

## Guidance Note:

# HACCP and the Small Food Manufacturer



## HACCP

### Introduction

The HACCP approach to food safety has, over the years, led to numerous books and publications dealing with the rationale behind the procedure and how to successfully implement it. In this article we seek to illustrate, with a few (of necessity anonymous) examples of our experiences at the 'sharp end' among the less well known names in the food industry. In this discussion, we define 'small' as a business that is run by an owner/manager - with this person probably being the only person there in a 'management' role. Businesses such as these make up well over 80% of the total number of food manufacturing companies in the UK and account for about 10% of all UK food manufacturing output.

Within the 'small' sector, many companies do not appear to have a properly documented HACCP programme. Quite often, they believe that they have neither the time nor the resource to implement one. EHOs have, quite rightly, concentrated on the high-risk companies, of whatever size, and also larger and middle size companies. These are the operations which are most likely to put significant numbers of the population at risk if something goes wrong. However, now enforcement is spreading wider and more pressure is being put on small businesses to comply with the legislation.

We must bear in mind that many of these small food businesses are operating around the break even mark – for them time really is money. It is just not available. The owner/manager does not, therefore, have a lot of money to spend and does not have time (or believe he does not have the time) to study the rationale behind a comprehensively documented HACCP. Unfortunately, too often he may not even understand the issues involved. For many there is also a language barrier. This is where reducing the decision tree to two simple questions to apply throughout the process is very valuable in helping to complete the HACCP Plan.

1. Is there a risk to product safety?
2. If there is a risk how can this risk be eliminated?

How should a small manufacturer proceed? Well there are a large number of HACCP courses available, ranging from the cheap and cheerful to the expensive, from the theoretical to the practical. The difficulty is always finding the course that not only is clear enough for the owner/manager to understand, but also contains a high level of practical input that can be transferred directly back to their working environment.

The HACCP Plan increasingly needs to be developed; should the owner/manager do the minimum possible to satisfy the EHO as well as his key customers - or should a wider view be taken? In some areas of London we have found that the wider view is being greatly favoured.

Quite often in SMEs there are no formal management procedures in place and any systems which are in place are either weak or non-existent. The development of the HACCP is, therefore, being taken as an opportunity to implement simple effective systems - which are also being used as the Management Control System. This can result in certain process steps being classified as **critical** control points where, in the classic HACCP model, they would not be regarded as being such.

Why not just classify them as control points? Owner/managers have found that, by classifying them as **critical**, it is easier to enforce staff to correctly complete record sheets in a timely manner. The 'overclassifying' of control points is being used to explain to staff the need for 100% compliance.

HACCP has also been used to force responsibility down the line. Where there is a process step with a control measure then, by defining who is responsible for undertaking this, the owner/manager is forced to delegate. This has a valuable advantage. Small businesses are often run on the basis of limited delegation, with owner/managers often either unwilling or unable to delegate. HACCP helps them discover a new and very valuable skill which enables them to uncover latent strengths in their workforce.

There are several other benefits. Quite often, the preparation of the HACCP Plan forces the owner/manager to re-look at his total business and, in 'walking the process', areas of weakness are discovered. These are often simple and inexpensive to correct. As an example, a baker could not understand why certain loaves were of variable quality. In implementing his HACCP, he discovered that the operator was not weighing the ingredients accurately. Rather than fire the person (which would have been a normal course of action in this establishment) the HACCP approach was used to stress the need for correct weighing. The quality of the loaves improved dramatically and sales of this line took off. There was, however, an unexpected supplementary benefit - the operator concerned was observed checking his colleagues weighing out ingredients and stressing to them the importance of accurate weighing.

Another company found that they had an unexpected advantage over their competition. Their HACCP Plan was more comprehensive compared with that of a competitor - who was also slightly cheaper in price. However, their more stringent HACCP system was favoured, despite the price disadvantage - and this one new contract for the company more than paid for their time and effort involved in developing their HACCP Plan.

It is interesting to see an owner/manager sitting down and studying HACCPs which he has received from his suppliers and noting whether they are more comprehensive than ones he has prepared. We have seen examples where they then use such information to upgrade their own HACCP Plan - they suddenly see that their suppliers have covered areas they never even thought about.

More than one small business has found that a detailed HACCP, used as a Management Tool rather than sitting in the corner and gathering dust, opens the doors to new opportunities which they were unaware existed. We know of one company that was able to sell their products to the petrol forecourts of one of the major oil companies primarily on the strength of their HACCP Plan.

Food sector networking groups (such as The Food Club) provide a means for owner/managers to exchange experiences of what EHOs and supermarket food technologists are looking for when visiting premises to inspect HACCP systems. For example, a major supermarket required proof that potatoes were stored in the dark so as to avoid the light induced production of dangerous substances within them. The HACCP Plan hadn't considered this. There are another benefits of such networking meetings. HACCP trainers, who attend, can then tailor the content of their courses for the smaller manufacturers to meet the real needs of this sector.

The HACCP approach is also being used as a training tool, with operators being asked to 'walk the process' with the owner/manager. The benefit here is that staff feel more involved in the business and morale rises. In turn, staff often suggest ways where the HACCP can be improved. At one food manufacturer's goods-in warehouse, labels are checked as soon as they arrive to make sure that they stick. Why? Because some time previously a batch did not - and they all had to work their day off to catch up. This simple check, although by no means a classical critical control point, had not been included in the draft HACCP Plan.

An unusual twist arises where food is manufactured specifically for use by religious groups. At Passover the use of certain ingredients like rape seed oil, otherwise permitted throughout the rest of the year, renders the product unsuitable for use, as far as Jewish dietary laws are concerned. This brings about the concept of a 'seasonal' HACCP Plans and the resulting opportunities that this brings.

### Summary

The implementation of HACCP, in a comprehensive manner, within a small food manufacturing operation and its use as the management control system can take the organisation to a position of positive advantage. We have seen wastage and 'fire-fighting' reduced, with accompanying increases in sales and profitability.

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### Notes

We hope that this Guidance Note, which Douglas Brown and Dr Jack Chudy have written for *The Food Club*, will be helpful in understanding how HACCP can be used to help small food manufacturers.

BFL Consultants specialises in helping the SME sector Worldwide in HACCP, ISO 9000 Implementation, Product Traceback, Product Recall and Incident/Crisis Management. They have run HACCP training courses in the UK, Poland and Lithuania.

Eclipse Scientific Group - from 12 laboratories in the UK and Ireland, the Group provides analytical services & technical support to the food and other industries