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## **GUIDANCE NOTE**

## **Food Safety Culture**

## Food Safety Culture Published by:

Food Safety Authority of Ireland The Exchange, George's Dock, IFSC, Dublin 1, D01 P2V6

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www.fsai.ie

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ISBN: 978-1-80639-005-2

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## 1. Introduction

## 1.1 Background

Food safety culture is at the heart of a food business, reflecting the behaviours, actions, and values demonstrated by all staff. It encompasses what the business is – its core values and practices – and what it possesses, including the resources it utilises and how they are applied, all contributing to the production of safe food. An appropriate food safety culture enhances food safety by increasing awareness and improving employee behaviour in food establishments.

Food safety culture is not new, as every business has an existing food safety culture. In 2021, a legal obligation was placed on food businesses to specifically establish, maintain and provide evidence of an appropriate food safety culture.

There is a need for guidance on food safety culture to comply with legal requirements and to protect consumers. This Guidance Note provides a foundation for understanding and implementing an appropriate food safety culture. While this is a relatively new legal requirement and research in the field is still evolving, the Food Safety Authority of Ireland (FSAI) aims to provide further support to food businesses and official agencies as more information becomes available.

## 1.2 Scope

This Guidance Note on food safety culture has been produced to provide guidance to food business operators on implementing food safety culture, and to assist official agencies in the incorporation of food safety culture assessment within official controls.

The Guidance Note outlines the legal requirements, and provides recommendations and best practices, to help food businesses of all sizes actively develop, maintain and ensure the appropriateness of their food safety culture. These best practice recommendations are not mandatory but provide valuable tools to comply with the legal obligations set out in Regulation (EC) No 852/2004 on the hygiene of foodstuffs, as amended by Commission Regulation (EU) 2021/382 (European Union, 2004; European Union, 2021).

Throughout this Guidance Note, the words 'must' and 'shall' indicate a legal requirement, while 'should' or 'may' refer to a recommended best practice to achieve compliance with those legal requirements.

### 1.3 Structure

This Guidance Note contains five sections and five appendices, as outlined below:

- Sections 1, 2 and 3: Introduction, legislation, and why food safety culture is important provide details of legislation, as well as background information and on the importance of food safety culture.
- Section 4: Food safety culture integration for food business operators supports food business operators in understanding the legal requirements for establishing a food safety culture and provides practical guidance and best practice examples to help reach legal compliance.
- Section 5: Food safety culture assessment within official controls considers how a
  competent authority might incorporate assessment of food safety culture into ongoing
  official controls, both directly and indirectly, thereby deriving a view on culture from food
  safety controls.
- Appendix 1: The reference appendix to self-assessment checklists and questionnaires
- Appendix 2: Self-assessment checklist for food business operators
- **Appendix 3:** Questionnaire for food business operators (using a 5-point Likert scale). This could also be used as a self-assessment questionnaire.
- Appendix 4: Correlation between chapter XIa, Annex II to Regulation (EC) No 852/2004 as amended and the sub-sections of Section 4
- Appendix 5: Checklist for food safety culture assessment for official controls.

## 2. Legislation

Regulation (EC) No 852/2004 on the hygiene of foodstuffs, as amended by Commission Regulation (EU) 2021/382, requires all food business operators to establish, maintain and provide evidence of an appropriate food safety culture (European Union, 2004; European Union, 2021). It applies to all food business operators involved in production, processing, distribution, and retailing of food. The only group of food businesses excluded from this requirement are those whose operations are limited to primary production.

The requirements of Chapter XIa, Annex II to Regulation (EC) No 852/2004, as amended, include the following:

- **"1.** Food business operators shall establish, maintain and provide evidence of an appropriate food safety culture by fulfilling the following requirements:
  - **a.** commitment of the management, in accordance with point 2, and all employees to the safe production and distribution of food;
  - **b.** leadership towards the production of safe food and to engage all employees in food safety practices;
  - **c.** awareness of food safety hazards and of the importance of food safety and hygiene by all employees in the business;
  - **d.** open and clear communication between all employees in the business, within an activity and between consecutive activities, including communication of deviations and expectations;
  - e. availability of sufficient resources to ensure the safe and hygienic handling of food.
- 2. Management commitment shall include:
  - ensuring that roles and responsibilities are clearly communicated within each activity of the food business;
  - **b.** maintaining the integrity of the food hygiene system when changes are planned and implemented;
  - **c.** verifying that controls are being performed timely and efficiently, and documentation is up to date;
  - **d.** ensuring that the appropriate training and supervision are in place for personnel;
  - e. ensuring compliance with relevant regulatory requirements;
  - **f.** encouraging continual improvement of the food safety management system of the business, where appropriate, considering developments in science, technology and best practices.
- **3.** The implementation of the food safety culture shall take account of the nature and size of the food business."

In addition to the legal requirements, various documents and standards also provide guidance on food safety culture. These include:

- Codex Alimentarius Commission. General Principles of Food Hygiene (CXC 1-1969). Food and Agriculture Organization of the United Nations and World Health Organization, 2020.
- European Commission Notice on the implementation of food safety management systems
  covering good hygiene practices and procedures based on the HACCP [Hazard Analysis
  and Critical Control Points] Principles, including the facilitation/flexibility of the
  implementation in certain food businesses 2022/C 355/01.

EU Commission Notice 2022/C 355/01 includes a chapter on food safety culture in Annex I, Good Hygiene Practices. It explains how the food safety culture shall take into account the nature and size of the food business:

It is obvious that the nature of the product e.g. its vulnerability to contamination and growth of hazards and the handling in the FBO [Food Business Operator], influences the need for the extent of a food safety culture, but the commitment to produce safe food must be present in all businesses.

For example, while the commitment to produce safe food must be present in all businesses, a high-risk food production business dealing with products that require stringent safety controls, will require more dedicated controls, training and supervision points for its employees than a low-risk establishment that does not handle such products. Furthermore, the size of the business also influences the implementation of food safety culture. In small consumer-facing establishments the food safety culture can likely be observed e.g. by the consumer or by the inspector during a routine inspection. In large businesses like a factory with high staff turnover and different shifts, regular assessment of food safety culture using tools mentioned in the Commission Notice or in this Guidance Note could prove more beneficial. An appropriate food safety culture must be present; however, the specific tools used to establish, maintain and demonstrate it may vary between different food businesses.

## 3. Why food safety culture is important

Despite robust knowledge of how to produce safe food, food incidents, potentially leading to illness and outbreaks, and breaches of food law may still occur. Knowledge and planning on how to produce safe food is not enough; actions and behaviours must ensure that the food safety

management system is implemented effectively. Food safety culture encompasses how everyone, including management and employees, thinks and acts in their daily activities. A business's food safety culture is therefore a combination of the environment, attitudes, behaviours, perceptions, beliefs, and priorities of staff members around food safety.

As outlined in the legislation chapter, it is a legal requirement for all food businesses to have an appropriate food safety culture in place. Food safety culture is not something new and it involves many actions already being carried out in a food business. Having a food safety culture appropriate to the nature and size of the food business improves food safety and reduces associated risks by increasing awareness and adopting safe food practices.

An appropriate food safety culture can act to:

- Maintain high standards of food hygiene and safety, and regulatory compliance.
- Help keep consumers safe from foodborne illness. This can boost consumer trust as well
  as the success of the business.
- Increase transparency and improve communication for all employees.
- Help prevent problems that result from unsafe food, such as reputational damage and costly product recalls.

# 4. Food safety culture integration for food business operators

## 4.1 Food business operator's implementation and integration

It is a legal requirement for food business operators to establish, maintain and provide evidence of an appropriate food safety culture. The implementation, however, shall take account of the nature and size of the food business – which will be represented by describing various best practices and providing relevant examples throughout this section.

Food safety culture includes many of the safe food practices businesses have already implemented. In essence, it is the commitment to and practice of the production and distribution of safe food across the food business.

Think of food safety culture as a team effort. Everyone needs to work together to keep food safe. This means knowing what can go wrong, talking to each other, and making sure everyone feels comfortable about highlighting issues. This Guidance Note is like a checklist to help businesses make sure they are doing everything they can to protect the consumer.

An appropriate food safety culture helps businesses identify and address areas of improvement in its food business operation. Existing legal requirements such as awareness and communication of food safety hazards to all employees; providing proper resources, training and supervision; and ensuring compliance with regulatory requirements are detailed in the following sections.

The following mandates reflect the core legal requirements for the development and implementation of an appropriate food safety culture in alignment with Regulation (EC) No 852/2004 as amended by Commission Regulation EU 2021/382:

- Management commitment and leadership
- Communication and awareness
- · Employee engagement
- Maintaining and verifying
- Continuous improvement and compliance.

Appendix 4 provides a comprehensive overview of the correlation between legal requirements and the corresponding sections in this Guidance Note.

## 4.1.1 Management commitment and leadership

The establishment and maintenance of an appropriate food safety culture are intrinsically linked to the actions and commitment of management and leadership. Consequently, this section is governed by all requirements laid out in Chapter XIa of Annex II to Regulation (EC) No 852/2004 as the responsibility for setting the tone and providing the framework for food safety rests with the management commitment.

Management plays a vital role in establishing and maintaining the appropriate food safety culture of the food business. Managers must lead by example, consistently demonstrating that food safety comes first. This includes clear and open communication about food safety practices and making sure all actions and decisions reflect that priority. When managers communicate consistently and

set clear priorities, it helps everyone understand the requirements and follow the correct procedures.

#### A. Developing clear understanding of food safety culture principles:

This can be seen as prioritising food safety at all levels of the food business operation, fostering a culture where food safety is ingrained in every process, and is not just a box-ticking exercise. It means integrating food safety into all existing systems and making it a sustainable daily practice. This may look like:

- Understanding the 'why' behind food safety, and the impact that unsafe food has on consumers and the food business's reputation.
- Developing an understanding of leadership's role in demonstrating safe food practices.
   Recognising that the management team's consistent example and prioritisation of food safety directly influence employee's understanding and adoption of safe food practices.
   This may work particularly well in small businesses where the management team is more hands-on.
- Fostering an understanding of the importance of open and honest communication where employees are encouraged to report any concerns they may have, and where such concerns are addressed as appropriate, and employees are informed of the outcome.
   While large businesses benefit from established communication structures, small businesses might thrive on regular, informal check-ins.
- Understanding the effectiveness of current training and supervision, including evaluating
  how well instruction is received, can guide targeted investment in food safety training,
  upskilling, refresher courses, and enhanced supervision. This ensures that supervisors
  have clear roles and responsibilities, and that employee's understanding of and adherence
  to procedures are regularly observed.
- Recognising the need to adapt to new challenges and assessing the business's readiness
  to implement process changes without compromising food safety.

**Leading by example:** In order to improve hand hygiene in a busy bakery, the owner regularly demonstrates proper handwashing techniques, emphasising the importance of handwashing, even during rush periods. To further emphasise its importance, the owner held a staff meeting to openly discuss hygiene concerns, and encouraged employees to remind each other about handwashing, thereby fostering a culture of shared responsibility for food safety. These actions created an environment where hand hygiene became a priority for all employees.

#### B. Availability of sufficient resources for food safety culture:

Food business operators must make available sufficient resources to ensure the safe and hygienic handling of food. They will also need to determine what resources are required for the business.

This may include:

- Infrastructure, education and training: Invest in training and supervision, equipment, and staffing.
- Employees: Ensure that employees receive appropriate training and supervision and are
  equipped to effectively implement food safety practices. The management team must
  ensure that roles and responsibilities are clearly defined and effectively communicated for
  each activity.
- **Time:** Allow sufficient time for training, supervision, meetings and discussions, as well as the proper implementation of food safety practices, prioritising food safety over rushed or additional production.

#### C. Assess the current food safety culture:

Food business operators can benefit from using different approaches to evaluate the current status of food safety culture in their food business and identify areas of improvement. Such approaches may include:

 Observation: Observing employees work practices and interactions by the management or leadership team can provide the leadership team with insights into actual behaviours and can also help them identify areas for improvement in relation to food safety. Small businesses can benefit from this approach as it allows for real-time assessment of food safety practices in their everyday operations.

- Questionnaires: Employee surveys can provide insights into values, behaviours and beliefs in the food business. For example, a food business operator might consider conducting a survey using food safety culture questionnaires (see Appendix 1, 2 and 3) or promoting participation from all employee levels in order to gain a complete understanding of different views and the food safety mindset in the food business. Different types of questionnaires can help various food business operators.
- A gap analysis can provide a snapshot of the current status of the food safety culture in the food business, helping to identify areas for improvement. This approach may involve tools such as staff questionnaires, internal and external audit results, employee training and supervision records, and the analysis of non-conformance trends such as customer complaints, past food safety incidents, product recalls and withdrawals. By examining these elements, businesses can uncover underlying systemic issues and draw cultural insights that support continuous learning and improvement. Large manufacturing sites may find this approach useful as it offers a structured framework for analysing complex operations and identifying weaknesses in food safety culture across various departments and processes.
- A physical environment assessment: Conduct walk-through of the premises and gather employee feedback on the current layout and workflow, focusing on how these factors impact on food safety.
- A review of customer complaints and feedback can show how well a food business
  operator handles food safety, especially small businesses that often have direct
  relationship with their customer.

These methods can help the food business operator identify areas for improvement and create an appropriate food safety culture.

#### D. Develop an appropriate food safety culture:

"(3) The implementation of the food safety culture shall take account of the nature and size of the food business."

Food businesses of all sizes must prioritise food safety, but how they do it can be adaptable. Building an understanding of the following three principles can help guide food businesses towards achieving a food safety culture tailored to their needs. What goes into each category will, however, be different from business to business, based on size and risk.

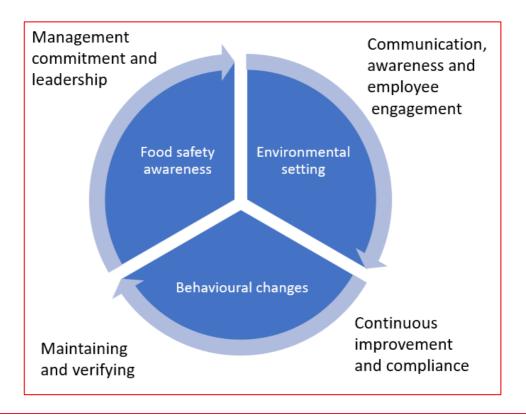


Figure 1 Diagram illustrating the holistic approach to achieving an appropriate food safety culture

Achieving an appropriate food safety culture requires a holistic approach to food safety (see Figure 1). First, there must be an existing food safety awareness that ensures all employees know their role and responsibilities in the production of safe food. Second, the business must provide an appropriate environmental setting which includes the support and resources needed to maintain the integrity of the food hygiene system. Finally, behavioural changes should be driven by management's commitment and leadership to encouraging safe practices.

- Food safety awareness: Management must ensure that all employees understand food safety risks in relation to their role, their part in safe food handling, and how to raise problems through proper training, supervision and communication.
- Environmental setting: Availability of resources to maintain food hygiene is crucial. A
  clean, safe, organised workspace with the right equipment and processes can support food
  safety. Adequate staffing levels are also crucial, in order to maintain the effective operation
  of food safety systems. Food business operators should demonstrate clear leadership in
  the production of safe food and actively engage all employees in food safety practices.
- **Behavioural changes:** Terms like commitment, communication, and appropriate training and supervision are about people and behaviours. Even with knowledge and a conducive

environment, unsafe behaviours such as forgetting to wash hands can undermine food safety efforts. The management team should encourage positive behaviours like handwashing and following food safety procedures and discourage unsafe shortcuts.

Each business should tailor its approach to its specific needs and challenges. This adaptable approach enables food businesses to focus on their unique needs – whether that is awareness, behaviour, or their work environment – while still creating an appropriate food safety culture.

#### Different businesses need different approaches to food safety culture

A ready-to-eat delicatessen might need to focus on food safety awareness for staff, especially in the areas of hygiene and food handling. This approach might benefit from training procedures and practical mentorship.

A large food processor might benefit from a well-structured, documented system, and a focus on preventing problems. Or they might need to focus on staff behavioural change, including existing long-term staff taking food safety-related risks.

A coffee shop (not handling other food on-site) with high staff turnover and language barrier challenges might need to emphasise clear communication, visual aids such as colour-coded equipment, supervision, and consistent rule reinforcement.

#### 4.1.2 Communication and awareness

Legal requirements directly relevant to this section:

- **"1.** Food business operators shall establish, maintain and provide evidence of an appropriate food safety culture by fulfilling the following requirements:
  - (1a) commitment of the management, in accordance with point 2, and all employees to the safe production and distribution of food;
  - (1c) awareness of food safety hazards and of the importance of food safety and hygiene by all employees in the business;
  - (1d) open and clear communication between all employees in the business, within an
    activity and between consecutive activities, including communication of deviations and
    expectations;
- 2. Management commitment shall include:
  - (2d) ensuring that the appropriate training and supervision are in place for personnel."

Open and clear communication is essential for ensuring an appropriate food safety culture. This involves open, honest communication about food safety at all levels of the business – ranging from food business operators and management to frontline employees and across all departments. Such information ensures that information is shared effectively, that issues are identified early, and that teams can work more collaboratively to resolve them. When roles and responsibilities are clearly communicated and understood, employees are better equipped to uphold food safety standards, reduce risks, and contribute to building consumer trust. Encouraging regular two-way feedback between employees and management is critical. This includes management proactively sharing relevant information, such as production issues, the number and nature of complaints received, recurring problems, and successes in maintaining high standards. This type of open feedback fosters greater awareness, helps employees to understand the real-world impact of their actions, and promotes a proactive, engaged approach to maintaining food safety.

Food business operators must clearly communicate food safety hazards and emphasise the importance of all employees maintaining high standards of food safety and hygiene. This includes identifying the specific hazards present in the work environment, such as allergens, high-risk foods, and other potential sources of contamination, and explaining how proper hygiene practices can prevent foodborne illness and cross-contamination. Much of the information should already be incorporated into the business's food safety management systems.

This may be approached or look like:

- Practical demonstrations by the management or senior staff who are responsible for promoting and ensuring food safety are essential for teaching proper food handling, cleaning, and sanitising techniques.
- **Engaging visual aids** to enhance understanding. For example, handwashing posters or zoning signage.
- 'What if' scenarios that could happen in the food business operation (such as 'What if the
  customer has an allergic reaction?' 'What if the fridge stops working?'). This approach is
  well-suited to many scenarios, particularly in small business where employees often
  perform a wide range of roles.

Food business operators must ensure that there is open and clear communication among all employees, as well as in individual activities and between consecutive steps in the food production. This includes communicating expectations as well as any deviations from standard procedures. It also means that communication needs to occur at all levels of the business, across

all stages of operation. Any changes in procedures or unexpected situations must be clearly communicated to all relevant staff, irrespective of their position in the food business operation hierarchy. Effective communication helps to ensure that all employees, regardless of literacy level or language background, understand and follow essential food safety practices.

To support this, food businesses may consider implementing some best communication practices, such as:

- Open communication: Use various channels of communication such as meetings, visual
  materials and/or suggestion boxes to share information and encourage employee feedback
  on food safety, safe production and distribution of food. Larger businesses can benefit from
  these shared channels to bridge communication gaps between teams. Smaller businesses
  can use pre-shift meetings, shift handovers, or informal conversations to discuss daily
  plans and past incidents.
- **Storytelling:** Share real-life examples, food safety media alerts, and case studies in order to highlight the importance of reporting food safety concerns at different stages of the food production process, without fear of repercussions.
- Employee training/supervision: Training plays a vital role in keeping employees informed about current processes, procedures and the business's expectations regarding safe food-handling practices. It establishes clear standards, roles and responsibilities, helping to set the business up for long-term success. Effective training should be engaging, inclusive, and should encourage active participation by all employees. It should be delivered regularly and be tailored to meet the needs of the employees. Importantly, the effectiveness of training should be verified through ongoing supervision and observation of workplace practices. The FSAI maintains a range of training and information resources in the FSAI learning portal and on the FSAI website.

It is important to create a culture of open and honest communication where everyone understands their role in maintaining food safety. The methods used may vary, but the commitment to clear and open communication of food safety hazards is essential for all food businesses.

**Example of communication:** In a fresh produce processing factory, the Quality Control Officer noticed rodent droppings near a pallet of lettuce. The officer immediately informed the Warehouse Manager and the Quality Control Manager and placed the affected pallet and any nearby produce under quarantine, in order to prevent potential contamination. The managers and the Quality Control Officer then thoroughly inspected the area for signs of rodent activity, identified potential entry points, and put corrective actions in place. They called out the factory's pest control company to assess the situation and implement appropriate control measures. The management team communicated details of the incident to all staff, emphasising the importance of maintaining a clean and sanitary work environment and proper storage practices, in addition to reporting any evidence of pest infestation to their line manager.

#### 4.1.3 Employee engagement

Legal requirements directly relevant to this section:

- **1.** Food business operators shall establish, maintain and provide evidence of an appropriate food safety culture by fulfilling the following requirements:
  - **(1b)** leadership towards the production of safe food and to engage all employees in food safety practices;
  - (1c) awareness of food safety hazards and of the importance of food safety and hygiene by all employees in the business;
  - (1d) open and clear communication between all employees in the business, within an
    activity and between consecutive activities, including communication of deviations and
    expectations;
- 2. Management commitment shall include:
  - (2a) ensuring that roles and responsibilities are clearly communicated within each activity of the food business."

In order to establish an appropriate food safety culture, food businesses must engage all employees in food safety practices. Areas such as communication, creating awareness of hazards and food safety roles, and providing the appropriate training and supervision all require engagement with employees. This includes ensuring that employees understand all food safety communications and have a clear, supportive channel to raise questions or concerns. It also

means creating a safe reporting culture, encouraging employees to identify potential food safety hazards, and reporting or acting when issues arise. This sense of responsibility for their role nurtures a proactive environment where everyone is invested in maintaining high standards in the safe production and distribution of food and compliance with legal requirements.

Management should engage employees in prioritising food safety practices to fulfil the food business's legal requirements. Approaches that may work include:

- Deliver targeted training and supervision on food safety risk awareness to employees for their specific duties. This enables them to contribute to safe food practices. Management must clearly communicate roles and responsibilities for all tasks, fostering a well-informed and accountable workforce.
- Recognise and reward good practices: Acknowledge and appreciate employees who
  demonstrate a commitment to food safety, ensure that they are retained and that they
  progress in the business. For example, introduce an 'employee of the month' initiative or
  create incentives for outstanding contributions.
- Create a safe reporting culture by developing a safe and supportive environment where employees feel comfortable raising concerns without fear of reprisal.

By actively engaging and motivating its employees in safe food handling, management can drive the implementation of an appropriate food safety culture.

## 4.1.4 Maintaining and verifying

Legal requirements directly relevant to this section:

- **"2.** Management commitment shall include:
  - **(2b)** maintaining the integrity of the food hygiene system when changes are planned and implemented;
  - (2c) verifying that controls are being performed timely and efficiently, and documentation is up to date;
  - (2e) ensuring compliance with relevant regulatory requirements."

Food safety culture is not a one-time, 'tick the box' exercise; rather, it is something that must be considered during operational changes. When changes are implemented, the management team should demonstrate its commitment to product safety by implementing modifications to

procedures, processes, facilities and/or equipment, thus ensuring that food safety is never compromised. The management team should also verify that controls are being performed in a timely, consistent, and effective manner, and that documentation is up to date. Furthermore, the management team should clearly communicate these changes to all relevant employees and actively invite constructive feedback in order to ensure full understanding and facilitate adaptation. The management team must also ensure compliance with relevant regulatory requirements, and therefore it is important to stay informed about all relevant and emerging food safety regulations. Monitoring progress is needed to track improvements, identify gaps, and ensure that any changes or procedures that have been introduced are being followed through correctly. This may be approached by:

- **Self-assessment:** Evaluate the impact of changes made using the initial assessment (see 4.1.1 Point C of this Guidance Note) gauging the efficiency of these changes. For example, is hand hygiene being performed better? Has cross-contamination been reduced? Are new procedures being followed correctly?
- Record review: Analyse records such as temperature logs and incident reports for accuracy, consistency, and trends. Ensure that documentation is up to date, and that it provides evidence of the culture's adherence to the new standards.
- **Employee feedback:** Gather input from employees on their knowledge, understanding, and confidence, and any challenges they face regarding food safety practices. Regularly review and update knowledge of applicable regulations.
- Regular monitoring: Conduct observations, repeat food safety culture self-assessments (within a specific timeframe), and perform periodic audits to track progress and identify areas for changes or further improvement.

**Example of maintaining and verifying food safety culture:** An oyster farm upgraded its depuration process with ultraviolet (UV) lights to manage pathogens. This involved creating a new procedure and training employees on its implementation, with supervision to ensure proper understanding and execution. Employees kept detailed logs of bulb longevity and bacteria levels, comparing them with before the installation of the UV lights, in order to see whether the new implementation effectively addressed the hazards. The management team reviewed the logs of staff controls and interviewed staff about the UV system's performance, any challenges they faced during its operation, and their confidence in its effectiveness. They conducted regular oyster sample analysis so as to ensure ongoing compliance with safety standards. They also performed periodic audits to verify the proper functioning and maintenance of the UV system. This business has demonstrated an appropriate food safety culture through its implementation of improvements to manage the hazards of the business. Verifying staff competence to carry out the new procedure, together with the management team interviewing staff on its effectiveness, embodies the principles of food safety culture.

**Draw conclusions:** It is important to not only collect the information but to draw a conclusion about what the results are saying. Some things one may look at are:

- **Effectiveness of changes:** Based on the analysis, determine whether the changes that businesses have implemented are having the desired effect.
- Areas for improvement: Identify any areas where performance is still lagging or where further action is needed. This could indicate a need for additional training, revised procedures, or more effective communication.
- Regularly review and adjust systems: Regularly review the outcomes of all
  assessments, and adjust systems as needed in order to make them more effective. For
  example, for businesses with a high staff turnover, the implementation of robust procedures
  and visual aids might facilitate acquisition of knowledge. If new employees also face a
  language barrier, language translation for training aids and procedures can provide crucial
  support. Continuously monitor the impact of these changes and refine them as needed to
  ensure ongoing food safety and operational efficiency.

#### When changes do not have the desired effect

If changes do not yield the desired outcomes, a food business with an appropriate food safety culture would reasonably be expected to critically reassess operations by doing the following:

- **Re-evaluate:** Assess the appropriateness and impact of the changes. This includes gathering employees' feedback in order to understand their perspectives and identify any barriers to positive implementation.
- Refine: Review the current environmental setting, training methods, supervision of employees who have recently undergone training, and communication channels to verify their effectiveness.
- **Reinforce**: Renew the commitment to food safety, provide positive reinforcement to employees, and foster a culture of continuous improvement.

Example of when changes do not have the desired effect: At a farmhouse cheese manufacturing site, the food business operator completed a self-assessment questionnaire which resulted in demonstrating a lack of food safety awareness on the part of its employees in relation to equipment cleaning procedures. Subsequently, the food business operator implemented a new cleaning protocol and associated training. However, 6 months later, verification showed inconsistent results. The management team immediately sought employee's input and discovered that time constraints resulted in employees not properly following the new cleaning standard. The management team then provided targeted retraining and supervision, added visual aids, and adjusted workflows in order to alleviate time pressures. By recognising good practices and holding regular food safety meetings, the management team ensured the effectiveness of the procedures and reinforced management's commitment to food safety.

## 4.1.5 Continuous improvements and compliance

Legal requirement directly relevant to this section:

- "2. Management commitment shall include:
  - (2f) encouraging continual improvement of the food safety management system of the business, where appropriate, considering developments in science, technology and best practices."

Food businesses operators must prioritise continuous improvement of the food safety management system in order to ensure ongoing compliance with food regulations.

Some best practices may include:

- Regularly review and update their food safety management system.
- In order to identify potential hazards, conduct internal audits (may be more useful in large businesses) or observe food-related practices and behaviours (in-house spot checks may be more applicable in small businesses).
- Seek external feedback such as customer feedback and reviews.
- Stay informed about industry best practices and new technologies.
- Invest in new technologies and replace old equipment in order to enhance food safety efforts.
- Monitor key performance indicators such as complaint trends, environmental swabbing trends and/or pest control trends.

**Example of continuous improvement and compliance:** A one-person hot food stall at a farmer's market demonstrates continuous improvement through simple, consistent daily temperature checks and cooking equipment hygiene, together with mindful observation of their own food-handling practices, active engagement with customers for feedback, staying informed via FSAI updates and peer discussions, and by making small, targeted investments in reliable equipment. By focusing on these accessible routines, the food business operator ensures that their food is safe and maintains high standards, proving that even the smallest food business can effectively prioritise food safety through continuous improvement.

Continuous improvement is essential for long-term success. It enables businesses to adapt to challenges, embrace new ideas, and consistently strive for the highest standards of food safety. Ultimately, this ongoing commitment helps protect public health and reinforces trust in the business.

## 4.2 Introduction to understanding behaviour in food safety culture

In order to make any changes or improvements in food-handling practices, it is important to understand how people behave. Most employees want to do the right thing and do not come to work with the intention of creating unsafe food. Nonetheless, making mistakes is an inevitable aspect of human nature; as a result, mishaps can and do happen. Creating an environment and culture that supports desired safety behaviours can reduce the likelihood of a food incident.

For example, some issues that lead to lapses in food safety and potentially result in consumer illness can often be traced back to employees' behaviour – and are outlined in Table 1. The table also illustrates how these behaviours are directly linked to the food safety culture legal requirements, as set out in EU legislation.

Note: Table 1 is not an exhaustive list of all behaviours, outcomes, or links.

Table 1 Behavioural links to food safety culture legislation

Issue	Associated behaviour	Possible outcome	Legal reference and the related behavioural gap
Failure to reach	Person responsible	The food is not	Chapter XIa, Annex II to
the correct	for cooking did not	cooked properly,	Regulation (EC) No
temperature while	check or forgot to	and some	852/2004, as amended,
cooking.	check the	consumers could	point 2d requires
_	temperature, or the	become ill with food	management to ensure
	person responsible	poisoning.	that appropriate training
	for calibrating the		and supervision are in
	probe did not do		place
	SO.		
			It is possible that the
			training procedures did not
			cover how to use a probe,
			or the training procedures
			were confusing. In
			addition, the employee did

Failure to properly store food due to unclear allocation of responsibilities.	Employees responsible for food storage are uncertain about the full extent of their duties, thus leading to overlooked tasks such as stock rotation or proper	Food stored under incorrect conditions (e.g. temperature, cross-contamination), resulting in a risk for consumers.	not have an opportunity to ask questions as there was no proper supervision of the skills and knowledge acquired during training.  Chapter XIa, Annex II to Regulation (EC) No 852/2004, as amended, point 2a: Management must ensure that roles and responsibilities are clearly communicated.  It is possible that employees are not fully
	segregation.		aware of the extent of their duties.
Failure to properly clean equipment due to shortage of cleaning materials.	Person responsible for cleaning did not follow the procedure and they did not use the correct cleaning materials.  Person responsible for stocking the appropriate cleaning chemicals or cleaning equipment did not ensure that adequate stocks were available.	Food is not handled in hygienic conditions, thus leading to risk to the consumer.	Chapter XIa, Annex II to Regulation (EC) No 852/2004, as amended, point 1e: Availability of sufficient resources to ensure the safe and hygienic handling of food.  It is possible that the appropriate cleaning materials were not available and there was no communication to relevant staff regarding the shortage.

**Example of behaviour change:** During an observation period that was part of a gap analysis, a manager identified that handwashing behaviour was not up to standard. The staff knew how to properly handwash as they could easily demonstrate the correct technique. Moreover, knowledge demonstrated during their training programme was adequate. Following a number of conversations with staff, the manager learnt that staff members' incorrect beliefs around how effective handwashing can really be the reason for incorrect handwashing. The staff just did not believe it could make such a difference. This belief/attitude was in turn reflected in their behaviour.

The manager decided to take two actions: First, they added a video to the training programme, whereby a visual demonstration would show how bacteria can be reduced through proper handwashing. Second, they designed a poster focused specifically on handwashing, using a simple pun as a message that the power to stop foodborne illness lies with staff members properly washed hands. The manager positioned the poster in a prominent location where staff put on their protective gear each day. As a result, not only did staff notice the poster, but they also developed a behaviour that is specifically used to create 'habit stacking'. (Habit stacking refers to a new desired behaviour that is attached to something that is already being done routinely. In this way, habit stacking helps to promote the desired behaviour.) The manager asked the senior chef, who was well liked, to promote the new desired behaviour by drawing everyone's attention to the poster.

## 5. Food safety culture assessment within official controls

Competent authorities performing official controls in accordance with the Official Control Regulation (EU) 2017/625 must verify that food business operators have established, are maintaining, and can provide evidence of a food safety culture appropriate to the business, taking into account the nature and size of the business (European Union, 2017). This means that when food business operators are being inspected under official controls, inspectors may ask operators to demonstrate evidence of an appropriate food safety culture in the business. Food safety culture is among the various explicit requirements of Annex II to Regulation (EC) No 852/2004. However, as food safety culture is integral to overall food safety management, operators may also expect its assessment to occur indirectly within broader food safety controls and in many instances without dedicated direct food safety culture official controls, (European Union, 2004).

Official control assessment should take into account, the approach taken by businesses to food safety commensurate with their size and nature, with larger operations potentially having formal systems, while smaller ones may have simpler approaches to food safety culture implementation.

## 5.1 Formal integration into official controls

Verification of compliance with food safety culture requirements should be incorporated within broader food safety official control systems, which are developed and implemented in accordance with Regulation (EU) 2017/625 (European Union, 2017). For example, when assessing non-compliance risks in the planning of risk-based official control frequency, food safety culture non-compliance should be among the considerations of competent authorities along with other food safety non-compliance risks. Similarly, food safety culture should be included in the documented procedures underpinning official controls and the written record of such official controls.

#### 5.1.1 Indirect assessment

Food safety culture official control assessment may involve substantial reliance on indirect assessment where food safety culture is considered based on what is observed within broader food safety controls. Food safety outcomes, such as compliance with microbiological and chemical standards, along with evidence of effective food safety management systems, adequate physical environments, and proper hygiene, can reasonably be regarded as suggesting the presence of an appropriate food safety culture. Conversely, non-compliance with regulations, poorly implemented systems, incomplete training records, lack of supervision, and inadequate hygiene may point to underlying cultural issues and lack of management commitment to implement a food safety culture. The way a food business operator addresses and responds to food safety problems, particularly recurring issues, can provide insights into the business's food safety culture.

#### 5.1.2 Direct assessment

Food safety culture official control assessment may involve specific official control efforts to directly examine the culture at a food business. Such assessment is likely to benefit from orientation conversations with management and employees in the food business, to understand overall management strategies and examining the effectiveness of internal processes operationally and any specific culture initiatives.

Possible tools that may be used within official controls include:

 Official control checklists may be valuable tools to assist direct assessment of food safety culture within official controls. Different levels of detail are possible in such checklists, and a template example is provided in Appendix 5 to guide an official control assessment through the various parameters directly required in legislation. A similar example is included in EU Commission Notice 2022/C 355/01. Official checklists may also assist in compliance with the obligation in Regulation (EU) 2017/265 to ensure that official controls are carried out according to documented procedures (European Union, 2017).

- Interviews with management and employees are useful official control techniques to directly assess food safety culture. Structured consistent interviews, with a mix of open and closed questions, can promote consistency. Carrying out interviews can help assess and provide an indication of awareness and knowledge of food safety issues, controls, roles and responsibilities. In addition, informal dialogue with staff should be considered as a complementary and ongoing method for assessing food safety culture in practice. This routine engagement, as distinct from formal interviews, can provide valuable insights into the prevailing attitudes, behaviours, and shared understandings in the food business.
- Observations can also assist with food safety culture assessment. In driving appropriate
  behaviours, the behaviours of staff regarding their food safety roles can be observed along
  with the behaviours of management and leadership. For example, management
  commitment could be assessed by evaluating resource allocation to operational
  infrastructure (e.g. handwashing stations, signage) and training/supervision, with a focus on
  staff knowledge, attitude, and behaviours.

### 5.2 Enforcement

Food business operators are obliged by law to ensure adherence to an appropriate food safety culture. Failure to do so is a non-compliance and can result in enforcement actions by competent authorities. Operators may receive inspection reports or enforcement notices where food safety culture is detailed among non-compliances; such reports/notices may require actions to remedy food safety culture, along with details of other issues to be addressed. Prosecution is also a possibility for non-compliance in relation to food safety culture issues – either alone or in conjunction with other non-compliances with food legislation.

Enforcement action should be considered in accordance with the competent authority's enforcement legislative provisions, FSAI food law enforcement policy, and Articles 137–139 of the Official Control Regulation (EU) 2017/625 (European Union, 2017). In general terms, enforcement actions by competent authorities should assess risks and include investigation of any suspicions. If non-compliance is established, the competent authority should ensure that action is taken to

determine the origin and extent of the non-compliance; and should take action to ensure that the issue is addressed and that there is no recurrence. Enforcement action may also include consideration of penalties.

Investigations of the origin and extent of broader food safety issues may identify food safety culture as a root cause contributor to those non-compliances. A typical enforcement scenario would involve food safety culture non-compliance mentioned in addition to other non-compliances. The enforcement approach should consider the extent to which food safety culture contributes to the overall picture; with potential for culture to be the main focus of any enforcement where it is regarded as the origin of other issues.

## References

**Codex Alimentarius Commission (2022)** General Principles of Food Hygiene (CXC 1-1969). Food and Agriculture Organization of the United Nations and World Health Organization, 2020. Available at: Related Standards | CODEXALIMENTARIUS FAO-WHO

**European Union (2004)** Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs. Available at: Regulation - 852/2004 - EN - EUR-Lex

**European Union (2017)** Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products, amending Regulations (EC) No 999/2001, (EC) No 396/2005, (EC) No 1069, OJ L 95, 07/04/2017, p. 1–142. Available at: Regulation - EU - 2017/625 - EN - EUR-Lex

**European Union (2021)** Commission Regulation (EU) 2021/382 of 3 March 2021 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, OJ L 74, 4.3.2021, p. 3–6. Available at: Regulation - 2021/382 - EN - EUR-Lex

**European Union (2022)** 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, C/2022/5307, OJ C 355, 16.9.2022, pp. 1–58. Available at: <u>EUR-Lex - 52022XC0916(01) - EN - EUR-Lex</u>

# Appendix 1 The reference appendix to self-assessment checklists and questionnaires

- Australia New Zealand Food Standards <u>Step 1 Know (foodstandards.gov.au)</u>: This is
  a short questionnaire that can be presented to both employees and management.
  Responses are in the form of a 10-point Likert scale of agreement with 9 different
  statements on various areas of food safety culture such as leadership, knowledge, and
  the workplace. This questionnaire may be useful for small businesses seeking a general
  overview of their food safety culture that includes the opportunity for employees to provide
  for written comments.
- Australia New Zealand Food Standards food-safety-culture-checklists.pdf
  (foodstandards.gov.au): This checklist is designed to identify ways to implement a food
  safety culture in a business and is organised by categories utilised in the Step 1 'Know'
  questionnaire mentioned above. The checklist is organised into three sections: first, for
  those who are just starting to set the scene; second, for those who wish to shape the
  existing culture; and third for those who wish to create the culture. The checklist is also
  useful for those who know which specific areas they wish to show improvement in; this is
  because the checklist provides a selection of ideas that relate to each of the three
  sections described above. The checklist may be useful for small businesses that would
  like general ideas on how to implement their food safety culture.
- The British Standards Institution Food-safety-culture-questionnaire: This is a short questionnaire that can be given to both employees and management. Responses are in the form of a 5-point Likert scale of agreement or in yes or no responses to a total of 22 statements or questions. Results reveal an overall score in relation to food safety culture. This questionnaire may be good for any business that is seeking a general starting point.
- Commission Notice 2022/C 355/01 Appendix 3 Questionnaire C 355: This is a short questionnaire for employees. Responses are in the form of a 5-point Likert scale on agreement with a total of 28 statements. Results can identify strengths or weaknesses in certain areas of food safety culture (such as communication or awareness); such strengths or weaknesses are categorised according to EU legal requirements. This questionnaire may be particularly useful for a large business, as it would enable it to compare specific divisions or branches.

- Commission Notice 2022/C 355/01 Annex III Questionnaire C 355: Table 1 presents
  an example of a checklist on food safety culture for competent authorities, which provides
  YES/NO questions based on the food safety culture components for use during an official
  audit through observation and interviews.
- United States Food and Drug Administration Food Safety Culture Restaurant Managers Tool.xlsx (live.com): This tool comprises a
   Microsoft Excel file with two different forms, one for employees and one for management,
   each with 16 statements. The Excel file includes a scoring sheet example. This tool may
   be useful as a starting point for assessing and improving a food safety culture, especially
   for small businesses.

# Appendix 2 Self-assessment checklist for food business operators

	Food safety culture assessment	Yes	No	Comments/Evidence
1	Does management demonstrate its ongoing			
	commitment to the safe production, integrity and			
	distribution of food, and compliance with relevant			
	legal requirements, even when changes are			
	implemented?			
2	Does management demonstrate leadership by			
	engaging all employees in food safety practices and			
	a proactive approach to safe food			
	production?			
3	Are all employees aware of the food safety hazards			
	relevant to their role and their impact on the overall			
	hygiene of the business, as a result of effective			
	training and supervision?			
4	Does the food business operator ensure that there is			
	open and clear communication to employees about			
	food safety expectations and potential deviations, as			
	required by Regulation EC No 852/2004?			
5	Are sufficient resources available to ensure the safe			
	and hygienic handling of food and do these			
	resources take into account the nature and size of			
	the business?			
6	Are food safety roles and responsibilities			
	communicated clearly, thus enabling timely and			
	efficient verification of controls and up-to-date			
	documentation?			
7	Does the food business operator encourage			
	employee feedback and recognise other			
	contributions to food safety as part of its continuous			
	improvement efforts?			

## **Appendix 3 Questionnaire for food business operators (using a 5-point Likert scale)**

	Food safety management	Food safety management and management commitment		Developing	Active	Proactive	Very well implemented
	Question	Guidance	1	2	3	4	5
•	1 Who oversees food safety	Identify roles and responsibilities related to					
	compliance in your food	food safety. What is their role in					
	business? Is there a dedicated	implementing/integrating a food safety					
	individual or team responsible	culture? The outcome of that investigative					
	for looking after food safety	process can provide a starting point for the					
	culture?	food business operator's level of					
		understanding of food safety culture.					
	2 How does management	Look for evidence of active participation in					
	demonstrate its commitment to	training, regular communication about food					
	food safety?	safety, and allocation of resources for food					
		safety initiatives.					
	3 After they have received	Review the training and supervision					
	training and supervision, do	programme (written policies, procedures,					
	employees understand the	and/or records if available). Is the training					
	product manufacturing process	and supervision programme effective, and					
	and the food safety risks	are policies, processes and procedures					
	associated with this process?	understood by all employees? Interview					

		employees about food safety processes.  This encourages staff communication and engagement.			
4	How do you ensure that all employees understand their role in maintaining food safety? What methods are used to keep employees informed about food safety standards and expectations?	Observe communication channels, meetings, and/or noticeboards. Observe food safety awareness throughout the food business.			
5	How are food safety incidents and near misses investigated and addressed?	Investigate past incidents and observe the response process.			
6	How does management encourage employee feedback and/or suggestions regarding food safety practices/risks?	Look for suggestion boxes, open-door policies, communication channels or other evidence of employee involvement in food safety improvements. Organise pre-shift meetings, coffee break chats, and end of shift meetings.			

7	How does management ensure that food safety training is effective and up to date?	Review training records and assess employee knowledge/performance.  Conduct staff interviews regarding supervised training that was undertaken by all staff.			
8	How does management measure and monitor food safety performance?	Review records of audits, inspections, and performance evaluations. Interview employees/management about recent improvements made in the food business. What insights into employee behaviour has management gleaned since the employee received training?			
9	How does management promote continuous improvement in food safety practices?	There is evidence of regular reviews, updates to procedures, and implementation of new technologies or best practices. There is evidence of changes in the environmental setting or in training methods. There is evidence of the use of storytelling by management to inform employees about food safety risks and their consequences.			

	Employee engagement		Poorly implemented	Developing	Active	Proactive	Very well implemented
	Question	Guidance	1	2	3	4	5
	1 How do employees perceive	Conduct interviews and observe employee					
	the importance of food safety?	behaviour. Ask them how they would					
		respond to an incident and who is the					
		person they would report it to?					
	2 How do employees perceive	Conduct interviews and assess employee					
	the level of support from	understanding of food safety. Examine any					
	management regarding food	self-assessment questionnaire that has					
	safety?	been distributed to staff.					
	3 Do employees understand their	Assess staff's knowledge of procedures					
	individual responsibilities	and protocols. What information/behaviour					
	regarding food safety?	guidelines do they receive from					
		management?					
4	4 How do employees	Observe hand hygiene, food-handling					
	demonstrate their	practices, and adherence to procedures.					
	understanding/commitment to	Interview employees and ask them to					
	food safety in their daily	describe the reasoning behind these safety					
	tasks?	practices.					

	5 Is there a sense of shared	Observe teamwork and communication			
	responsibility for food safety	related to food safety.			
	among employees?				
(	6 Do employees feel comfortable	Assess the reporting culture and			
	about reporting food safety	communication channels. Assess the			
	concerns? Have they fears of	activity of management in relation to their			
	reprisal?	responses to incidents.			
	7 Are employees trained and	Assess the level of autonomy and			
	allowed to initiate corrective	decision-making authority given to			
	steps when they notice a food	employees.			
	safety hazard?				
	8 How does the food business	Look for incentive programmes, employee			
	operator recognise good food	recognition initiatives, and positive			
	safety practices?	reinforcement.			

Continuous improvement			Poorly implemented	Developing	Active	Proactive	Very well implemented
	Question	Guidance	1	2	3	4	5
1	How does the food business	Review training materials and observe					
	operator identify and address	employee behaviour. Is the training					
		method tailored to the specific activities of					

	behavioural factors that may	employees? Are these methods flexible			
	contribute to food safety risks?	enough to accommodate changes in			
		responsibilities? Is management actively			
		involved in the following up on and			
		supervising the training that's provided?			
2	Are programmes in place to	Examine awareness campaigns, training			
	promote positive food safety	initiatives, and feedback mechanisms. Do			
	behaviours?	management/leaders discuss the			
		importance of food safety and the fact that			
		it is everyone's responsibility?			
3	How does the food business	Review data on incident rates, employee			
	operator measure the	feedback, and audit results. What			
	effectiveness of its food safety	improvements have been made since the			
	culture initiatives?	food business operator started working on			
		its food safety culture?			
4	What processes are in place to	Assess the food business operator's			
	ensure continuous improvement	approach to learning from incidents,			
	in food safety culture?	implementing corrective actions, and			
		updating procedures. Seek a prevention			
		plan, in order to reduce possible incidents			

		and enable the food business to be more			
		proactive regarding food safety risks.			
5	How does the food business	Inquire about industry memberships			
Э	now does the lood business	Inquire about industry memberships,			
	operator stay informed about	subscriptions to official publications, and			
	new food safety regulations and	participation in conferences/training			
	best practices?	sessions.			

## Appendix 4 Correlation between chapter XIA, Annex II to Regulation (EC) No 852/2004 as amended and the sub-sections of Section 4

	Food safety culture legal requirement	Sections	Sections
1	Food business operators shall establish, maintain and provide evidence of	4.1.1	Management commitment and leadership
	an appropriate food safety culture by fulfilling the following requirements:		
1a	commitment of the management, in accordance with point 2, and all	4.1.1,	Management commitment and leadership;
	employees to the safe production and distribution of food.	4.1.2	communication and awareness
1b	leadership towards the production of safe food and to engage all employees	4.1.1,	Management commitment and leadership;
	in food safety practices.	4.1.3	employee engagement
1c	awareness of food safety hazards and of the importance of food safety and	4.1.1-	Management commitment and leadership;
	hygiene by all employees in the business.	4.1.3	Communication and awareness/employee
			engagement
1d	open and clear communication between all employees in the business,	4.1.1,	Management commitment and leadership;
	within an activity and between consecutive activities, including	4.1.2	Communication and awareness
	communication of deviations and expectations.		
1e	availability of sufficient resources to ensure the safe and hygienic handling of	4.1.1	Management commitment and leadership
	food		
2	Management commitment shall include:	4.1.1	Management commitment and leadership

ensuring that roles and responsibilities are clearly communicated within each	4.1.1,	Management commitment and leadership;
activity of the food business.	4.1.3	employee engagement
maintaining the integrity of the food hygiene system when changes are	4.1.1,	Management commitment and leadership;
planned and implemented.	4.1.4	maintaining and monitoring
verifying that controls are being performed timely and efficiently and	4.1.1,	Management commitment and leadership;
documentation is up to date.	4.1.4	maintaining and monitoring
ensuring that the appropriate training and supervision are in place for	4.1.1,	Management commitment and leadership;
personnel.	4.1.2	communication and awareness
ensuring compliance with relevant regulatory requirements.	4.1.1,	Management commitment and leadership;
	4.1.4	maintaining and monitoring
encouraging continual improvement of the food safety management system	4.1.1,	Management commitment and leadership;
of the business, where appropriate, considering developments in science,	4.1.5	Continuous improvement and compliance
technology and best practices.		
The implementation of the food safety culture shall take account of the	4.1.1	Management commitment and leadership
nature and size of the food business.		
	activity of the food business.  maintaining the integrity of the food hygiene system when changes are planned and implemented.  verifying that controls are being performed timely and efficiently and documentation is up to date.  ensuring that the appropriate training and supervision are in place for personnel.  ensuring compliance with relevant regulatory requirements.  f encouraging continual improvement of the food safety management system of the business, where appropriate, considering developments in science, technology and best practices.  The implementation of the food safety culture shall take account of the	activity of the food business.  maintaining the integrity of the food hygiene system when changes are planned and implemented.  verifying that controls are being performed timely and efficiently and documentation is up to date.  ensuring that the appropriate training and supervision are in place for personnel.  ensuring compliance with relevant regulatory requirements.  4.1.1, 4.1.4  encouraging continual improvement of the food safety management system of the business, where appropriate, considering developments in science, technology and best practices.  The implementation of the food safety culture shall take account of the  4.1.1

## Appendix 5 Checklist for food safety culture assessment for official controls

	Reference	Food safety culture assessment	Yes	No	Comments/Evidence
1	1a and 2	Is there evidence of management's commitment to the safe production and distribution of food?			
2	2a	Is there evidence of management clearly communicating roles and responsibilities regarding food safety?			
3	2b	Is there evidence of the integrity of the food hygiene system being maintained when changes are planned or implemented?			
4	2c	Is there evidence of verification by management of food safety controls being performed correctly and documented?			
5	2d	Is there evidence of appropriate training and supervision by management?			
6	2e	Is there evidence of management ensuring compliance with regulatory requirements?			
7	2f	Is there evidence of continual improvement of the food safety management system (FSMS)?			
8	1a	Is there evidence of commitment of all employees to safe production?			
9	1b	Is there evidence of leadership engaging all employees in food			

		safety practices towards			
		• •			
		production of safe food?			
10	1c	Is there evidence of awareness at			
		all levels of employees of the food			
		safety hazards relevant to their			
		role and how they impact the			
		overall hygiene of the business?			
11	1d	Is there evidence of open and			
		clear communication about food			
		production among all employees,			
		including safety expectations and			
		deviations from the required			
		standards?			
12	1e	Is there evidence of sufficient			
		resources being made available			
		to ensure the safe and hygienic			
		handling of food?			
13	Indirect	Does assessment of food safety			
		systems, structures and practices			
		support the existence of an			
		appropriate food safety culture?			
14	3	Does the implementation of the			
		food safety culture take into			
		account the nature and size of the			
		food business?			
		Toda badii 1000.			



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