



Section 1, Setting Up

In this section you will learn

- ▶ What do you need to keep in mind when expanding your primary production operations?
- ▶ Will you need to file a food establishment notification or change to the primary production notification?
- ▶ How can you ensure that the premises are suitable for your operations?
- ▶ What kind of competence is required from you and your staff?
- ▶ What else is required of you?
- ▶ What is the own-check plan or description of own-check?

Primary production or a food establishment business?

In addition to the production, raising and cultivation of **primary production** products, primary production includes harvesting, grain drying, milking and other animal-related production before slaughter. It also includes hunting, fishing and gathering wild produce. In addition to these, primary production includes the storage of products at the farm and, to a large extent, the delivery of products to the next processing location.

You can deliver vegetable products and honey to, for example, a packing plant, shop, service establishment, wholesaler, mill, bakery or food plant.

In addition, you may expand your operations, such as by opening a shop at your farm or processing the foodstuffs you produce.

Within certain limits, you can carry out such operations as a primary producer but, in certain cases, you will need to file a **food establishment notification** of your operations.

The food establishment notification is filed with the municipal **food control authority**.

If the operations can be carried out as primary production, filing a change to the **primary production notification** with the municipal food control authority will suffice.

What difference does it make whether your operations constitute primary production or is a food establishment business?

The greatest difference between these classifications is in the own checks requirements. An actively implemented and monitored **own-check plan**, like the one needed for food establishments, is not required for primary production.

Describing the ways of managing the risks related to your operations will be a **sufficient description of own checks** in primary production. For consumer sales, for example, you need to describe the principles of cleaning your storage area and sales premises, along with what information you will provide to customers about the food and how. Risk-management methods require very little recording of measures.

For food establishments, on the other hand, an own-check plan is required. You will learn more about the own-check plan in the Own-check system section.

You are selling food on your farm – will you need to file a food establishment notification?

Consult the diagram on Annex 1 to see when your operations will be classified as primary production and when you will need to file a food establishment notification.

When is a food establishment notification required for direct sales?

Direct sales means selling products produced by yourself directly to consumers.

If you are selling primary production products directly and the sales volume exceeds the amount specified in the **Low-Risk Decree**, you will have to file a food establishment notification on the sales.

All activities related to the actual production of products is still primary production, even if you would have to file a food establishment notification for consumer sales.

What do you need to take into account when selling products to consumers at the market?

You can also sell vegetable products, mushrooms and honey you have produced as primary production at the market. If the volume of direct consumer sales remains

below the threshold provided for in the Low-Risk Decree, you can sell your products at any market in Finland without notifying the local supervisory authorities.

If you were required to file a food establishment notification of the sales, however, and you are selling the products at a market outside your municipality of residence, you will have to notify the local food control authorities of the sales. You must notify the authorities at least four days before the sales event. Such sales are considered to constitute mobile food establishment operations.

You will need to take this into account when filing the food establishment notification with the food control authorities of your municipality of residence.

If you visit the market regularly, such as every other Tuesday, a single notification will suffice.

What else do you need to know about outdoor sales?

Instructions for selling products at markets can be found in **Finnish Food Authority's** outdoor sales guide (in Finnish). A link to the guide is provided on the same web site with the link to this guide.

The protection requirements for the furniture and products needed for outdoor sales are determined by the risks involved in the operations. If you are only selling vegetable products **prepared for sale**, you can sell them directly from the trunk of your car if you like.

At a market, you may need to protect the point of sale from birds, at least from above and sometimes also from the sides.

How can products be delivered directly to consumers?

Direct sales are often managed through **REKO food rings**. In REKO, consumers order

the product or products in advance from the producer, with the products changing hands at an agreed-upon location at an agreed time. This is called a handover and does not constitute a sales transaction, so even if the seller has a food establishment, the local food control authority does not have to be notified of the handover location and time.

The delivery can also take place through different channels, such as Matkahuolto or the post.

Selling self-produced vegetable products on your farm

You are free to sell the following directly to consumers as primary production:

- up to 50,000 kg of self-grown leaf vegetables per year (lettuce, spinach, cabbage, herbs and shoots – but not sprouts); and
- up to 100,000 kg of other self-produced vegetable products (potatoes, carrots, tomatoes, cucumber, onions, strawberries, apples, etc.).

You can sell the primary production products

- directly from the farm; or
- as door-to-door sales; or
- at a market; or
- you can deliver the products against orders placed by consumers through a mutually agreed channel (such as REKO sales).

Selling products of other farms on your farm or at the market

In addition to your own produce, you can sell low-risk primary production products of other producers to consumers (principally vegetable products, mushrooms and honey produced by others) for a total of EUR 10,000 without having to file a food establishment notification.

When selling honey

You are free to sell honey produced and packed by others. In addition, if your farm has beehives, you can sell a maximum of 2,500 kg of self-produced honey to consumers as primary production each year.

You will have to file a primary production notification of your honey production to the food control authority of the municipality in which your honey extractor or operation is located. The notification form is available on the website of the municipality.

Finnish Food Authority's website contains information on how to register as a beekeeper and how to report the locations of the hives to the agricultural authority.

This registration is mandatory.

If you sell more than 2,500 kg of your own farm's honey to consumers per year, you must also file a food establishment notification of the selling with the municipal food control authority.

Would you like to pack vegetable products, mushrooms or honey?

You may operate a packing plant on your farm. In this case, the packing operation constitutes primary production, provided that you only process vegetable products, mushrooms or honey produced by yourself, and the nature of the products does not change in packing them or preparing them for sale.

You can also sell your packing service to other producers, as long as the packed products are returned to their farms of origin.

A packing plant is a **food establishment** if

- it operates as a **cooperative**; and/or
- it is not located on a farm; and/or
- you buy products of other producers for packing and marketing.

If you sell meat, keep the following principles in mind:

1. Selling meat always requires a food establishment notification.
2. As a rule, meat sold to consumers must have been inspected at a slaughterhouse.
3. If you market self-produced meat, you either have your own slaughterhouse at the farm or take the meat of animals you have raised back from the slaughterhouse for sale. However, you may slaughter small quantities of poultry and rabbit meat yourself, without having it inspected.
4. When you store, sell and possibly deliver to customers inspected fresh or frozen and prepacked meat that has been handled at the cutting plant
 - if you do not open the packages or process non-prepacked meat, your operations are not limited by the quantity thresholds specified in the Low-Risk Decree.

In some cases, meat can be exempted from the inspection obligation.

■ **Deer meat**

You can buy deer meat with the skin and fur on directly from a hunting club if your point of sale is equipped with facilities for skinning and cutting the meat hygienically. You can buy uninspected, cut deer meat for sale from a hunting club or hunter if they have notified their local **supervisory authority** of their operations.

■ **Hare and game bird meat**

The same rules apply to caught hares and game birds as to the meat of deer animals. The Hunting Act prohibits the sale of certain species of wild grouse, such as capercaillie.

■ **Poultry and rabbit meat**

You may sell uninspected poultry or rabbit meat from animals you have raised

and slaughtered. You can also buy such meat directly from other producers and sell it. Selling meat requires a food establishment.

If you sell self-produced and uninspected poultry or rabbit meat, thresholds for your production have been specified in the Low-Risk Decree. You may produce 40,000 kg of poultry meat and a quantity of rabbit meat corresponding to 20,000 rabbits per year. If you exceed these quantities, the animals must be slaughtered at an approved slaughterhouse.

Sale of eggs

You can only buy eggs for sale directly from other farms, without **grading** and X-ray scanning, if your point of sale is located in one of the exemption areas. If it is not, you may only sell grade A eggs processed at a packing plant. This restriction does not apply to self-produced eggs.

You may sell up to 20,000 kg of eggs produced at your own farm to consumers each year, or an unlimited quantity of eggs if you file a food establishment notification on your sales operation. Participation in the Salmonella control programme is mandatory.

The exemption area for egg sales consists of the regions of Lapland, Northern Ostrobothnia, North Karelia, Northern Savonia and the Åland Islands.

Sale of raw milk

As a milk producer, you can sell your **raw milk** and **colostrum** directly to consumers on your farm. Colostrum can be sold either fresh or frozen.

You may sell 2,500 kg of each type of milk per year as primary production. If you open a food establishment selling raw milk on your farm, there is no limit on the quantity of raw milk you may sell to consumers in your

establishment. In such cases, you must comply with the requirements of the Decree on the sale of raw milk. More information (in Finnish) on the conditions for the sale of raw milk is available on the website where the link to this guide is found.

If your farm does not produce milk, you can purchase frozen **colostrum** produced on another farm and sell it, provided that you have a food establishment.

Selling fish

You may buy non-gutted fish from a professional fisherman and sell it. Purchasing salt-water fish directly from a fisherman requires you to register as a first-purchaser of fish at a **Centre for Economic Development, Transport and the Environment (ELY Centre)**.

If you purchase professionally fished salt-water fish for resale to your customers, read the Ministry of Agriculture and Forestry's guide (in Finnish) at <http://kalat.fi/kaupallinen-kalastus>.

Your farm can be located by the sea or on the lakeside and you fish as a hobby. You would like to sell the catch in your shop. You must register with the local food control authority as a fisherman in addition to other lines of primary production; and in the register of commercial fishermen maintained by the ELY Centre.

If you are fishing in the sea, your vessel will also need to be registered. Marine fishing is subject to the additional requirement that the first purchasers of fish must register with the ELY Centre. In this case, when you are both the fisherman and first purchaser, contact the ELY Centre to ask how the registration should be performed.

At what conditions may fishermen deliver gutted fish to you?

Fishermen may deliver gutted fish to you for sale if they have an approved fish processing establishment.

However, if the fisherman only operates a food establishment that requires notification, restrictions apply to the delivery amounts and delivery area of gutted fish. The quantity depends on how much gutted fish the fisherman sells directly to consumers and how much to other businesses or restaurants. The delivery area consists of the local region.

If you have a fish pond

If you have a fish pond in which you farm fish and either catch them yourself for sale or let customers catch their own fish, you need to register as a fish farmer with your local food control authority.

A fish pond also requires registration in the aquaculture register. The register is maintained by the ELY Centre by mandate of Finnish Food Authority.

In addition, if you produce more than 2,000 kg of fish per year, your pond will require a health certificate. The health certificate is granted by Finnish Food Authority.

Sales of other products and organic products

You can sell 5,000 kg of eggs of other birds than chicken as primary production per year. If you exceed this threshold, you will have to file a food establishment notification for the sales.

You may also purchase eggs of other birds (than chicken) directly from other producers and sell them.

Wild produce can also be bought directly from the gatherer.

If you sell **organic products**, your operations will be subject to control of organic origin in addition to regular food control.

You process vegetables from your own crop – will you need to file a food establishment notification?

Do you make products such as jam, juice, salads, grated salads, pickles, sour dairy products, flour, hulled grain or flakes, bread or other baked goods or casseroles?

If the production is small-scale and low-risk, you can make these products without filing a food establishment notification.

Your activity no longer consists of primary production, however, as the nature of the products changes. From the diagram on the Annex 2 you can see when you will need to file a food establishment notification and when it will not be necessary.

Will you need to file a food establishment notification on the production?

If the processing of products of primary production will change the nature of the products, a food establishment notification is normally required.

If the processing is low-risk, it is permitted up to the value of EUR 10,000 without a food establishment notification, provided that the processing is carried out in connection with another business, such as primary production. The monetary limit is the Tax Administration's view on what constitutes a livelihood.

Low-risk processing includes:

- the processing of grain and its milling into hulled grain, flour or flakes;
- baking bread, marble cake and cookies;
- making honey products by flavouring honey; and
- freezing or deep-freezing berries.

What does production for marketing trial purposes mean?

If the processing only involves a moderate amount of risk, the operation can be tested for marketing trial purposes in connection with other operations, without filing a food establishment notification. Such processing includes making jam or juice, for example.

When you begin producing your product regularly, you will need to file a food establishment notification. The maximum duration of marketing trials is one year, and the notification must always be filed within a year of starting operations.

Suitable premises

You will not necessarily need sales premises for the sale of primary production products directly from the farm. You can sell the products directly from storage, even if their sale requires a food establishment notification.

If you want to arrange the sales in a dedicated sales area, however, you should carefully design and build the area according to the needs of your business.

The baseline requirement is easy to clean, durable and non-toxic materials and structures. If you only sell non-prepacked, soil-covered root vegetables, such as potatoes and carrots, however, you may sell them from wooden bins. Wood is also a suitable material for washed root vegetables that will be cooked or peeled before eating.

Please remember that, in most cases, wood is too porous and absorbs dirt and water too readily for use with foodstuffs.

Always choose materials with product safety and ease of cleaning in mind.

If you decide to expand the operations of your farm from primary production to selling meat,

the first requirement is to have a sufficient amount of cold storage space for the meat.

If you cut the meat in the kitchen of your residence on the farm, do it separately from other cooking. Always clean the kitchen between activities.

Use clean utensils and wash your hands often enough. Make sure that the **cold chain** remains unbroken.

You can ask the **food inspector** to confirm that your premises are suitable for their intended purpose.

If you would like to sell your products outside the farm and are acquiring retail premises for the purpose, check with your municipal **building supervision authority** to confirm that the premises have been designed for your intended purpose.

When you are thinking about whether the premises are suitable for your intended purpose, the minimum consideration is whether or not your business can be sensibly run on the premises. Find out whether or not there are enough water fixtures and storage space on the premises. If you think you would like to expand your product selection at a later date, choose sufficiently large or modifiable premises from the start.

Also consider whether the processing of food could require a large and expensive surface renovation.

The **food inspector** and advisory organisations will be able to advise you on these matters. Information on advisory organisations is available via the links on our website.

The Premises section of this guide also contains additional information on the requirements for premises.

Design the processing premises so that the following will be easy to implement:

- Do not allow animals, customers or other external parties onto premises where food is processed.
- Do not process food products close to the front doors. Above all, this should be avoided if people use the door during processing.
- Place food preparation and processing areas so that passage through them, for example, from outside to the dressing room or food storage, is minimised.
- Store non-food products so that they will not leave smells or taste in foodstuffs. Also ensure that they will not pose a danger if they break.
- Remove any unnecessary items, such as furniture, devices and utensils no longer being used, from the premises since they collect dust. They can also cramp the spaces and make cleaning more difficult.

If you are acquiring new premises for sales or processing

The municipal building supervision authority approves the use of premises or a property as, for example, a restaurant, shop, office or industrial facility. The intended use of premises is specified in their building permits, and the premises may not be used for other purposes than those approved in the **building permits**. If you require further information, see the guide on setting up a restaurant.

Requirements for personnel

Food establishments can set requirements for personnel. Depending on the nature of the work, personnel may need:

- A hygiene passport
- Protective clothing
- **A health certificate**

Persons who **process perishable foods** professionally must have a **hygiene passport**

and wear appropriate protective clothing. A hygiene passport is a certificate of competence for demonstrating familiarity with **food hygiene**.

If necessary, the employees must also be able to reliably demonstrate that they do not have **salmonella** infection.

The purpose of all these requirements is to ensure the safety of foodstuffs. These personnel requirements will be discussed in more detail in the Staff section of this guide.

There are less requirements for primary production personnel:

- No hygiene passport is required.
- A health certificate is only required if the farm sells raw milk. You must nevertheless verify that personnel who process food are in a good state of health. You should also provide your staff with training on health risks.
- There are no requirements on the use of protective clothing either; the operator must assess their need.

What aspects of own-check system should you consider when setting up your operation?

Operating a food establishment requires an own-check plan. A **description of own-check** is sufficient for primary production.

If you sell products of primary production at quantities below the threshold specified in the Low-Risk Decree, the own-check description requirement does not apply to producers of vegetable products, mushrooms, honey and eggs of chicken or other birds.

The own-check plan or description of own-check can be substituted with a best-practice guide for your line of food business

If the line of food business has drawn up

a best-practice guide, you can follow that instead of drawing up an own-check plan or description of own-check.

There are best-practice guides suitable for the primary production of fresh vegetables. The Laaturaha guide and IP-Kasvikset certificate cover the production of vegetables (in Finnish).

There is a best-practices guide for honey producers published by Suomen Mehiläishoitajain Liitto (the Association of Finnish Beekeepers, in Finnish) and one for producers selling raw milk, published by the Finnish Association for Milk Hygiene (in Finnish).

Summary

If you decide to expand the operations of your farm from primary production to selling foodstuffs or further processing

- ▶ Find out the restrictions on your operations, such as what can be performed as primary production.
- ▶ Make the required notifications, either a food establishment notification or change to the primary production notification.
- ▶ Draw up an own-check plan or expand your description of own-check to cover the risk management of the products you will be selling.
- ▶ Make sure that the required personnel have hygiene passports, protective clothing and health certificates. These will be needed by persons who, for example, make jam or handle meat or other perishable foodstuffs in a food establishment.