Scottish Food Enforcement Liaison Committee – Guidance on Article 5 compliance

INTRODUCTION

The main aim of this document is to facilitate consistency in the enforcement of food hygiene regulations by identifying the minimum standards, which we as Food Safety Enforcement Officers are looking for from businesses, in order for them to comply with Regulation EC 852/2004 Article 5.

It must be emphasised that the aim is to try to identify the ‘acceptable minimum’, not what would necessarily be recommended or ideal. It is suggested that the minimum be thought of as the level below which enforcement action could or should be taken. Businesses meeting this standard may be expected to score 10 in the confidence in management parameter of the food hygiene risk rating scheme. See Annex 3 for guidance on scoring Article 5 compliance.

It is important to remember and consider the flexibility allowed by current EC law and guidance in relation to what we can demand or expect. Industry guidance is also available and the previously published guides to good practice are being updated to take account of the Article 5 requirements. An extract from the Catering Industry Guide is attached at Annex II.

The majority of food businesses will not require a ‘classical’ HACCP food safety management system and accordingly this document concentrates on the flexibility available for food businesses when preparing their HACCP based procedures. The following guidance is based on Annex II of EC Guidance Document “Implementation of procedures based on the HACCP principles, and facilitation of the implementation of the HACCP principles in certain food businesses”. Section 5 of Annex II sets out the prerequisite requirements that should be in place before HACCP based procedures can be established. This is a useful starting point to consider what the minimum requirements would be for each process step in a food business:

1. **PURCHASE** Pre-requisite Raw Materials

   **Suggested Requirement:**
   - The only action required at purchase is for a business to be able to achieve traceability. This will require the keeping of records.

   **Detailed guidance:**
   - Businesses should be able to show clearly from where all food is purchased.
   - While this may be possible through invoices it should be reasonable and practicable to expect them to produce and keep a list of suppliers and food supplied by them.
   - Receipts may then be used to trace individual items, deliveries etc.
   - Ideally it is suggested that a description of the food i.e. frozen, fresh should be noted however it is doubtful that it could be insisted on.

2. **RECEIPT OF GOODS** Pre-requisite Raw Materials & Cold Chain

When considering the need for controls on incoming goods, in a hazard analysis, it must be considered for what food is this a critical control point. It is only a CCP for high-risk products such as cooked meats (page 66 of the existing catering guide contains a definitive list of foods which may be applicable), which are not going to undergo cooking by the business prior to serving. It is therefore only controls and checks on foods such as these that can be insisted upon.

   **Suggested Requirement:**
   - Businesses must have suitable controls to ensure the safety of high-risk foods as defined above. This must include at least the physical checks of sight, touch and smell for all deliveries. There must be some level of additional temperature control checks including the checking of van temperature readouts and cross-checks using a probe thermometer. Staff carrying out such checks must know what the control temperatures are and what is required if these are exceeded.
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Detailed guidance:
- The company must be able to show that they monitor and check the receipt of high risk foods. It is recommended that as a minimum exception reporting ie. Recording of occasions when problems have arisen and corrective action taken should be recorded.
- The business must set targets for temperatures of such foods e.g. target temperature <5C and acceptable <8C.

3. STORAGE Pre-requisite Cold Chain

Suggested Requirement:
The main critical control point requiring to be dealt with in storage is the temperature control of refrigerated high-risk food (as previously defined). As the operation of a refrigerator will usually affect several foods it is reasonable to expect a precise target to be set and recorded monitoring to occur although exception reporting and recording of corrective action taken will again be acceptable.

Other controls requiring to be dealt with in storage are cleaning, pest control, stock rotation and cross contamination.

Detailed guidance:
- Temperature Control
  - Refrigerators to be either fitted with a thermometer or have one inside.
  - Refrigerator temperature checked and recorded once per day.
  - Control temperatures to be decided by food business operator however it would be best practice to expect the normal target to be <5C with an acceptable maximum variation to 8C.
  - Goods stored away on receipt.
  - Stock rotation and observance of date coding. Use by / Best before, or, if in house preparation, in house shelf life to be applied. It is recommended that for the majority of in-house produced goods a maximum shelf of three days would be acceptable without further clarification e.g. cooked meats. Consideration should however be given if this shelf life is applied to certain higher risk foods such as un-pasteurised egg mayonnaise where one day may be appropriate.
  - All foods contained / wrapped / covered.
  - Separate fridges or correct separation i.e. cooked top / raw bottom.

General Storage
- Regularly monitor for signs of pest activity and physical damage and ensure staff are aware of hazards and actions to remedy. Exception reporting and corrective action taken again should be expected as a minimum.
- Ensure stock is stored according to manufacturer instructions and rotated on first in first out basis.
- Ensure packaging is intact or decant to suitable lidded containers.

4. PREPARATION Pre-requisite safe handling

Suggested Requirement:
The main critical control point requiring consideration in preparation is the potential for cross contamination of high-risk foods. There are two main controls available, both of which must be used. Firstly staff must be trained in the basic rules of hygiene and must operate to them and secondly separation by space or time must be achieved.

N.B. FSA have issued detailed technical guidance on the steps that food businesses need to take in order to control cross-contamination between raw foods and ready-to-eat foods where E. coli O157 is a hazard. This guidance is also relevant when determining controls to prevent cross-contamination in general.
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Detailed guidance: -
- Food handler training in basic rules of hygiene and in-house procedures.
- Assessment of actual preparation procedures to identify applicable foods and cross-contamination risks.
- Removal of cross-contamination risks by hierarchical controls where separation should be the principal control. Where separation is not physically possible risks may be reduced through strict and consistent application of cleaning, disinfection and handwashing procedures.
- Adequate cleaning and disinfection procedures.
- Managerial control.

5. CLEANING SCHEDULES / METHOD STATEMENTS: Pre-requisite clean/disinfect

Suggested Requirement: -
While it is accepted that cleaning schedules can play a major part in ensuring high standards of cleanliness it must also be understood that they cannot themselves be insisted upon by inspectors. Cleaning schedules and / or cleaning method statements are however the most obvious way that a proprietor can instruct staff on how and when surfaces and equipment should be cleaned and disinfected. When considering cleaning procedures the proprietor must consider the operation as a whole.

N.B. FSA have issued detailed technical guidance on the steps that food businesses need to take in order to control cross-contamination between raw foods and ready-to-eat foods where E. coli O157 is a hazard. This guidance is also contains information on appropriate cleaning methods and cleaning chemicals that are relevant for all food businesses.

6. COOKING: Pre-requisite safe handling

When considering the controls required at cooking, it is necessary to consider the two types of cooking process usually found in operation and what controls are relevant to each.

Batch cooking refers to any process carried out in a programmed or set manner based on a time/temperature/weight ratio. An example would be the cooking of a joint of meat of a certain weight for a certain time at a set temperature or oven setting.

Suggested requirement: -
The food business operator must demonstrate that the cooking process is adequate i.e. core temp with probe. Thereafter if the same time/temp/weight combination is used further checks would be aimed at ensuring the continued satisfactory operation of the cooking equipment, since this is the only uncontrolled variation likely to occur. The purpose of these checks is therefore similar to the checks carried out on refrigerated storage i.e. to ensure the continued correct operation of the equipment. It would be reasonable therefore to expect recorded checks to be carried out at a similar frequency with exception reporting and corrective action taken being the minimum.

Individual cooking refers to the cooking of food in an unprogrammed or adhoc manner where the completion of cooking is judged by the chef, either using judgement based on experience or training or in some instances temperatures checked using a probe thermometer.

Suggested requirement: -
The food business operator must demonstrate that the measures taken to ensure cooking are adequate. In the case of the majority of individual dishes e.g. a portion of Chicken Kiev these controls will rely on the training and judgement of the chef. In some instances it will be reasonable to expect the use of a probe thermometer e.g. when a large or nonuniform (size and weight) product such as a joint, casserole or lasagne is being cooked. Where this is the case it is not reasonable or necessary for recording of this check to occur. The important action is that the dish is returned to the oven etc. until the correct
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temperature is reached although again exception reporting and corrective action taken would be good practice.

**Detailed guidance: -**
- Temperature check cooked foods such as large joints to ensure an adequate core temperature using a probe thermometer. Staff must know target temp i.e. \( \geq 75 \)C.
- Visual examination of cooking juices to ensure they run clear.
- Visual examination of liquids to ensure they bubble on stirring.
- Batch or timed cooking should be subject to routine checking and recording of operation similar to the checks on refrigerators to ensure the continued satisfactory operation of the equipment. It is recommended that a temperature check is taken and recorded for each batch of a batch-produced food and once a week for an individually cooked food.

7. **COOLING: Pre-requisite safe handling**

Cooling is normally only a critical control point for cooked foods, which will not undergo re-heating.

**Suggested Requirement: -**
The food business operator must demonstrate that the measures taken to ensure safe cooling are adequate. There is no requirement that such systems must be documented or recorded.

**Detailed guidance: -**
- Cooling to refrigeration temperatures must occur as quickly as possible by an hygienic method, in a maximum time to be decided by the proprietor but justified if over 90 minutes. Time and temperature limits should be set, as should corrective action to be taken when not complied with.

8. **REHEATING: Pre-requisite safe handling**

**Suggested Requirement: -**
As with cooking the food business operator must demonstrate that the measures taken to ensure reheating are adequate. This will again be the case for both batch and individually reheated items. The controls required for each are the same as those required for cooking.

**Detailed guidance: -**
- Temperature check reheated foods such as large joints to ensure an adequate core temperature using a probe thermometer. Staff must know target temp of \( \geq 82 \)C.
- Visual examination of liquids to ensure they bubble on stirring.
- Batch or timed reheating should be subject to routine checking and recording of operation similar to the checks on refrigerators to ensure the continued satisfactory operation of the equipment. It is recommended that a temperature check is taken and recorded for each batch of a batch reheated food and once a week for an individually reheated food.

9. **HOT HOLDING: Pre-requisite safe handling**

**Suggested Requirement: -**
The food business operator must demonstrate, through experimentation and the use of a thermometer, that the holding time and temperature combination ensures the food is held above 63C. Thereafter random checks should be made.

**Detailed guidance: -**
- The only recorded checks, which may be pertinent, would be weekly temperature checks to demonstrate the continued satisfactory operation of the equipment (exception reporting).
- Limiting the time food is held hot should be considered as the most important and practical control i.e. if food is displayed for less than two hours the actual temperature of holding is unlikely to be critical to food safety.
FSM System Records & Record Keeping

Records are an important tool for the competent authorities to allow verification of the proper functioning of the food businesses' food safety procedures. The requirement for records needs to be balanced with the nature and size of the business. Some records may assist a business to form a due diligence defence but may not be related to critical operations in the food operation. In relation to enforcement officers should only require records which are essential with regard to food safety. The following advice on record keeping is based on EC Guidance Document “Implementation of procedures based on the HACCP principles and facilitation of the implementation of the HACCP principles in certain food businesses” and the guidance on the traceability requirements of EC 178/2002.

Records should be kept for an appropriate time; that period must be long enough to ensure information will be available in case of an incident and will allow records to be traced back to the food in question. The period for retaining records should be linked to the period during which the food can be consumed. For certain foods the date of consumption is fairly certain, in the case of catering premises consumption takes place shortly after the time of production; therefore it is recommended that records are kept for two months after the date of consumption. This can be achieved in a practical way by the catering business holding records for 2 months after they have been completed. In this way the FBO will have at any given time the working records for the current month plus the completed records for the previous two months.

For food for which the date of consumption is uncertain, records should be kept for a reasonably short period after the expiry date of the food. When determining what constitutes a ‘reasonably short’ time the guidance on traceability records is useful and we suggest that guidance forms the basis for retaining FSM procedure records. The general rule of thumb is that records should be kept for 6 months after the expiry of the minimum durability date. This guidance should be applied to manufacturing and processing premises, including retailers who produce their own products. It would not be reasonable to require purely retail businesses to retain records for 6 months after the expiry of the minimum durability date for products sold. The retention system suggested earlier for catering businesses would be more appropriate for retail outlets.

However, in the traceability guidance this common rule has been adapted in some cases as follows:
- For products without a specified shelf life, the general rule of 5 years applies;
- For products with a shelf life above 5 years, records should be kept for the period of the shelf-life plus 6 months;
- For highly perishable products, which have a “use by” date less than 3 months or without a specified date, destined directly to final consumer, records should be kept for the period of 6 months after date of manufacturing or delivery.

It should be taken into account that, apart from the traceability provisions of Article 18 of EC 178/2002, many food businesses are subject to more specific requirements in terms of record keeping (type of information to be kept and time). Competent authorities should ensure that they comply with these rules.

Summary:
Annex I summarises in tabular form the suggested minimum requirements for businesses to comply with Regulation EC 852/2004 Article 5. This guide should be used by food enforcement officers when advising food business operators on their legal obligations and when considering enforcement action. This guide should be read in conjunction with the Food Law Code of Practice and associated guidance. When a food authority plans to take enforcement action inconsistent with this guide they should bring the matter to the attention of their liaison group.
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Annex 1

In this document we attempt to reference these minimum standards to business types and sizes in the hope that enforcement officers can meaningfully extrapolate the guidance either up or down to fit whatever business they are inspecting.

It is suggested that prerequisite areas 1 to 5 would meet the requirements placed on a retailer with limited handling of open food, while the additional prerequisite areas 6 to 9 would be required in a café style operation with a simple menu. See HACCP Continuum diagram below.
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*This template is to be used as guidance only in order to harmonise compliance assessment. Specific activities should be targeted rather than specific premises type.*

**RETAIL BUSINESSES**

(Note: Pre-requisites must be in place at all premises prior to establishing a Food Safety Management System. (One man businesses - exception reporting as per SFBB would be acceptable to meet article 5 requirements)

<table>
<thead>
<tr>
<th>Activities</th>
<th>Critical Risk Factors</th>
<th>Minimum Documentation to Meet Article 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 <strong>Prepacked and open low risk foods</strong>&lt;br&gt;e.g. Confectioner, corner shop, forecourt shop, public house/club (no food), market stall, off licence, chemist, greengrocer</td>
<td>No significant risk factors</td>
<td>No documentation required</td>
</tr>
<tr>
<td>2 <strong>Prepacked High risk foods</strong>&lt;br&gt;e.g. corner shop (no open food), forecourt shop (no open food), market stall,</td>
<td>Time/temperature abuse (chilling)</td>
<td>Receipt of food (house rules and records)&lt;br&gt;Stock control (house rules and records)&lt;br&gt;Chilled storage (house rules and records)&lt;br&gt;Personal hygiene (house rules)</td>
</tr>
<tr>
<td>3 <strong>Open High Risk foods</strong>&lt;br&gt;e.g. supermarket, bakers shop, fishmonger selling high risk smoked products, grocer selling both pre-packed and open food, ice cream retail only</td>
<td>Time/temperature abuse (chilling)&lt;br&gt;Contamination/Cross contamination</td>
<td>Receipt of food (house rules and records)&lt;br&gt;Stock control (house rules and records)&lt;br&gt;Chilled storage (house rules and records)&lt;br&gt;Personal hygiene (house rules)&lt;br&gt;Cleaning and disinfection (house rules and records)&lt;br&gt;Food Handling (house rules and records)&lt;br&gt;Training records</td>
</tr>
<tr>
<td></td>
<td>Scottish Food Enforcement Liaison Committee – Guidance on Article 5 compliance</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---------------------------------------------------------------------------</td>
<td></td>
</tr>
</tbody>
</table>
| 4 | **Open High risk foods with preparation (predominately retail)**<br>O of the following:<br>-
|   | Sandwich bar, ice cream outlet, corner shop making sandwiches, ice cream retail from pre-mix<br>-
|   | Time/temperature abuse (chilling) Contamination/Cross contamination<br>-
|   | Fully implemented CookSafe or equivalent covering the following:<br>- Receipt of food (house rules and records)<br>- Stock control (house rules and records)<br>- Chilled storage (house rules and records)<br>- Food handling (house rules and records)<br>- Personal hygiene (house rules)<br>- Cleaning (schedule & records)<br>- Training records<br>|
| 5 | **Re-heating/heating high risk foods (predominately retail)**<br>-
|   | e.g. Corner shop with pies, etc, supermarkets, bakery shops, grocer selling both pre-packed and open food with heating/reheating,<br>-
|   | Time/temperature abuse (chilling, reheating and hot-holding) Contamination/Cross contamination<br>-
|   | Fully implemented CookSafe or equivalent covering the following:<br>- Receipt of food (house rules and records)<br>- Stock control (house rules and records)<br>- Chilled storage (house rules and records)<br>- Food handling (house rules and records)<br>- Personal hygiene (house rules)<br>- Cleaning (schedule & records)<br>- Hot temperature records<br>- Training records<br>|
| 6 | **Butchers shop, (raw & ready to eat food)**<br>-
|   | Cooking, cooling and re-heating if appropriate.<br>-
|   | Time/temperature abuse (chilling, cooking cooling, reheating and hot-holding) Contamination/Cross contamination<br>-
|   | HACCP documentation requirements equivalent to previous licensing scheme<br>

This template is to be used as guidance only in order to harmonise compliance assessment. Specific activities should be targeted rather than specific premises type.

### CATERING BUSINESSES

(Note: Pre-requisites must be in place at all premises prior to establishing a Food Safety Management System)

(One man businesses - exception reporting as per SFBB would be acceptable to meet article 5 requirements)

<table>
<thead>
<tr>
<th>Activities</th>
<th>Critical Risk Factors</th>
<th>Minimum Documentation to Meet Article 5</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong> Open High risk foods with cooking, re-heating and hot-holding.</td>
<td>Time/temperature abuse (chilling, cooking, re-heating and hot-holding)</td>
<td>Fully implemented CookSafe or equivalent covering the following:</td>
</tr>
<tr>
<td>Satellite kitchens, lunch trade catering, public house/club with pre-packed foods, school servery, tea room,</td>
<td>Contamination/Cross contamination</td>
<td>Receipt of food (house rules and records)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Stock control (house rules and records)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Chilled storage (house rules and records)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Food handling (house rules and records)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Personal hygiene (house rules)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Cleaning (schedule &amp; records)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Hot temperature records</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Training records</td>
</tr>
<tr>
<td><strong>2</strong> Open High risk foods with cooking, re-heating and hot-holding</td>
<td>Time/temperature abuse (chilling, cooking, cooling, re-heating and hot-holding)</td>
<td>Fully implemented CookSafe or equivalent covering the following:</td>
</tr>
<tr>
<td>Fish &amp; Chip shop, hot &amp; cold food vehicle, fast food outlet, Restaurant,</td>
<td>Contamination/Cross contamination</td>
<td>Receipt of food (house rules and records)</td>
</tr>
<tr>
<td>café, takeaway, staff canteen, supermarket with café, public house/club</td>
<td></td>
<td>Stock control</td>
</tr>
<tr>
<td>with meals, nursery providing meals, school kitchen, Hotel, care home,</td>
<td></td>
<td>Chilled storage (house rules and records)</td>
</tr>
<tr>
<td>hospital kitchen, large restaurant, outside caterer</td>
<td></td>
<td>Food handling (house rules and records)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Cleaning (schedule &amp; records)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Personal hygiene (house rules)</td>
</tr>
<tr>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td>Training records</td>
</tr>
</tbody>
</table>
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**THIS TEMPLATE IS TO BE USED AS GUIDANCE ONLY IN ORDER TO HARMONISE COMPLIANCE ASSESSMENT**

**SPECIFIC ACTIVITIES SHOULD BE TARGETED RATHER THAN SPECIFIC PREMISES TYPE**

### MANUFACTURING BUSINESSES

(Note: Pre-requisites must be in place at all premises prior to establishing a Food Safety Management System)

<table>
<thead>
<tr>
<th>Activities</th>
<th>Critical Risk Factors</th>
<th>Minimum Documentation to Meet Article 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Manufacturer of High Risk Foods/Approved Premises</td>
<td>As per business type</td>
<td>Full HACCP system</td>
</tr>
<tr>
<td>Bakery, Meat product manufacturer, high risk fish product manufacturer (e.g. Salmon smoker, cooked and peeled prawns), Dairy products manufacturer</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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Annex 2

This extract from the Catering Industry Guide and its section on compliance with Reg. 4(3)(d) is a useful reference for catering businesses.

There are two main points: -
1. Controls must be set for the critical points.
2. Checks introduced.

The Industry Guide states the following: -

Controls will either reduce a hazard to an acceptable level or get rid of it completely.

- The controls should be as precise as possible. For example, it is better to state that raw meat will be stored under refrigeration at a set temperature, rather than to simply say that it must be kept in the chiller.
- A control target should be set for every critical control point that has been identified.
- When controls have been set, it is then possible to monitor the critical points whenever that preparation step is used.
- The targets can be checked.
- The frequency of checks should be set for each control. It is not necessary to measure critical points every time a step is performed; it may be enough to do checks at intervals.
- In some cases it may be useful to keep records. For example, it may allow the manager or supervisor to check that the system is being followed. But it is not essential to keep records for each and every control.
- Checking temperatures does not always involve probing food with a thermometer.
- Delivery vans or storage chillers may be fitted with temperature readouts, and these can be checked. (Air temperature measurements do not always reflect the temperature of food at every part of the chiller or van. Occasional cross-checks should be made.)
- For cooking or cooling, you may have established that a certain combination of time and temperature in the oven etc. gives an acceptable result. Batch by batch, it may be good enough just to check that the setting is correct and the batch is processed for the right time.
- Periodically there should be a cross-check using a probe thermometer.
- Other critical controls are more difficult to measure, for example cleaning & disinfection of equipment or the personal hygiene of staff. They will often be vital to the safety of food, and there should be regular checks that standards are kept up. This may simply be a visual check by the manager or supervisor. Cleaning schedules may play a part.
- Some controls will be the same for many different foods, and this makes monitoring very much easier. It does not have to be done item by item. For example many perishable raw materials will be kept under refrigeration at 5°C or cooler. One check of the fridge temperature controls a large number of foods in that fridge.
- Corrective action: If monitoring shows that control is not satisfactory, it is important to take corrective action. For example,
  - poor cleaning of food contact equipment - take out of service and clean again
  - poor fridge temperatures - adjust or repair
  - inadequate cooking temperature - return to heat for further cooking
- The chart at the end of this part of the guide gives an example of steps, hazards, controls and monitoring procedures that may apply to a typical catering operation.
- It is important to remember that each operation is different and the proprietor must focus on the actual hazards and controls that are critical to his operation.
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Annex 3

Food Law Code of Practice ANNEX 5: Confidence in Management

DEFINITIONS AND DESCRIPTORS IN PRACTICE

The Food Standards Agency has published guidance on the Food Hygiene Rating Scheme (FHRS) intended to ensure consistency in implementation and operation of the FHRS by local authorities. The aim is to ensure that where food business establishments are rated under the FHRS and where consumers see FHRS branding, they can be confident that the local authority is operating the FHRS as the Food Standards Agency (FSA) intends.

Part of FHRS guidance includes information on ‘scoring’ food businesses in relation to Annex 5 of the Food Law Code of Practice and will obviously be relevant for all Food Authorities. The ‘Confidence in Management’ element of the Annex 5 risk rating scheme is the principal element where compliance with Article 5 of EC Regulations 852/2004 is considered in the risk rating. The following is an extract from the guidance and provides detail on what differing levels of compliance looks like in practice and maps this to a ‘score’ in Annex 5.

CONFIDENCE IN MANAGEMENT /CONTROL PROCEDURES

**C Score 0** Good record of compliance. *Access to technical advice within organisation.* Will have satisfactory documented HACCP based food safety management procedures, which may be subject to external audit process. Audit by Food Authority confirms compliance with documented procedures with few/minor non-conformities not identified in the system as critical control points

1. No follow-up action by local authority apart from report of inspection provided to food business operator. No re-visit necessary before next planned intervention.
2. No follow-up action identified for food business operator in relation to food safety management procedures.
3. Food safety management/procedures in place and appropriate for size and nature of the business, taking into account the flexibilities provided by Article 5 of Regulation (EC) 852/2004 on food hygiene and the related European Commission Guidance Document on Implementation of procedures based on HACCP principles, and facilitation of the HACCP principles in certain food businesses.
4. **External audit of food safety management procedures.**
5. Hazards understood, properly controlled, managed and reviewed with supporting evidence.
6. Food safety management procedures adequately cover all activities.
7. Food safety management records appropriate for size and nature of business are maintained.
8. *Access to technical advice within organisation.*
9. All staff suitably supervised, instructed and/or trained in food hygiene.
10. Appropriate staff trained in application of HACCP principles.
11. Very good track record but new businesses or those existing businesses where there has been a change in circumstances (e.g. a change in management) should not be penalised on track record where they have food safety management procedures in place.
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C Score 5  Reasonable record of compliance. Technical advice available in-house or access to, and use of, technical advice from trade associations and/or from Guides to Good Practice. Have satisfactory documented procedures. Able to demonstrate effective control of hazards. Will have satisfactory documented food safety management system. Audit by Food Authority confirms general compliance with procedures.

12. No follow-up action by local authority apart from report of inspection provided to food business operator. No re-visit necessary before next planned intervention.

13. Only minor follow-up actions (not critical to food safety) identified for food business operator in relation to food safety management system (e.g. minor record keeping issues that are being dealt with by management).

14. Food safety management/procedures in place and appropriate for size and nature of the business, taking into account the flexibilities provided by Article 5 of Regulation (EC) 852/2004 on food hygiene and the related European Commission Guidance Document on Implementation of procedures based on HACCP principles, and facilitation of the HACCP principles in certain food businesses.

15. Hazards understood, properly controlled, managed and reviewed with supporting evidence.

16. Food safety management procedures adequately cover all activities.

17. Food safety management records appropriate for size and nature of business are generally maintained – but some minor deficiencies/gaps.

18. Technical advice available in-house or access to, and use of, technical advice from trade associations, other sources such as the local authority enforcement officer and/or from Guides to Good Practice.

19. Staff suitably supervised, instructed and/or trained in food hygiene with good general staff knowledge and new staff receiving induction training.

C Score 10  Satisfactory record of compliance. Access to and use of technical advice either in-house, from trade associations and/or from Guides to Good Practice. Understanding of significant hazards and control measures in place. Making satisfactory progress towards a documented food safety management system/procedures commensurate with type of business.

22. Follow up action for local authority in accordance with its enforcement policy but likely to be considering informal action (report of inspection/letter identifying issues) with establishment unlikely to be a priority for a re-visit.

23. Some follow-up action identified for food business operator in relation to further development and completion of documented procedures where these are commensurate with the size and nature of the business and where issues are not critical to food safety but may become so if not addressed, and not likely to put consumers at unacceptable risk.

24. Generally satisfactory food safety controls in place and appropriate for size and nature of the business, and making satisfactory progress, taking into account the flexibilities provided by Article 5 of Regulation (EC) 852/2004 on food hygiene and the related European Commission Guidance Document on Implementation of procedures based on HACCP principles, and facilitation of the HACCP principles in certain food businesses.

25. All significant hazards understood and controls in place.

26. Generally, food safety management procedures satisfactorily cover all activities but some further development/completion needed.

27. Food safety management records appropriate for size and nature of business, and are generally maintained but with some deficiencies/gaps identified.

28. Staff generally suitably supervised, instructed and/or trained in food hygiene but there may be some minor issues e.g. not all staff fully aware.

29. Appropriate staff adequately trained in application of HACCP principles.

30. Satisfactory track record but new businesses or those existing businesses where there has been a change in circumstances (e.g. a change in management) should not be penalised on track record where they have food safety management procedures in place. This might include existing businesses with a good previous track record but with some minor recent lapses.
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**C Score 20**  Varying record of compliance. Poor appreciation of hazards and control measures. No food safety management system.

31. Follow-up action by the local authority likely to include commencement of formal enforcement action, using a graduated approach in accordance with local authority enforcement policy and re-visiting the establishment to secure compliance.

32. Follow-up action identified for food business operator – to address all identified non-compliances in relation to development of food safety management/procedures, supervision, instruction and training, as a matter of urgency within stipulated timescale.

33. Food safety management/documented procedures inappropriate or inadequate for size and nature of the business, taking into account the flexibilities provided by Article 5 of Regulation (EC) 852/2004 on food hygiene and the related European Commission Guidance Document on Implementation of procedures based on HACCP principles, and facilitation of the HACCP principles in certain food businesses.

34. Significant hazards not fully understood and not all controls in place.

35. Significant improvements in food safety procedures/implementation of controls required.

36. Some staff not suitably supervised, instructed and/or trained in food hygiene.

37. Appropriate staff not adequately trained in application of HACCP principles.

38. Varying track record, may be some evidence of previous problems.

**C Score 30**  Poor track record of compliance. Little or no technical knowledge. Little or no appreciation of hazards or quality control. No food safety management procedures.

39. Follow-up action by the local authority likely to include prohibition procedures where there is imminent risk and ongoing formal enforcement, using a graduated approach in accordance with local authority enforcement policy and re-visiting the establishment within a short timescale to secure compliance.

40. Follow-up action identified for food business operator - immediate and significant action required in respect of all serious risks. Address all other matters in relation to development of food safety management/procedures, supervision, instruction and training, within stipulated timescale.

41. No evidence of food safety management/documented procedures as appropriate for size and nature of the business, taking into account the flexibilities provided by Article 5 of Regulation (EC) 852/2004 on food hygiene and the related European Commission Guidance Document on Implementation of procedures based on HACCP principles, and facilitation of the HACCP principles in certain food businesses.

42. Significant hazards not understood and no effective controls in place.

43. Major improvements in food safety procedures/implementation of controls required.

44. No or totally inadequate food safety management procedures.

45. Staff not suitably supervised, instructed and/or trained in food hygiene and no appreciation of food hazards or controls.

46. Appropriate staff not adequately trained in application of HACCP principles.

47. Poor track record, may be some evidence of previous problems.