



Section 5, Own-check system

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

- ▶ What is the own-check description?
- ▶ When will you need an own-check plan?

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 foodstuff storage, heating and cooling temperatures and times are appropriate. In addition, you can ensure that food is processed hygienically at every stage.

Through own-check activities, you can also ensure that your customers obtain the required information on food ingredients that can cause allergies or intolerances.

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 paid official supervision.
- It will reduce waste and errors.
- It will help prevent extra costs.

It is sensible to incorporate the own-check system as part of the company's quality system.

A description of own-check is usually required for primary production

A description of own checks is required for primary production. In some cases, however, the requirement can be waived.

The own-check description refers to describing the farm's practices that have an impact on food safety. The regular recording of procedures is not required.

The own-check plan requirements include many risk management methods that can also be used in the own-check descriptions of primary production.

When is it not necessary to make the own-check description

You are exempt from the own-check description, if

- your production is small in scale and
- you sell vegetable products, mushrooms, honey or eggs of chickens or other birds and
- you do not sell your products to wholesalers or for further processing.

Small-scale production means that you sell your products directly to consumers, and the amount of products you deliver to local retailers remains below the threshold specified in the Low-Risk Decree.

If these conditions are met, you do not need to have the quality of your water inspected either. You are not required to carry out water inspections even if you are using your own water source and irrigate ready-to-eat products, such as strawberries or lettuce, by **overhead watering** or wash parts of vegetable products intended for food before sale.

Where to obtain a guideline for best practices in primary production?

There are best-practices guides for primary production, which can be used in place of the own-check description. You can use the parts of the best-practices guide that are suitable for your operations and supplement it according to your needs.

The Laatutarha guide, published by Puutarhaliitto (the Finnish Garden Association, only available in Finnish) and evaluated by Finnish Food Authority, is available for the primary production of vegetable products. The guide can be downloaded freely from Puutarhaliitto's website.

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).

The guides are free to download from the websites of the associations.

When will you need an own-check plan?

If you sell products in a food establishment or mobile food establishment or engage in the further processing of vegetables, you must draw up an own-check plan before starting operations.

In the plan, you must describe your operations at a level of detail that permits you to manage the food hygiene risks related to your operations.

Your own-check plan must be available for inspection at the start of operations and in connection with inspections of your food establishment.

Where can you get help with drawing up the sales own-check plan?

You can find materials for drawing up the plan in this section and on the websites of many food control authorities.

For example, an own-check plan template for selling food (in Finnish) drawn up by the City of Helsinki Environment Centre can be found at <http://www.hel.fi/www/Helsinki/fi/asuminen-ja-ymparisto/elintarvikevalvonta-ja-ymparistoterveys/huoneistot/oma/>.

Your business includes the further processing of vegetables – Where can you get help with drawing up the own-check plan?

The Working group for hygiene in fresh-cut vegetable processing industry has drawn up a best-practices guide (in Finnish) to provide companies that cut fresh, ready-to-eat vegetables with practical help and a template for drawing up an own-check plan.

The purpose of the guide is to help companies manage the risks involved in their operations and provide guidance in the interpretation of legislation.

The best-practices guide is available at <http://urn.fi/URN:ISBN:978-952-326-09-2>.

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 foodstuffs;
- storage;
- cooking and heating; and
- cooling.

Risks include everything that can compromise product safety and the management of conditions. Once you have identified the risks, you can think about means and measures for their management.

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.

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

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 purity samples taken from surfaces have been good for a long time. In this case, you can reduce the sampling frequency.

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.

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

For example, you need to check the cleanliness of the premises and surfaces each day. In terms of recording these cleanliness inspections, it is usually enough to note any dirty surfaces and the fact that they were washed again.

You should monitor and record the storage temperatures of foodstuffs on a regular basis.

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 one year from the date of having sold the food or processed it as a raw material. In the case of food marked with a **period of minimum durability**, you must store the records longer. In such cases, the own-check records must be stored for a minimum of one year from the end of the period of minimum durability.

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

An inspector will check the own-check plan. This is usually done during the first inspection visit. Later on, the inspector will assess during regular inspections whether your own-check system is functional and well implemented.

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

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 serve.
- ▶ 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 rectify any mistakes.
- ▶ The inspectors will also monitor the functioning and implementation of your own-check activities.

5.1 Content of the Own-check Plan

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

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 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 non-prepacked, 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 you original hygiene passports.

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

Purchasing raw materials

Purchasing raw materials that involve special restrictions should be discussed 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 are worth monitoring.

Any special arrangements for the use of premises

Separation in time means that different operations are performed in the same premises, 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 isolation of different foodstuffs or ingredients during all work stages.

Plan how to avoid **contamination** when purchasing, accepting, labelling, storing and processing foodstuffs and ingredients.

Examples of separation

- How can you avoid contaminating cooked and other ready-to-serve foods with raw or soil-covered foodstuffs?

- How will you keep substances and products that can cause allergic and intolerance reactions separate from each other and from food for which they are not intended?

A list of substances and products that can cause allergies or intolerances is provided in the “Food Information Management” section.

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

Plan the following:

- Will the processing premises 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?

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
- During cold storage and other 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 traceability information, such as delivery lists and purchase receipts, be stored?

Please remember that traceability also applies to materials and supplies such as dishes, utensils and packaging materials.

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.

How to ensure that the customer gets the right information

How will you ensure the accuracy of the information you provide to customers about foods and foodstuffs?

How will you provide information on non-prepacked foodstuffs?

If you sell prepacked foodstuffs, how will you 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 food products that are found not to comply with the requirements for the safety of foodstuffs shall be withdrawn from the market.

Your own-check plan should include a plan for the possibility of withdrawals:

- Preventing the entry of defective product batches to the market.
- Withdrawing delivered product batches from the market.
- Preventing withdrawn batches from being mixed with other raw material or product batches.
- Act according to Finnish Food Authority's withdrawal instructions and contact the establishment's inspector.

Suspected cases of food poisoning

If you receive customer complaints of food poisoning from food you have prepared, you must notify the local food control authority of them.

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 do 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 them to provide this information.

Water quality

You may be required to take **microbiological samples** from the water you use. 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.

Plan and record how often you will take samples, what analyses will be performed on the samples and which laboratory will conduct the analyses.

Sampling plan

You may be required to take 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 hygiene at your establishment are at an acceptable level.

Plan and record how often and from where you will take samples and what analyses will be performed on them.

Send the samples to a laboratory for analysis. You can analyse **surface cleanliness samples**

yourself, which indicate the general level of cleanliness.

More information on sampling requirements is available on Finnish Food Authority's website (Microbiological Criteria Decree application instructions for operators, in Finnish).

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. You can declare the shelf life of some products on the basis of publicly available research data.

If you manufacture or produce perishable foodstuffs and assign them a shelf life of at most four days, you do not need to perform shelf-life tests.

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?

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 do it?

Food transport

If you transport food yourself, plan the following:

- How will you ensure the safety of foodstuffs during transport?
- What means of transport will you use?
- How will you package the food for transport?
- How long will the deliveries take?
- How will you manage temperatures during transport?
- 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.