8 June 2005

FDF Comments on Final Draft Standard prEN ISO/FDIS 22000

FDF welcomes the opportunity to respond to this consultation on prEN ISO/FDIS 22000, Food safety management systems — Requirements for any organization in the food chain (AW90.0046/05).

A brief description of FDF is given at Annex 1.

Executive Summary

The Final Draft Standard is much improved and very different from the previous draft (AW90.0032.04), in that it does seem to concentrate on food safety only, and the prerequisites are now less confusing. The document remains rather cumbersome, but is certainly more acceptable than the DIS and our thanks our extended to the Technical Committee and the Working Group for taking onboard our previous comments (submitted through Mr David Rose, EFSIS).

Given that such progress has been made in improving the document FDF feels that it is a pity that the rush to publish the standard is overriding what should be the primary concern i.e. ensuring that the content of the document is correct and complete (as mentioned below the failure to address allergens as a food hazard is a serious flaw, as is the incomplete text on validation. These issues can not be addressed by a simple quick fix). In its current state the standard runs a very high risk of not being taken up by the industry. A short delay to allow for further development could greatly improve its usefulness.

Whilst welcoming the overall intention of harmonising food safety management systems, (therefore reducing complexity for food manufacturing companies) and recognising that the document has been significantly improved through its various revisions, we retain a number of serious doubts and concerns. These concerns are listed below.

General Comments

1) There draft standard still contains no mention of the concept of substantial equivalence. This means that food manufacturers run the risk of having to re-write perfectly good food safety management systems simply to comply. This brings no added benefit and only additional cost to food manufacturers. The fact that re-writing would have to be done against such key texts such as CODEX and current EU legislation really reinforces the message that the concept of substantial equivalence must be included if a significant amount of work, at no extra benefit, is to be avoided.

2) The document remains far too complex and overly bureaucratic for SMEs (including caterers) and has no chance of being implemented by them. The majority of organisations who are not currently operating food safety management systems are SMEs and this is where regulatory authorities such as the FSA are focussing their
current efforts. Since the majority of food poisoning outbreaks currently have their origin in the catering sector the likely impact the ISO 22000 standard on public health is zero.

3) The document unnecessarily duplicates information that is well written elsewhere e.g. the sections related to HACCP are already well covered in other documents e.g. SANCO/2655/2004 Rev. 6. This fact also brings into question the standards value when it adds little to either existing systems (ISO 9000) or current EU legislation.

4) The document is still too long and contains much that is unnecessary e.g. figure 1 (is a figure to illustrate communication up and down the food supply chain really required?)

**Detailed Comments**

5) Page vii, para 5: "Recognition of an organizations role and position........" should read "Recognition of an organizations responsibilities and position........"

6) Page 2, Section 3, "Terms and definitions": there is no practical need to adapt CODEX definitions. The word that should be used here is Adopted (see also comment three above).

7) Page 2, "Terms and definitions, 3.3 food safety hazard": must mention specifically allergens. The absence of allergens from the document means that in food safety terms it is substantially inferior to many existing systems.

8) Section 4, 5 & 6 are unnecessary duplications of concepts that are already adequately defined in ISO 9000 series.

9) Page 11, 7.3.2 Food safety team: this is a clear example of the lack of applicability to SMEs. How can an organization of between one and five people (the size of the majority of food SMEs) possibly have a food safety management team?

10) Section 7.6.5: should be amended to read "Documented procedures shall be established....................to ensure that they are not released or, at least, not released until they have been evaluated". The way this is currently worded suggests that such things as verification testing can be relied on as a substitute for required corrective action. However, the section 7.10. does spell out the requirements more adequately.

11) Section 8: is an unnecessary duplication of concepts that are already adequately defined in other texts e.g. Establishing a HACCP Plan in the ILSI monograph "A simple guide to understanding and applying the Hazard Analysis Critical Control Point concept" and Validation and Verification in the ILSI monograph "Validation and Verification". In addition to the duplication the text on Validation is incomplete only covering control measures and misses out the complete range of activities necessary to ensure that the plan will deliver safe product.
Annex 1

The UK Food and Drink Manufacturing Industry

The Food and Drink Federation (FDF) represents the food and drink manufacturing industry, the largest manufacturing sector in the UK, employing over 500,000 people. The industry's annual turnover is over £69bn. It purchases some £11 billion worth (about two thirds) of UK agricultural produce and imports a further £21 billion worth of food and drink products, of which £4bn is unprocessed and £10bn is lightly processed. UK food and drink exports in 2003 were almost £10bn.

The following organisations are members of the Food and Drink Federation:

ABIM  Association of Bakery Ingredient Manufacturers
ACFM  Association of Cereal Food Manufacturers
BCA   British Coffee Association
BCCCA  Biscuit, Cake, Chocolate and Confectionery Association
BOBMA  British Oats & Barley Millers Association
BSIA  British Starch Industry Association
CFA   Chilled Food Association
CIMA  Cereal Ingredient Manufacturers’ Association
EMMA  European Malt Product Manufacturers Association
FA   Food Association
FOB   Federation of Bakers
FPA   Food Processors’ Association
FF   Frozen Food Group
GPA   General Products Association
ICF   Ice Cream Federation
IDFA  Infant and Dietetic Foods Association
LDT   Lifestyle and Dietary Trends Group
MSA   Margarine and Spreads Association
MG   Meat Group
NABIM  National Association of British and Irish Millers
NACM  National Association of Cider Makers
OHG   Out of Home Group
ORG   Organics Food and Drink Manufacturers’ Group
SB   Sugar Bureau
SG   Seafood Group
SIBA  Society of Independent Brewers
SMA   Salt Manufacturers’ Association
SNACMA  Snack, Nut and Crisp Manufacturers’ Association
SPA   Soya Protein Association
SSA   Seasoning and Spice Association
UKAMBY  UK Association of Manufacturers of Bakers’ Yeast
UKTA  UK Tea Association
VEG   Vegetarian and Meat Free Industry Group