







"Supporto all'operatività della riforma in materia di semplificazione" CUP J59J16000760006

Workshop

Assicurare l'effettività e l'efficienza della notifica sanitaria e dei controlli sanitari. Buone prassi, sfide, e possibili elementi di riforma

Titolo

a cura di Gordana Ristic

Venezia, 18 marzo 2019
Palazzo Grandi Stazioni, Sala Polifunzionale - II Piano, Fondamenta Santa Lucia, Cannaregio n. 23



STRATEGIC PLANING IN FOOD INSPECTIONS TO IMPROVE FOOD CHAIN SAFETY AND OPTIMIZE MANAGEMENT OF RESOURCES

Gordana Ristic MD, PhD
Food safety and inspection reform consultant

Venezia, March 18, 2019

CONTENT

Strategic planning

Check lists and instructions for inspectors – self regulation

Compliance promotion

Financing of inspections

Registration of facilities

Reform of the legal environment

STRATEGIC PLANNING IN ORGANISATIONS

Based on mission and vision and relevant data

Follows Deming cycle (PDCA)

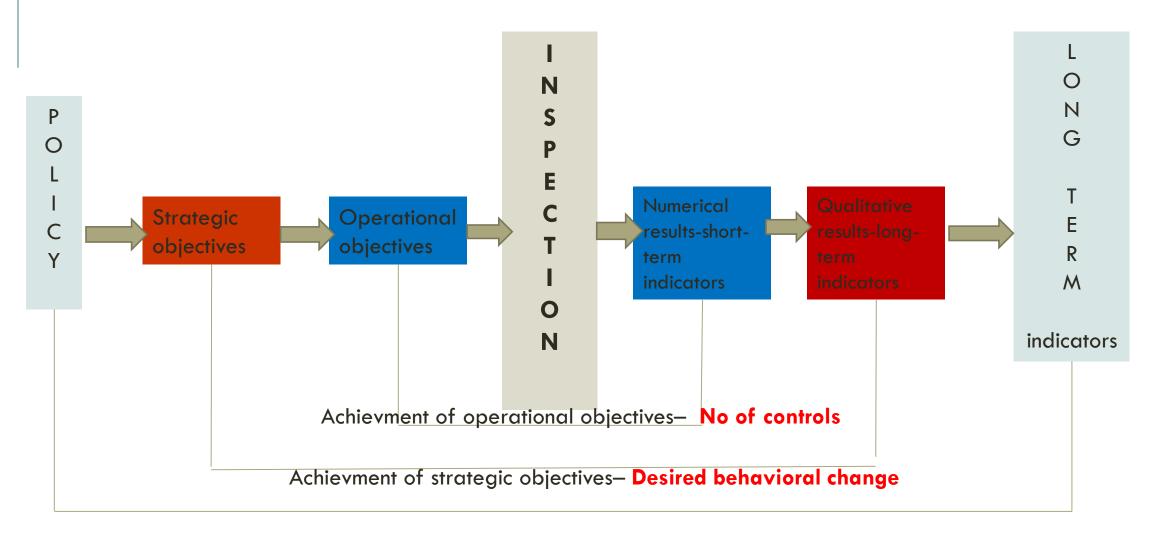


Requires strategic management of resources (human, physical, IT, finances)

Monitored and evaluated according to realization of selected KPIs

Revised periodically

PLANS, OBJECTIVES AND INDICATORS



Achievment of top-level objectives- Impact measurement



Strategic - more general	Operational— more precise, how to realize strategic objectives
Derived from the mission and vision and may help redefine the vision	No effect on the vision
Defined using SMART criteria	
Followed by programs and activities	Define human, physical, financial resources
May require investment from FBOs, budget, loans	No investment from FBOs
Relate to the inspectorate, FBOs, general population	Relate to the inspectorate only

KEY PERFORMANCE INDICATORS- FOR EACH OBJECTIVE ONE OR MORE KPIs SHOULD BE DETERMINED

Direct indicators— Direct measurable effect

Indirect indicators – Less punitive approach

Proxi indicators— Customer satisfaction

Objective: Capacity development of inspection department to secure risk based control

Activities: annual plans for training of all inspectors, training of trainers, toolkits for training prepared, dissemination of knowledge, and assessment of knowledge

KPI 3.1.a Trainers trained and their knowledge assessed

KPI 3.1.b Improved level of knowledge of inspectors assessed

KPI c. Decreased No of inspection measures

KPI d. Level of satisfaction of businesses with inspectors` knowledge and capacities for providing advices

BELGIUM: EVOLUTION DUE TO REALIZATION OF STRATEGIC PLANS

2005-2008	2009-2011	2012-2014	2015 - 201 <i>7</i>	
Efficient risk assessment Efficient and effective crisis management	An increasingly safe food chain	A safer food chain	Monitoring the food chain by means of controls by maintaining an optimal level of food chain safety	
	An agency accepted by food business FFBO's and recognized by society	An agency accepted by food business FFBO's and recognized by society and the consumers in particular		
Commu <mark>n</mark> ication to consumers and enterprises	A transparent Agency	A transparent Agency	Optimal services to FBOs and to the	
From inspection to audit	The stimulation of self-checking	The expansion of self-checking in the food chain	government	
	The way to administrative simplification	Administrative simplification	Optimal organizational management	
Competent and highly trained staff members	A professional and demanding Agency in the field of results	A modern human resources policy		
Public-private cooperation	ivate cooperation An optimal public-private cooperation		An appropriate legislative framework to support food chain	
A good cooperation with other public services	COORESTON WITH OTHER DUBLIC		safety	
Integrated information and data management	An integrated IT-management	An ambitious IT plan		
Quality assurance	Quality guarantees on services rendered			
		Reliable and high-performing laboratories		
Update of the existing funding mechanisms				
	Sustainable development & the BFSA		An agency accepted by FBOs and	
Integrating the European context	International context	International trade: improving services provided to exporters and achieve international recognition of the Agency	consumers and recognized nationally and internationally	

GOAL 1: MONITORING THE FOOD CHAIN BY MEANS OF CONTROLS BY MAINTAINING AN OPTIMAL LEVEL OF FOOD CHAIN SAFETY

6.1.2. Strategic and operational objectives

- S1.1 The BFSA has an annually updated control programme that is fully executed, complemented by specific actions. Unplanned, but necessary controls are carried out within reasonable terms.
 - O1.1.1 A scientifically based multi-annual control programme that is reviewed annually, both for the inspections and the analyses, and which is optimized for the entire food chain. In this respect, special attention goes to the control of self-checking systems and a more extensive classification of FFBO's.
 - O1.1.2 Full implementation of the control programme, adjusted for the budgetary efforts.
 - O1.1.3 Carrying out of actions outside of the control programme to follow-up on specific problems concerning the activities as well as the products.

Unplanned controls

- Conducting unplanned controls within legal and/or reasonable and pre-defined terms (treatment of complaints, RASFF-files, approvals and authorizations, certification checks...)
- Efficient import controls which guarantee that the imported products meet the same safety level as EU products, taking into account the increasing globalization and complexity of the food chain, which are adjusted and based on a refined risk assessment.

- Undue delays
- O1.1.6 Optimal support of the control programme by guaranteeing the quality of the analyses within the shortest possible lead time, at the lowest possible cost and using the most cost-efficient distribution between internal and external analyses.
- O1.1.7 Efficient fraud control in the food chain based on a policy that provides specific actions and which is aimed at creating awareness among staff.

- S1.2 The monitoring of animal and plant health is organized and based on pre-defined programmes that are part of a global sanitary policy
 - 01.2.1 Actively participating in the updating of the sanitary policy
 - O1.2.2 Developing a structured approach for epidemiological surveillance and epidemiological monitoring, including new (emerging) animal and plant diseases, both in domestic and in wild animal species.
 - 11.2.3 Active participation in programmes with a focus on reducing resistance against antimicrobial and antiparasitic agents.

GOAL 2: AN APPROPRIATE LEGISLATIVE FRAMEWORK TO SUPPORT FOOD CHAIN SAFETY

6.2.2. Strategic and operational objectives

S2.1	The legislation elaborated by the BFSA, or that will be elaborated, will either comply with the following
	basic principles: legally sound; clear, efficient, proportional to the intended purpose, with a minimum of
	administrative burden and aimed at attaining the objectives or it will be adjusted to those objectives. The
	same principles will be defended concerning the Belgian and European legislation the BFSA is contributing
	to

ln	due
tin	ne

52.2

- O2.1.1 Permanent evaluation of the existing legal framework to meet the principles of the strategic objective.
- 2.1.2 The directives will be transposed in due time and where required by the Regulations, the necessary national measures will be provided to complement the EU regulations.
- FFBO's active in the food chain have all the necessary tools to elaborate a self-checking system that complies with the legislation and have to be able to get this self-checking system validated in a reliable way.

Selfchecking

- The tools for implementing the self-checking systems are available. They are aimed at specific needs (both in terms of complexity and in terms of the FFBO type). They are easy to use with a minimum of administrative burden and are actively promoted together with the validation.
- The BFSA guarantees the credibility of validation by the certification organisms.
- O.2.2.3 Implementing the mandatory validation of the self-checking system for activities that require special attention, such as the production and/or the export of certain groups of foodstuffs, or at the request of the sector organizations.
- S2.3 The BFSA has a training and information policy in place that guarantees transparency, provides consumers with the necessary information to safely handle foodstuffs and provides FFBO's with the necessary tools to comply with regulations.

Communica tion

02.3.2

- D2.3.1 Integration of the communication by means of diverse media in a global strategy with measurable objectives.
 - A differentiated training and information package aimed at different target groups with special attention for starters as well as FFBO's that need coaching is available. The training and information is provided in consultation with other authorities and sector organizations involved.

\$2.4	The BFSA is sufficiently prepared to manage incidents and crises.
32.7	the billor is sufficiently prepared to manage incidents and crises.

O2.4.1 The BFSA has a policy aimed at preventing incidents and crises as much as possible by efficiently capturing signals that provide indications on the possible occurrence of certain dangers.

Crisis mng

- 2 The BFSA has up-to-date crisis scenarios, a structure to manage incidents and crises and tests the readiness of both the organization and the FFBO's by regularly organizing exercises.
- 3 The BFSA is an active partner in improving the management of food-borne outbreaks.
- S2.5 The BFSA has an extensive international network that allows for support of the Belgian policy on an international level.
 - O2.5.1 Maintain and, where possible, expand the network in the EU in the framework of the HoA, CVO, COPHS, SCOPAFF and within the Codex Alimentarius.

Startups

GOAL 3: AN AGENCY ACCEPTED BY FBOs AND CONSUMERS AND RECOGNIZED NATIONALLY AND INTERNATIONALLY

6.3.2. Strategic and operational objectives

S3.1	3.1 The consultation of the stakeholders is structured and systematic				S3.4 A transparent and visible BFSA				
	03.1.1	Permanent consultation in the Advisory Committee and concultation during sector meetings.		O3.4.1	The BFSA provides general information on its activities in a user-friendly way, in which a				
onsum	3.1.2	Regular surveys of consumers, FFBO's and staff on their assessment of the functioning of the BFSA and on the expectations of the stakeholders.	2009 2010		website that is complete as possible plays a pivotal role, supported by other media. The Agency also communicates by means of specific actions aimed at special target groups.				
rs urvey	3.1.3	3.1.3 Veterinary practitioners have to be consulted on a regular basis regarding policy choices and assigned tasks.		.4.2	Timely executed mandatory reporting, transparent global reporting by means of annual reports, the food chain safety barometers and the publication of the inspection results				
	03.1.4			.4.3	The BFSA makes its knowledge and good practices available to other like-minded organizations, within the EU as well as in third party countries.				
S3.2	The RES			Equit	able financing of the BFSA				
33.2	03.2.1	The Scientific Committee has the necessary means at its disposal to ensure the impartiality of its advices.	Func	03.5. ling	1 Contributions and fees are calculated based on publicly available, up-to-date and objective parameters that guarantee a fair spreading of the costs between all controlled sectors and takes into account the validation of self-checking systems regarding contributions.				
S3.3	Handling	Handling complaints efficiently		O3.5.	하는 기계가 가득하다면 보다 하나는 아니라 아니라 이 아니라 전에 아니라 이 아니라				
	03.3.1	The BFSA has a client-oriented consumer contact point and efficient procedures in place to ensure that complaints are processed within reasonable terms and that feedback is provided.			fines,				
ppeal	3.3.2	FFBO complaints are handled with, using a clearly communicated and uniform procedure either by or under the supervision of an independent internal mediation service of the BFSA.							

TASK 4: OPTIMAL SERVICES TO FBOs AND TO THE GOVERNMENT

6.4.2. Strategic and operational objectives

	54.4	Camilar	unidate to FERO/s to see a stand officiently and others a smalled by many of district to the
	S4.1	Service p	provision to FFBO's is organized efficiently and where possible by means of digital tools
Online support		O4.1.1.	FFBO's can submit their most important requests and consult and update their data via FOODWEB, including BECERT. Services are rendered efficiently via the PCU.
		O4.1.2	Regarding inspections, the modernization initiated on the EU-level is implemented and the company-assisted inspection is being further elaborated.
		O4.1.3	The activities of the calibration laboratory of DG Laboratories are made available to both internal and external clients.
	S4.2	Export ar	nd import are actively supported as a part of the BFSA's competences
Supports		04.2.1	New export markets are being explored, in collaboration with all of the stakeholders and
export			authorities involved, and tapped into when deemed useful
		O4.2.2	The BFSA supports the preservation and further development of goods flows via Belgian points of entry
	54.3	The BFSA	carries out the tasks it has been delegated following the agreed-upon modalities
Mutual		O4.3.1	The BFSA integrates the tasks relating to the controls it has been entrusted with or relating
agreemen	t		to shared competences in its control programme, based on a control policy and a control programme that is determined by mutual agreement.
		04.3.2	The BFSA guarantees an efficient management of the Animal and Plant health Funds based on a protocol with the competent authority.

TASK 5: OPTIMAL ORGANIZATIONAL MANAGEMENT

6.5.2. Strategic and operational objectives

					\$5.3	The con	aborators have all the necessary tools to carry out their assignments	
	S5.1	A staffin	A staffing policy aimed at maintaining a competent and motivated workforce			05.3.1	The equipment, the services used and the housing complies with the minimal quality	
SHRM		05.1.1	O5.1.1 The staffing plan is executed to its fullest extent, with corrections for budgetary measures.				requirements and are made available in a cost-efficient manner. In this respect, special attention goes to creating synergies with other authorities.	
		along with the new yaquisements and involuments a high quality quality quality		Mng of resources		es .	The IT systems are developed based on a coherent and uniform strategy and are based on the organization's needs	
	S5.2	S5.2 The quality and the efficiency of the work is a permanent concern				05.3.3	The data warehouse and the analytical accounting of the BFSA are being developed into	
		05.2.1	The quality is guaranteed by means of certified quality systems with a focus on continuous improvement, an efficient organization and a fully-developed risk management.				instruments that transform data into useful information and this way support both the interna functioning and the reporting of the BFSA. This way quality monitoring of essential data is	
Quality	,	05.2.2	O5.2.2 Internal control guarantees compliance with administrative legislation.		S5.4		guaranteed. legation of tasks and the deployment of third parties is organized in a cost-efficient manner	
mng		05.2.3	The work organization, the internal procedures and the instructions are assessed and if necessary reviewed in order to be simplified or optimized and are integrated into a global transversal process model.	global Delegat		05.4.1.	The delegation/outsourcing of tasks to third parties is organized in a cost-efficient and objective manner.	
		05.2.4				on 2.	Notwithstanding its responsibility for the safety of the food chain, the BFSA will participate in initiatives of third parties that are geared towards ensuring the safety and quality of products, insofar as the necessary means are available.	

FRANCE: DIFFERENT TASKS WITHIN THE SAME ORGANISATION

Strategic objective 1.- Behavioral change to improve safety of food and environment

Operational objective 1.1— use of pesticides and antibiotics

► Indicators- 1.1.a Quantity of pesticides sold

1.1.b. Use of antibiotics in treatment of animals

Strategic objective 2. — Prevention and reduction of risks in all controlled facilities

Operational objective 2.1— inspection measures and follow-up inspections

Indicator: 2.1.a Percentage of facilities where inspection measures are applied annually, and according to risk level of facilities

Strategic objective 3. — Efficacy and appropriate response

Operational objective 3.1— Preparednes for reaction in crisis

Indicators: 3.1.a Percentage of the system for crisis management developed

3.1.b Percentage of inspection measures terminated on time

Operational objective 3.2. — Control of costs

Indicator- 3.2.a Price of a single inspection

UK SOUTH KESTEVEN DISTRICT COUNCIL

Strategic objective: Financial independence through development of services which aim to support FBOs to start-up, develop or improve the business

Planned controls	2017/2018	Realized	2018/2019
High risk	165	158	173
Medium risk	199	204	267
Low risk	146	147	226

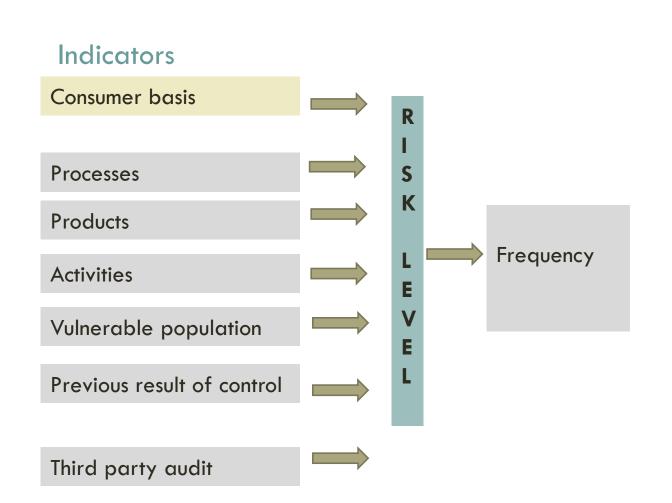
Other forms of inspections` work	2017/2018	Realized	2018/2019
Interventions	75	125	125
Follow-up inspections	110	90	100
Provision of advices	40	55	60
Support start-ups	125	124	125
Complaints	150	129	130
Other requests	215	186	190
Pre-audit where legally demanded	50	82	85

COMPLIANCE PROMOTION TOOLS

- Transparency
- Self-regulation
- Collaboration with industry
- Proportionality of controls
- Selection of industries where activities will be intensified
- Official control lists

- Voluntary compliance schemes
- •Industry specific HACCP models
- Provision of advices during inspection or as a separate activity
- Enforcement model
- Regulatory delivery
- Publication of reports
- Coherent approach

DENMARK: COMPLIANCE PROMOTION THROUGH RISK CATEGORIZATION OF FBOs



Types of control

Documentary

Inspection

Audit

Inspection of FBO's which have chains of facilities

DENMARK: FREQUENCY OF CONTROL

Risk level	No of points	Standard frequency	Elite frequency	Reduced frequency	
Very high	122 and more	4	3	2 ←	If third
High	76-121	2	1	-	party audited
Medium	50-75	1	0.5	-	adanea
Low	11-49	0.5	0.5	-	
Very low	10 and less	As required	-	-	

Elite: no non-conformities during 12 months or 4 controls

CHECK LISTS: POLAND, GREECE

		PODSTAWA PRAWNA		OCENA	INSTRUKCJA
			P/ ND	N	
5.0	GOSPODARKA ODPADAMI I ZABEZPIECZENIE PRZED SZKODNIKAMI				
5.1	Odpadami stałymi zarządza się zgodnie z prawem:	Zał. II, rozdz. VI, ust. 2 - Rozp 852/2004	р.		
5.1.1	a) znajduje się wystarczająca liczba odpowiednich pojemników na odpady,			5	
5.2.1	a) pojemniki na odpady są regularnie opróżniane i poddawane zabiegom higienicznym,			10	Poddawane zabiegom higienicznym oznacza myte, suszone i dezynfekowane.
5.2	Urządzenia do zwalczania szkodników i insektów	Art. 59 ust. 1, art. 60 UBŽŽ. Roz. III art. 7 Rozp. 852/2004			
5.2.1	a) sq odpowiednio umieszczone i regularnie czyszczone,			5	Pułapki na szkodniki zawierające środki trujące mogą być stosowane tylko na zewnątrz budynku.
5.2.2	a) nie ma bliskiego kontaktu między urządzeniami do łapania szkodników a żywnością.			10	
5.3	Brak oznak obecności szkodników, zwierząt dzikich czy domowych.	Zał. II, rozdz. IX, ust. 4 - Rozp 852/2004	р.	25	Nie istnieją widoczne ślady bytowania szkodników (odchodów, pogryzień, fragmentów szkodników). Zapobiega się przedostawaniu się dzikich zwierząt na teren obiektu. Na terenie ani w obiekcie nie ma zwierząt domowych.
5.4	Produkty, których termin ważności upłynął lub produkty niezgodne są bezpiecznie usuwane.	Zai. II, rozdz. VI, ust. 1 - Rozp. 852/2004, Art. 14 ust. 1-5 Roz. 178 z 2002r.		15	Terminy produktów niezgodne oznacza, że takie produkty spożywcze nie spełniają kryteriów specyfikacji, np. produkty zwrócone przez konsumentów lub produkty wyprodukowane w obiekcie, których termin ważności upłynął. Muszą one natychmiast być usuwane. Produkty lub przyprawy przeterminowane muszą być umieszczane osobno względem produktów, dla których data ważności nie upłynęła, wyraźnie oznakowane i usuwane tak szybko, jak jest to możliwe.
5.5	Odpadki pokonsumpcyjne i technologiczne są usuwane codziennie z pomieszczeń produkcyjnych. Ich ponowne przetwarzanie jest zabronione.	Zai. II, rozdz. VI, ust. 1 - Rozp. 852/2004, Art. 14 ust. 1-5 Roz. 178 z 2002r.		15	Termin resztki oznacza niezjedzone lub częściowo zjedzone przez klientów produkty gotowe danego przedsiębiorstwa. Żywność, która nie była serwowana, jeżeli zgodnie ze specyfikacją może być przechowywana więcej niż jeden dzień, powinna być prawidłowo etykietowana (data produkcji) i przechowywana nie dłużej, niż dopuszczone zgodnie ze specyfikacją. Powinna być przechowywana z zamkniętych pojemnikach lub zawinięta w folię ochronną.
		SUMA UZYSKANY PUNKTĆ			

REGISTRATION

APPLICATION FORM FOR THE REGISTRATION OF A FOOD BUSINESS ESTABLISHMENT

(Regulation (EC) No. 852/2004 on the Hygiene of Foodstuffs, Article 6(2))

This form should be completed by food business operators in respect of new food business establishments and received by the relevant Food Authority 28 days before commencing food operations. On the basis of the activities carried out, certain food business establishments are required to be approved rather than registered. If you are unsure whether any aspect of your food operations would require your establishment to be approved, please contact Dudley MBC for guidance.

The completed form should be sent to: **Dudley Metropolitan Borough Council** Food and Consumer Safety 4 Ednam Road Dudley West Midlands

Address of establishment (or address at which moveable establishment is kept)			
		Post Code	
. Trading name of food business			
or Limited Company where relevant)			
. Head Office OR Home address of Food Business Operator where different from address of establishment)			
	Post Code		
Felephone No.	Mobile No		
E-Mail			
5. Type of food business (Please tick ALL the boxes that apply):			
Staff restaurant/canteen/kitchen Hospital/residential home/school Retailer (including farm shop) Distribution/Warehousing Restaurant/café/snack bar Food manufacturing/processing Market/Market stall Importer Takeaway Catering	00000000	Hotel/pub/guest house Packer Private house used for a food business Moveable establishment e.g. ice cream van Wholesale/cash and carry Primary Producer – livestock Primary Producer – arable Food Broker	
Other (Please give details):			
3. If this is a new business the date you intend to open			
Date			
Name(BLOCK CAPITALS)	NOT ACT	ER THIS FORM HAS BEEN SUBMITTED, DD BUSINESS OPERATORS MUST FIFY ANY CHANGE IN ACTIVITIES TO THE FIVITIES STATED ABOVE (INCLUDING DOURE) TO DUDLEY MBC AND SHOULD DOWNTHIN 28 DAYS OF THE CHANGE(S)	

HAPPENING.

NOTES ON FOOD REGISTERED PREMISES

What is registration?

Registration of premises used for a food business (including market stalls, delivery vehicles and other
moveable structures) is required by law. Registration will allow local authorities to keep an up-to-date list of
all those premises in their area so they can visit them when they need to. The frequency of the visits will
depend on the type of business.

Who needs to register?

- 2. If you run a food business you must tell (or arrange for someone else to tell) the Local Authority about any premises you use for storing, selling, distributing or preparing food. Food premises includes restaurants, hotels, cafes, shops, supermarkets, staff canteens, kitchens in offices, warehouses, guest houses, delivery vehicles, buffet cars on trains, market and other stalls, hot dog and ice cream vans etc.
- 3. Anyone starting a new food business must register with the Local Authority at least 28 days before doing so.
- The majority of premises will have to be registered. However, certain premises are exempt from registration e.g. some which are already registered or approved for food law purposes, some domestic premises and some village halls. You should contact your Local Authority if you think you might be exempt.

How do I register?

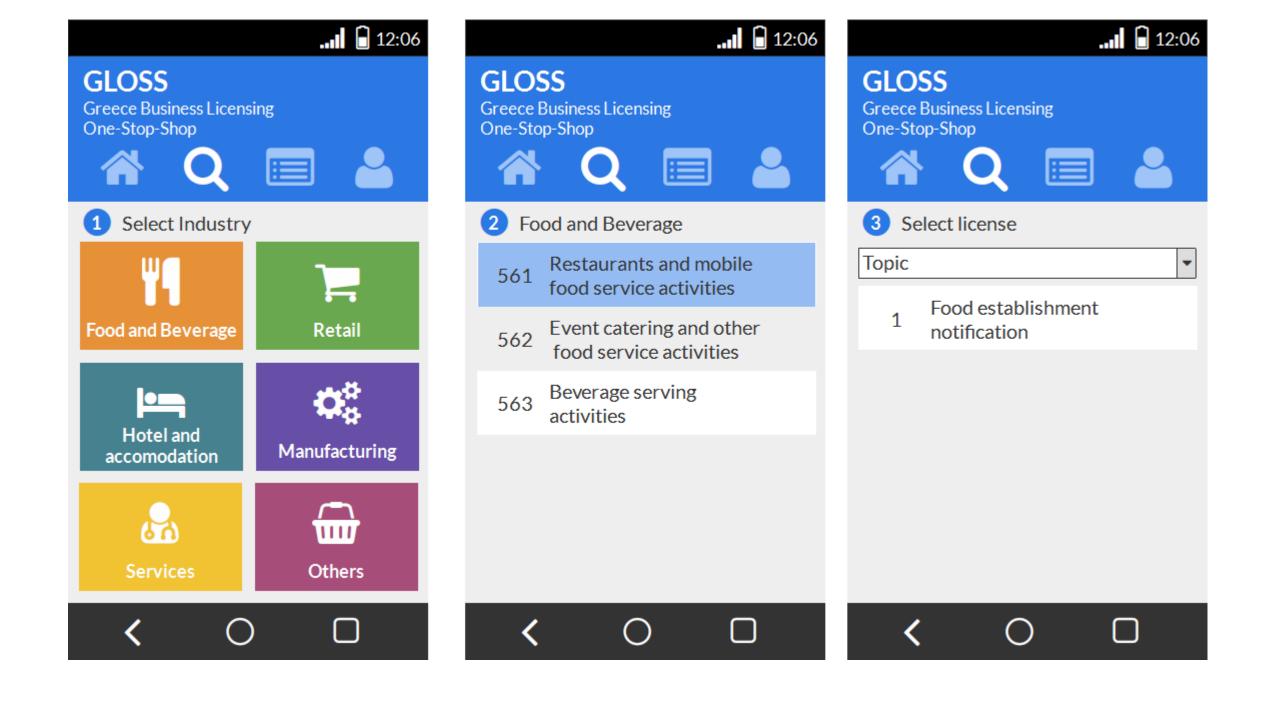
- 5. By filling in this form. Registration cannot be refused and there is no charge. The registration form must be sent to your Local Authority. The address is on the front of this form. If the form is sent to the wrong address your application will not take effect until it is received at the proper place. If you use premises in more than one Local Authority area, you must register with each authority separately.
- 6. You must tick all the boxes which apply to your business, answer all the questions and give all the information requested. If you have any questions your Local Authority will help you. It is an offence to give information which you know is false.

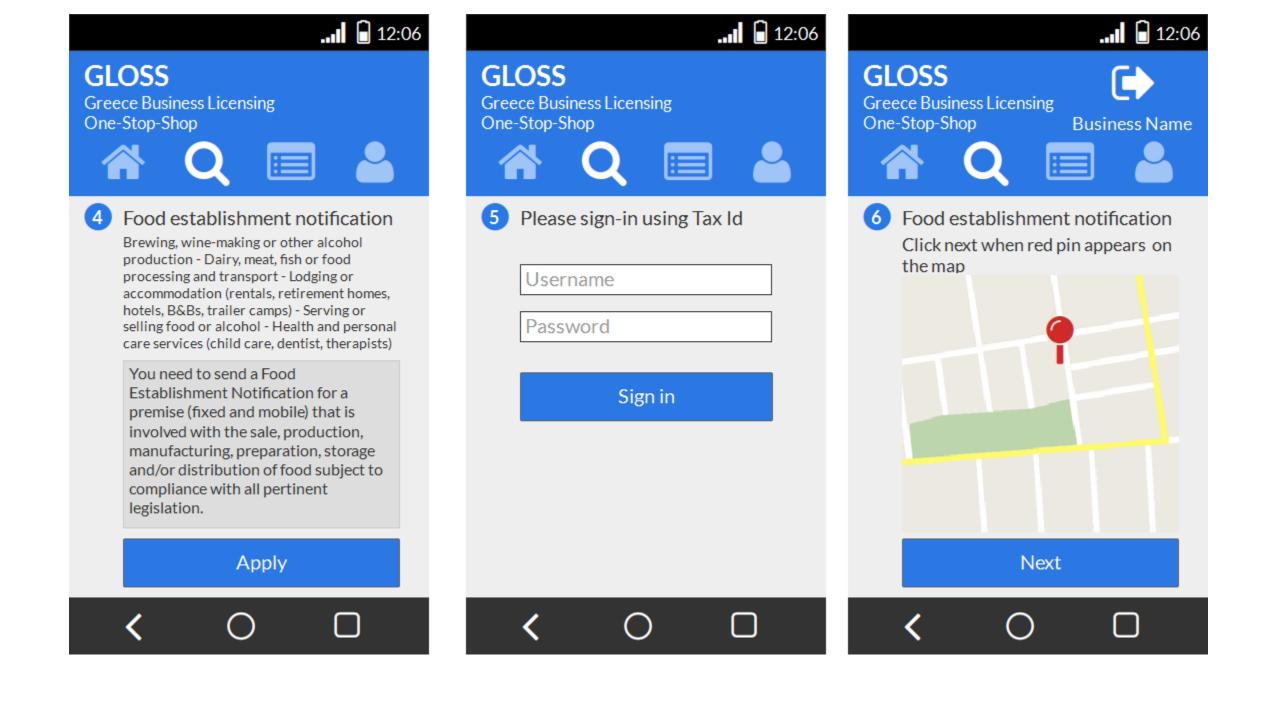
What happens to the information given on the form ?

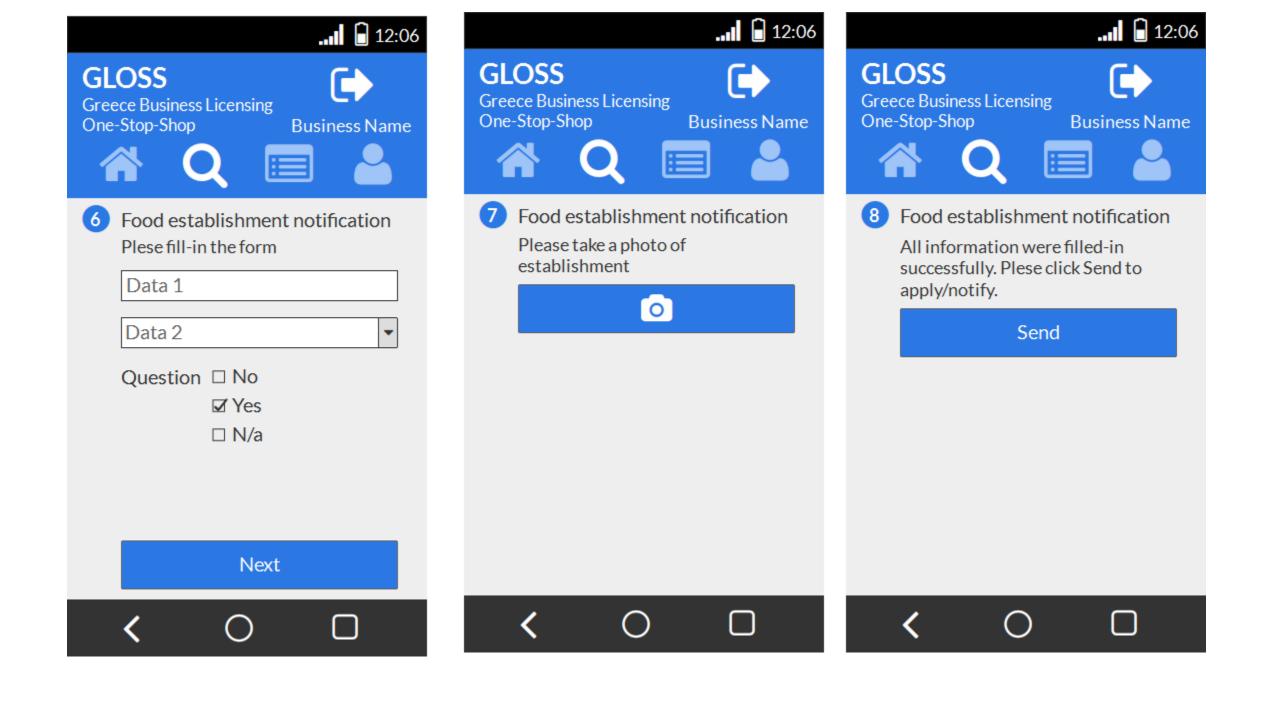
- The Local Authority will enter the details on its Register. A register of addresses and the type of business carried on at each will be open to inspection by the general public. Records of the other information provided will not be publicly available.
- 9. The information given on this form is subject to provisions of the Data Protection Act 1998. Your personal details will be collected solely to process your application for registration of food premises. Other information about your business may be shared with other agencies such as the Food Standards Agency or Defra. Further data protection information can be obtained from the Information Commissioner's website www.informationcommissioner.gov.uk

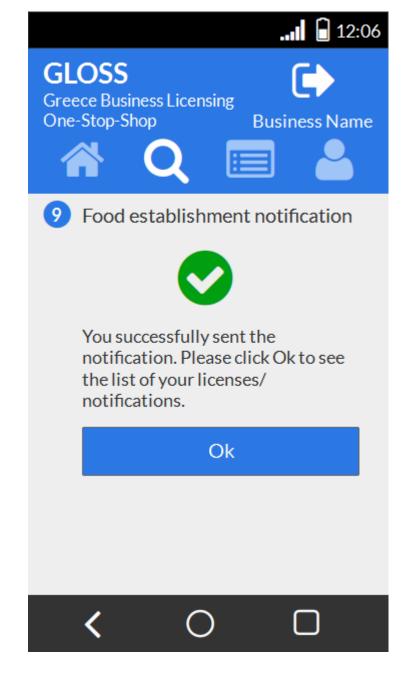
Changes

10. Once you have registered with the Local Authority you only need notify them of a change of proprietor, if the nature of the business changes, or if there is a change of the address at which moveable premises are kept. The new proprietor will have to complete an application form.









EU FRAMEWORK AND NATIONAL LEGISLATION

Greece – EC rules on the top of national: the Government comes first



UK – Blending and Regulatory delivery: Businesses come first



Although efforts have been made to reach a working level of harmonization in EU food law, this is far from being the case. And even in the most harmonized cases, national differences in law enforcement are a sad reality. Yet knowing which requirements apply to each product and how to comply in the various countries is essential for food companies. http://foodcomply.eu/onfoodlaw/

THANK YOU

Gordana.ristic011@gmail.com