

### **Section 3, Operations**

#### In this section you will learn

- What must the surfaces of your establishment and its workbenches be like?
- What materials are permitted in dishes, tools and packaging?
- How will you ensure the safety of water?
- Why do you need to know the origin of raw materials and the destination of finished products?
- What information must be on the food packages?
- What should be taken into consideration when transporting foods?

# Cleaning and cleanliness of surfaces and equipment

The surface materials of the facilities, utensils and appliances must be non-toxic and easy to clean. If necessary, such as in food-processing premises, the materials must be able to withstand washing with water and mechanical cleaning, such as with a brush, and also possible disinfection.

Materials that do not have a smooth, waterrepellent and hard surface absorb dirt and odours and cannot be kept clean in practice. Such materials are not suitable for food preparation, processing or storage facilities, in which cleanliness is particularly important.

Broken and rusty surfaces are also difficult to clean. This is why you should favour durable and rustproof materials. The condition of the surfaces must be monitored and broken surfaces repaired or replaced.

#### **Concessions on surface materials**

The quality requirements for surface materials are not that strict in all circumstances. The storage of soil-covered root vegetables, such as potatoes and carrots, in connection with sales and milling grain are good examples of operations where the surface materials do not necessarily need to be washable with water.

#### **Plastic cutting boards**

Plastic cutting boards are convenient because they are easy to keep clean.

When grooves appear on the boards, they need to be replaced or ground smooth.

# Wooden processing surfaces are only suitable for dry foodstuffs and baking

The use of wood as a surface material should be avoided, particularly on premises where meat is processed. Wood is a porous material and can absorb water, dirt and detergents and remain damp for a long time. Wooden processing surfaces are suitable for dry foodstuffs such as bread and other bakery goods. Wood is also an acceptable material as a baking surface.

#### Cleaning the premises

Premises, devices and utensils used in food production must be cleaned carefully, at least at the end of each day or shift. If necessary, the premises must also be disinfected.

Surfaces and utensils that come into contact with food must be kept as clean as possible during the working day.

Food-processing areas, equipment and utensils must always be cleaned in a manner that does not damage the food.

#### Only use clean cleaning equipment

Cleaning equipment must be cleaned or changed frequently enough.

If this is neglected, they will spread dirt, bacteria and viruses between surfaces.

# Dedicated cleaning equipment for premises in which food is prepared or processed

Food preparation and processing premises need their own cleaning equipment. The equipment may not be used to clean other premises. This prevents the spread of bacteria and viruses that cause **food poisoning** through the cleaning equipment.

Toilet facilities also require their own cleaning equipment.

Disposable cleaning equipment can be a safe solution for cramped premises in which it is difficult to set apart an appropriate storage area for cleaning equipment.

# Do not forget the ceiling and other high surfaces

Dirt, harmful bacteria and viruses may contaminate unprotected foodstuffs and

processing surfaces from many places and for many reasons.

Dirt, bacteria, and viruses may originate from, for example,

- human hands
- the air, or
- high surfaces, such as the ceiling or shelves with flaky paint or mould.

For this reason, unprotected food should not be processed in premises whose high surfaces are in poor condition.

#### Sufficiently effective ventilation

The ventilation in food premises must be powerful enough to prevent humidity from accumulating in the structures, leading to the growth of mould. Mould can easily enter foodstuffs, either directly or via the processing surfaces.

Dripping moisture from roof structures can **contaminate** food and processing surfaces.

Efficient ventilation also removes heat, which is important for the operation of refrigeration equipment. Different activities require different kinds of ventilation.

#### Dehumidification

Water frequently condenses on the cold surfaces and refrigeration equipment of refrigerated areas. This is called condensed water or condensation. The dripping of condensation into food must be prevented, for example with **condensation basins** and drainage pipes. Alternatively, the surfaces must be dried often enough to prevent water from dripping.

Moisture left by washing must also be prevented from dripping into food.

#### Pests must be kept from food premises

**Pests**, such as rats, mice, cockroaches, flies and silverfish bring dirt, bacteria and viruses with them. It is important to prevent pests from entering premises where food is processed.

The dirt, bacteria and viruses carried by pests frequently originate from outside or from the sewers. They can cause food poisoning if allowed to contaminate foodstuffs.

#### Materials suitable for use with food

All materials coming into contact with food must be suitable for use with food and for their intended purpose. This ensures that harmful chemicals will not migrate from the materials into the food.

In the industry, we talk about 'contact materials'. This refers to all materials that come into contact with foodstuffs, such as work surfaces, dishes, utensils, appliances and packaging materials.

# How do I know whether a material is suitable for use with food?

The purpose of use of the material can be indicated by its trade name, such as cheese film, coffee cup, food plate, frying pan, bread bag or baking surface. If the package or item bears the **wine glass and fork symbol**, it is suitable for use with food.



Wine glass and fork symbol

## What other, specific restrictions have been issued?

The use of a material can be subject to further restrictions regarding, for example, the temperature, fat content, acidity or usability period of the food. In such cases, the wine glass and fork symbol may not be sufficient by itself to tell what kind of contact the material is suitable for.

# What will I do if a product's purpose is not indicated by its packaging or instructions?

If the purpose or conditions of use are not indicated by the trade name or instructions in the package of a contact material, you should confirm them from the supplier.

Especially fat content, heat and acidity can contribute to the migration of harmful chemicals from materials to foodstuffs. For this reason, it is important to use materials according to instructions and only for the purposes for which they are intended.

# How can you ensure that the material is suitable for your purposes?

As a rule, the wine glass and fork symbol is a sufficiently clear indication of a product's suitability for use with food.

When you buy products from a wholesaler, the product's trade name can indicate the purpose of the item or material. Such trade names can include a grill bag, meat wrap or marinade bowl. If the purpose of use is not clear, it should be checked from the wholesaler. In this case, for example, additional information obtained by e-mail will be sufficient.

If you buy your materials/articles directly from manufacturers or importers, request them to provide **compliance documents** that include instructions.

# Which dishes can be put into a microwave oven or microwave?

Materials such as ceramics and glass are suitable for **microwaving**. However, ceramic dishes with gold inlays are not suitable for use in a microwave. Plastic dishes may be used in microwaves only if they bear markings that indicate suitability for microwaving. Dishes containing metals may not be put into a microwave.

# Why can't you put any plastic dish or bowl into a microwave?

If a plastic dish does not have a marking that indicates suitability for microwaving, it should not be used to heat food in a microwave. It is common for food to be heated unevenly in the microwave. In this case, the plastic can soften and cause substances to migrate into the food.

#### Protect foodstuffs from aluminium

Do not prepare or store acidic foods, such as juices, in aluminium dishes. Steel utensils must not be used with aluminium dishes, since steel is harder and scrapes off aluminium which is then transmitted into the food in the dish. Aluminium foil may not be used to protect steel dishes because the steel will make holes in the aluminium, leaving traces of it in the food.

#### **Opened tins**

When you have opened a metal tin, transfer the contents to another container for storage. *Why?* 

An opened tin will come into contact with oxygen. That can cause tin or other metals to come off into the food.

#### Choose appropriate disposable gloves

Vinyl plastic disposable gloves are not always suitable for the processing of fatty foods.

Regular vinyl gloves, for example, are thus not suitable as general-purpose gloves for working with food. If the glove package does not

indicate which foods the gloves can be used with, confirm this from the supplier.

#### Water source

Most companies use water from the public utility network. The waterworks monitor the quality of public water. If you use water from your own well or another water source or install water filters on taps, you must take samples of the water. Alternatively, you may use the water-quality monitoring services of the health protection authorities in your owncheck activities.

#### Water in primary production operations

If your primary production operation involves washing and selling parts of vegetable produce intended for use as food, you must comply with the water requirements set forth in the Primary Production Decree.

However, if your primary production operations are small in scale and your sales and delivery volumes remain below the thresholds specified in the Low-Risk Decree, you are not required to have the water quality inspected.

#### **Products for sale**

It is likely that your sales operations will focus on the produce of your own field, garden or animals, or on natural produce you have picked or caught (e.g. berries, mushrooms and fish). You can also purchase the produce of others for resale.

If you file a food establishment notification of your operations, there are fairly few restrictions on your business. Food of animal origin is nevertheless subject to certain restrictions.

# Take care of the cold chain and remember to wash your hands

The requirements on structures and operations increase with the potential food

hygiene risks related to the products you are selling.

The cold chain must be kept as unbroken as possible for products that require cold storage. Take this into account in all of your operations.

If you handle ready-to-eat or perishable non-prepacked foods in connection with sales, you must be able to wash your hands conveniently.

# The restrictions on consumer sales are listed in Section 1, Setting up

With regard to vegetable produce and honey, the restrictions concern the sales method; i.e. whether you may sell them as primary production or will need food establishment.

In addition, food of animal origin is often subject to requirements that may feel like restrictions.

The restrictions apply to the following food products:

- Raw milk and colostrum
- Eggs
- Meat
- Fish

Most of the restrictions are explained in Section 1, Setting up.

# Consider the harmful substances contained in natural products

When selling natural products, please remember that some plants and mushrooms contain substances harmful to human health.

The harmful substances occurring naturally in food can be mitigated by choosing the right raw materials or processing them appropriately (for example, processing false morels). Additional information is available from the links provided on the same web page with the link to this guide.

In some cases, however, the processing of foodstuffs, such as by drying, can actually increase the concentration of harmful substances.

#### **Gather natural produce from clean areas**

Harmful substances not naturally occurring in plants or mushrooms can accumulate in them from the environment.

When gathering plants and mushrooms, take account of any local factors that could be harmful, such as near-by roads or factories or the use of pesticides.

If the plants or mushrooms have been picked in a clean area, they are safe to use in this respect.

#### Assistance from the natural herb guide

Arktiset Aromit ry has drawn up a good practical guideline for natural produce entrepreneurs, titled Luonnonyrttiopas (Guide to Natural Herbs, only available in Finnish). The guide discusses the picking, sales and use of herbs growing naturally in Finland, along with the legislation related to such activities.

Finnish Food Authority has evaluated the guide's sections related to the use of herbs as food. The guide to natural herbs can be purchased from the online shop of the Finnish National Agency for Education, <a href="http://verkkokauppa.oph.fi/">http://verkkokauppa.oph.fi/</a>.

#### Storage and sales of fish

Ungutted fish weighing more than 500 g may be stored and sold for two days, including the day of accepting the delivery. The fish must be gutted on the day after accepting the delivery if you want to continue selling them. This requirement applies equally to self-caught and purchased fish.

## Foods that are uncommon or unknown in Finland

You may sell a plant or animal product whose use as food is not known in Finland. In that case, before starting to sell the product, you must find out whether or not it has been used as food in another EU Member State.

If the product has not been used as food, selling it may require a **novel food authorisation**. More information is available via the links on our website. You can also contact your municipal food inspector.

# Purchasing raw materials for further processing

The majority of raw materials you use in the production of your food naturally originate from your own field and garden. They can also be natural products you have gathered (such as berries or mushrooms). You may need to buy some ingredients from nearby farms or a wholesaler.

You are free to use the produce of your own field and garden for food production. However, the purchase of raw materials for food production may be subject to certain restrictions.

#### Vegetable products as raw materials

There are no restrictions on the use of self-grown vegetable products for further processing. You can also purchase vegetable raw materials from other farms.

Seeds used for growing sprouts are subject to strict microbiological requirements and requirements related to production conditions, which are not discussed in this guide.

#### Natural products as raw materials

When using natural products, such as plants and vegetables you have picked, as raw materials for products, follow the

same guidelines that apply to their sale to consumers. The guidelines can be found under the header "Products for sale" in this section.

You can also purchase the natural products you need as raw materials directly from their gatherer.

#### Honey as a raw material

You may want to replace sugar with honey in certain situations. Honey is classified as a food product of animal origin. Regardless of this, there are no restrictions on purchasing honey.

You may use honey produced by your own beehives for food production. See the instructions on beekeeping in Section 1 "Setting up".

You can also purchase honey directly from another producer.

#### Chicken eggs as a raw material

You may not purchase chicken eggs directly from another farm. The eggs must be **graded** and X-ray scanned at a packing plant process.

You can only use grade A eggs as a raw material, unless you have produced the eggs yourself and use them for a food that is heated sufficiently during preparation.

#### Eggs of other birds as a raw material

Eggs of other birds than chicken can be bought directly from the producer. You are also free to use self-produced eggs of other birds as a raw material.

#### Raw milk as a raw material

If you are a milk producer, you can use raw milk produced at your own farm in the production of food.

If your farm does not produce milk, you can purchase raw milk directly from a dairy facility or as packaged retail products. If you use the milk for food that is heated during

preparation, such as buns or pies, you can also buy raw milk directly from other milk producers.

#### Meat and fish as raw materials

Purchasing meat and fish for use as raw materials has been discussed under "Setting up", with additional information on buying fish for sale presented in this section. You can follow these instructions if you produce small quantities of food with raw minced meat, such as cabbage casserole or cabbage rolls.

The guidelines are also applicable to meat or fish casseroles and pies made with raw meat or fish.

# Foods that are uncommon or unknown in Finland as raw materials

You may process a plant product whose use as food is not known in Finland. In that case, you must find out whether or not it has been used as food in another EU Member State. If the product has not been used as food, its use may require a novel food authorisation.

Additional information on novel foods is available on Finnish Food Authority's website. You can also contact your municipal food control authority or health inspector.

#### **Acquisition of organic raw materials**

If you advertise the production of organic products, your preparation facility will be subject to control of organic origin in addition to regular food control.

#### **Traceability**

It must be possible to trace the origin of foodstuffs and their ingredients. **Traceability** means that you will need to be able to demonstrate from where ingredients and other products were purchased and where the finished products were delivered. You must also know the purchase and delivery times of ingredients and products.

Efficient tracing enables the effective limitation of issues related to food safety. For example, poor-quality ingredients or ingredients that cause food poisoning can be removed from the food chain when their origin or place of delivery is known.

The better you are able to connect the information of ingredients you have purchased and food you have delivered, the better you will be able to limit financial losses and health hazards in the event of an incident.

#### **Food information management**

The law requires you to declare certain information on your foodstuffs. You are responsible for the accuracy and sufficiency of the information if the food is sold under your name or your company name.

Food is divided into non-prepacked and prepacked foods.

#### Non-prepacked foods

Non-prepacked foods are

- served to consumers for immediate consumption or,
- to make sales quicker and easier, packaged for immediate sales, such as sandwiches or pies, or
- food packaged by the consumer or
- food packaged at the request of the consumer.

At the retail level the information of nonprepacked foods must be declared in writing, on a visible and legible brochure or board or in another clear manner.

The information can also be provided verbally, provided that you clearly indicate that the information is available upon request. An exception to this is products with a high salt content for which information must always be provided in writing.

As the operator of the business, you are then responsible for the information and its accuracy.

# What information on non-prepacked foods must be declared to customers in connection with sales

#### 1. Name of the food

You must state the name of the food. For example, rye bread, strawberry jam. The trade name alone will not suffice.

# 2. The country of origin must be indicated if necessary

The food's country of origin, or the country in which the food was manufactured or produced, must be indicated if omitting the information could mislead the consumer. The country of origin must be declared for products such as beef, poultry, pork, mutton and goat meat, honey, fish, fruit and vegetables. The country of origin must also be declared on the delivery batch documentation of the above-mentioned non-prepacked foods, such as the covering letter. The most precise batch-specific information on the country of origin is required for beef.

# 3. Substances and products that can cause allergies or intolerances

You must be able to notify customers of the presence of substances and products that can cause allergies or intolerances, listed in the food information regulation. A list of such ingredients and products is provided on the following pages.

#### 4. Ingredients

You must inform the customer of the product's ingredients also when selling non-prepacked products.

# 5. Instructions for storage and use if necessary

If necessary, you must notify the customer of the instructions for storage and use also when selling non-prepacked products.

## 6. In certain cases, the amount of fat and salt

Customers must be notified of the fat and salt content of cheeses, sausages and cold cuts. The salt content of bread must also be declared. Such products must also be labelled with an extra salt content marking if necessary. You are not required to declare this information, however, if you only produce small quantities of such products and deliver them directly to the end consumer or a local retailer that will deliver the products directly to end consumers.

# 7. Matters required by special legislation When selling non-prepacked food, you must equip it with the markings required by special legislation if required. Such legislation applies to, for example, raw milk, honey, products of fishing and aquaculture, vegetables, jam and juice. Additional information is available from

the links provided on the same web page

# Customers must always be notified of the following substances and products that cause allergies or intolerances

 cereals containing gluten, i.e., wheat, barley, rye, oats and products made of these cereals;

with the link to this guide.

- crustaceans and crustacean products;
- eggs and egg products;
- fish and fish products;
- peanuts and peanut products;
- soy beans and soy bean products; and
- milk and dairy products.
- nuts and nut products;
- celery and celery products;
- mustard and mustard products;
- sesame seeds and sesame seed products;
- sulphur dioxide and sulphite in concentrations of more than 10 mg/kg or 10 mg/l;

- lupin and lupin products; and
- molluscs and mollusc products.

#### **Prepacked foods**

You must label the packaging of food sold or delivered prepacked.

Prepacked food refers to food that has been completely or partially enclosed in a package before sale, and the contents of the package cannot be changed without opening or breaking the package.

However, food that has been packed on site for immediate sale in order to make sales faster and more convenient is not considered prepacked. Such food includes bread and pies, for example.

# Packages must contain the following information:

- Name of the food
- List of ingredients if necessary
- Ingredients that can cause allergies or intolerances (a list is provided on the following pages) must be printed in bold in the ingredient list
- The quantities of ingredients or ingredient groups highlighted on the label, such as the quantity of blueberries in blueberry pie or minced meat in a minced meat pizza
- The amount of food contained in the package
- Date of minimum durability, best before date or use-by date, and the date of freezing if applicable
- Special storage and/or use conditions, if required
- Instructions for use, if required
- The producer's name or company name and address
- If necessary, the food's country of origin or place of departure

- Nutritional values, if required. Nutritional values will not be required if, for example, your farm produces small quantities of food products delivered directly to the end consumer or to a local retailer for sale. Neither are the values required for unprocessed products, such as vegetables and berries prepared for sale.
- A batch ID identifying the food products belonging to the same batch
- An identification mark for food of animal origin
- An extra salt content marking if required
- Any other markings required by special legislation Special legislation applies to products such as beef, poultry, pork, mutton and goat meat, along with honey, fish, vegetables, jams and juices.

# When labelling your products, make sure that:

- The information provided on your food products are accurate and sufficient. They must not be misleading.
- The labels are legible, noticeable and clear. The minimum size of a small x is 1.2 mm.
- The goal is for a person with normal eyesight to be able to read the label without effort or the use of aids, like reading a newspaper or book.
- All the necessary markings are present on the package. The required markings include those provided for in the EU food information regulation and those required by special legislation where applicable.
- The markings have been made in accordance with statutory requirements. For example, additives have been indicated with both their group name and the name or E code of the additive.
- Compulsory labelling is in both Finnish and Swedish. Labels in one language are sufficient for products sold in monolingual municipalities.

# These allergy- and intolerance-causing substances and products must be emphasised

- cereals containing gluten, i.e., wheat, barley, rye, oats and products made of these cereals;
- crustaceans and crustacean products;
- eggs and egg products;
- fish and fish products;
- peanuts and peanut products;
- soy beans and soy bean products; and
- milk and dairy products.
- nuts and nut products;
- celery and celery products;
- mustard and mustard products;
- sesame seeds and sesame seed products;
- sulphur dioxide and sulphite in concentrations of more than 10 mg/kg or 10 mg/l;
- lupin and lupin products; and
- molluscs and mollusc products.

# Also check that the labels and other information provided on the food correspond to the product:

- the recipes/production methods/finished products are consistent;
- the name of the food is correctly formulated;
- all ingredients used have been indicated in the ingredient list;
- compound ingredients have been correctly itemised in the ingredient list;
- ingredients that can cause allergies and intolerances have been indicated;
- the ingredients are stated in the correct order;
- the amounts of ingredients, such as meat content, are correct;

- salt content has been calculated and determined using sodium (salt = sodium × 2.5). This formula takes account of both the sodium contained naturally in the ingredients and sodium from added salt.
- the origin of the food is stated correctly; and
- the use of claims (e.g., lactose-free, glutenfree, milk-free or additive-free) is justified.

#### **Production of food for special diets**

When you prepare gluten-free, lactose-free, milk-free or other similar food, you must know the ingredients that cause these allergies or intolerances.

For example, a milk-free food product may not contain milk or products made of milk, such as cheese, curds or butter.

# What information is required on food products sold via distance selling?

The same information requirements apply to non-prepacked and prepacked food sold via distance selling than to food sold in shops.

For example, before concluding the sale, you must provide the same information on prepacked food than in conventional commerce, with the exception of variable information.

For prepacked food, such information consists of the period of minimum durability or use-by date, date of freezing and batch number. This information must be declared to the buyer at the moment of delivery.

#### What is distance selling?

A means of distance communication refers to a device that can be used to make an agreement between an entrepreneur and consumer without the parties physically meeting. Commerce via means of distance communications includes e-commerce and mail-order selling.

#### What if I only advertise my products online?

If you only use the internet to advertise food and customers cannot order your products online, the activity consists of marketing. In that case, you do not need to provide the information required in connection with sales.

Such marketing is evaluated according to the general marketing provisions in the Food Act and Consumer Protection Act.

# How do I need to provide the information in practice?

You must provide the mandatory food information either in the distance-sales support materials, such as the online shop's home page, or by another appropriate method. The most important thing is to clearly indicate where the information can be found. You must provide the information both in Finnish and Swedish before the consumer decides on the purchase.

The customer may not incur additional costs from obtaining the information.

#### More information on food information

More information on the management of food information is available in Finnish Food Authority's Food information guide for small and medium-sized businesses.

#### **Composition and recipe management**

Composition and recipe management applies to all food products you sell, whether prepacked or non-prepacked.

You are usually required to have written recipes for all products you make, such as jam, juice, pickles and bread, stating the names and amounts of ingredients used for each product.

The recipe must correspond to the food information. When you change ingredients or recipes, you must update the recipes and labels accordingly. You must keep your recipes up to date.

# Comply with requirements when creating recipes

When planning recipes, you need to take into account the requirements of food legislation regarding, among other things, additives, salt and other substances potentially added to your products. By calculating from the recipe and, if necessary, own-check inspections, you can make sure that you do not exceed the maximums for additives in your products, for example.

Only use additives and other **food improvement agents** (flavourings and
enzymes) that are permitted for your
products. The amounts of some food
improvement agents have been limited.
Further information is available from Finnish
Food Authority's website.

#### Keep your recipes up to date

You will need to make changes to your recipes in the event of changes to the law or composition of your product, or when changing raw material suppliers, for example.

In order to be able to keep your recipes up to date and accurate, it is important to always obtain accurate, up-to-date product information or specifications from your raw material supplies.

When you make changes to recipes, make sure that the information about the changes is conveyed through all the handling and labelling phases, i.e., throughout the food chain.

Remember all of these steps:

- acquisition of raw materials
- labelling
- data systems
- consumer and customer information.

#### Manage your production process

Production process management includes, for example,

- following the recipe;
- the correct dosage of ingredients (such as salt and additives);
- preventing the contamination of products with foreign allergens; and
- ensuring that the right products are packaged in the right packages.

Your measures and scales can be manual or automatic. Make sure that you use them correctly.

#### **Food transport**

If you deliver food to customers, you must make sure that its safety is not compromised during delivery.

The means of transport and containers must be clean and they must protect the food from dirt, harmful bacteria and viruses and other harmful substances.

Food must also be maintained at a safe temperature during transport. Foods requiring cold storage must be transported refrigerated and food delivered hot must be transported so that it will not cool.

More information on transportation temperatures of foodstuffs is available on the website where the link to this guide is found.

#### **Summary**

When you start selling foodstuffs or further processing of vegetable products, remember the following:

- Surfaces and utensils must be clean, intact and easy to clean.
- Make sure that materials that come into contact with foodstuffs are suitable for your purposes.
- ▶ Keep pests away from the premises.
- Do not break the cold chain.
- ▶ Follow the regulations issued on the purchase of foodstuffs.
- Ensure the traceability of food and raw materials and keep their documentation.
- Provide accurate and sufficient information on foodstuffs.
- If you transport food, maintain the correct temperature during transport.