

**Advisory Council on Food and Environmental Hygiene**

**Promotion of Hazard Analysis Critical Control Point System  
and ISO 22000 to Food Premises**

**Purpose**

This paper informs Members of actions taken by the Food and Environmental Hygiene Department (FEHD) to promote the adoption of the Hazard Analysis Critical Control Point (HACCP) System and ISO 22000 by food business operators. Members are also invited to note the latest incentive scheme introduced since February 2007 to exempt ISO 22000-certified food premises from the normal Risk-Based Inspection System and the Demerit Points System administered by FEHD.

**HACCP and ISO 22000**

2. Prescribed by the Codex Alimentarius Commission<sup>1</sup>, HACCP is a systematic approach to evaluate and control potential physical, chemical and biological hazards at all stages of the food production and preparation process. Key actions known as Critical Control Points will be taken to reduce or eliminate the risk of such hazards. This approach differs from the traditional “produce and test” methods by screening out unsafe practices through prior planning. A comprehensive HACCP plan will describe in clear terms how hazards identified at different stages of the business processes can be controlled, and how these controls can be monitored and verified. Since the 1970s, HACCP has been adopted by many large-scale food-manufacturing establishments worldwide.

3. In 2001, the International Organization for Standardization (ISO) started the development of an auditable food safety management system, culminating in the formal launch of ISO 22000 on 1 September 2005. ISO

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<sup>1</sup> The Codex Alimentarius Commission was created in 1963 by the Food and Agriculture Organisation of the United Nations (FAO) and the World Health Organisation (WHO) to develop food standards, guidelines and related texts such as codes of practice under the Joint FAO/WHO Food Standards Programme. The main purposes of this Programme are protecting health of the consumers and ensuring fair trade practices in the food trade, and promoting coordination of all food standards work undertaken by international governmental and non-governmental organizations.

22000 is an improvement on HACCP in that it has integrated the HACCP principles with the application steps (including the skills to identify potential hazards, ways of control and monitoring action etc.) developed by the Codex Alimentarius Commission. Specifically, an organisation seeking to obtain an ISO 22000 certification is required to -

- (a) plan, implement, operate, maintain and update a food safety management system aimed at providing products that are safe for the consumers;
- (b) demonstrate compliance with applicable statutory and regulatory food safety requirements; and
- (c) seek certification or registration of its food safety management system by an external organization, or make a self-declaration of conformity to ISO 22000.

4. An ISO 22000 certificate is valid for three years. ISO 22000-certified organisations are subject to audits by third-party certification body every six to 12 months. Any deviation from the food safety management system detected would be recorded and referred to the certified organisation for rectification. If any major deviation likely to affect product safety is detected, the certification body may exercise its power to withdraw the certification immediately.

### **Promotion of HACCP and ISO 22000 by FEHD**

5. Over the years, FEHD has taken active steps to promote the adoption of HACCP by local food business operators to enhance food safety standards. The following programmes are launched regularly -

- (a) develop food safety education materials including guidelines, codes of practice and information sheets for the food industry;
- (b) arrange workshops and seminars to introduce and promote the implementation of HACCP principles and HACCP-based Food Safety Plan principles to the food industry and the general public;
- (c) promote and assist in the implementation of Good Manufacturing Practice and HACCP principles at local slaughterhouses; and
- (d) organise HACCP training courses for Health Inspectorate Officers.

6. These efforts have generally heightened industry awareness of the importance of food safety plans. In 2005, some 30 local food premises operating as food factory, milk factory, bakery and frozen confection factory have adopted HACCP.

7. In response to industry demand and after careful consideration, FEHD proposed in late 2006 a voluntary scheme under which food premises with ISO 22000 certification would be exempted from the Risk-based Inspection System (RBIS)<sup>2</sup> and the Demerit Points System (DPS)<sup>3</sup>. The key considerations are set out below, with elaboration on the reasons for not extending the same exemption to HACCP compliant food premises –

- (a) ISO 22000 has integrated the HACCP requirements. It has duly tackled pre-requisite programmes including sanitation, design layout and pest control and brings clarity and definition to them, which makes it more comprehensive than HACCP.
- (b) ISO 22000 creates a harmonised safety standard, and is easier to understand, apply and recognize. As such, it is more effective than HACCP for food premises.
- (c) ISO 22000 extends the successful management system approach of the ISO 9001 quality management system standard, which is widely implemented in all sectors and is therefore easier for conversion by premises already practising ISO 9001.

8. The food business trade was consulted in December 2006 and they were supportive of the proposed incentive scheme, which was later launched in February 2007. The details about the scheme are elaborated below.

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<sup>2</sup> Under the RBIS, FEHD-licensed food premises are subject to regular inspections by Health Inspectors at intervals ranging from once every four weeks to once every 20 weeks, depending on the risk level of the food premises concerned.

<sup>3</sup> Under the DPS, a pre-determined number of demerit points ranging from 5 to 15 (depending on the nature and severity of the offence) will be registered against a licensee upon conviction of an offence in relation to food safety and environmental hygiene under Cap. 132 and its subsidiary legislation. A licence will be suspended for 7 days if 15 points are accumulated within a period of 12 months (first suspension) and 14 days if another 15 points are accumulated within 12 months from the date of the last offence that led to the first suspension (second suspension). If another 15 points are accumulated within 12 months from the date of the last offence that led to the second suspension, the licence will be cancelled.

## **Incentive Scheme for Food Premises with ISO 22000 Certification**

9. Under the scheme, any ISO 22000-certified food premises<sup>4</sup> covered by a valid provisional or full food business licence issued by FEHD, and which has not been convicted of any food safety-related offence or breached any licensing requirement and condition in the preceding 12 months, will be eligible to apply.

10. Once the eligibility of the food premises is established and their applications approved, they will be exempted from inspections under the RBIS. Instead, they will be inspected approximately once every five months to prevent unauthorised alteration to approved layouts. Special inspections may also be conducted in the event of food poisoning outbreak, or upon receipt of food or other complaints. Moreover, these premises will not be subject to the DPS as long as they remain eligible, because they are already bound by the certification to comply with the relevant food safety and hygiene standards and requirements.

11. The above exemptions are devised to encourage the trade to adopt ISO 22000 certification, which is considered the best food safety management system at present. However, this does not mean that FEHD has relaxed its regulatory oversight on these premises. FEHD will continue to monitor the food and other safety standards of these premises and, where necessary, take appropriate actions including the following –

- (a) Take out prosecutions against the licensee of the food premises concerned should any breach against the law is detected.
- (b) Issue warning letters to ensure that the licensing requirements and conditions are adhered to by the licensee at all times.
- (c) Impose closure orders to the food premises concerned if it is involved in major food incidents.
- (d) Release to the certification body for its consideration and necessary action the details of any irregularity identified during inspections and action taken against such irregularity, change in layout, record of prosecutions / breach of licensing requirements and conditions and any other penalty administered by FEHD as the licensing authority.
- (e) Remove the food premises concerned from the incentive scheme<sup>5</sup> so

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<sup>4</sup> The certification must cover the entire licensed food premises.

<sup>5</sup> Such removal may become necessary in the event that premises concerned (i) no longer possess a valid ISO 22000 certificate or a valid food licence; (ii) is involved in a major food incident leading to temporary closure of the premises; or (iii) has breached the law that is considered very serious from the public health and safety

that they will again be subject to the normal regulatory control by FEHD as with other food premises.

12. A comparison table showing the differences in the application of various regulatory regimes to those licensed food premises under the incentive scheme and those that are not is at **Annex I**.

13. As at 20 June 2007, two licensed food premises (one food factory and one general restaurant) have been recognised under the incentive scheme. The details are at **Annex II**. Their names and addresses are publicly accessible via the FEHD website. Nine other eligible licensed food premises (two milk factories, five food factories and two general restaurants) have applied to join the scheme, and their applications are being processed.

### **Comparison with Overseas Practices in the Promotion of ISO 22000 and Other Programmes**

14. We gather through exchanges with many western countries that there are a number of alternative food safety plans, even though they may not be as comprehensive as HACCP or ISO 22000. Some of these plans are provided at **Annex III** for reference. However, none of the countries named in **Annex III** provides specific regulatory exemption for food premises on the ground of their adoption of any food safety management system. For instance, in the United Kingdom, the food trade recognises ISO 22000 as a good practice and a standard higher than that required by the European Union in terms of food hygiene, but ISO 22000-certified food premises receive no special treatment and are subject to the same inspection frequency as any other food premises. The case is similar in Australia and Canada.

15. In Singapore, there is also no relaxation in the control of food premises that are ISO 22000-certified, though such premises may be subject to less frequent inspections as they are more likely to have a cleaner and more hygienic premises.

### **Way Forward**

16. FEHD will continue to promote the adoption of HACCP and ISO 22000 by food premises in Hong Kong with a view to enhancing their food safety and hygiene standards. We will closely monitor the effectiveness of the incentive scheme in encouraging food premises to adopt ISO 22000 certification.

We will also keep in view the development of more advanced food safety management systems in other parts of the world and consider introducing them into Hong Kong where appropriate.

17. Members are invited to note and comment on the progress made so far by FEHD.

**Health, Welfare and Food Bureau  
Food and Environmental Hygiene Department  
June 2007**

**Comparison of Regulatory Controls for Licensed Food Premises  
Under the Incentive Scheme and the Normal Regime**

<b>Regulatory Controls for Licensed Food Premises</b>	<b>Under the Incentive Scheme</b>	<b>Under the Normal Regime</b>
Prosecution (Summons/Arrest)	✓	✓
Risk-based Inspection System (RBIS)	✗ (only inspected at approximately five-monthly intervals)	✓ (inspected once every 4, 10 or 20 weeks depending on risk classification of the food premises)
Demerit Points System (DPS)	✗	✓
Warning letter system	✓	✓
Temporary closure of premises	✓	✓

✓ : applicable

✗ : not applicable

**Particulars of Food Premises Recognized under the Scheme**

(1) Health Affluence Technology Group Co. Ltd. (康研進科集團有限公司)

Address	:	G01, 02, 05, 06, G/F, Lai Sun Yuen Long Center, 21-35 Wang Yip Street East, Yuen Long N.T.
Area of Premises	:	about 970 m <sup>2</sup>
Type of Licence	:	Food Factory for preparation and processing of instant bird nest products packed for retail, wholesale and food manufacturing customers
Date of Recognition	:	11.5.2007

(2) Satay King (Tsuen Wan Shop) (沙嗲王(荃灣店))

Address	:	2/F-3/F Chau Hop Shing Building, 2-8 Chung On Street, Tsuen Wan, N.T.
Area of Premises	:	about 590 m <sup>2</sup>
Type of Licence	:	General Restaurant
Date of Recognition	:	15.5.2007

Some Alternative Food Safety Plans in Other Countries

**1. Food Safety Management Pack (FSP) in UK**

The UK Food Standard Agency uses FSP as a food safety plan for the food trade. It is designed for small catering businesses such as restaurants, cafes and takeaways. It has been developed by the Food Standards Agency in consultation with the catering business. The principles are based on HACCP but have been modified to be more practical and easy to use.

**2. Food Safety and Inspection Service (FSIS) in USA**

FSIS is also HACCP-based. It capitalises on the food safety and other consumer protection gains garnered by the HACCP-Based Inspection Models Project, while still meeting the demands of the inspection laws.

**3. Food Safety Program in NSW, Australia**

The Food Safety Program is a set of practices and procedures that food businesses can use to manage food safety. Some businesses, mostly those that need a license to operate, such as meat, shellfish, dairy plants, are required by the Food Regulation 2004 (NSW) to adopt the Program. For other businesses, especially those which do not need a licence from the NSW Food Authority, adoption is optional. The NSW Food Authority has developed some general assistance materials to help food businesses develop and implement the Program.

**4. Food Safety Enhancement Programme (FSEP) in Canada**

FSEP is the Canadian Food Inspection Agency's approach to encourage and support the development, implementation and maintenance of HACCP systems in all federally registered establishments. FSEP models were developed to cover as many processes and products as possible to facilitate the development of plant-specific HACCP plans.