Section 5, Own-check plan

In this section, you will be introduced to the own-check plan.

- What is it and why is it necessary?
- How is it drawn up?
- What do you need to take into account in the plan?
- How is its implementation monitored?

You must draw up an own-check plan before starting operations. The purpose of the own-check plan is to help you describe your operations and manage the food hygiene risks associated with them.

What is the own-check system and what is it needed for?

As an operator in the food industry, you are responsible for the safety of your food. In addition, you must ensure that accurate and sufficient information is provided on your food.

In practice, you will ensure this through own-check activities. The own-check system is your own system. In it, you plan in advance how to manage the risks posed by your operations and how to correct any mistakes if necessary.

Through own-check activities, you can ensure, for example, that the storage and cooling temperatures and times of foodstuffs are in order. In addition, you can ensure that food is processed hygienically at every stage.

You can also use own-check activities to guarantee allergen safety and that the composition of your food products is compliant with requirements.

Other things ensured through own-check activities include, for example,

- the condition and cleanliness of premises and equipment;
- the correspondence of recipes with food information; and
- sufficient competence in food hygiene among your staff.

Make sure that your own-check activities are effective:

1. before starting any operations;
2. at least once a year; and
3. whenever your operations change.

Own-check activities are mandatory, but a well-designed own-check system will also provide direct benefits to you:

- It reduces the likelihood of food poisoning.
- It helps keep customers happy.

- It reduces the need for costly official supervision.
- It will reduce waste and errors.

What must the own-check plan include?

The own-check plan covers all work stages essential to food safety. You must also indicate how and through what measures you will manage risks.

Work stages essential to food safety can include:

- the purchase and acceptance of meat and other raw materials
- storage
- refrigeration
- cutting of meat
- mincing of meat before refrigeration
- ingredient dosage.

Terms related to own-check system

Hazard analysis
A hazard analysis identifies all possible hazards to food safety at the different stages of production.

Such hazards can include, for example, the reproduction of pathogenic bacteria in the raw materials or products, chemical traces and foreign objects. In the hazard analysis, you will also consider how to manage these hazards in your operations.

Support system
The own-check support system refers to the methods that are bottom line requirements for safe food production. These include, for example, hygienic work methods, ambient temperature management and pest control.

Critical control point
A critical control point is a work stage that is of material importance for the prevention or elimination of a food safety hazard or lowering the hazard to an acceptable level. In production of meat products, for example, the sufficient heating of the products in order to kill bacteria can be a critical control point.

The HACCP system
The HACCP system is adopted when you decide to manage hazards with critical control points. The HACCP system has its own requirements, more stringent than those applied to your other own-check activities.

What constitutes sufficient hazard management according to Evira?
If you own a cutting plant or minced meat or meat preparation production facility, you can, in Evira's opinion, use a support system to manage the risks of your operations. In other words, it is Evira's view that you do not require critical control points and an HACCP system in such establishments.

Once you have analysed the hazards, however, you must decide for yourself whether you will need to implement critical control points and the HACCP system. More detailed information on these is available on Evira's website.

How to identify and manage hazards?
Hazards include everything that can cause persons eating the food a risk of falling ill or being harmed by the food. Once you have identified the hazards, you can consider methods and measures for their management. You **always** need to make a separate hazard analysis for each work stage, i.e., evaluate the risks and hazards entailed by each work stage.

Microbiological sampling is part of your own-check activities
You are required to take regular microbiological samples from both the food you produce and the surfaces and equipment coming into contact with it.

By taking samples, you can make sure that the quality and safety of your food and production hygiene at your establishment are at an acceptable level. The samples are inspected for, for example, total bacteria, enterobacteria, salmonella and the *E. coli* bacterium.

Send the samples to a laboratory for analysis. You can analyse surface cleanliness samples, which indicate the general level of cleanliness, yourself.

When you have drawn up the own-check plan:

- Keep the own-check plan up to date.
- Update the own-check plan after significant changes in your operations.

The own-check plan may be drawn up partially or entirely in electronic format.

Where can I get help drawing up the own-check plan?
Contact your municipal food control authority or advisory organisations. You can ask them for more detailed instructions for drawing up the own-check plan or templates.

What do you need to take into account in the own-check plan?

The contents of the own-check plan are always dependent on the extent and nature of operations. The most challenging preparation methods in terms of food hygiene require a more detailed description in the own-check plan.

In some cases, the plans can be very simple, such as work instructions. In such cases, it is not always necessary to present the plans in written format.

In companies with one or two employees, for example, all parts of the own-check plan do not need to be drawn up in writing. It will suffice if you can describe your procedures verbally.

You can sign an agreement with another company for parts of the own-check plan
Some sections of the own-check plan, such as “Pest Control”, can be managed through an agreement with another company. Even in such cases, however, the responsibility for compliance with the law remains with you.

Lightening/reducing own-check activities
In some cases, own-check activities can be lightened/reduced. Examples:

- The temperatures of the supplier’s products have consistently complied with regulations. In this case, you can decide to measure the temperature of this supplier’s products less frequently.
- The results of surface cleanliness samples have been good for a long time. In this case, you can reduce the sampling frequency.

How will the realisation of the own-check plan be monitored?

The implementation of own-check activities should be monitored and recorded.

In some cases, it may be to your benefit if you can demonstrate through own-check records that you have acted correctly. Such situations include, for example, suspected cases of food poisoning and customer complaints.
You will be able to demonstrate that the products have been prepared and stored in compliance with requirements.

In your own-check plan, you will specify the frequency of recording the various aspects. For some parts, it can be quite sufficient to only record deviations and the measures taken to correct the situations.

Examples of record-keeping
You must check every day that, for example, the facilities and surfaces are clean.
For cleanliness inspection records, it may suffice to record any observations of dirty surfaces and their washing.

You must regularly monitor and record the temperatures of food and its storage facilities.

Own-check records must be archived
You must archive the records of your own-check activities so that the inspector can inspect them. The records may be kept entirely or partially on a computer, or you can note the records down on paper.

The records must be stored for at least two years from the date of handling the food.

Records must be kept for longer than two years if the product has a long period of minimum durability. In that case, you must keep records of own-check activities for at least one year from the product's use-by or best before date.

Responsibilities

Employees must be familiar with the instructions and methods related to their own tasks and with an impact on food safety. These instructions and methods must also be complied with. Every employee is responsible for the safety of food.

You must appoint a person responsible for the own-check system. The person must have the knowledge and skills required by the task. This person must be familiar with the operations of your business and with the own-check system.

The own-check plan and the authorities
The inspector will assess whether your own-check system is functional and well implemented and notify you of any shortcomings if necessary. The inspector will conduct inspections and take samples.

You must ensure that the inspector will be able to inspect the own-check plan and your own-check records in connection with the inspection. If this is not possible in connection with the inspection, the inspector must be able to check the own-check plan and records within a reasonable time after the inspection.

More information on official supervision is available via the links on our website.

Summary

- You are responsible for the safety of food that you produce and sell.
- You are also responsible for ensuring that customers receive accurate information about your products, such as with regard to ingredients that can cause allergies.
- The own-check system is a way of ensuring the safety of food.
- In the own-check plan, you will consider and plan in advance how to manage the risks in your operations and correct any mistakes.
- The inspectors will also monitor the functioning and implementation of your own-check system.

5.1. Contents of the own-check plan

Observe these minimum considerations that need to be taken into account in the own-check plan.

Operation, products and product groups
Record the basic details of your operations in the own-check plan, for example,

- which species of meat do you cut and
- what products you prepare.

Access and transport routes
Plan the access routes of your staff.
Also plan the transport routes:

- for raw materials;
- for products;
- for packaging materials; and
- for by-products and waste.

Mark the access and transport routes on the floor plan.

Also plan the transport schedules.
Do all of this in a manner that does not compromise food safety.

Monitoring the health of employees
At the start of employment and whenever required after that, you need to ensure that employees who process food are free of salmonella infection. The necessity of a test is determined on a case-by-case basis for each employee.

The own-check plan must specify how records of tested personnel are kept and where those records are stored.

The actual health information of the personnel does not have to be stored at the workplace. The information can be managed by, for example, the occupational health care provider.

Orientation, guidance and training
Employees require orientation in subjects such as work hygiene and the requirements for protective clothing and own-check activities.

Plan the following:

- How to introduce employees to hygienic working methods and own-check activities?
- How to record orientation and training?
- Who will be in charge of orientation?
- What kind of protective clothing will the employees wear?
- Where will the protective clothing be stored and how will it be washed?

Ensuring the hygiene competence of personnel
The employer must ensure that personnel who process unpackaged, perishable food hold hygiene passports.

How and where are records kept of hygiene passports?
The records can consist of:

- copies of the hygiene passports; or
- a list of persons who have presented original hygiene passports.

In small businesses, it can suffice for the employees to present their original hygiene passports to the inspector.

Purchasing raw materials
Plan how you will handle the purchase of raw materials subject to special restrictions.
The purchase of such raw materials should be addressed in the own-check plan.

Acceptance inspections of raw materials
Plan the following:

- How often will you conduct acceptance inspections?
- How will you monitor the temperatures of refrigerated and frozen deliveries? They should be monitored.

Any special arrangements for the use of facilities
Separation in time means that different operations are performed in the same area, but at different times.
The premises must be washed carefully between different operations.

Make plans for the careful management of separation in time and washing the facilities and appliances.

Separation
Where necessary, ensure the separation of different foodstuffs or raw materials.

Plan how to avoid contamination when purchasing, accepting, marking, storing and handling foodstuffs and raw materials.

Examples of separation planning

- How can you avoid contaminating ready-to-eat foods with raw foodstuffs?
- How will you keep substances and products that can cause allergies and intolerances separate from each other and from food for which they are not intended?

A list of substances and products that can cause allergies and intolerances is available in the section ”Operations”, under the subject heading ”Food information management”.
More examples on separation are available on our website.

Also take into account the order of work and cleanliness of premises, appliances and utensils.

Plan the following:

- Will the production area have dedicated work stations and tools for foodstuffs that must be separated completely; or
  Will you use the same utensils and work stations and clean them between different applications?
- Will you also prevent contamination through the division of duties and work instructions?

The possible cutting of carcasses before receiving the results of the trichinella test
(If you have a meat cutting plant operating in connection with a slaughterhouse):
You can cut carcasses before the results of the trichinella test are in, provided that the supervisory authority approves the procedure.

Plan and record in your own-check plan how you will mark and separate such carcasses and parts from other meat until you receive the test results. Also describe the measures for tracing and rejecting any meat and other carcass parts found to test positive and unfit for use in the trichinella test.

Records of cutting meat upon which the inspecting veterinarian has imposed conditions for its handling
(If you have a meat cutting plant operating in connection with a slaughterhouse):
Plan and record in your own-check plan how you will keep records of cutting meat upon which the inspecting veterinarian has imposed conditions for its handling.

Freshness requirements for the raw materials of minced meat
Describe in your own-check plan, how you will make sure that the raw materials for minced meat comply with the freshness requirements.

More detailed information on the freshness requirements for minced meat is available in the section ”Operations”.

Refrigeration and storage of minced meat and meat preparations
Describe in the own-check plan how you will make sure that minced meat and meat preparations are refrigerated and stored at appropriate temperatures.

More detailed information on temperatures is available in the section ”Premises”.

Composition and recipe management
Plan how to ensure that your recipes and product compositions are correct and in compliance with legislation.

For instance, make sure that

- you are only using additives permitted for your product;
- your doses are correct;
- your recipes are kept up to date;
- you obtain sufficient and up-to-date information from your raw material suppliers;
- information on recipe changes is conveyed through all handling and labelling stages;
- the correct amount of food is packaged; and
- the right products are packaged in the right packages.

Temperature management
Plan the following:

- How will you monitor the temperatures of food and its storage facilities?
- What will you do in the event of problems with temperature management?
- From where will you measure the temperatures?
- How often will you take the measurements?
- How often will you record the results?
- What will you do if the temperature is not within the limits specified by law?

At a minimum, confirm the temperatures during these work stages

- When accepting food deliveries
- When handling meat
- During refrigeration
- During cold storage

Traceability
How will you demonstrate the traceability of food and its ingredients?

- from where and when was it acquired; and
- to where and when was it delivered?

How will you ensure that the special requirements regarding beef, pork, poultry, mutton and goat meat are complied with?

How will traceability information, such as delivery lists and purchase receipts, be stored?

Remember that the traceability requirement also applies to the materials and equipment, such as dishes, utensils and packaging materials used at your establishment.

Food information management
In your own-check plan, you should plan how you will ensure that

- the labelling and other food information is in compliance with legislation, i.e., your products are correctly labelled; and
- the markings and information on your products correspond to your actual recipes.

Withdrawals
Withdrawal means that, if it is discovered that a food product does not comply with the requirements for the safety of foodstuffs, the product shall be withdrawn from the market.

Your own-check plan must include a plan for action in case of a withdrawal:

1. Preventing the entry of defective product batches to the market.
2. Withdrawing delivered product batches from the market.
3. Preventing withdrawn batches from being mixed with other raw material or product batches.
4. Act according to Evira's withdrawal instructions and contact the establishment's inspector.

Suspected cases of food poisoning
If customers complain that they have contracted food poisoning from food produced by you, you must notify the local food control authority of the complaints.

Record the contact information of the food inspector in the own-check plan.

Management of packaging and contact materials
Plan the following:

- From where will you acquire your materials?
- How will you confirm the materials' suitability for use with food?
- How will you make sure that the materials will be used according to their instructions?
- Where will you store certificates of suitability for use with food or declarations of compliance?
- How will you ensure the traceability of packaging and contact materials?

Cleaning of premises and appliances
Plan the following:

- How will you ensure the cleanliness of premises, appliances and utensils?
- How often will each area, appliance or utensil be cleaned?
- Who will be responsible for it?
- What tools and materials will be used for cleaning?
- Where will the cleaning equipment be stored?

If the cleaning is handled by an external company, ask it to provide this information.

Disinfection of tools
Cutting plant employees must have the opportunity to disinfect their tools. This is important in areas such as the carcass acceptance inspection point, where employees may have to remove spoiled parts of carcasses.

Make plans for monitoring that

- the temperature of tool disinfection water is at least 82 °C; or
- if you are using a different, equivalent system, state how you will monitor its functioning.

Sampling plan
You are required to take regular microbiological samples from both the food you produce and the surfaces and equipment coming into contact with it.

Plan and record

- how often and from where you will take samples and what analyses will be performed on them; and
- in which laboratory the samples will be analysed.

Additional information on the sampling frequency and sample amounts is available via the links on our website (microbe criteria regulation application instructions for operators).

Shelf-life tests
The shelf lives of products or product groups can be determined with shelf-life tests. The results of these tests indicate the use-by dates or best before dates of your products.

Make plans for conducting shelf-life tests in your own-check plan.

Water quality
You are required to take regular microbiological samples from the water you use. Plan and record how often and from where you will take samples, what analyses will be performed on the samples and which laboratory will conduct the analyses.

Maintenance of premises and appliances
Plan the following:

- How will you take care of the functionality and maintenance of premises, appliances and utensils?
- Who will be responsible for it?
- What scheduled maintenance or inspections will be performed?
- What will you do in case of problems?

Foreign object risk management
Plan the following:

- What kind of light bulbs will you choose for the facility? Will you choose lamps and bulbs that will not spoil the food if they break?
- What will you do if a glass container breaks during food processing?
- How will you prevent humidity and the flaking of paint in order to avoid flakes of paint ending up in the food?

Pest control
Plan the following:

- How will you prevent pests such as rats, birds and cockroaches from entering the premises?
- What will you do if pests do find their way into the premises?

By-products
You must ensure that by-products are treated, stored and disposed of in accordance with regulations. By-products must not cause a risk to food hygiene.

Plan and record the following in your own-check plan:

- What category of by-products will your establishment generate and how much?
- How will you mark them?
- How will you keep them separated from food?
- Where will you deliver the by-products and how?

If your cutting plant handles TSE risk material:

- How will you separate, store and dye the material?
- Where will you send the risk material for further processing?
- In your assessment, how much TSE risk material will you generate in a year?

TSE risk material is discussed in greater detail in the “Setting up” section of this guide.

Waste management
Append the following reports to your own-check plan:

- How will you handle waste?
- Where will you collect different types of waste?
- How often will you empty and wash the bins?
- Who will be responsible for it?

Transport
If you transport food yourself, plan the following:

- How will you ensure the safety of foodstuffs during transport?
- What means of transport will be used?

- How will the food be packaged for transport?
- How long will the deliveries take?
- How will temperatures be managed during transport?
- How will you ensure the functioning of the recording temperature management system for transport taking more than two hours?
- What will you do in case of problems?

If another company is responsible for your deliveries, the above-mentioned points can be addressed in that company's own-check plan.

Organic products and import

If your selection includes organic products, your own-check activities will entail special requirements with regard to organic production.

If you import animal products such as meat or cheese, it will entail special requirements on your own-check activities.