

A better use of the hygiene and food safety regulatory framework for small food producers – perspective of a competent authority

„Local agriculture and short food supply chains“

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Austrian Federal Ministry of Health
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Content

- Legal Framework in Austria
- Special legal basis for meat, milk, eggs and fish
- National Guidelines

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- **LMSVG – Lebensmittelsicherheits- und Verbraucherschutzgesetz (Food Safety and Consumer Protection Act)**
 - In force since 2006 (BGBl. I Nr. 13/2006)
 - <http://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=20004546>
 - **Implementing European hygiene legislation**
 - Reg. (EC) No. 178/2002
 - Reg. (EC) No. 852/2004; Reg. (EC) No. 853/2004 and Reg. (EC) No. 854/2004
 - Reg. (EC) No. 882/2004

- **Österreichisches Lebensmittelbuch (Austrian Food Codex)**
 - First edition published in 1886
 - LMSVG § 76. The Federal Minister of Health is responsible for editing the Austrian Food Codex (Codex Alimentarius Austriacus).
 - it serves as bulletin for the publication of technical names, definitions, testing methods and evaluation principles as well as guidelines for the production and placing on the market of items; it may be published in electronic form.
http://bmg.gv.at/home/Schwerpunkte/VerbraucherInnengesundheit/Lebensmittel/Oesterreichisches_Lebensmittelbuch/

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- **CODEX COMMISSION**
 - LMSVG § 77. (1) For the purpose of advising the Federal Minister for Health in all matters of food legislation including guidelines on hygiene as well as for the preparation of the Austrian Food Codex (Codex Alimentarius Austriacus)...
 - **Members are:**
 - representatives of several ministries, e.g. of Health, Justice, Agriculture and Forestry, Consumer Protection, Economic Affairs, and Finance
 - 2 representatives of the federal provinces
 - 1 representative of the Chamber of Labour, Chamber of Commerce, Union, Chamber of Agriculture and the Verein für Konsumenteninformation (Consumer Information Association)
 - 3 representatives of laboratory institutions
 - experts from the respective relevant stakeholders

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- **Food Hygiene Adapting Regulation**
 - European Basis
 - Article 10 of Reg. (EC) No. 853/2004 (former Article 4 of CDir 64/433/EEC)
 - Adaptation of annexes II and III
 - National implementation (BGBl. II Nr. 91/2006)
 - § 13 LMSVG
 - National regulations aim at
 - allowing the application of traditional methods on all steps of food production and
 - meeting the concerns of regions in difficult geographical situations.
 - and relate to construction, conceptual design and equipment of establishments

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- **Food Direct Marketing Regulation**
 - European Basis
 - Article 1 (4) of Reg. (EC) No. 853/2004 (former Article 4a of CDir 71/118/EEC and CDir 91/495/EEC)
 - National implementation (BGBl. II Nr. 108/2006)
 - § 11 LMSVG
 - **National guidelines**
 - European Basis
 - Article 8 Reg. (EC) No. 852/2004
 - Guidelines on HACCP during slaughter and cutting of bovines, pigs, sheep and goats
 - Guidelines on good hygiene practice for establishments regarding the slaughter of poultry and rabbits by farmers

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- **Food Retailing Regulation**
 - European Basis
 - Article 1 (5) lit. a, b of Reg. (EC) No. 853/2004
 - National implementation (BGBl. II Nr. 92/2006)
 - § 12 LMSVG
 - **Food Direct Marketing Regulation**
 - European Basis
 - Article 1 (4) of Reg. (EC) No. 853/2004
 - National implementation (BGBl. II Nr. 108/2006)
 - § 11 LMSVG

- **Raw Milk Regulation**
 - European Basis
 - Article 10 (8) (a) Reg. (EC) No. 853/2004
 - National implementation (BGBl. II Nr. 106/2006)
 - § 14 LMSVG
- **National guidelines**
 - European Basis
 - Article 8 of Reg. (EC) No. 852/2004
 - Guideline
 - on HACCP when processing milk in alpine dairies
 - on HACCP when processing milk in agricultural establishments by farmers
 - on hygiene practice during slaughter and processing of fish
 - for apiculture establishments, and
 - for egg packaging and egg collection establishments.

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Contents of guideline

- e.g. **Guideline on slaughter:**
 - Explanation on the following topics:
 - Approval or registration, water, pest control, cleaning and disinfection, room temperature, ABP, stunning and slaughter
 - Work hygiene, staff hygiene, staff training,
 - Information on the food chain, animal identification, HACCP, microbiolog. criteria, test results, traceability, control reports
 - Check lists:
 - Constructional requirements for e.g. stables, slaughter premises, cutting premises, cooling and maturation premises, staff rooms.
 - ABP, pest control, temperature records, production of meat products
 - Basic principles of staff hygiene and application of HACCP-based procedures

National Guidelines

- **Explanations:**
- Focus on the needs of producers: e.g. no references to legal text (food producers are no jurists), practical tips, layout
- Adapting of the HACCP- principles for small scale food producers →
 - Concentrate on the essential points: e.g. predetermined and practical explained process runs, as a part of the documentation framework
 - Error protocol in stead of daily work protocol (e.g. Food producers < 7,5 tons of meat per week - heating temperature)
 - Cleaning and disinfection plan - not a daily reporting
- Microbiological criteria - „risk based approach“ →
 - Product analysis (which product – how often) amount of production and hygiene risk: e.g. Row milk cheese will be checked more often than butter of pasteurised cream
 - Criteria and thresholds are based on Regulation (EU) 2073/2005

Important ad-on!

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- National guidelines are important , but:
 - Paper work alone is not enough.
 - Food-producers and official inspectors have to know the content and have to be able to understand and implement the content.
 - Documentation must not be an end in its self.
 - “more motivation and information than documentation”

Further activities

- **Supplementary non official activities:**
 - Farmer union has to plan in cooperation with the national authority standardized training and education concepts (handbooks, presentations, pictures, examples)
 - Centralized training of multipliers
 - Training courses for farmer by the multipliers
 - Close cooperation with the local responsible food safety inspector and the official veterinarian.
 - Education program can be financed by the European rural development fund.

Documents

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- EU-legislation:
 - <http://eur-lex.europa.eu/de/index.htm>
 - National legislation:
 - <http://www.ris.bka.gv.at>
 - Guidelines by the CODEX-Commission:
 - http://www.bmg.gv.at/home/Schwerpunkte/VerbraucherInnenengesundheit/Lebensmittel/Lebensmittel_Unternehmer/Lebensmittelhygiene

Thank you for your attention!

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