REGULATIONS RELATING TO THE APPLICATION OF THE HAZARD ANALYSIS AND CRITICAL CONTROL POINT SYSTEM (HACCP SYSTEM) - (by Trevor Larson) Bakers Publication September 2006

On the 27 June 2003, the Regulation Relating to the Application of the Hazard Analysis and Critical Control Point System, was promulgated in terms of the Foodstuffs, Cosmetics and Disinfectants Act (Act 54 of 1972). This regulation states that once a specified sector and food handling enterprise has been listed, that sector and food handling enterprise may not handle food without a fully implemented HACCP system.

Listing is made by notice in the Government Gazette after consideration of a request made by a representative body of a specific sector and food handling enterprise, or, if the Director-General is of the opinion that it is in the interest of the safety of food handled by a specific sector or category of food handling enterprise, and also the health of the consumer, that such a sector or food handling enterprise must comply with the requirements specified in the Regulation.

Prior to the implementation of a HACCP system, the enterprise should already operate in accordance with good manufacturing practices and that it complies with all the relevant health and safety legislation applicable to the foodstuff and food handling operation under consideration. This is also applicable to foodstuffs received from a producer or supplier. To this end, the food handling enterprise must comply with the following:

Regulation 918 of 1999 (Regulation governing the general hygiene requirements for food premises and the transport of food)
In terms of these Regulations, no food shall be handled on any food premises in respect of which a valid certificate of acceptability has not been issued. To obtain a certificate of acceptability the food premises must comply with the requirements of the regulation, which addresses the general hygiene requirements for food premises and the transport of food. The certificate of acceptability is issued by the local authority in whose jurisdiction the premises is situated.

SANS 10049 : 2001 Food hygiene management
This Standard covers provisions for the hygienic handling of food for human consumption, in order to ensure a safe, sound and wholesome product. It applies to the preparation, processing, packaging, storage, transport, distribution and sale of food for human consumption. The overall aim of this Standard is to set out the basic requirements for a food hygiene management system starting with management responsibility. This Standard is currently under review.

When implementing a HACCP system, the owner of the establishment must ensure that the system is in accordance with the principles as provided for by the Joint Food and Agricultural Organization / World Health Organization. In the South African context the

SANS 10330: 2007 Requirements for a Hazard Analysis and Critical Control Point (HACCP) system, is applied. This Standard contains the requirements for the development, implementation and maintenance of a HACCP system as a preventative system to enhance the safety of food. This is the most recent publication and contains significant changes compared to the previous document, SABS 0330 : 1999 and one minor change compared to SANS 10330 : 2006.

The owner of a food handling enterprise may apply a system equivalent to the one referred to in SANS 10330:2006, if such equivalent system includes at least the principles and process of HACCP. Such a system is **ISO 22000:2005, entitled "Food Safety Management Systems – Requirements for Any Organization in the Supply Chain"**. It is designed to provide a framework of internationally harmonized requirements for the global food industry. Organizations within the food supply chain range from primary producers (e.g., farmers, ranchers) through food processors, storage and transportation operators, subcontractors, and all the way to retail outlets (e.g., groceries, restaurants), as well as every point and company in between. And though their products are not part of the food we consume, makers of processing equipment, packaging material, cleaning agents, additives / ingredients, and even service providers (e.g., equipment testers, contract cleaners) are also integral parts of the supply chain.

In South Africa, most food processors and other food related companies have only recently embarked on the HACCP path. The application of the HACCP system has evolved and expanded into a basis for establishing food safety standards for the international food trade. Although Regulation 908 has been in existence for quite some time, no request from a representative body for listing in the Government Gazette has been submitted, making HACCP compulsory for that industry.