



# Back to Basics: HACCP & the Law

*Ensuring Food Safety through Legal Compliance*

# What is HACCP?



- HACCP was first developed in the 1960s
- Hazard Analysis and Critical Control Points
- **Science-based, preventive and systematic** approach to **food safety**; a methodology designed to identify, evaluate and control **significant hazards** in a food operation - so that the end products **do not cause harm** to the consumers
- HACCP helps businesses **proactively identify & control food safety risks to prevent foodborne illnesses and injuries**



# Why is implementing HACCP essential?



- **To protect consumers** (from being harmed - foodborne illnesses & injuries)
- **For due diligence / business protection** (food recalls, reputational damage, fines and other legal penalties, closures...)
- To obtain **voluntary food safety certifications** (eg BRCGS, Salsa, FSSC 22000, IFS, SQF...)
- **For legal compliance!** HACCP is required by law in the UK, the EU & many other countries



# Regulation (EC) 852/2004 – Scope

- Establishes “general rules for food business operators on the hygiene of foodstuffs” across the EU and the UK (*retained post-Brexit*).
- Applies to “*food business operators carrying out any stage of production, processing and distribution of food after primary production*”.
  - Eg: Manufacturing, catering, retail, food storage & distribution.
  - But not : Home cooking for private use, small-scale direct farm sales, primary production.





# Regulation (EC) 852/2004 Chapter II Article 5 – HACCP Requirements

“Food business operators shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles.”



Enforcement carried out by **food safety authorities** through inspections.



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# HACCP principles as listed in Article 5

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- (a) identifying any hazards that must be prevented, eliminated or reduced to acceptable levels;*
- (b) identifying the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels;*
- (c) establishing critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards;*
- (d) establishing and implementing effective monitoring procedures at critical control points;*
- (e) establishing corrective actions when monitoring indicates that a critical control point is not under control;*
- (f) establishing procedures, which shall be carried out regularly, to verify that the measures outlined in subparagraphs (a) to (e) are working effectively;*
- (g) establishing documents and records commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined in subparagraphs (a) to (f).*



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# Regulation (EC) 852/2004 – Introduction

CODEX ALIMENTARIUS  
INTERNATIONAL FOOD STANDARDS

“The HACCP requirements should take account of the principles contained in the Codex Alimentarius.”



Note: The law allows **flexibility** for small **businesses** but still requires to **retain documents**.

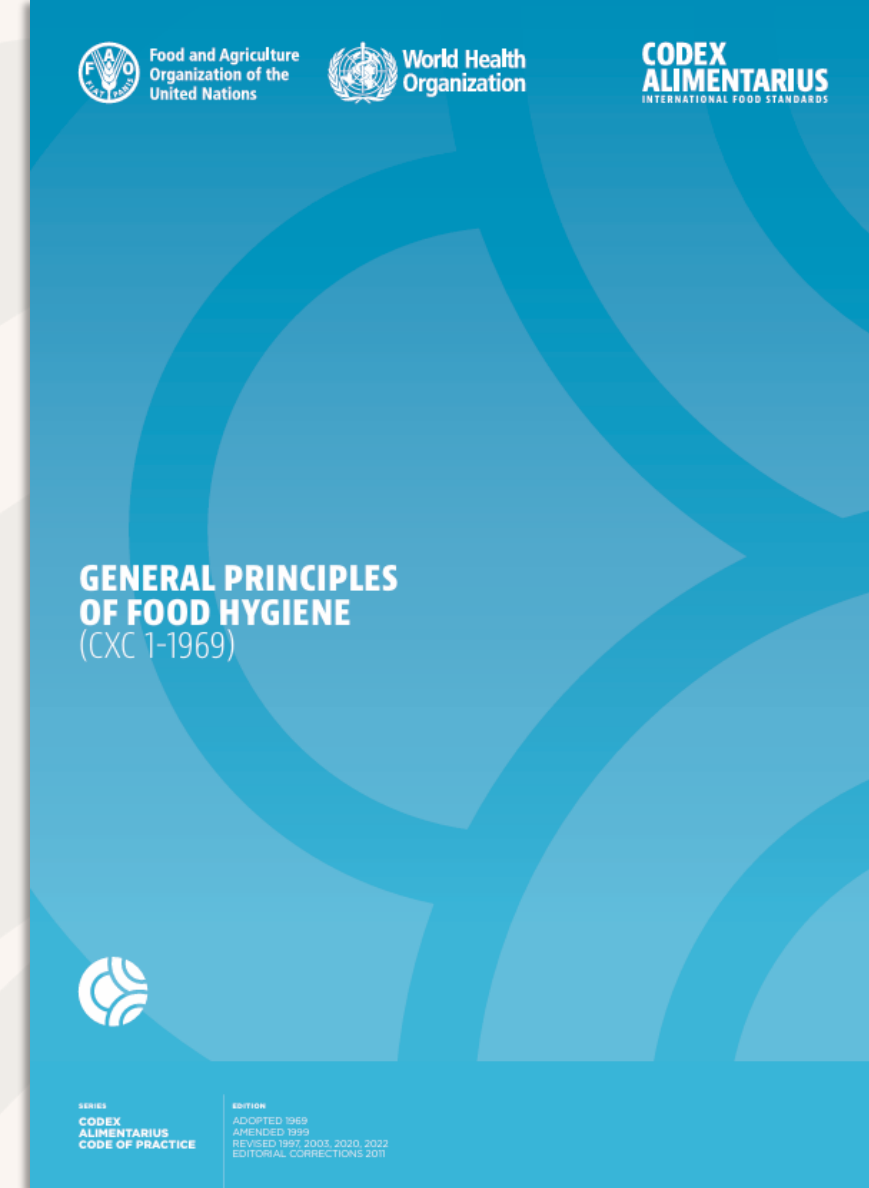


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# Codex HACCP (2023)

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- The **Codex General Principles of Food Hygiene** outline **12 logical steps** to implementing HACCP:
  - 5 preparatory steps
  - 7 principles
- **Every food business in the UK & the EU must integrate the 7 principles of HACCP into its daily operations.**





# Codex HACCP – the 12 logical steps

*Required by law*



## 5 pre-steps

1. Assemble HACCP team
2. Describe product
3. Identify intended use
4. Construct flow diagram
5. On-site confirmation of flow diagram

 *NOT Required by law*


## 7 principles

1. List all potential hazards  
Conduct a hazard analysis to identify the significant hazard(s)  
Consider control measures
2. Determine CCPs
3. Establish validated critical limits for each CCP
4. Establish a monitoring system for each CCP
5. Establish corrective actions
6. Validate the HACCP plan and establish verification procedures
7. Establish documentation and record keeping

# Who requires HACCP Training?

- EC Reg 852/2004 **Chapter XII requires** that:
  - food handlers be “supervised and instructed and/or trained in food hygiene matters”,
  - “those responsible for the development and maintenance of [HACCP] or for the operation of relevant guides have received **adequate training in the application of the HACCP principles**”;
- **No set levels, no set refresher frequency.**
  - Industry best practice:
    - Level 2: Food handlers
    - Level 3: Supervisors
    - Level 4: HACCP plan developers & managers





# What else does (EC) 852/2004 require?

- **PRPs (Pre-Requisite Programmes)**

- adequate maintenance, cleaning and disinfection
- protect against toxic materials
- pest control
- suitable temperature-controlled handling and storage conditions
- enough lavatories & washbasins with effective drainage
- food waste management
- staff hygiene & health
- etc

- **Food Safety Culture (EU, post-Brexit)**





# Common Pitfalls & Best Practices



- **Mistakes businesses make:**
  - HACCP plan **too generic** (not site-specific, not tailored to specific hazards).
  - **Poor record-keeping** – no evidence of consistent monitoring.
  - **Lack of or inadequate staff training** on HACCP procedures and/or hygiene.
- **Best practices:**
  - Keep HACCP **simple and practical**.
  - Assign clear responsibilities and train all staff on their role in food safety.
  - **Review and update plans regularly** to reflect operational changes.

# Conclusion & Key Takeaways

- HACCP is a legal requirement under Regulation (EC) 852/2004.
- Compliance protects businesses and consumers, ensuring **food safety, due diligence, and supporting customer & consumer trust.**
- **Training and documentation are key to success and legally required.**

 *Stay informed, review your HACCP plans, and ensure staff are trained!*

 *Think of HACCP not just as a legal duty*

 *but also, as a tool to protect customers, consumers and your business reputation!*







Thank you for  
listening 😊



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