

ALBANIAN FOOD LAW REQUIREMENTS REGARDING HACCP AND THE POSSIBLE CURRENT WORLDWIDE FOOD SAFETY MANAGEMENT SYSTEMS (FSMS) TO BE APPLIED FROM THE FOOD BUSINESS OPERATORS IN ALBANIA

Arben Memo^{1*}, Aleksander Petre², Arjan Xhelaj², Teodor Kote³

¹Faculty of Natural Sciences at Tirana University, bul. Zogu I, PC 1000 Tirana, Albania

²TMC Training Management Consulting Ltd., Rr. I. Tomini, P.32, PC 1016 Tirana, Albania

³Academic Network of Albania, rruga Sami Frasheri Nr. 54, PC1001 Tirana

*e-mail: arben.memo@fshn.edu.al

Abstract

Albanian Food Law Nr. 9863 dt. 28.01.2008 defines the requirements for all the food business operators (except primary one) to have in place a self-control system based on HACCP methodology.

In Albania there is not any official regulation yet, which can define clearly and systematically what the Albanian food business operators should document and implement referring to the HACCP model. So to be on the safe side most of the food operators are asking for consultancy and certification against ISO 22000:2005. But those which are certified and more others which plan to do it perceive this model as quite complex for them. This paper reveals other FSMS for the food business operators to apply except ISO 22000:2005, and finds out if those systems are really less complicated and more suitable for them. The methodology used are inquiries, interviews with food business operators, food safety literature, results, inductive and deductive type of results presented in narrative and tabular way.

Conclusions are that also the other FSMS systems except ISO 22000:2005 can be implemented and certified from the Albanian food business operators. But similar to ISO 22000:2005, those FSMS are perceived from them as complex ones as well. In reality all these systems require a certain level of technical and management documentation and technical know-how. So the reasons to choose one or another FSMS rely mostly not on the complexity of those systems (as they all are complex), but on the business objectives of the food business operators and their specific client and partner needs.

Keywords: Albanian Food Law, Food Safety Management Systems, ISO.

1. Introduction

Albanian Food Law No. 9863 dated from 28.01.2008, requires all the Food Business Operators (FBOs) in Albania already to have implemented the HACCP methodology. But unfortunately that is still not the case. According to some data gathered through interviews with officials from the Albanian Food Authority and the Albanian Directorate for Food Safety at the Ministry of Agriculture, Rural Development and Water Management we have a situation where about 35% of the controlled FBOs can be considered as they seem to implement the HACCP Principles, as the Albanian Law requires. Even this quite bad figure should be seen critically taking in consideration that the Food Authority investigates only the so called "HACCP infrastructure". The evidences and official published data on continuous (day by day) HACCP implementation are missing. Also there is no official data from any institution in Albania on how many FBOs are registered against ISO 22000, HACCP or against any other Food Safety Management Scheme. Some old data revealed from Food Authorities say that the most implemented Standards are ISO 22000 and HACCP and the number of companies certified does not exceed 10% of FBOs.

From those certified companies we have interviewed professionals from 10 FBOs with more than 50 employees and which are certified from more than three years against ISO 22000 or HACCP. The common concerns that come from those FBO-s are that they find ISO 22000 and HACCP as a very complex management systems, which in case of continuous implementation will cause a lot of costs for them regarding personnel trainings, infrastructure maintenance, product tests, documentations etc.

There was also another common finding from all FBOs. They would be ready to properly implement a Food Safety Management System (FSMS), but they wish

that such system should be much simpler comparing to what HACCP and ISO 22000 requires. That means that FSMS-s would probably require as less as possible skilled persons, risk analysis, tests, continuous implementation (data) and periodic improvements. Does such Food Safety Management Systems/Standards exist? From the beginning we say no, such systems can not exist and will not exist as the food processing is becoming more and more complex and the awareness of people for safe food in Albania is increasing. We will review some FSMS-s based on the benchmarking process performed from the Global Food Safety Initiative (GFSI).

2. Current situation with food safety standards

This discussion is based on review of different food safety standards requirements, their applicability in Albania and on oral discussion with 10 food business operators.

GFSI is a global non-profit foundation led by the Consumer Good Forum [1]. The GFSI develops and issues a guide that defines and updates the requirements that must be met by the developed Food Safety Management Standards in order to be recognized by GFSI. The most all encompassing Food Safety Management Standards benchmarked by GFSI are BRC Global Standard, SQF Code, IFS and FSSC 22000.

BRC (British Retail Consortium) Global Standard for Food Safety (6th edition) is a globally quite well-accepted safety and quality certification scheme applied in over 100 countries by retailers and suppliers. All companies, part of the supply chain from farm to fork, are required to identify and control food safety and legality of their products during the whole production and distribution process.

Safe Quality Food (SQF) Code has been recently revised into one standard that includes specified modules for all industry sectors, substituting the previous two standard approaches (SQF 1000 and SQF 2000). The SQF is organized in modules and through a provided table can be identified which module applies to which food industry sector. The appropriate module selection should be done either directly with SQF Institute or through a reputable and qualified certification body or consultant. SQF offers three certification levels. Level one is basically compliant with basic GMP requirements and is not recognized as an approved GFSI scheme. Level two is a recognized GFSI scheme and includes the requirements from level one together with HACCP food safety requirements. Level three includes the requirements of Level two including evidenced compliance against quality management system requirements.

International Featured Standards (IFS) is a widely EU spread food safety standard especially required by retailers in Germany, France, Italy as an alternative to BRC, the British equivalent standard. IFS provide a range of audits on safety and quality of processes, primary production, and products of food manufacturers, with the exception of agricultural primary production. IFS cover the entire food chain through a series of relevant Standard but only IFS Food and IFS PACsecure are currently GFSI recognized schemes.

Food Safety System Certification (FSSC) 22000 Food Products is a complete certification scheme for food safety systems based on ISO 22000:2005, ISO 22002-1:2009, and FSSC 22000 additional requirements. ISO 22000:2005 alone is not approved by GFSI because through the benchmarking process were identified weaknesses related to specific requirements for Prerequisite Programs (PRP-s). To be FSSC 22000 compliant FBOs already certified against ISO 22000:2005 in fact can add ISO 22002-1 to its scope, pass the relevant audit and get certified against this recognized GFSI scheme. FSSC 22000 gives the possibility to the organizations to integrate also quality in their certification scope through compliance against the requirements of ISO 9001:2008 standard. FSSC 22000 can be applied in a wide range of FBOs of the food chain that deal with food processing and production for humans and animals is including the production of food ingredients as well.

Looking at the above mentioned schemes/standards we find out that some ground pillars are present at all of them. At each and every of them are identified requirements related to the following categories: a) HACCP based on Codex Alimentarius; b) Food Safety Management through organized processes, interrelated into functional systems; c) Operational and technical production, processing and delivery Practices, all based on worldwide known Good Practices (GMPs, GAPs, etc.).

Based on the review of the requirements of the selected schemes/standards I am proposing here a Table which compare the strengths of the main common requirements of all those GFSI schemes versus ISO 22000:2005 Standard, which currently is the most implemented and certified standard in Albania. ISO 22000:2005 requirements are used as benchmarks and are signed with 3 asterisks. If a requirement from other Standards is evaluated as stronger, than to it are assigned more asterisks than to the respective ISO 22000:2005 requirement. If the requirement is evaluated as weaker than less asterisks are assigned to it.

Table 1. Comparison of ISO 22000 requirements versus GFSI recognized Schemes FSSC 22000, BRC, SQF, IFS

Requirements ISO 22000:2005	ISO 22000 [2]	FSSC 22000 [3]	BRC [4]	SQF [5]	IFS [6]
Food policy and objectives	***	***	****	***	****
Procedures and records	***	***	***	***	***
Food safety manual	***	***	***	***	***
Control of documents	***	***	****	****	***
Control of records	***	***	****	****	***
Management commitment	***	***	****	****	***
Food safety team leader	***	***	**	****	***
Suppliers and contractors	***	***	****	***	***
Internal communication	***	***	***	***	***
Emergency preparedness and response	***	***	***	***	***
Management review	***	***	****	***	****
Provision of resources	***	***	***	***	***
Human resources	***	***	***	****	***
Competence awareness and training	***	***	***	****	***
Infrastructure	***	****	****	****	****
Work environment	***	****	****	****	****
Prerequisite programs (PRPs)	***	*****	*****	*****	*****
Food safety team	***	***	***	****	***
Product characteristics	***	***	***	***	***
Raw materials, ingredients and product contact materials	***	***	***	***	***
End products	***	***	***	***	***
Intended use	***	***	***	***	***
Flow diagrams	***	***	***	***	***
Description of process steps and control measures	***	***	***	***	***
Hazard identification and determination of acceptance levels	***	***	***	***	***
Hazard assessment	***	***	***	***	***
Selection and assessment of control measures	***	***	***	***	***
Establishing OPRPs	***	*****	*****	*****	*****
HACCP plan	***	***	***	***	***
Identification of CCPs	***	***	***	***	***
Determination of critical limits	***	***	***	***	***

Monitoring CCPs	***	***	***	***	***
Actions when critical limits exceeded	***	***	***	***	***
Updating preliminary information and documents	***	***	***	***	***
Verification planning	***	***	***	***	***
Traceability	***	***	***	***	***
Control of non-conformity	***	***	***	***	***
Corrections	***	***	***	***	***
Corrective actions	***	***	***	***	***
Requirements ISO 22000:2005	ISO 22000 [2]	FSSC 22000 [3]	BRC [4]	SQF [5]	IFS [6]
Handling of potentially unsafe products	***	***	***	***	***
Withdrawals	***	***	***	***	***
Control of monitoring & measuring	***	***	***	***	***
FSMS verification	***	***	****	***	****
Internal audit	***	***	****	***	****
Evaluation of individual verification results	***	***	****	***	****
Analysis of results of verification activities	***	***	****	***	****
Improvement	***	***	***	***	***
Continual improvement	***	***	***	***	***
Updating the FSMS	***	***	***	***	***

*** = Benchmarked Strength of the main Requirements of ISO 22000.

** = Weaker Strength of Requirement of the other Standard(s) in comparison to the respective ISO 22000 Requirement's strength.

* = Much Weaker Strength of Requirement of other Standard(s) in comparison to the respective ISO 22000 Requirement's strength.

**** = Higher Strength of Requirement of Other Standard(s) in comparison to the respective ISO 22000 Requirement's strength.

***** = Much Higher Strength of Requirement of Other Standard(s) in comparison to the respective ISO 22000 Requirement's strength.

3. Conclusions

- First of all, we must say that all of reviewed standards require the documentation and implementation of the HACCP principles regarding food safety control. To implement all requirements from HACCP or other food safety standards as base needs establishment of qualified and trained HACCP/Food safety team, which can technically specify raw materials and final product, map the process flows, establish critical control points (CCPs) and manage them through detailed HACCP/Food safety standard plan.

- HACCP and all other food safety standards are requiring a lot of management procedures and commitment which will guarantee: plan, do, act, and check cycle of operations. Food safety management procedures for all those systems and standards have different requirements, including: food safety policy, food safety

manual, management review, internal audits, corrective and preventive actions (CAPAs), customer and supplier management, traceability, product testing.

- Food safety systems/standards are differentiating mostly in operational and technical procedures. It is quite important to say that these schemes use the same sources of knowledge like: FAO, WHO, ISO, CAC. The differentiation comes mostly on the fields of scheme applications, related to specific industry categories. Besides all of these, schemes are requiring prerequisite programs PRPs (general and operational), combined with GMPs, GAP, and other good practices. All this body of knowledge should be continuously updated and at the same time transmitted to all food safety plans during their periodic reviews.

- Certification schemes are also different. However, all of them in their audit are using principles defined at

ISO 19011:2011 [7]. Most used certification scheme is ISO 22000:2005, and this scheme is most applied.

- We could draw the following conclusions targeting the expectations of the Albanian FBOs:

- There are no "easier" food safety requirements comparing to what is required from the Albanian Food Law or the main popular certification schemes. Reviewing the certification process of all the above mentioned food safety schemes, the conclusion is that they are at least as strict and professional as written in ISO 22000. According to the Albanian Food Law, the certification schemes are not required, but this adds a lot value to the clients and is very much recommended process, at least at the first years of FSMS implementation.

- The food safety expertise costs money as it is a valuable know-how gained through education, training and experience. So FBOs should consider spending money for food safety in the same way they are spending money for the electricity and water. Safety is a necessary cost point, no more and no less, which in longer term pays off itself. If safety is not achieved for all food products, exporting the food products to EU or other developed countries will be only a dream. Failing food safety implementation will not only damage own businesses, but will be a quite bitter pillule for the new economic model that Albania is pushing and which rise hope in generating incomes through Albania made products, i.e. first and above of all, from processed food products, using Albanian natural agricultural resources.

- We recommend FBOs to employ more adequate educated experts (chemists, microbiologists, biologists, chemical technologists, etc.) and train them periodically regarding the food safety issues.

- FBOs should be prepared to invest in PRPs like: premises, equipment, pest control, GMPs (Good Manufacturing Practices), GAP (Good Agricultural Practices), GHPs (Good Hygienic Practices), etc. As soon as possible they start, it will be better for them, especially in terms of business competition and legal compliance.

- We also highly recommend to all FBOs to look after the necessary applied know-how provided from reliable food safety consultants, universities or scientific institute experts. Every money spent for such expertise should be looked through the prism of the benefits that FBOs will gain by offering their products to new markets (providing the conditions regarding safety), and in the way that they also saving money from the missing fines/penalties, as the Food authorities are strengthening their controls progressively.

4. References

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