<td>Food of Non-Animal Origin</td>
</tr>
<tr>
<td>GFSI</td>
<td>Global Food Safety Initiative</td>
</tr>
<tr>
<td>HACCP</td>
<td>Hazard analysis and critical control points</td>
</tr>
<tr>
<td>HORECA</td>
<td>Hospitality, Restaurants and Catering sector</td>
</tr>
<tr>
<td>IFS</td>
<td>International Featured Standards</td>
</tr>
<tr>
<td>IFSS</td>
<td>Individual firm food safety standards</td>
</tr>
<tr>
<td>ISO</td>
<td>International Organisation for Standardisation</td>
</tr>
<tr>
<td>MANCP</td>
<td>Multi-annual national control plan</td>
</tr>
<tr>
<td>NL</td>
<td>The Netherlands</td>
</tr>
<tr>
<td>NVWA</td>
<td>Food and Consumer products Safety Authority (Nederlandse Voedsel- en Warenautoriteit)</td>
</tr>
<tr>
<td>PFSS</td>
<td>Third party certification schemes</td>
</tr>
</tbody>
</table>
1 INTRODUCTION

This fact-finding mission took place in the Netherlands (NL) from 7 to 15 November 2017. The mission formed part of the Directorate-General for Health and Food Safety (DG Health and Food Safety) planned work programme and is part of a series of fact-finding missions which will be carried out in four Member States in 2017. The mission team comprised two auditors from DG Health and Food Safety and a national expert from an EU Member State.

An opening meeting was held on 7 November with representatives from the competent authority, the Food and Consumer Products Safety Authority (Nederlandse Voedsel- en Warenautoriteit – NVWA) and representatives of the Ministry of Agriculture, Nature and Food Quality and the Ministry of Health, Welfare and Sport. At this meeting, the objective of, and itinerary for the mission were confirmed by the mission team and the information provided by the competent authority in response to the pre-mission questionnaire was discussed. Representatives from the NVWA accompanied the mission team throughout the mission.

2 OBJECTIVE AND SCOPE

The objective of this fact-finding mission was to gather information on the way and the extent to which the competent authority of NL take account of results of own-checks systems, individual firm food safety standards¹ (IFSS) and private sector food safety standards schemes (PFSS), more commonly referred to as third party certification schemes, in organising official controls on food of animal and non-animal origin. The mission sought to acquire an insight into the potential benefits the competent authorities consider obtaining, or not, by taking into account information available from IFSS, own-checks systems and PFSS. In addition, the fact-finding mission also aimed to identify good practices as well as possible problems and limitations the competent authorities encountered, affecting the level of potential synergies between the official controls systems and the third party certification schemes.

In terms of scope, the mission focused on:

a) Existing PFSS, IFSS and own-checks systems in order to establish their coverage and understand the type and amount of information available or potentially available for consideration by the competent authorities.

b) Synergies between third party assurances and own-checks systems with official controls, including:
   - co-operation arrangements in place, if any;
   - mechanisms in place to ensure the suitability and reliability of the information obtained;

¹ These are standards owned and applied by individual FBOs such as, for example, large retailers. Further information on individual firm food safety standards and also on private sector food safety standards can be found in the document "Private Food Safety Standards: Their role in food safety regulation and their impact" of the Food and Agriculture Organisation of the United Nations, accessible at: www.fao.org/docrep/016/ap236e/ap236e.pdf
- impact on the organisation of official controls, and;
- impact on the level of compliance of food business operators (FBOs).

In pursuit of this objective, the following sites were visited:

<table>
<thead>
<tr>
<th>Visits / meetings</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Competent Authorities</strong></td>
<td></td>
</tr>
<tr>
<td>Central level</td>
<td>3</td>
</tr>
<tr>
<td>Opening and Closing Meeting with representatives from NVWA and a meeting with the NVWA team performing the assessments of third party certification schemes</td>
<td></td>
</tr>
<tr>
<td>Regional/local level</td>
<td>n/a</td>
</tr>
<tr>
<td>Official controls are organised and executed from NVWA</td>
<td></td>
</tr>
<tr>
<td><strong>PFSS</strong></td>
<td></td>
</tr>
<tr>
<td>Scheme owners</td>
<td>3</td>
</tr>
<tr>
<td>One covering the business to consumers (B2C) sector and two the business to business (B2B) sector, with one of the two from the primary production sector and the other from the transformation sector.</td>
<td></td>
</tr>
<tr>
<td>Private certification bodies (CBs)</td>
<td>1</td>
</tr>
<tr>
<td><strong>FBOs</strong></td>
<td></td>
</tr>
<tr>
<td>Primary producers</td>
<td>1</td>
</tr>
<tr>
<td>For food of non-animal origin (FNAO)</td>
<td></td>
</tr>
<tr>
<td>Food establishments</td>
<td>4</td>
</tr>
<tr>
<td>Two from the Hospitality, Restaurants and Catering sector (HORECA), one for FNAO and one for food of animal origin.</td>
<td></td>
</tr>
<tr>
<td>Supermarket chains</td>
<td>1</td>
</tr>
</tbody>
</table>

3 **LEGAL BASIS**

This fact-finding mission was carried out in agreement with the competent authority.

4 **BACKGROUND**

This was the third of a series of fact-finding missions to gather information on the way and the extent to which competent authorities take account of results of own-checks systems and third-party assurance schemes in organising official controls in food of animal and non-animal origin.

The outcome of this mission series, which will include the experiences gained, any good practices identified, as well as the difficulties faced by the competent authorities which may affect the level of synergies, will be compiled in an overview report to be discussed in a workshop with all Member States.

EU consumers have growing expectations as regards the quality and safety of the food they purchase and consume.
According to a discussion paper presented and discussed at the 23rd session of the Codex Committee on food import and export inspection and certification systems, which took place in February 2017,

"Third party certification schemes were introduced by the food industry in response to business and global market demands to assure food safety outcomes, reduce supply chain risks, and differentiate products....

Third party certification schemes allow individual companies to demonstrate the integrity of their products and production systems through conformity with a standard. Such standards often largely replicate, or incorporate, a country’s national legislative requirements, or relevant internationally recognised standards...."

Some of these voluntary standards have been created by primary producer groups or by other FBOs. Others have been developed by the retail sector, in particular by large supermarket chains. In particular, the latter have an impact on their suppliers, as a result of which, more and more FBOs, including primary producers, implement these voluntary IFSS and/or become certified under a PFSS.

The idea behind the PFSS, which are voluntary, is that if an FBO follows the structured requirements laid down in these standards (which in some cases may go beyond the minimum requirements laid down in the legislation), this should provide assurance that the particular FBO produces foods with relatively high and stable levels of quality and safety.

Some of the PFSS schemes lay down requirements that raw materials and their suppliers need to fulfil in order to qualify for the production of food in a certified establishment, requirements about the production processes and the implementation of the food safety systems based on hazard analysis and critical control points (HACCP) principles, as well as requirements concerning laboratory testing of raw materials and finished goods. Participating primary producers and other FBOs, which have been certified under a third-party assurance scheme, are subject to audits and inspections carried out by CBs appointed for that purpose by the PFSS scheme owners, or the individual firm setting the IFSS.

Article 3 of Regulation (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 stipulates that Member States shall ensure that official controls are carried out regularly, on a risk basis and with appropriate frequency, so as to achieve the objectives of the Regulation. In doing so, they shall take account of amongst others, FBOs' past record of compliance with food law, the reliability of own-checks that have already been carried out and any information that might indicate non-compliance.

Furthermore, Article 10 of this Regulation states that official controls on feed and food shall include the examination of any control systems that FBOs have put in place, and the results obtained. This includes IFSS or PFSS.

2 The discussion paper on Regulatory Approaches to Third Party Certification in Food Safety, presented and discussed during the 23rd session of the Codex Committee on food import and export inspection and certification systems is accessible at http://www.fao.org/fao-who-codexalimentarius/sh-proxy/zh?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-733-23%252FWD%252FFic23_08e.pdf.
The participation of FBOs, including primary producers in an IFSS or PFSS *de facto* generates information in the form of operators’ own-checks, and of analyses or reports issued following inspections or audits carried out by the CBs to verify compliance with the IFSS or PFSS requirements, which in turn could be of value for the planning and prioritisation of official controls. This is why some Member States, with resource constraints in many competent authorities, have considered using all available information, provided it is valid and reliable, in organising and carrying out their official controls.

5 FINDINGS

5.1 EXISTING THIRD PARTY ASSURANCE SCHEMES (IFSS AND PFSS)

1. The NVWA started exploring the possibility of using information from the private sector for prioritising official controls in 2008. In the early years, the project started with three B2C schemes for the HORECA sector. The NVWA co-operated with the three schemes and, through a dynamic process of exploring and developing, they established the system currently in place.

2. The table below presents the relevant B2C schemes for the HORECA sector, which are currently present in NL. Schemes number 1 to 8 in the following table have been assessed by NVWA and accepted for supporting official controls; schemes number 9 and 10 are still in the process for assessment and acceptance by NVWA.

<table>
<thead>
<tr>
<th>Name of the scheme / Scheme owner</th>
<th>Sectors focused</th>
<th>Number of participating FBOs (July 2017)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Houwers groep zelfcontrolesysteem / Houwers Groep</td>
<td>Catering, restaurants, care institutions, retail, bakeries</td>
<td>764</td>
<td>Representing: 2.5 % of artisanal, 2.75% of catering, 0.8 % of institutions, 3 % of retail</td>
</tr>
<tr>
<td>2 Waarborg Voedselveiligheid / Sensz BV</td>
<td>Catering, restaurants</td>
<td>147</td>
<td></td>
</tr>
<tr>
<td>3 Keurmerk Voedselveiligheid / Bureau de Wit</td>
<td>Catering, restaurants, greengrocers, care institutions</td>
<td>738</td>
<td></td>
</tr>
<tr>
<td>4 Goed &amp; Groen / Kroonenburg Advies</td>
<td>Retail, restaurants</td>
<td>43</td>
<td></td>
</tr>
<tr>
<td>5 SVVW Hygiène-inspecties / Stichting Voedselveiligheidinspecties Wageningen (SVVW)</td>
<td>Bakeries</td>
<td>112</td>
<td>In total: 2.6% of B2C FBOs</td>
</tr>
<tr>
<td>6 Zekerheid in Veilig Voedsel / Eurofins Food Safety Solutions</td>
<td>Retail</td>
<td>304</td>
<td></td>
</tr>
<tr>
<td>7 Diversey Consulting Zelfcontrolesysteem / Diversey Consulting</td>
<td>Catering, restaurants, care institutions</td>
<td>64</td>
<td></td>
</tr>
<tr>
<td>8 NVWA zelfcontrolesysteem / GGD Amsterdam</td>
<td>Care institutions</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>9 Bureau voor Kwaliteitszorg / Bureau voor Kwaliteitszorg</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10 Stichting Veilig Voedsel / Stichting Veilig Voedsel</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3. The overall membership of FBOs to schemes for the HORECA sector is, with 2.6%, low. Aside from the commitment of certain FBOs and their internal policy to produce and sell high quality safe food, which were the main drivers for their decision to participate to a
B2C scheme, there are no other incentives to encourage FBOs to participate to such schemes.

4. The mission team noted that the following facts discourage FBOs to apply for membership to B2C schemes:

   a. The particular certification does not provide yet to the FBOs any advantages for market access.

   b. The cost the FBOs are asked to bear for the scheme audits which take place twice a year, is considered too high, compared to the cost for official controls, which are free of charge and due to their risk-based prioritisation it could take several years for a FBO to be selected for inspection.

   c. The publishing by NVWA of FBOs’ performance and compliance in form of labels on the basis of the overall score achieved during official controls or controls carried out by the schemes, poses a disadvantage for the schemes as the green label is granted to scheme members only if they score above 80% during a scheme audit, whereas a non-certified FBO obtains the same colour following an official control even if it scored between 60% and 80% (see paragraph 56).³

5. NVWA started working on ideas on synergies with B2B schemes for the transformation sector around 2010. The horse meat scandal in 2013 triggered an acceleration in the process of exploring by NVWA, of possibilities for co-operation and synergies with B2B schemes (see section 5.2). The table below presents the B2B schemes accepted or in the process of being accepted in NL. Only three schemes (numbers 1 to 3 below) are currently accepted by NVWA for supporting official controls. A further four schemes (numbers 4 to 7 below) of which three are for the primary production sector, are currently in the process of being assessed by NVWA.

<table>
<thead>
<tr>
<th>Name of the scheme</th>
<th>Scheme owner</th>
<th>Certified FBOs (July 2017)</th>
<th>Sector</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 FSSC 22000 (version 4.0)</td>
<td>Stichting Certificatie Voedselveiligheid</td>
<td>618</td>
<td>Food manufacturers, traders</td>
</tr>
<tr>
<td>2 IFS Food Standard (version 6)</td>
<td>International Featured Standards (IFS)</td>
<td>787</td>
<td>Food manufacturers, traders</td>
</tr>
<tr>
<td>3 BRC Global Standard for Food Safety (issue 7)</td>
<td>Brand Reputation Compliance (BRC) Global Standards</td>
<td>866</td>
<td>Food manufacturers, traders</td>
</tr>
<tr>
<td>4 Riskplaza</td>
<td>Stichting Riskplaza</td>
<td>92</td>
<td>Food manufacturers, traders</td>
</tr>
<tr>
<td>5 GlobalG.A.P Integrated Farm Assurance Standard (IFA), Crops certification</td>
<td>GlobalG.A.P</td>
<td>3600</td>
<td>Primary production</td>
</tr>
<tr>
<td>6 SKV</td>
<td>Stichting Kwaliteitsgarantie Vleeskalversector</td>
<td>1857</td>
<td>Primary production</td>
</tr>
<tr>
<td>7 IKB Nederland Varkens</td>
<td>IKB Nederland Varken</td>
<td>1850</td>
<td>Primary production</td>
</tr>
</tbody>
</table>

³ In their response to the draft report the CA explained that at present the incentive is limited because the publication of data is geared only to lunchrooms and HORECA in three municipalities. As a result, only a small number of participating operators benefit. The biggest step can be made by publishing everything in due course. ⁴ Formerly known as British Retail Consortium.
6. The three B2B schemes for the transformation sector which are accepted by NVWA for supporting official controls are recognised by the Global Food Safety Initiative (GFSI).\(^5\)

7. According to NVWA, over 90% of the food manufacturers are certified against one or more of the accepted B2B schemes for the transformation sector (FSSC 22000, IFS and/or BRC).

8. In the primary production sector for FNAO, according to FBOs met, the GlobalG.A.P Integrated Farm Assurance Standard is almost a pre-requisite for all primary producers who want to supply their products to retailers or other FBOs certified for one of the three accepted B2B schemes for the transformation sector. According to a scheme representative met, more than 90% of the farmers in NL are certified for this standard.

9. In one large retail chain visited, the FBO explained that it is a basic requirement that all their suppliers are certified for at least one of the GFSI recognised schemes to be accepted for supplying their products to this retailer.

10. As regards FBOs active in other sectors such as storage, transportation or brokerage though, the NVWA estimates that less than 10% of them are certified.

11. In addition to the B2B and B2C schemes listed in the tables above (see paragraphs 2 and 3) large food retail chains have put in place their own IFSS covering in particular products marketed under their own-label brands. For these products, the retailers define their specifications which they verify at their suppliers by means of audits, inspections and sampling.

12. According to a FBO and to representatives of a scheme met during the mission, the IFSS put in place by large retail chains do not contribute much to increasing the level of food safety as compared to the contribution of the GFSI recognised schemes. As stated, the IFSS introduce specific requirements beyond the requirements of the schemes in order for the retailers to obtain advantage over their competitors in marketing their products. The scope of these IFSS often includes additional requirements e.g. on animal welfare, use of veterinary medicinal products or use of plant protection products. As regards the latter, a FBO met stated that the requirements posed by the different retailers contradict each other. For instance one retailer allows the use of a plant protection product while another retailer prohibits the same. According to the FBO, with the additional and contradictory requirements the retailers enforce as regards the plant protection products, it is almost impossible to be able to supply produce to more than one big retail chain, unless you produce entirely organic products.

13. The B2C schemes for the HORECA sector are national schemes which do not use any certification body to perform the controls to their scheme members; audits, inspections and sampling are carried out by auditors of these schemes. One of the schemes visited used exclusively auditors permanently employed by the scheme.

14. For the B2B schemes, which are the ones using certification bodies (CBs) for auditing, inspection and certification of members, NVWA considers the scheme owners rather than the CBs, as exclusively responsible for the performance of the entire scheme. This includes amongst others the authorisation of the CBs and the maintenance of an up-to-date list of the authorised CBs. The NVWA does not seek direct contact with the CBs and does not exercise supervision over them or assess their performance as this is considered a task for the scheme and its integrity programme. An integrity programme consists of

---

different measures put in place by the scheme owners in order to verify the level of performance of CBs and individual auditors and their adherence to the requirements of the scheme, aimed at harmonising the approach of the CBs and ensuring the validity and reliability of their assessments.

15. According to the list of CBs provided by NVWA in the response to the pre-mission questionnaire, there are currently 31 CBs active in NL, out of which 12 are based in NL, seven are based in the United Kingdom, five in Germany, three in Italy, two in Denmark, and one in Belgium and Spain.

16. The PFSS met required CBs to be accredited for ISO 17021 with the standard of the schemes included in the scope of the accreditation.

17. The mission team noted that the FBOs are free to choose the CB of their preference for auditing and certification for a particular scheme, provided that the CB is authorised by that scheme. In one FBO visited it was explained that several producers established a trading association for their products, which negotiates the prices for auditing and certification of its members for the different schemes. By doing so as a group, the FBO explained, the members of the association can obtain lower fees for the audits by a CB than they would achieve on an individual basis.

Conclusions on existing third party assurance schemes

18. There are several B2B third party certification schemes in the Netherlands for the primary production sector and the transformation sector, as well as B2C schemes for the HORECA sector.

19. The membership of FBOs to B2B schemes is high reaching almost 90% percent of the FBOs being certified for at least one scheme.

20. In the B2C schemes for the HORECA sector the FBO membership is very low as there are currently no incentives or perceived advantages an FBO could gain from such a membership, other than pursuing the own policies and commitments for high level performance in food safety.

5.2 Synergies between PFSS, IFSS, CBs, own-checks and official controls

5.2.1 Types of synergies

21. In relation to synergies of official controls with third party certification schemes, NVWA has arrangements in place for synergies with B2C schemes for HORECA sector, B2B schemes for the transformation sector and IFSS for the primary production of milk and eggs.

22. NVWA started investigating the possibility to establish synergies with B2C schemes in 2008 with three B2C schemes involved in the development. The fact that B2C schemes inspect their member FBOs twice a year provided NVWA additional reasons for exploring the possibility of synergies with these schemes.

---

6 In their response to the draft report the CA provided the following explanation: 2.6% of all B2C operators are members of one of the systems. Set against the inspection pressure imposed by the NVWA, as a result of which, on average, 20,000 operators are visited each year (not necessarily 20,000 different operators each year), the participating operators ensure there is 10% more supervision.
23. Meanwhile, eight B2C schemes are currently accepted by NVWA for the purpose of supporting official controls.

24. FBOs participating in one of the eight NVWA assessed and accepted B2C schemes and included on the list communicated to NVWA on a monthly basis, are not taken into account by NVWA for planning and prioritisation of official controls. These FBOs may be subject to verification inspections by NVWA aimed at assessing the performance of the accepted schemes.

5.2.1.2 Synergies with B2B schemes for the primary production sector

25. According to NVWA, synergies in the primary production sector are in place in the dairy and the egg production sectors (see section 5.2.1.4), however, these are not related to participation of the FBOs in a third party certification scheme.

26. In the primary production sector for meat and FNAO (crops), NVWA carries out official controls only in case of complaints or incidents. Regular official controls initially take place after the level of the slaughterhouse (for meat) or at first purchaser level in the case of FNAO.

27. Due to the fact that more than 90% of the farmers are members to a GFSI recognised scheme for primary production (see paragraph 8), which is, according also to farmers met, considered a basic requirement for gaining market access for their agricultural produce, it means that these FNAO producers are at least subject to controls carried out by the schemes.

28. According to NVWA and information available on the 'Food Chain Custody' website www.ketenborging.nl, the GlobalG.A.P scheme is currently being assessed by NVWA for acceptance and listing.

5.2.1.3 Synergies with B2B schemes for the transformation sector

29. In 2012, as a result of the early efforts for establishing ways to exploit such synergies with B2B schemes (see paragraph 5), the NVWA reduced the frequency of inspections to FBOs (other than slaughterhouses) certified under a third party certification scheme to 50%. FBOs were subject to one inspection every two years and one audit every three years or four years depending on whether the FBO handled and processed meat or not. The audit and inspection frequency for slaughterhouses remained unchanged, namely at least one inspection per year and an audit every three years.

30. The horsemeat scandal of 2013 was the trigger for the Dutch government to take action for enhancing the trust of consumers in the food production chain. After the scandal surfaced in 2013, the Dutch Minister of Health, Welfare and Sport and the Dutch State Secretary for Economic Affairs established the Food-Trust Taskforce, which was assigned with the task of preparing and initiating an action plan to help regain the trust of consumers in the food chain.

31. One of the actions proposed by the Taskforce was the creation in 2014 of the 'Food Chain Custody' initiative (hereinafter: Ketenborging.nl). The Taskforce and the industry acknowledged that both public and private safeguarding of food safety and integrity are

---

7 Ketenborging.nl was launched in 2014 following a proposal of the Food Confidence Task Force established by the Dutch Minister of Health, Welfare and Sport and the Dutch State Secretary for Economic Affairs after the horsemeat scandal in 2013.
crucial in ensuring food safety and recognised the important role private quality schemes could play to that end. The *Ketenborging.nl* website, which is run and maintained by an independent foundation, includes information about the status of the different B2B schemes which have applied for acceptance by NVWA as well as the status of their application. The website also includes the criteria against which the NVWA assesses the B2B schemes in order to accept them for the purpose of adapted supervision. *Ketenborging.nl* adapts the list of schemes and their status when asked to do so by NVWA.

32. At the end of 2016, the first three B2B schemes passed the NVWA’s assessment procedure and were published by *ketenborging.nl*. These systems are also GFSI recognised.

33. The way the synergies are exploited is the subject of a project to be implemented throughout 2017. The decision on how the adapted supervision will look in the future will depend on the outcome of this project (for further details see section 5.3.1).

5.2.1.4  *Synergies with IFSS*

34. According to information provided by NVWA, the Netherlands Milk and Milk Products Control Authority (*Centraal Orgaan voor Kwaliteitsaangelegenheden in de Zuivel - COKZ*) and the Netherlands Egg Control Authority (*Nederlandse Controle Autoriteit Eieren – NCAE*) take into account the fact that certain primary producers are authorised suppliers of raw materials to large FBOs with their own food safety standards in order to amend the frequency of official controls on food hygiene.

35. NVWA has not explored yet the possibility of synergies with IFSS of large food retail chains. As noted by the mission team during a visit to one food retail chain, such FBOs who are implementing their own IFSS can be a valuable source of information for the competent authorities, in particular in relation to laboratory analyses of food products along the chain. The mission team noted that the retail chain visited for instance, carried out more than 2,000 laboratory analyses in 2016 for food safety (residues, contaminants and microbiological tests) and about 60 second party audits to their suppliers. Access to this information could allow the competent authority to better target and prioritise inspection and sampling activities.

5.2.1.5  *Synergies for the monitoring of residues of plant protection products*

36. Several associations of primary producers of FNAO established together an independent organisation (*Food Compass*) to organise and run the residue monitoring system for its associated members. The concentrating of sampling under one umbrella allows for negotiating with the laboratories lower prices per sample tested, providing thus the associated members with a cost-effective residue monitoring service.

37. Aside from sampling, *Food Compass* runs and maintains the database where all laboratory analysis results for residues monitoring are recorded. This database is shared also with the NVWA, which records therein the results of the official samples for residue monitoring.

38. As explained to the mission team, full access to the details for each particular sample are only granted to the owner of the sample, however, all users (both NVWA and Food
Compass) have access to anonymised data from the database that allow them to analyse trends and improve the focus for risk-based sampling.

**Conclusions on types of synergies**

39. There are synergies exploited in different sectors and at different stages of the food production chain. The NVWA started almost a decade ago exploring the possibilities of synergies between official controls and controls carried out by the private sector. The strongest impulse however that triggered the exploring of synergies with third party certification schemes for the transformation sector was provided by the horsemeat scandal.

40. The establishment by NVWA and the private sector of a common database for the residue monitoring in FNAO creates a win-win situation for all parties involved. The farmers can obtain lower prices for the laboratory analyses and the competent authority and the private sector can avail of a larger pool of information for more informed risk assessments and targeting of sampling.

### 5.2.2 Cooperation arrangements and mechanisms in place for information sharing

#### 5.2.2.1 Third party certification schemes

41. There are arrangements in place that B2C schemes communicate to NVWA on a monthly basis a list with the FBOs participating in the scheme. As a pre-condition that NVWA requires, is that such a scheme should be in a position, if requested, to communicate to NVWA control related data for the listed FBOs. According to information provided by one scheme visited, FBOs participating in the scheme are required to sign an agreement with the scheme owner that they agree with the sharing with NVWA of information gathered during the scheme's controls. According to the scheme owner and the NVWA, FBOs who do not consent to such a sharing of information are not included in the list communicated to NVWA even though they might be certified. NVWA takes into account for reduction of official controls only FBOs included by the schemes on the list.

42. As part of the scheme assessment process of B2B schemes for the transformation sector, NVWA agreed with the accepted schemes the contents of a contract to be signed both by the schemes and NVWA laying down the obligations of each party as regards information sharing.

43. According to NVWA, no contracts have been signed yet with B2B schemes. As explained to the mission team, NVWA uses and assesses for the time being only publicly available and aggregated anonymised data (meta-data) for which no contract is required. Should additional data be required the agreed contracts will be signed.

#### 5.2.2.2 Individual firm food safety standards and own-checks systems

44. NVWA has no arrangements in place for information sharing with any IFSS of large retail chains.
45. The retail chain visited explained that they would have no reservations in sharing information with NVWA, if this is so agreed with the NVWA, because the added value for all would be the enhancement of food safety along the chain.

**Conclusions on cooperation arrangements and mechanisms in place for information sharing**

46. There are formalised arrangements in place for communication and information sharing with PFSS for the HORECA and transformation sectors, currently accepted by NVWA for adapted supervision.

47. FBOs in the HORECA sector are expected to give their consent to the scheme owner for sharing of information with NVWA whenever required. Refusal of consent by the FBO results in its exclusion from the list of certified FBOs communicated by the scheme to NVWA on a monthly basis.

48. NVWA has reached agreement with the schemes in the transformation sector about the type of information to be communicated in both directions between the parties. For the time being though, no information sharing contracts have been signed as currently only publicly available information and anonymised metadata are exchanged.

**5.2.3 Mechanisms to ensure suitability and reliability of the information**

5.2.3.1  **B2C Schemes in the HORECA sector**

49. NVWA has put in place an assessment procedure for the schemes aiming to ensure that accepted schemes deliver reliable results, which can be taken into account by NVWA.

50. The schemes are expected to be committed to being accepted by NVWA for their performance. It is therefore up to a scheme to decide whether to apply for assessment and recognition by NVWA or not.

51. Following an application by a scheme for acceptance by NVWA and prior to its acceptance, there is a thorough assessment procedure the schemes must go through.

52. The procedure starts with NVWA assessing amongst others the independence of the scheme, the standard itself, which in the case of the B2C schemes for the HORECA sector must reflect the relevant national guide of good hygiene practice and the frequency of controls foreseen in the scheme and whether these are unannounced or not. NVWA also assesses whether a scheme considers certain requirements as of paramount importance (so-called "knock-out questions"). Deviations and non-compliances of a FBO to "knock-out" questions immediately lead to a score of below 80% but the inspection is nevertheless completed. In case of certified FBOs, failing a "knock-out question" results to suspension or withdrawal of the certificate; for non-certified FBOs the audit is considered as "failed".

53. The next step of the assessment process consists in the evaluation "in-the-field" of the scheme. NVWA requires the files for 40 FBOs, which the scheme owners consider are to at least 80% compliant with the scheme requirements. The results are compared with the results obtained in previous NVWA inspections. To that end, the NVWA looks at the data in its system from the previous year. If discrepancies are found NVWA discusses the issue with the scheme. If the issue is resolved or no discrepancies were found, the assessment progresses to the next stage, which consists of a headquarters' audit. With a
successful outcome of the headquarters’ audit the scheme is accepted and published on the list of the NVWA accepted schemes.

54. NVWA has also put a system in place to monitor and verify the performance of the accepted B2C schemes of the HORECA sector. This consist of:

   a. Random verification inspections of certified FBOs. For schemes with more than 100 members, 26 certified FBOs are inspected and results of the official control are compared to the scheme audits.

   b. Administrative controls consisting of checking for ten FBOs all audit reports produced by the scheme over the previous two years.

   c. Re-auditing of the schemes' headquarters.

   There is no set timeframe for completion of the above-mentioned verification procedures.

55. NVWA has also put in place criteria for deciding on the eligibility for listing of certified FBOs by the scheme, thereby excluding these FBOs from the selection pool for official controls. These measures are aimed at ensuring that the listing of certified FBOs would provide NVWA with adequate guarantees in relation to their performance and compliance.

   a. For the schemes, the FBOs must obtain during the scheme audits an overall score of 80%, which is the pass mark the NVWA requires from the schemes. According to information provided by NVWA, this raising of the bar for the schemes aims at ensuring that even in the case where performance of the scheme or the certified FBO is not the best, there would still be enough safety margin for an FBO to avoid the state of 'fail'. In the case of official controls an FBO fails if the overall score achieved is below 60%.

   b. FBOs to be listed and communicated to NVWA must obtain a score of at least 80% during two consecutive scheme audits. According to NVWA, the reason for requiring a pass mark of over 80% during two consecutive audits is to minimise the possibility of a so-called yo-yo effect, where the FBOs take short-term measures which they cannot sustain to pass the audit, resulting thus in failure during the subsequent audit.

   c. Once FBOs have achieved this and have been listed, they are allowed to score below 80% (but above 60% which is the pass mark for NVWA official inspections) only once, in which case they are assigned a warning from the scheme. If they score below 80% for a second consecutive audit, FBOs are delisted and have to restart the cycle for listing from the beginning. FBOs who are delisted, return back to the NVWA pool of FBOs from which the risk-based sample for official inspections is chosen.

56. The NVWA has put in place an accessible system for publishing inspection data for FBOs in the HORECA sector. The system is accessible through the internet. There are five colour labels FBOs can be assigned (white, red, green, orange and yellow) as follows:

   a. A white label means that there are no recent inspection data available for the particular FBOs.

   b. A red label means that the NVWA has closed the FBO in whole or in part or suspended its operations on account of serious non-compliances.

---

8 In their response to the draft report the CA explained that in the HORECA sector, this means that the particular FBOs have not been inspected during the past three years.
c. A green label is granted by NVWA to an FBO if the overall official control result was above 60%. The same label can be granted to a FBO certified and listed by an accepted B2C scheme only if the overall performance score achieved is above 80%.

d. An orange label means that more serious non-compliances were found and NVWA placed an FBO under increased monitoring aimed to improve the situation. In cases where the FBOs do not improve, the orange label turns to red.

e. If the score of a participating FBO is between 60% and 80%, then the FBO is assigned a yellow label (see paragraph 55.c). The mission team noted that some FBOs met were frustrated about the unequal treatment they were subject to. This is because they could neither understand nor explain to others why their establishments had been labelled yellow whereas at the same time another establishment which was not part of a B2C scheme and was only subject to official controls by NVWA with an even lower overall score appeared with a green label. The mission team noted that this point might be also one of the reasons, amongst others, explaining the low participation rates in B2C schemes for the HORECA sector.

57. The schemes from their side have introduced measures to ensure that their results are reliable and that the auditors perform within certain acceptable limits. In a scheme visited during the mission, these measures consist of regular training of the auditors with a gradual introduction to independent auditing following a number of witness audits by senior experienced auditors of the scheme. In addition, the scheme organises regular harmonisation meetings where particular cases are discussed and experiences are shared between auditors. As explained to the mission team, all reports drafted by the auditors are checked for completeness and correctness before they are released.

58. The mission team noted that the B2C schemes for the HORECA sector did not use external CBs for carrying out the audits but used instead 'in-house' auditors.

5.2.3.2 B2B Schemes in the transformation sector

59. The mission team noted that NVWA has put in place an assessment procedure for the schemes aiming to ensure that accepted schemes deliver reliable results, which can be taken into account by NVWA.

60. As mentioned (see paragraph 31), the NVWA together with the industry have established criteria, which the B2B schemes need to fulfil in order to be accepted for synergies with official controls.

61. Schemes seeking acceptance by NVWA must apply to NVWA for the assessment against the criteria laid down in Ketenborging.nl.

62. The mission team noted that the entire assessment takes almost two years to complete.

63. The assessment process starts with the application by a scheme, which must also submit to NVWA a self-assessment. With this, the scheme owners are expected to explain their motivation for applying for acceptance and their expectations from this cooperation. They are also expected to provide a mapping of the standard’s requirements against the legal requirements.

64. Once the self-assessment is submitted and accepted by NVWA, a desk study is carried out to assess the scheme's compliance with the criteria laid down in Ketenborging.nl. One of the criteria the schemes must comply with deals with the predictability of the scheme
audits. NVWA requires the schemes to have at least a minimum number of unannounced audits as part of the requirements of the scheme in order to eliminate predictability of the audits thus preventing FBOs from taking temporary measures shortly before an expected audit only to succeed and then fall back to unacceptable conditions until the next audit. With unannounced audits FBOs are considered more likely to maintain the general hygiene conditions on a daily basis.

65. The next step in the assessment consists in the comparison of a number of FBO audit reports prepared by the scheme, with data and reports of NVWA. The number of FBO records to be compared has been fixed as the square root of the total number of FBOs who are members of the specific scheme in NL.

66. The NVWA then assesses the influence of the scheme on the performance and compliance of the FBOs with the legal requirements and evaluates the strengths and the positive elements of the scheme as well as the potential weaknesses and negative elements thereof.

67. On the basis of the above-mentioned steps and the evaluation, the NVWA issues an initial improvement plan, which is transmitted to the scheme owner with a request to take measures to address elements of the scheme, which NVWA considers could be refined. Schemes successfully completing the above process are then listed on the Ketenborging.nl website as being accepted by NVWA.

68. The mission team noted that the performance of the accepted schemes is subject to annual review by NVWA as part of the annual improvement cycle for the schemes. This is carried out through either evaluation of audit reports or verification inspections by NVWA. The outcome of these annual re-assessments is a new improvement plan and a meeting with the scheme to discuss and analyse the results and agree the actions to be taken.

69. According to information provided to the mission team by the schemes visited, the schemes have also put in place measures to ensure the reliability of the results of the audits carried out for certifications for the schemes. The mission team noted that these measures are amongst the criteria laid down for the schemes on Ketenborging.nl and are thus also subject to assessment and verification by NVWA. One of the basic requirements the schemes require from the CBs is that the latter are accredited to ISO17021 – 'Conformity assessment -- Requirements for bodies providing audit and certification of management systems' with the relevant standard included in the scope of the accreditation, which adds an additional layer of confidence as the CBs and their compliance with the standards' requirements are subject to audits by the accreditation bodies.

70. The measures put in place by the schemes consist of an integrity programme with different elements for verifying the performance of the CBs authorised to carry out certification audits. The elements included consist amongst others of:

   a. Defining the qualification requirements for the auditors and the training curriculum that they must follow before being authorised to carry out scheme audits.

   b. Organising at least on an annual basis the so called 'harmonisation days' aiming to promote a harmonised approach by the auditors. Participation to these meetings is mandatory for all authorised scheme auditors.

   c. Witness audits where scheme senior auditors accompany and observe the work of CB auditors while auditing FBOs.

   d. Assessment of audit reports.
Analysis of statistics for every auditor in order to identify trends in relation to the performance of the audits (e.g. systematic focus on particular issues, comparable findings in different establishments).

Headquarter audits to the CBs where the scheme owner verifies amongst other compliance of the CB with scheme requirements, handling and follow-up of non-compliances, following of certification procedures, training records for auditors etc.

The mission team noted that the CB visited has also put in place an internal quality and integrity programme to ensure the reliability of the results of the audits carried out by its auditors.

**Conclusions on mechanisms to ensure suitability and reliability of the information**

| 72. | The NVWA and the schemes accepted by them have put a number of measures in place to ensure the reliability of information obtained from the controls of these private schemes, both those for the HORECA sector as well as the B2B schemes for the transformation sector. These measures include amongst others, establishment of criteria for acceptance, benchmarking against the criteria and assessment of performance of the schemes, both at the initial assessment stage as well as on annual basis. In addition there are integrity programmes in place with different elements for verifying the reliability of the results and the performance of the private auditors. |
| 73. | The raising of the 'bar' for B2C schemes and FBOs in the HORECA sector (80% score instead of 60% for non-certified FBOs) is a measure which provides NVWA with additional confidence that even if any issues might have been overlooked by the schemes, certified FBOs will at least be as good as an FBO scoring 60%. However, this high threshold could explain the reluctance of FBOs to participate to such schemes. |
| 74. | The annual evaluation of the performance of accepted schemes for the transformation sector as part of the improvement cycle introduced by NVWA is a good practice which helps year by year to improve the co-operation and optimise the synergies and improve the standards achieved. |

### 5.3 Impact of synergies

**5.3.1 Impact on planning and prioritisation of official controls**

As already mentioned in section 5.2.1.1, FBOs certified for one of the accepted B2C schemes for the HORECA sector are no longer included in the risk analysis for prioritisation of the regular official controls. These FBOs are only subject to verification inspections carried out at random intervals, aimed at verifying the performance of the schemes concerned.

The NVWA decided to exclude certified FBOs from the official controls, given the high number of FBOs in the HORECA sector, as a measure for more effective targeting of limited resources for risk-based official controls.
77. The mission team noted, however, that due to the very low number (less than three percent) of FBOs certified for one of the NVWA accepted B2C schemes for the HORECA sector, the impact of the synergies on planning and prioritisation of official controls and saving of resources is minimal.

78. In the transformation sector, following the assessment and acceptance of three B2B schemes, the NVWA designed and implemented in 2017 a project aimed at evaluating different options for adapted supervision of the certified FBOs. The NVWA included in the project industrial scale FBOs certified for one of the three accepted schemes, who were not subject to any complaint investigation or visited in connection with specific country requirements (exports) and did not have a history of non-compliance.

79. The options for adapted supervision evaluated by the project concerned the reduction of frequency, scope and duration of the inspections. The audit frequencies of FBOs remained unchanged. On the basis of these options the following instructions were given to the NVWA inspectors:

   a. Reduce the frequency of inspections by 50%, namely one inspection every three years (instead of every two years);

   b. Exclude the basic requirements and risk identification from the scope of the inspections;

   c. Reduce the duration of inspection by 50%, namely from eight hours to a maximum of up to four hours per inspection.

   d. In cases where minor non-compliances are detected, inspectors should not intervene but only notify the findings to the NVWA functional mailbox for reporting of non-compliances.

   e. Where major non-compliances are identified, inspectors should intervene as usual during official controls.

80. Based on the preliminary results from the first six months of the implementation of the project, the NVWA estimated that the synergies, as implemented with the project, resulted to a saving of 982 hours (30% saving of time) of inspections compared to the hours spent for inspections without the adapted supervision on the basis of certification to recognised schemes. However, this figure does not take into account the time spent in the office for assessing the schemes and managing/evaluating the data obtained. The mission team noted that currently a lot of time is spent on these activities due to the fact that relevant computer applications supporting these projects are in the process of being developed. NVWA expects the relevant support software to be in place by the end of 2018.

81. According to information provided by NVWA, the intention of the team dealing with the development of the synergies with the B2B schemes in the transformation sector is to propose to the NVWA board of management that adapted supervision for certified FBOs should consist in a further reduction in inspection frequency (beyond the frequency used

---

9 In their response to the draft report the CA explained that although a small percentage is involved in terms of the population, the participating operators provide an additional 10% information on compliance. 2,000 participating operators out of 20,000 (not necessarily 20,000 different operators) are visited annually by the NVWA.
for the project. However, the scope of the inspections should cover again the basic requirements and their duration should increase to the time normally spent for all FBOs (approx. eight hours per inspection).

82. In the dairy sector, COKZ inspects once every 100 years (1%) the milk producing farms supplying the big dairy FBOs with an own IFSS. About 90% of milk producing farms supply such dairy establishments. The rest of the farms, namely those not supplying their milk to FBOs with an own IFSS (10% of the dairy farms in NL) are inspected once a year.

83. In the egg sector, NCAE inspects egg laying farms which supply their eggs to FBOs with an own IFSS once every three years, whereas the rest of the egg laying farms are inspected every year.

5.3.2 **Impact on food business operators and impact on compliance**

84. According to NVWA and based on the experience gained from the synergies with B2C schemes for the HORECA sector and the preliminary results of the pilot project for synergies with B2B schemes for the transformation sector, certified FBOs show overall a better level of compliance with the EU food hygiene regulations than those not certified.

85. The mission team noted that for certified FBOs in the HORECA sector the fact that regular official controls are no longer carried out by NVWA does not result in a significant reduction of the burden because official controls are risk-based and for some FBOs it could take years until they are subject to an official control.

86. Taking into account the intention of NVWA to reduce the frequency of official controls to certified FBOs of the transformation sector, the mission team noted that this will result in some reduction of the burden imposed on FBOs by the official controls.

**Conclusions on impact of synergies**

87. Based on the assessments and evaluations carried out by NVWA in relation to performance of the schemes and the effects their membership has on FBOs, the NVWA consider that certified FBOs show overall a better level of compliance with the legal requirements on food hygiene.

88. Synergies between official controls and third party certification schemes can in certain cases, notably certified FBOs of the transformation sector, have an impact on planning and prioritisation of official controls and on the burden of official controls for FBOs.

5.4 **EXPERIENCES GAINED - LESSONS LEARNED**

89. Following the implementation of the project on adapted supervision in certified FBOs in the transformation sector, the NVWA identified that any form of adapted supervision, other than a reduction of frequency of official controls (e.g. reduction of the scope and/or

---

10 In their response to the draft report, the competent authority stated that the intention now is to propose adapting supervision in line with the degree of confidence the NVWA has in the PFSS.
duration of official controls) creates difficulties for the inspectors who are used to routinely covering the entire official control scope during their controls.

90. As regards the reduction of the duration of inspections, the NVWA identified that in practice it is difficult to plan two inspections in one day, of four hours each (due to travelling times and the working hours of establishments).

91. The preliminary results of the pilot project showed that the level of compliance of certified FBOs could allow for a further reduction in the frequency of inspections, without food safety being negatively impacted.

92. According to NVWA, the implementation of the pilot project did not reveal any legal or operational barriers that would prevent them availing of such synergies.

93. Based on NVWA experience and perception, the PFSS participating in Ketenborging.nl contribute to enhancing and safeguarding food safety and integrity across the entire food chain.

94. According to NVWA, private certification of FBOs can play a key role in the risk-based approach of the NVWA supervision activities. However, third party certification schemes cannot and should never completely replace official controls.

95. NVWA considers transparency and the exchange of information as key elements for the development of synergies because the increased knowledge about the FBOs’ performance facilitates better targeted risk-based official controls.

5.5 PLANNED/PROPOSED DEVELOPMENTS AS REGARDS POTENTIAL SYNERGIES BETWEEN THIRD PARTY ASSURANCE SCHEMES, OWN-CHECKS SYSTEMS AND OFFICIAL CONTROLS

96. NVWA will continue with the assessment of schemes in the framework of Ketenborging.nl.

97. As already mentioned, as regards adapted supervision in FBOs certified for one of the recognised third party certification schemes in Ketenborging.nl, the NVWA intends to propose to the board of managers after the final results of the 2017 pilot project up to a 100% reduction in the frequency of inspections of such FBOs (from once every two years, which was the frequency applied for certified FBOs before the 2017 project, to once every four years)\(^{11}\). However, a definitive decision on this matter has not yet been taken.

98. In the future, NVWA intends to explore possibilities of two-way exchange of information, from the schemes to NVWA and vice versa.

\(^{11}\) In their response to the draft report, the competent authority stated that the intention now is to propose adapting supervision in line with the degree of confidence the NVWA has in the PFSS.
6 OVERALL CONCLUSIONS

The NVWA started almost a decade ago to explore the possibility of synergies between private certification schemes in the hospitality sector and official controls. At the same time there were attempts to establish synergies also in other segments of the food sector. The horsemeat scandal, which surfaced at the end of 2013, accelerated efforts and has led to the establishment of the 'Food Chain Custody' initiative, which forms the basis on which synergies between third party assurance schemes in the transformation sector and official controls can be exploited.

Third party assurance schemes for the hospitality or the food transformation sector undergo a rigorous and thorough assessment process by NVWA prior to being accepted to be taken into account to reduce the extent and frequency of official controls of the scheme members. The criteria against which the schemes for the transformation sector are assessed and benchmarked were established by the 'Food Confidence Taskforce' and can be accessed at Ketenborging.nl. One of the requirements to which NVWA pays particular attention concerns the measures to eliminate predictability of controls carried out by third party certification schemes; NVWA expects a number of audits under a scheme to be carried out unannounced. The performance of accepted schemes is monitored by NVWA and there are measures in place for accepted schemes for the transformation sector, which aim at improving the performance of the schemes and enhancing the co-operation with NVWA.

From the experience gained and the analysis of data collected until now, food business operators certified for one of the accepted schemes are perceived by NVWA as better performers with a higher level of compliance with the legal requirements. As regards the accepted schemes for the transformation sector, NVWA noted that the differences are relatively small between the three accepted schemes.

The major food retail chains have in place their own IFSS for their suppliers of own-label brand products, which are subject to frequent laboratory analyses for food safety and verification by means of second party audits to their suppliers.

Existing synergies in the hospitality sector have had a negligible impact for NVWA in terms of saving resources, due to the very low number of food business operators who are currently certified under hospitality sector schemes. Exploitation of the synergies with schemes for the transformation sector though have resulted, based on the preliminary results of a pilot project implemented in 2017, in almost 30% of savings in time spent on official inspections. Considering though the time spent by NVWA on scheme assessments, monitoring and verification of their performance, the actual net saving is probably lower. However, the introduction by NVWA in 2018 of information technology software will increase the benefits to be achieved from the synergies and lead to increased saving of resources.
7 CLOSING MEETING

A closing meeting was held at the NVWA headquarters in Utrecht on 15 November 2017. The mission team presented the findings of the mission. The representatives of NVWA acknowledged the findings and expressed their satisfaction for this Commission initiative on the mission series on synergies, which will allow the Member States to share experiences and practices on this important topic.
<table>
<thead>
<tr>
<th>Legal Reference</th>
<th>Official Journal</th>
<th>Title</th>
</tr>
</thead>
</table>