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FoodDrinkEurope Guidelines on food safety culture

Food Safety Culture: From Theory to Practice



May 2023

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Summary



This short guidance document was developed by the food safety culture ad-hoc group of FoodDrinkEurope. It aims at providing some general guidelines, practical examples, and tools for Food Business Operators (FBOs) to help them understand, implement, and measure food safety culture.

Food safety culture consists of the shared values, beliefs, attitudes, behaviours, and practices within an organisation which contribute to the creation and maintenance of a safe food environment. In FBOs it encompasses the individual and collective actions of all employees, from management to the front-line workers, in creating a work environment that prioritises food safety.

Implementing a strong food safety culture requires a combination of both top-down and bottom-up approaches. Senior management shall set the tone and lead by example while employees are fully engaged and actively involved in the process. This includes providing adequate and appropriate training, availability of resources, and support for employees and leaders to ensure that they understand the importance of food safety and are equipped to perform their duties safely.



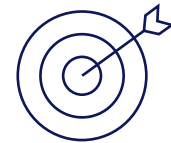
Background



In September 2020, the Codex Alimentarius Commission (CAC) adopted a revision of its global standard on General Principles of Food Hygiene¹ ([CXC 1-1969](#)). The revised CXC 1-1969 introduces the ‘food safety culture’ concept as a general principle. Food safety culture enhances food safety by increasing the awareness and improving the behaviour of employees in food establishments within a determined organisation.

In 2021 the European Commission followed with Regulation (EU) 2021/382², which introduced Chapter XIa on food safety culture in Annex II of Regulation (EC) No 852/2004 on Food Hygiene. The Commission Notice on Food Safety Management Systems³, published in September 2022, aims at facilitating and harmonising the implementation of the EU requirements by providing practical guidance to FBOs.

Objective



The objective of the FoodDrinkEurope guidelines on food safety culture is to provide guidance on:

1. The main considerations that are arising from the legislative framework;
2. General elements and tools that could be used to develop and measure a food safety culture;
3. Examples on how to best apply these concepts in practice.

¹ GENERAL PRINCIPLES OF FOOD HYGIENE CXC 1-1969 Adopted in 1969. Amended in 1999. Revised in 1997, 2003, 2020. Editorial corrections in 2011

² Commission Regulation (EU) 2021/382 amending the Annexes to Regulation (EC) No 852/2004 of the European Parliament and of the Council on the hygiene of foodstuffs as regards food allergen management, redistribution of food and food safety culture

³ Commission Notice on the implementation of food safety management systems covering Good Hygiene Practices and procedures based on the HACCP principles, including the facilitation/flexibility of the implementation in certain food businesses (2022/C 355/01)

Main considerations arising from Regulation (EU) 2021/382

Regulation (EU) 2021/382 includes the following elements as the main components of a food safety culture:

- **Commitment** of the management to the safe production and distribution of food;
- **Leadership** towards the production of safe food;
- **Engagement** of all employees in food safety practices;
- **Awareness** of food safety hazards and of the importance of food safety and hygiene by everyone in the business;
- **Communication** to be open and clear between all employees;
- **Resources** availability to ensure the safe and hygienic handling of food.

Additionally, among other considerations, the management of an FBO shall verify that controls are implemented, measured and reviewed. Furthermore, it should ensure that appropriate and repeated training and supervision are in place for the personnel.

Continuous improvement of the food safety management system (FSMS) should be encouraged and should consider developments in science, technology and best practices.

According to the Regulation, the implementation of food safety culture shall take account of the nature and size of the food business.

General guidelines



Corporate culture is an organisation's shared values, attitudes, and behaviours that define its identity and guide its actions. A food safety culture, on the other hand, is about the internal organisation and, unlike corporate culture, cannot be defined as an overall culture. Each group, discipline, department, function, person usually has different food safety tasks and assigned expectations. It is important to define these in the company's FSMS, which includes the Hazard Analysis Critical Control Point (HACCP) management system. Developing a food safety culture requires careful organisational planning, as well as ongoing efforts in training and communication. It is important to recognise that there is no 'one size fits all' solution for achieving a food safety culture.

Outlined below is an example of a ten-point plan for developing a food safety culture⁴:

1. Senior management should communicate SMART goals⁵ and expectations to the different business levels and disciplines;
2. Establish a transparent horizontal and vertical consultation structure;
3. Develop a food safety corporate and chain strategy;
4. Promote an environment in which people can communicate freely about (internal) deviations;
5. Management visibility and awareness: a visible and engaged management that is aware of food safety risks and actively promotes a food safety culture;
6. Empowerment, management, competencies, position, desired role model behaviour: empower employees through training and provide management with the competencies to act as desired role models for food safety culture, while holding employees accountable for their actions;
7. Make food safety culture visible and measurable;
8. Availability and communication of resources, arrangements, facilities and protocols: providing employees with the necessary resources and facilities is essential to ensure that they can perform their jobs safely and effectively;
9. Regularly communicate food safety developments;
10. Implement induction of new staff, training and education programs with accountability measures and steer towards the desired food safety culture and subculture adaptation.

⁴ "Ten Point Plan for Food Safety Culture" originally developed by the food safety culture WG of the Central Organisation for the Meat Sector (COV) and the Dutch Meat Industry Association (VNV)

⁵ SMART (Specific, Measurable, Achievable, Relevant, and Time-Bound)

Proposed tools to measure food safety culture

The Commission Notice highlights the importance of training as a primary tool for fostering and reinforcing appropriate attitudes and behaviours, and for addressing any identified gaps or weaknesses in the food safety culture. It's important to note that training shall include both formal training and on-the-job training.

Additionally, as described in the Notice, although the components of food safety culture are subjective (perception), tools have been developed to measure it objectively within an FBO. These can help compare the extent to which food safety culture and its components are met between FBOs, between different groups of employees within an FBO (e.g. operators versus management, different sites, in direct contact with foods or not) or to evaluate trends in time (by re-using this tool). This can trigger corrective actions such as additional training of certain staff on some or all of the components of food safety culture, improvement of communication channels, investment in resources, etc.

A tool which can be useful in developing and assessing food safety culture is a survey with a set of indicators or statements related to each component of the food safety culture. For example, respondents can express the extent to which they agree or disagree (e.g. on a scale from 1 to 5). The survey can be distributed to all levels of the organisation, including management and top management, and can serve as a valuable tool for assessing food safety culture. Furthermore, it can also be used as a basis to verify food safety culture in an FBO during an audit (see Appendix 3 to the Commission Notice). In addition to surveys and questionnaires, other methods for measuring food safety culture include observations of food safety practices and behaviours within an FBO, asking input from individuals within the organisation, as well as assessments of the FBO's food safety internal policies and procedures. These assessments can be conducted by internal staff or by external auditors and can provide valuable insights into the FBO overall food safety culture.

Practical examples

1. Leadership commitment

Senior management should lead by example, making a strong commitment to food safety. This includes regularly communicating the importance of food safety, providing resources for employee training, and ensuring that food safety policies and procedures are being followed.

Examples:

- A food safety manager or champion may be appointed to oversee food safety efforts within the FBO;
- Senior management to:
 - regularly communicate the importance of food safety and the role of each employee in maintaining food safety;
 - set aside adequate budget for food safety training and equipment;
 - publicly demonstrate their commitment to food safety by following food safety procedures and encouraging others to do the same;
 - ensure a safe environment to build a culture of trust, promoting constant improvement;
 - plan workshops to help establish the desired food safety culture within the FBO;
- Plant managers to communicate the importance of food safety through regular messages which can help to set the tone from the top and promote a food safety culture within the organisation;
- Develop surveys that are easy to understand and are adopted for the site. This tool can also be addressed to managers and top managers;
- Quality culture shall be a natural part of documents of intent, for example the Quality Policy.

2. Employee involvement and adapted training

In order to promote a food safety culture within an FBO, it is essential to provide all employees with regular and personalised training on food safety practices. This should include both initial induction training as well as ongoing training to keep up with new regulations and technologies. Additionally, involving employees in food safety efforts, such as through the establishment of a food safety committee, can help to create a shared sense of responsibility and commitment to maintaining high standards of food safety.

Examples:

- All employees receive regular training on food safety, including good hygiene practices, food safety regulations, and procedures for reporting food safety concerns;
- Implementation of nudging techniques which have been demonstrated to be a strong behavioural change tool. These may include simple and catchy messages displayed in common areas such as the reception, the lobby, the elevator, at the canteen, etc. Similar techniques have been successfully used to ensure employees' understanding of health and safety;
- Employees are encouraged to take an active role in developing a food safety culture through opportunities for feedback and participation in relevant committees;
- Managers hold regular meetings with employees to discuss food safety culture and provide updates on new initiatives;
- New employees receive appropriate training as part of their induction;
- Food safety culture week: engage employees via "Food Safety Culture Weeks". Such an initiative may include trainings and activities with pertinent themes (e.g. quizzes, challenges, etc.);
- Engage employees by motivating each department to make suggestions for further improvement, either using a simple box, or even a tailor-made App;
- Organising workshops and "on the job" trainings, leading to active participation and learning;
- All employees shall have the responsibility to report problems on possible deviations from the food safety culture to the identified person;

Practical examples

- Where applicable, take actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken;
- To embed food safety culture within the organisation, it is important to integrate it into the annual code of conduct training. This should involve educating employees on potential hazards, procedures for reporting incidents, and the overall importance of food safety for the consumer. Food safety should be framed as an essential aspect of the organisation's mission, stressing the impact on the consumer and promoting a natural and instinctive approach to food safety;
- Examples that focus on the consumer perspective should be included in food safety training, such as case studies that illustrate the impact of non-compliance incidents on the consumer. This can help employees understand the importance of food safety and the critical role they play in maintaining consumer trust and confidence in the company's products.



3. Continuous improvement

A strong food safety culture should continuously strive for improvement. This includes regularly reviewing and updating internal policies and procedures, incorporating new technologies and best practices, and encouraging employees to provide feedback and suggestions for improvement.

Examples:

- The organisation regularly assesses and updates its food safety culture policies and procedures based on new information and best practices;
- Encouraging and rewarding employees;
- Employees are encouraged to report food safety incidents and “near-misses” to help identify areas for improvement;
- Implement not just a “top-down” but also a “bottom-up” approach, where all employees are genuinely involved (e.g. each department can put forward a minimum of suggestions on food safety e.g. via email, in written form via idea boxes etc);
- Management regularly reviews food safety culture performance data to identify areas for improvement and track progress;
- Gap analysis versus Performance, compare the critical parameters; for example third parts certification (announced/unannounced), claims, and internal deviations;
- Food safety culture plant audits and mock drills e.g. will an operator challenge a person wearing the wrong personal protective equipment?;
- Create a safe environment to ensure appropriate communication with employees;
- An effective way to increase the visibility of food safety Key Performance Indicators (KPIs) is to use a food safety triangle (digital or physical board), similar to the EHS (environment, health, and safety) triangle, to highlight critical metrics such as days since the last recall, number of near misses, incidents, complaints, and more. This approach can help raise awareness and create occasions to celebrate food safety achievements and milestones.

Example of a food safety triangle:



4. Corrective actions

When food safety issues are identified, it is important to have a clear and effective corrective action plan in place. This includes prompt investigation, documentation, and implementation of corrective actions to prevent similar incidents from happening in the future.

Examples:

- Thorough monitoring: the organisation must create and uphold documented information that outlines the necessary steps to identify and eliminate the root cause of any non-conformities that are detected, prevent their reoccurrence, and restore the process to its normal state after a non-conformity has been identified. Lessons shall be shared following an incident (e.g. by involving the specific team in finding ways for improvement);
- Encourage reporting: encourage all employees to report any food safety issues they encounter, and make sure that they know how to do so. Create a culture where it is safe to report mistakes and where employees are not afraid of reporting issues;
- Investigate thoroughly: when issues are reported, investigate them thoroughly to identify the root cause and take action. Additionally, it's important to report back to the individual who reported the incident, to colleagues and the department they belong to, and in some cases, to other departments or the organisation as a whole;
- Continuously review and improve corrective action procedures to ensure that they are effective and up-to-date. This may involve regular reviews of procedures, employee training and ongoing monitoring of performance metrics.

Conclusion



In conclusion, food safety culture should be at the heart of every FBO. Creating a strong food safety culture requires commitment and active participation from all members of the organisation, and it necessitates constant improvement. By placing food safety culture as a top priority, FBOs can reduce the risk of foodborne illnesses and cross-contamination and food allergies, while building consumer trust and loyalty. Therefore, it is essential for FBOs to prioritise food safety culture to ensure that they are delivering safe, high-quality products to their customers, and to ensure long-term success.

Further guidance

- [bsi. PAS 320:2023 – Developing and sustaining a mature food safety culture – Guide](#)

References

- [Commission Notice on the implementation of food safety management systems](#) covering Good Hygiene Practices and procedures based on the HACCP principles, including the facilitation/flexibility of the implementation in certain food businesses (2022/C 355/01);
- [A culture of food safety A position paper from the global food safety initiative \(GFSI\)](#). V1.0 November 2018;
- [CODE OF PRACTICE ON FOOD ALLERGEN MANAGEMENT FOR FOOD BUSINESS OPERATORS CXC 80-2020](#);
- Draft guidelines developed by the food safety culture WG of the Central Organisation for the Meat Sector (COV) and the Dutch Meat Industry Association (VNV);
- ISO 22000:2018 – Food Safety Management Systems – Requirements For Any Organization In The Food Chain.



Avenue des Nerviens 9-31, 6th floor

1040 Brussels

BELGIUM

tel: 32 2 514 11 11

fax : 32 2 511 29 05

e-mail: info@fooddrinkeurope.eu

website: www.fooddrinkeurope.eu