



Normapme Food Group Position on TC 34 draft standard ISO 22000

Meeting Date 16 September 2004

Subject ISO 22000 of TC34

Position Present draft standard does not take into account the method of working of small enterprises and therefore is not fit for use by them. We therefore propose the following changes.

Proposal

1. We propose that an additional paragraph be inserted at the end of clause 1 Scope as follows:

It is appreciated that small companies would not be able to comply with all the requirements as demanded in this standard that was drafted for large companies' requirements. In these cases registration by an external organisation like their Sector organisation should take into account that the enterprise has achieved the principles of the systems defined in this standard, using the sector specific guidelines specially developed for SMEs.

2. Small enterprises have a considerable wealth of guidelines, which describe the hygiene application methods in detail and in a way that is suitable and adapted to the enterprise activities and size. At least 400 of these sector specific guidelines exist and are in daily use according to the European Commission.

We propose therefore that the ISO 22000 refers to these guidelines and uses them as the solution for the SME.

3. NORMAPME is of course willing and able to help the TC 34 in incorporating this into the ISO 22000 standard.

Justification We have been in touch with many small businesses, business organisations and standards bodies in Europe and the consensus is that this ISO 22000 draft was not designed for small business. It is appreciated that such businesses would not be able to comply with the definitions of procedures within the standard, neither has the organisational people structure nor the means of documentation as demanded. When referring to Top Management to define in writing the food safety policy of the enterprise or the organisation of food safety teams it clearly is totally unrealistic for a micro company. Indeed, small businesses tell us that they would have no plans to seek accreditation to this standard. The danger for small businesses is that their large clients will however seek to impose the standard on them to use it with no clear consideration of the SME reality, even when referring to the Annex A.

Even so there is support for the standard as a goal to work to under the rules of the established sector guidelines and **as an objective for larger companies** to aspire towards.

This is particularly true in the sense of the aims of the standard for “an organisation to demonstrate its ability to control food safety hazards in order to consistently provide safe end products that both meet agreed customer and applicable regulatory food safety requirements.”

It is seen as unfair that the current wording of the standard precludes small business from reaching this goal with the means the standard offers to them. .

We are aware that some 90% of food business operators employ less than ten people. We are concerned that these businesses have the opportunity to trade in the same markets as the larger. We have seen no evidence that their hygiene and quality performance is any less than the larger companies. Indeed we believe that it may well be superior. They are also meeting a need in the market for specialist bespoke products that the other businesses cannot satisfy.

NORMAPME and its members thus oppose the standard in its present form.

A more detailed position paper will be submitted to CEN and ISO.

Loucas Gourtsoyannis
Director