Industry Guide to Good Hygiene Practice: Spirit Drinks

Regulation (EC) 852/2004 on the Hygiene of Foodstuffs
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1.0 Introduction

This Industry Guide has been drawn up to assist Spirit Drinks producers comply with two key pieces of legislation;


The Food Hygiene (Scotland) Regulations 2006 and the equivalent Regulations in England, Wales and Northern Ireland respectively. Referred to as “the UK Hygiene Regulations” throughout this guidance.

The development of national guides for specific food groups is outlined in Regulation (EC) No 852/2004, Articles 7 and 8. This Industry Guide has been recognised by the UK Food Standards Agency (FSA) as having been developed in accordance with Article 8 of Regulation (EC) No 852/2004 and it follows the guidance published in “Guidelines for the development of national voluntary guides to good hygiene practice...” issued by the Food Standards Agency, Second Edition, February 2007.

The Guide has special status under law and may be used by enforcement officers undertaking a compliance assessment of hygiene requirements at the premises of a spirit drinks producer. However, use of the Guide is entirely voluntary and companies are free to demonstrate compliance with the legislation in other ways. It is hoped that the information in this Guide will be adopted and used to assist businesses to meet their legal obligations and ensure food safety.


Physical, chemical and microbiological hazards should be considered when evaluating food safety risks.

It is worth noting that the antiseptic properties of ethyl alcohol are an important feature when considering food safety as these properties minimise the likelihood of microbiological hazard in spirit drinks. This fact has been confirmed by scientific evidence and in light of this microbiological hazards can be considered as low risk in products with more than 15% abv.

However, alcoholic beverages with an alcohol content of less than 15% abv will have a higher potential likelihood of microbiological growth and the risk should be well researched and controlled through the HACCP process to ensure food safety is maintained.
Introduction (Continued)

Since the current EU and UK Food Hygiene Regulations build on previous requirements most businesses should find that they already meet most of their obligations. It should be recognised however, that it is a requirement for all food businesses to have permanent procedures in place to conduct hazard assessment (HACCP) of their operations. Article 5 of Regulation (EC) No 852/2004 outlines the principals of HACCP and this guide is structured to lead businesses through the requirements of HACCP and on to specific aspects of the production of spirit drinks. It is not envisaged that the guide would be read from cover to cover but as a reference to be used to clarify the legislation and assist the reader to assess the risks specific to their own business processes.

This industry guide has been developed by a Working Group comprising of:

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The guidance and advice contained in this Guide is for Spirit Drinks, as defined by Council Regulation (EC) No 110/2008 of 15 January 2008, their production, processing, packaging and distribution throughout the United Kingdom.

Alcoholic beverages of less than 15%abv are out with the scope of this guide because they are not covered by Regulation (EC) No 110/2008 Spirit Drinks.

However, some of this guide may be applicable to alcoholic beverages of less than 15%abv eg RTD/RTS/Liqueurs etc, in that they contain distilled spirit as an ingredient. As noted in section 1.0 these low strength products may be subject to potential hazards not likely in Spirit Drinks of >15% abv eg microbiological. Therefore, the HACCP system for these low strength alcoholic beverages should ensure relevant hazards & risks are identified and required controls are fully implemented.

Any additional requirements beyond this guide should be put in place.
1.2 Structure and Layout of the Guide

National hygiene guides often use a ‘three column layout’ to detail the legal requirement, guidance and advice on best practice. Throughout this guide, the level of detail provided meant the three column approach could become cluttered so the three sections are presented in the body of the text.

The structure of many Hygiene Guides is based on a typical industry process flow and this takes the reader through the process with detailed guidance at the appropriate stages. However, this format would have lead to much repetition and may have been cumbersome when the wide range of spirit types and process steps were to be covered. Therefore, the working group elected to present the guidance under the key topics from the Regulation.

Section 2 sets out detailed guidance with reference to the key legislation for companies that have still to set up a HACCP system. To assist companies who may be carrying out an initial assessment of their business processes or are re-engineering a significant part of their process, a table of common hazards has been included. The wide range of defined processes and company procedures used to manufacture distilled spirits meant that this list could not be exhaustive and merely provides a starting point for companies.

Section 3 details key areas of the legislation that are deemed to be most relevant to the spirits industry, and addresses the provisions of Annex II of Regulation (EC) No 852/2004.

Section 4, the Appendices contain important information to support this guide along with more general good practice guidance and information that is not strictly hygiene related but is important to the integrity of Spirit Drinks, including a section on Allergens.
Glossary

For the purpose of this document, the following definitions are used:

- **ABV – Alcohol by volume** is a standard measure of how much alcohol (ethanol) is contained in an alcoholic beverage.
- **Air Blowing** – method for rinsing bottles before the filling operation.
- **Allergen** – is any substance that can cause an allergy.
- **Bacteriocidal** – is a substance that kills bacteria.
- **Blending** – the mixing of different types of spirit to produce a specific brand, product or quality.
- **Bloom** –
  - a deposit of micro-organisms, including yeast, found on the skins of fruit, most commonly grapes.
  - a white coating usually found on glass bottles after a prolonged period of storage. The main constituent is calcium and this can cause a reaction with the beverage.
- **Botanicals** – is a plant or plant part valued for its flavour and/or scent.
- **BRC** – British Retail Consortium.
- **Brown Spirits** – general term for spirits, principally brandy, rum and whisky, which have extracted colour from the cask during maturation.
- **By-Product** – is a secondary product deriving from a manufacturing process, chemical reaction, and is not the primary product or service being produced. A by-product can be useful and marketable or if intentionally discarded it can be considered as a waste.
- **Cased Goods** – is the finished product in final packaging for distribution.
- **Cask** – a barrel used to store and to mature spirits.
- **CCP** – Critical control point is a point, step or procedure at which controls can be applied and a food safety hazard can be prevented, eliminated or reduced to acceptable (critical) levels.
- **Chill filtration** – a production step in the preparation for bottling phase – filtration at reduced temperature (4 deg C to -4 deg C) enhances the removal of natural fatty acid compounds which can cause precipitation or haze formation during storage in market.
- **CIP** – Cleaning in place.
- **Codex Alimentarius** – is a collection of internationally recognised standards, codes of practice, guidelines and other recommendations relating to foods, food production and food safety.
COSHH – The Control of Substances Hazardous to Health Regulations 2002 is a United Kingdom Statutory Instrument that states general requirements on employers to protect employees and other persons from the hazards of substances used at work by risk assessment.

Disgorging – emptying the barrel of its liquid contents.

Distillation – the process of concentrating alcohol by boiling and condensing the resulting vapours.

EC – The European Commission is the executive body of the European Union. The body is responsible for proposing legislation, implementing decisions, upholding the Union’s treaties and the general day-to-day running of the Union.

Ethanol – also called ethyl alcohol, pure alcohol, grain alcohol, or drinking alcohol, is a volatile, flammable, colourless liquid. Best known as the type of alcohol found in alcoholic beverages, it is also used in thermometers, as a solvent, and as a fuel. In common usage, it is often referred to simply as alcohol or spirits.

Ethyl Carbamate – suspected Carcinogenic compound which can be present in many food products, including alcoholic beverages, in trace amounts.

Fermentation – is the process by which an organic substance (usually a sugar) is converted by a single-celled microorganism such as yeast into alcohol.

FEMAS – Feed Materials Assurance Scheme.

FSA – Food Standards Agency is a non-ministerial government department of the Government of the United Kingdom. It is responsible for protecting public health in relation to food throughout the United Kingdom and is led by a board appointed to act in the public interest.

Germination – the barley is allowed to begin its growing phase from a seed to a plant. This initiates the activation of enzymes that breakdown the starch converting it to sugar.

Glycosidic Nitrile – precursor compound for ethyl carbamate, found in some varieties of barley or other cereals.

GNS – Grain Neutral Spirits.

HACCP – Hazard analysis and critical control points - is used in the food industry to identify potential food safety hazards, so that key actions can be taken to reduce or eliminate the risk of the hazards being realised.

HMRC – Her Majesty’s Revenue and Customs is a non-ministerial department of the UK Government responsible for the collection of taxes and the payment of some forms of state support.

Malting – is the process of converting barley into malt, for use in brewing or distilling.
Mashing – the process of mixing grist (usually milled malt) with hot water to activate enzymes which convert starch to fermentable sugars and to solubilise the sugars.

Maturation – storage of spirit in oak casks to allow removal of unwanted flavours components and to develop an improved flavour by chemical reactions between flavour components of the spirit and the wood of the cask, also by reaction with atmospheric oxygen diffusing into the cask.

Methanol – (methyl alcohol) Toxic alcohol, of lower molecular weight than ethyl alcohol, which is produced in small amount during fermentation of cereal.

NDMA – Nitrosodimethylamine is a semi-volatile organic chemical that is highly toxic and is a suspected human carcinogen.

PAS – Publicly Available Specification is a consultative document where the development process and written format is based on the British Standard model. Any organisation, association or group who wish to document standardised best practice on a specific subject, can commission a PAS, subject to the BSI acceptance process.

PET – Polyethylene terephthalate - resin of the polyester family and is used in synthetic fibers; beverage, food and other liquid containers.

Potable Spirit – distilled spirit, usually at least 37.5% alcohol by volume, which is approved for human consumption.

Raw Materials – the material of agricultural origin from which fermentable extracts are made.

Reduction – dilution of spirit with water. Distilled spirit is too strong for maturation and reduction to 63 – 70% alcohol by volume is necessary.

Reverse Osmosis - process for water purification.

Rousing – mixing the contents of a vat by injection of air or by a paddle.

RTD and RTS – ready to drink or ready to serve, sub 15% alcoholic beverages sold in bottles, cans or other packs and typically in smaller quantities, 200 ml or less.

Steeping – part of the malting process, barley is put in to a vessel and covered with water to initiate the germination process.

SWRI – The Scotch Whisky Research Institute.

UV Radiation – a form of sterilisation for water systems - exposure to UV wavelength of light.

White Spirit – potable spirits which have not been matured in cask and therefore retain the water-clear appearance of the new distillate.

Yeast – a micro-organism used to ferment wort, must or molasses.
2.0 Application of Hazard Analysis and Critical Control Points (HACCP) Principles

The requirement to conduct a risk assessment of all activities occurring within a food business deemed critical to ensuring food safety, has been a part of legislation since the introduction of the Food Safety (General Food Hygiene) Regulations 1995. However, the introduction of EC No 852/2004 is far more specific in the requirement to document the HACCP process.

Throughout the process of establishing and maintaining a HACCP system it should be remembered that all businesses manufacturing, producing or distributing a foodstuff have a legal requirement to have a HACCP based system in place.
2.1 Guidance on Setting up Hazard Analysis and Critical Control Points (HACCP) Procedures

HACCP is science based and systematic; it identifies specific hazards and measures for their control to ensure the safety of a process. HACCP is a tool to identify and assess hazards and establish control systems that focus on prevention rather than relying mainly on end-product testing.
Prerequisites

All HACCP systems shall be supported by various prerequisite programmes. These are the foundations of a food safety system and must be well embedded in an organisation before the application of HACCP. This is not an exhaustible list but includes:

a) The general principles of food hygiene
b) Legislation compliance
c) Hygiene controls
d) Supplier quality assurance
e) Calibration
f) Pest control
g) Preventative maintenance
h) Training
i) Management systems including recall, record keeping etc
j) Design and facilities
k) Control of operations
l) Transportation
m) Product information and consumer awareness

Guide to Compliance

See Codex General Principles of food hygiene Codex Alimentarius Commission/ RCP 1-1969, Rev. 4-2003 for definitions

Application of HACCP Principles should follow the logic sequence in Codex Alimentarius Commission Basic Texts.

In order to commence development of a HACCP system, each food business must complete the following:

- Assemble a HACCP Team - The team should be multi-disciplinary in order to capture the relevant expertise. Representation can be sought from both outside and from within the company. e.g. Quality Assurance/Technical, Supplier Quality Assurance, Operations / Production, Engineering, Package/ Product Development and any other process-specific expertise
- Define the Scope
  a) Identify the classes of hazard to be considered as part of this process e.g. physical, chemical and biological
  b) Define the limits of the study – i.e. what is the hazard analysis designed to cover – raw material receipt to distillation or blending of spirit to bottling and despatch
Prerequisites (continued)

c) clarify the boundaries of the hazard analysis (i.e. whether process specific, product specific, or designed to cover a specific range of products)

- Construct a flow diagram showing all the process steps (see Appendix B)

- Identify the following:
  a) Associated inputs e.g. raw materials, maturation containers, compressed air usage, reducing water
  b) Packaging materials
  c) Process activities
  d) Equipment design features
  e) Rework
  f) Storage conditions
  g) Steps before and after the specific operation should be considered
  h) Distribution

- On site confirmation of the flow diagram

- a) Confirm the processing operation against the flow diagram. Amend if appropriate

Describe the product

a) Consider relevant safety information like raw materials and product composition and chemical composition. Identify if your product has a high or low microbiological risk. (Spirits of 37.5% abv can generally be considered low risk. Other lower alcohol strength spirits especially cream liqueurs may be higher risk)

b) Consider the Processing (e.g. distilling, heating, cooling) and the extent of each

c) Identify intended use and distribution channels. i.e. consumer target group

d) Shelf life data

e) Consider the packaging used to distribute your products i.e. bottles, bulk shipment, containers etc.

f) Describe the storage conditions

Advice on Best Practice

- Allergens are not considered to be a significant risk in distilled products as distillation itself acts as barrier to allergenic material from the raw materials. However, anything which is added to the spirit post distillation, or any allergenic materials which have the potential to cross contaminate the product post distillation, must be considered. Allergens can be considered as a hazard on their own or as part of the chemical hazard analysis.

- PAS 220:2008 Prerequisite Programmes on food safety for food manufacturing.
Hazard Analysis

Legal Requirements

Article 5 para 2 (a) Regulation (EC) No 852/2004 – HACCP

- The HACCP principles referred to in paragraph 1 of this section shall include: Identifying any hazards that must be prevented, eliminated or reduced to acceptable levels.

Definition:

A hazard is a biological, chemical or physical agent in, or condition of food with the potential to cause an adverse health effect.

Hazard analysis is the process of collecting and evaluating information on hazards and conditions leading to their presence within the product and then deciding which of them are significant to food safety and therefore should be addressed in the HACCP plan.

(Codex Alimentarius Commission Food Hygiene Basic Texts 2003)

Guide to Compliance

- List all potential hazards - with the HACCP Team, associated with each of the process steps identified

  **Physical**
  Physical Contaminants such as glass or machine parts could be sharp and cause injury, dental injury or choking

  **Chemical**
  Chemical Contaminants could be split into 2 categories –

  - The 1st category of chemicals which may arise within the process / raw materials such as pesticides, microbial/natural toxins, heavy metals, allergens (which are not labelled on the product and therefore not meant to be a part of the product), documented chemical contaminants that are a part of the production process such as NDMA and Ethyl Carbamate

  - The 2nd category of chemicals would be those which are unintentionally added to the product / process such as cleaning chemicals, lubricants, refrigerants or others

  **Biological**
  Biological contaminants such as pathogenic bacteria, viruses, parasites, mould and mycotoxins – not associated with all spirit drinks due to the high alcoholic strength, but should be considered in manufacturing process steps post distillation and also of relevance to lower alcohol products and cream liqueurs

  **Macrobiological**
  Macrobiological hazards such as those introduced by insects or rodent pests

  - Analyse the Hazards to ensure production of safe food

  - Consider the significance of the hazard – this is the likelihood of the hazard occurring and its potential adverse health effects
Hazard Analysis (Continued)

- Following the identification of hazards and their significance, the team shall consider the control measures which are in place, or require to be in place, to control the hazards.

- Consideration shall be given to how the controls are implemented, i.e., more than one control measure might be required to control a specific hazard that occurs at different parts of the process, and/or more than one hazard might be controlled by one specified control measure.

Advice on Best Practice

- Ensure that members of the HACCP team are trained in HACCP principles, preferably to intermediate level.

- Document the significance of the hazards you assess so you have a record of your decision making process.

- Use a Risk assessment matrix of your preference to help with this task using any quality or quantity data available. For example – HACCP risk assessment.

- Consider the survival or multiplication of micro-organisms of concern.

- Consider the production or persistence in the food of toxins, chemicals or physical agents.

- Consider each of the potential hazards (physical, chemical/allergenic, biological) at each of the process steps in terms of:
  - what might already be present in the product at this process step.
  - what might have been introduced to the product at this process step.
  - what might grow and/or survive at this process step (biological only).
Critical Control Points

Guide to Compliance

- Identify the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or reduce it to acceptable levels
- Train the HACCP team in the use of a decision tree
- Use a decision tree to help assess any CCPs for each process step and related hazard. For example Codex Alimentarius CCP decision tree (see Appendix C)

- Control measures shall be put in place for all identified CCPs, if a hazard that requires control has been identified and there is no way to introduce a control at that point in the process, then the process should be modified to include a control measure

Legal Requirements

Article 5 para 2 (b) Regulation (EC) No 852/2004 – HACCP

- The HACCP principles referred to in paragraph 1 of this section shall include: Identifying the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels. (See Codex Principle 2 – Determine the Critical Control Points (CCPs)

Definition:

A CCP is ‘A step at which control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level.’ (Codex Alimentarius Commission 2003)

Advice on Best Practice

- Document the CCP decision making process for future reference
- Consider the ‘significant’ hazards when identifying CCPs and rate their significance to help prioritisation
- Use the HACCP team and any other relevant person
Critical Limits

Legal Requirements

Article 5 para 2 (c) Regulation (EC) No 852/2004 – HACCP

- The HACCP principles referred to in paragraph 1 of this section shall include: establishing critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination, or reduction of identified hazards. (See Codex Principle 3 – Establish Critical limits for each CCP)

Definition:

A critical limit is the criterion which separates acceptability from unacceptability (Codex Alimentarius Commission 2003).

Guide to Compliance

- When the process steps, related hazards, control measures and CCPs have been identified the next step is to consider critical limits
- Critical limits set the safety boundary and should be based on substantiated evidence and be validated
- Critical limits shall always relate to the control measure
- Critical limits shall be measurable

Advice on Best Practice

- In some cases e.g. process variations, it may be necessary to specify more stringent target levels to ensure that critical limits are observed
Monitoring

Guide to Compliance

- Following the establishment of critical limits the procedure for monitoring these critical limits shall be established or implemented.
- Monitoring shall take place at the frequency stipulated to provide reliable information.
- Monitoring must be able to detect loss of control at critical points and provide information in time for corrective action to be taken.
- The monitoring programme should describe the methods, frequency of testing and the recording procedure i.e. who, when and how monitoring is performed.
- Records and documents associated with CCPs shall be signed by the person(s) doing the monitoring and then shall be evaluated and signed-off by a designated and responsible person with the authority to carry out corrective actions.

Legal Requirements

Article 5 para 2 (d) Regulation (EC) No 852/2004 – HACCP

- The HACCP principles referred to in paragraph 1 of this section shall include: establishing and implementing effective monitoring procedures at critical control points. (See Codex Principle 4 – Establish a monitoring system for each CCP)

Definition:

Monitoring is the act of conducting a planned sequence of measurements or observations of control parameters to assess whether a CCP is under control or not (Codex Alimentarius Commission 2003).

Advice on Best Practice

- Personnel involved in monitoring activities should be suitably trained.
- Some parts of the production process take extensive periods of time (whisky maturation – minimum of 3 years) and allow monitoring of CCPs to be easily accommodated. However, systems need to be designed to allow monitoring information to be reviewed when the product is to be used.
- Where CCPs are specific to on-line processes and there will not be time for lengthy analytical testing, a system to allow testing and monitoring of the tests needs to be carefully implemented to maintain control.
Corrective Actions

Guide to Compliance

- If loss of control is detected during monitoring then specified corrective action shall be applied to bring the process under control again.
- The corrective action shall address material/product produced during the period of deviation.
- Actions taken must include appropriate management of the affected product in accordance with procedures in the HACCP plan.
- Action will also be required in order to prevent recurrence of the incident.
- The HACCP plan and associated procedures shall document the corrective action process.
- Records of measures taken to implement corrective action shall be maintained.

Advice on Best Practice

- Monitoring may indicate that preventative measures shall have to be taken if corrective action for the same procedures has to be taken repeatedly.

Legal Requirements

Article 5 para 2 (e) Regulation (EC) No 852/2004 – HACCP

- The HACCP principles referred to in paragraph 1 of this section shall include: establishing corrective actions when monitoring indicates that a critical control point is not under control. (See Codex Principle 5 – Establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control.)
Guide to Compliance

- Procedures for Verification shall be in place to ensure that the HACCP system is working correctly.
- Verification activities such as auditing, procedures and tests, including sampling and analysis, will enable trends to be identified and allow improvements to be made.
- Verification should be carried out by someone other than the person who is responsible for the monitoring and undertaking corrective actions.
- Verification activities should include actions to confirm that all elements of the HACCP system are efficient. If change is required the system should be reviewed to ensure it is still valid.
- External experts or qualified third parties may perform verification activities if these cannot be performed in house.

Advice on Best Practice

- The frequency of verification should be sufficient to confirm that HACCP is working effectively.
- It is good practice to document all verification plans.
- Verification is not confined to data from the monitoring points it may include other data e.g. from HACCP team meetings, customer complaints and internal/external audits, reviews of the HACCP system and plan, dispositions and confirmation that CCPs are under control.
- The HACCP team should specify the methods and procedures to be used for determining if HACCP is working correctly.
- Methods for verification may include random sampling and analysis, tests at selected critical points, intensified analysis of final products, surveys on actual conditions during storage, distribution and sale, internal audits.

Legal Requirements

Article 5 para 2 (f) Regulation (EC) No 852/2004 – HACCP

- The HACCP principles referred to in paragraph 1 of this section shall include: establishing procedures, which shall be carried out regularly, to verify that the measures outlined in subparagraphs (a) to (e) are working effectively. (See Codex Principle 6 – Establish procedures for verification to confirm the HACCP system is working effectively).

Definition:

Verification is the application of methods, procedures tests and other evaluations, in addition to monitoring, to determine compliance with the HACCP plan. (Codex Alimentarius Commission 2003).

Verification activities are required to ensure that the HACCP system and supporting programmes are being maintained and are effective in delivering hygienic and safe products. These activities are in addition to monitoring and validation processes. Verification activities and any corrective actions shall be documented.
Documentation

Guide to Compliance

- All documentation relating to the establishment and maintenance of the HACCP system shall be in accordance with the nature and size of that business and procedures and policies applying to that business.

- All documents should be sufficient to assist in the verification of HACCP controls.

Advice on Best Practice

- Retention time for documents may be related to shelf life or HM Revenue & Customs requirements or may be stipulated within the internal procedures and policies of that business.

- A simple record keeping system can be effective and easily communicated. It may use existing paperwork, such as delivery invoices and checklists to record, for example, product temperatures or volumes.

- Co-operation between primary producer, industry and responsible authorities is of vital importance. Opportunities to encourage and maintain a continuous dialogue and create a climate of understanding in the practical application of HACCP should be provided.

- Documents should be approved and signed by members of senior management in the company.

- To assist in training to support a HACCP plan, work instructions and procedures should be developed which define the tasks of the operating personnel to be stationed at each CCP.

For more information and links to further guidance please refer to Appendix H.
2.2 Potential Hazards within the Spirit Drinks Industry

This is an introductory sample of hazards and further details can be found in the following sections of the document. The table below provides readers with the key areas in which operators should be aware of, and the possible risks of contamination.

The table is a guide and not exhaustive or exclusive. Producers should carry out the necessary risk assessments to identify food safety hazards and controls within their own operations.
Typical examples of hazard types and their controls:

<table>
<thead>
<tr>
<th>Source of Hazard</th>
<th>Type of Hazard</th>
<th>Example of Potential Hazard &amp; Control</th>
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<td>Raw Materials</td>
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<td>Equipment Magnets Maintenance Schedules</td>
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<td>Water</td>
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<td>Quality control testing Sensory</td>
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<td>Assessment</td>
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<td>Physical</td>
<td>Particulate material in the water</td>
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<td>Quality Control Process Control</td>
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<td>Maintenance</td>
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<td>Water Intake point Water Storage and/</td>
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<td>or Treatment Point of use</td>
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<td>Cleaning Agents</td>
<td>Chemical</td>
<td>Contamination of bottles by use on</td>
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<td>filling machine Cleaning Programme</td>
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<td>QC spirit checks – in process and</td>
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<td>finished product testing</td>
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<td>Contamination</td>
<td>with Cleaning in Place (CIP) chemicals</td>
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<td>Packaging</td>
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<td>Glass breakage resulting in</td>
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<td>contamination Glass Breakage Procedures</td>
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<td>and Training Air Blowers Spirit</td>
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<td>Rinser and Filtration Intake, Storage</td>
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<td>and bottling process – inspection and</td>
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<td>inspection</td>
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<td></td>
<td>Intake, storage conditions and use</td>
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<td>of materials</td>
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3.0 Spirit Drinks Industry Guidance

The following chapters focus on the key topic areas for the spirit drinks sector providing the reader with guidance on complying with the legislation and advice on best practice.

The full list of requirements under this legislation can be found in Appendix A.
3.1 Official Controls, Registration and Approval

Legal Requirements

Regulation 852/2004 Article 6 (2)

Every food business operator shall notify the appropriate competent authority, in the manner the latter requires, of each establishment under its control that carries out any stages of production, processing and distribution of food, with a view to the registration of each establishment.

Food business operators shall also ensure that the competent authority always has up to date information on establishments, including notifying any significant change in activities and any closure of an existing establishment.

Guide to Compliance

- Food premises must be registered with the Competent Authority
- Any significant change to the product range or plant operation should be notified to the Competent Authority

Advice on Best Practice

- Currently no advice
The design, construction, and location of equipment and infrastructure for food premises are of paramount importance to ensure hygienic operations. During the initial project planning phase of any new or modified building work or process re-engineering, sufficient consideration should be given to hygiene issues to ensure the delivery of a cost-effective and hygienic operation.

In the case of existing premises or equipment, the constraints and limitations need to be identified and appropriate hygiene procedures adopted. Historical evidence demonstrates that older premises used for primary production, without sealed floors and tiled walls can be maintained in a hygienic condition and these conditions will not impinge on the hygiene of the subsequent bottled products.

Guide to Compliance

Reduction of hygiene risk including inference risks to the product and business are key goals of good plant design. The key process areas for the spirit drinks industry is from distillation onwards. When designing or modifying the premises and installing new equipment, consideration shall be given to the following areas where appropriate:

Plant Design
- When designing in and around premises, minimise the accumulation of inaccessible dirt
- Good design allows for easy inspection and auditing of housekeeping standards e.g. pipes must run and drain effectively
- Elimination of contamination risks through the separation of low & high risk processes e.g. cleaning pipes separate to production pipework
- Where chemicals are used to prevent corrosion e.g. chill filtration plants, they should be used in accordance with the manufactures instructions
- A finished goods storage area should be identified and condensation minimised to ensure that transit cases are not spoiled or damaged which may lead to the production of taints
- Preventing ingress of pests and harbourage of pests and maintain dry low humidity storage areas. This is particularly important for the storage of cereals
- Adequate security measures should be taken to ensure unauthorised entry to the production premises is avoided

Legal Requirements

Regulation (EC) No 852/2004 on the Hygiene of Foodstuffs, Annex II Chapter I (2)

Plant Design

2) The layout, design, construction, siting and size of food premises are to:

a) Permit adequate maintenance, cleaning and/or disinfection, avoid or minimise air borne contamination, and provide adequate working space to allow for the hygiene performance of all operations;

b) Be such as to protect against the accumulation of dirt, contact with toxic materials, the shedding of particles into food and the formation of condensation or undesirable mould on surfaces;

c) Permit good food hygiene practices including protection against contamination and in particular pest control; and

d) Where necessary, provide suitable temperature-controlled handling and storage conditions of sufficient capacity for maintaining foodstuffs at appropriate temperatures and designed to allow those temperatures to be monitored and, where necessary, recorded

Regulation (EC) No 852/2004 on the Hygiene of Foodstuffs, Annex II Chapter V(1)

Equipment Requirements

1) All articles, fittings and equipment with which food comes into contact are to:

a) Be effectively cleaned and, where necessary, disinfected. Cleaning and disinfection are to take place at a frequency sufficient to avoid any risk of contamination;

b) Be so constructed, be of such materials and be kept in such good order, repair and condition as to minimise any risk of contamination;

c) With the exception of non-returnable containers and packaging, be so constructed, be of such materials and be kept in such good order, repair and condition as to enable them to be kept clean and, where necessary disinfected; and

d) Be installed in such a manner as to allow adequate cleaning of the equipment and the surrounding area
Infrastructure

- All changes and modifications shall be reviewed for impact via the HACCP plan
- Appropriate to level of risk and be maintained
- The construction materials procured should be appropriate to the level of risk such as sealed floors and smooth impervious walls for post distillation areas where high hygiene standards are needed to be maintained e.g. filling stores, disgorging, blending and bottling areas
- Surface water and foul drainage should be free flowing and not be situated under any of the buildings
- Floors should be drainable to avoid standing water and open drains should be covered where possible

Equipment

- Where the plant and equipment requires cleaning and sterilisation, adequate working space to allow full access for maintenance is required. This is particularly important for fermentation, compounding and bottling plant equipment
- Materials coming in contact with the product must not impart toxic substances, taste or taint. Companies must identify the correct specification or grades of material to ensure compliance with the European Food Contact Material legislation e.g. grade of copper for stills; high strength spirit rubber, hoses, gaskets and plastic pipes

Advice on Best Practice

- Due to the nature of the old buildings that many distilleries are housed in, a bespoke approach to cleaning and maintenance programme is required. Measures should be proportionate to the risks identified
- All investment decisions in plant and equipment should be assessed at an early stage for any potential impact on food safety, hygiene and quality
- Where possible open containers and product should be covered to the maximum extent. Particularity in the bottling line, which should be covered up to the filling stage. Any lighting above open systems e.g. open man-doors, vats and bottles should be covered to prevent glass contamination and inspected regularly for damage
- Where you have open systems, restrict access to minimise risks of contamination
- Segregate dry and wet goods from bottling and packaging areas where possible
3.3 Maintenance

Legal Requirements


Equipment

b) be so constructed, be made of such materials and kept in good repair, so as to enable them to be kept thoroughly cleaned and, where necessary, disinfected. The layout, design, construction, siting and size of food premises are to permit adequate maintenance and cleaning and to protect against contamination.

Annex II Chapter V.3

Where chemical additives have to be used to prevent corrosion of equipment and containers, they are to be used in accordance with good practice.

A planned and regular maintenance programme is essential to ensure the hygiene of the product, but it should be relevant to the identified risks. There should be regular maintenance programmes in all areas of the production process. Stringent checks should be made to ensure maintenance is correctly performed and equipment is clean and in good condition.

Guide to Compliance

- A documented system of planned maintenance shall be in place, covering all equipment which impacts product safety, quality or legality.
- Equipment, including fixtures and fittings shall be maintained to minimise the risks of affecting product by contamination.
- New and existing equipment shall be assessed for frequency of maintenance using a risk assessment.
- Maintenance activities should be signed off as complete and equipment/area fit for use.
- Food grade lubricant should be used where there is a potential risk of it being in contact with the product.
- Exterior walls, roofs and gutters should be adequately maintained.
- Rubber parts in seals, gaskets and hoses should be inspected and replaced when faulty or perished.

Advice on Best Practice

- Food manufacturers should ensure that product safety is not affected by or during regular maintenance.
- Temporary repairs should be controlled to protect the safety of the final product. These repairs should be permanently repaired as soon as possible and within a defined timescale.
- Contractors involved in maintenance of equipment should be supervised by a nominated person. This may extend to issuing a ‘permit to work’.
- Heating and ventilation systems should be designed to minimise airborne contamination. Filtration at air intake points should be considered and the use of mesh, to prevent potential ingress, via extraction ducts should also be considered.
- Where you have open systems, restrict access to minimise risks of contamination.
- There should be a documented ‘handback’ system from the maintenance personnel back to production to ensure that the required maintenance operations have been completed, that the maintenance has not introduced further foreign body hazards, and the plant is safe to use. In distilling, large scale maintenance is carried out when the plant is in silent season. Detailed re-commissioning and hand back of the plant to the operators should be documented and signed-off.
Water systems must be maintained to ensure that water used for food production is of the stipulated quality - this includes water used as an ingredient, as a process aid and for washing purposes.

The industry considers that primary production up to and including distillation is not a concern, since bacteria would not survive the high temperatures of distillation. There is a low potential biological risk if contaminated reducing water is used. However, evaluation of such a risk should take into account post-distillation processes such as maturation, filtration, UV radiation and reverse osmosis. Particular consideration should also be given to the bacteriocidal effect of alcohol at the various stages of production and bottling.

Guide to Compliance

- Companies must have evidence of water supplies being analysed on a regular basis to confirm it is fit for purpose and poses no risk e.g. review of Scottish Water reports on public water supply.
- Any on-site storage and distribution must be such that the water remains fit for purpose to the point of use. Stored water shall be protected from anything which could contaminate it – physically, chemically and microbiologically.
- All hoses/pipes for the transfer of potable water shall be of food grade quality.
- Any water treatment plants (e.g. De-mineralisation /Reverse Osmosis) shall be maintained and serviced in line with manufacturer’s guidelines.
- Recycled water must be assessed to ensure it does not introduce contamination into the production process.
- All materials in contact with the water supply must be of suitable quality set out in the water fittings and materials directory http://www.wras.co.uk/Directory/
- Non-potable water may be used in the mashing process during the distillation of spirits and for the washing of plant during the distillation of spirits.
- Water of potable standard shall be used for spirit reduction, subject to any amendments of future regulations.
- Steam used directly in contact with food shall not contain any substance which presents a hazard to health, or is likely to contaminate the product.
- All water sources must have agreed specifications. A regular sampling and review of the water supplied should be carried out in house or contracted out to a 3rd party.
Advice on Best Practice

- A good working relationship with your water provider should be sought. Part of this will be regular reviews of their specification and water analysis.

- Water specifications should be maintained for all sources. Set a sampling regime appropriate to risk that should be implemented and any deviation outside stated parameters should trigger investigation into possible contamination.
Compressed air is widely used in the spirit drinks industry for mixing vats of liquids, moving liquids from vat to vat or purging pipework and in some companies blowing debris from bottles prior to filling. For these uses the compressed air will be in contact with the product and so its purity and cleanliness should be assessed and systems designed to supply compressed air should be maintained against a defined standard.

The International Air Quality Standard, ISO8573 consists of nine parts. Part 1 specifies the quality requirements for compressed air and parts 2-9 specify the methods of testing the three categories detailed in the standard; solid particles, water and oil.

ISO 8573-1:2010 does not specify the purity level required for specific uses. Users of compressed air need to determine the level of purity that is appropriate for their application. However, a code of practice has been drawn up by BRC and BCAS for food and beverage users and three uses of air and corresponding recommended purity limits are listed; direct contact with food, non-contact high risk, and non-contact low risk, see table below.

### Guide to Compliance

- Companies should ensure that air compressing equipment is correctly specified for the grade of air to be used taking the BRC and BCAS code of practice in to account.

- The details of the air quality specification should be agreed with the plant supply company and the maintenance company that will service the equipment.

- The air quality specification will only be met if the supply air to the compressor is of appropriate quality, so siting the compressor and its air intake should be carefully considered.

- Careful consideration should be given to the grade of air required at different points throughout the compressed air supply system. It may not be necessary to have the same grade available at all points depending on the intended use.

### Solid Particles

- Defined as the number of particles per cubic meter and they are measured over three size ranges, see table below.

- Microbial contamination – none should be detected, see test method ISO8573-7.

### Water

- The amount of water in compressed air is defined by the pressure dew point of the drying system.

- In food contact applications it must be -40°C or lower.

- Older refrigerant driers typically only reach 3°C dew points and should only be used in non-contact air supplies since there is too much water remaining in the air at this temperature.
Compressed Air Quality (Continued)

Oil & Oil Vapour

- Oil quality specifications are more stringent than the other two categories regardless of contact or non-contact use.

- Oil contamination would constitute a major contamination issue in a food production operation and therefore oil should not be found in compressed air used in food operations.

- Maintenance schedules should be set at six monthly intervals although daily inspection of filters, dryers and pipework should be a routine part of the plant operator’s duties.

- Pipework – smooth bore pipe should be used wherever possible and carbon steel pipework avoided because it is prone to corrosion.

Advice on Best Practice

- Oil free compressors are widely available and should be considered when new or replacement compressors are being installed.

- Filtration of the compressed air is important to achieving the desired final quality but in some instances filtration of the intake air may need to be considered if site design cannot accommodate large quantities of clean air.

- Modern air compressors are air cooled but in cases when liquid coolant is used the grade of coolant should be compatible with food use.

Table – Specification for Air Quality

Food contact & non-food contact with high risk recommendation

Compressed air coming into direct contact with food shall meet or exceed the following recommendation;

ISO8573 – 1:2010 Class 1.2.1

- Dirt (solid particles) the maximum number of particles in the following size ranges shall not exceed;

<table>
<thead>
<tr>
<th>Particle size, µm</th>
<th>0.10 &lt; d ≤ 0.5</th>
<th>0.5 &lt; d ≤ 1.0</th>
<th>1.0 &lt; d ≤ 5.0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum number of particles; per m³</td>
<td>100 000</td>
<td>1000</td>
<td>10</td>
</tr>
</tbody>
</table>

- humidity ≤ -40°C PDP (at air line pressure)
- Total oil < 0.01 mg/m³

Non-contact low risk recommendation

Same as contact grade except, humidity ≤ +3°C PDP (at air line pressure), ISO8573 – 1:2010 Class 1.4.1

Where the HACCP shows the air may be used in a process that has a high risk of food contact occurring then the air purity shall be the same specification as the food contact grade above, ISO8573 – 1:2010 Class 1.2.1
3.6 Cleaning

**Legal Requirements**

Regulation (EC) No 852/2004 on the Hygiene of Foodstuffs: Annex II Chapter I – General requirements for food premises

1) Food premises are to be kept clean and maintained in good repair and condition.

2) a) b) The layout, design, construction, siting and size of food premises are to permit adequate maintenance cleaning and/or disinfection to protect against the accumulation of dirt.

10) Cleaning agents and disinfectants are not to be stored in areas where food is handled.

Chapter II – Specific requirements in rooms where foodstuffs are prepared, treated or processed.

1) In rooms where food is prepared, treated or processed the design and layout are to permit good food hygiene practices, including protection against contamination between and during operations. In particular floor surfaces, wall surfaces, ceilings and overhead fixtures, windows and doors are to be maintained in a sound condition and be easy to clean. This will require the use of impervious, non-absorbent, washable and non-toxic materials unless food business operators can satisfy the competent authority that other materials used are appropriate. Where appropriate, floors are to allow adequate surface drainage.

2) Adequate facilities are to be provided, where necessary, for the cleaning, disinfecting and storage of working utensils and equipment. These facilities are to be constructed of corrosion-resistant materials, be easy to clean and have an adequate supply of hot and cold water.

**Effective cleaning is crucial to maintaining hygienic conditions in any food premises. The design and construction of new premises and equipment shall permit adequate cleaning and protect against the accumulation of dirt. The walls, floors, ceilings and surfaces in areas post distillation shall be maintained in a sound condition and be easy to clean. Post distillation, bottling halls and fillers are identified as priority areas in Spirit production. Cleaning is more than the removal of dirt. Effective cleaning also ensures the avoidance of contamination with chemicals.**

**Guide to Compliance**

- Each location shall have documented cleaning schedules covering all areas as a means of maintaining a hygienic production environment. Cleaning schedules shall detail areas to be cleaned, frequency of cleaning, method of cleaning, responsibility for cleaning, cleaning assessments and records to be maintained.

- New buildings for the manufacture, processing and storage of spirit drinks shall be located, designed and constructed to allow for effective cleaning and disinfection.

- Floors in post distillation, particularly processing and packaging areas shall be non-porous, smooth, free of potholes, easy to clean and of a non-slip surface. Floors shall be maintained in a clean, hygienic and safe condition. Floors shall be constructed and finished to require minimal or easy maintenance and cleaning. Windows and doors shall be close fitting and allow for effective cleaning. Where external windows are used for ventilation, they shall be fitted with insect-proof screens to prevent ingress of insects and pests. The design of screens shall enable easy cleaning.

- Equipment shall be maintained in a clean, tidy and hygienic condition and cleaning records shall be kept.

- Cleaning agents shall be stored away from production areas e.g. still houses, blending and bottling areas.

- Measures should be taken to ensure that prior to filling and sealing, bottles are free from contamination i.e. bottle rinsing or blowing.

- Steam pipes used for sterilisation should be free from rust or fitted with suitable filters to eliminate possible contamination of the plant and equipment.

- Chemicals should be approved and a list maintained. Chemicals must not endanger the product or introduce any contamination or taint. COSHH records will be part of this process.

- Where chemicals are used procedures should be put in place so that no residues are left to contaminate the products.

- Companies should develop a glass breakage clean up procedure to eliminate the risk of contamination.
Chapter V – Equipment requirements

1) All articles, fittings and equipment with which food comes into contact are to:

- Be effectively cleaned and, where necessary, disinfected. Cleaning and disinfection are to take place at a frequency sufficient to avoid any risk of contamination;

- Be so constructed, be of such materials and be kept in such good order, repair and condition as to minimise any risk of contamination;

- With the exception of non-returnable containers and packaging, be so constructed, be of such materials, and be kept in such good order, repair and condition, as to enable them to be kept clean and, where necessary, to be disinfected;

- Be installed in such a manner as to allow adequate cleaning of the equipment and the surrounding area.

Advice on Best Practice

- Whilst all post distillation processing and packaging areas should fully comply with the above requirements for floors, wall, ceilings and windows, best practice would be for the same requirements to be applied to raw material storage areas, primary production facilities, filling stores, maturation warehouses, bulk spirit storage areas and finished goods storage areas.

- Checks should be in place to ensure that cleaning agents used are completely removed from all production surfaces i.e. effective rinses are in place. Also when they are not in use the cleaning agents and disinfectants should be kept in a sealed unit away from the production floor.

- Employees should be trained in cleaning activities including the method/ procedure to be used, safety and environmental considerations, materials and equipment required, standard to be achieved and the reason for cleaning.

- For compounded products of lower alcoholic strength:

  a) cleaning schedules should include microbiological testing to confirm that plant and equipment is clean and free from contamination by microorganisms.

  b) products that use higher risk ingredients such as dairy products, cleaning activities should include a testing program to show that the plant and equipment is free from contamination which could cause a risk of cross contamination by microorganisms or potential allergens.

- Wash down hoses should be kept off the ground on wall mounted reels and the ends should be capped.

- Records of plant/processing cleaning should be maintained and hygiene/ housekeeping inspections should be carried out to ensure effectiveness of the cleaning schedules.
All containers used for the transportation of foodstuffs should be of suitable quality to minimise contamination. This includes the bulk transportation of raw materials and spirit, transportation of dry goods and finished product and also containers used for the finished product.

Guide to Compliance

All Vehicles
- Vehicles used to transport raw materials, ingredients, bulk spirit, packaging materials and finished goods shall be in a hygienic condition
  - Vehicles shall be inspected and assessed prior to loading and unloading for suitability for the relevant goods
  - Vehicles shall be clean, dry and free from odours

Bulk Spirit/Ingredients
- Bulk Spirit tankers shall be designated for spirits and alcoholic beverage use only
- Appropriate cleaning certificates shall be checked prior to filling. Different requirements needed for lower alcohol strengths

Packaging and Finished Goods
- All packaging materials and finished goods shall be protected from external contamination during transport by appropriate external packaging
- All handling/transfer operations shall be carried with due care to prevent risk of damage to finished goods. Any damaged or leaking containers shall be removed to prevent further damage, contamination or infestation
- Product specifications shall stipulate any storage and transport parameters and once specified, shall be passed forward through the distribution network

Advice on Best Practice

Bulk Spirit
- Where possible bottom loading tankers should be used; this removes the need for open manholes which could allow contamination. If using top loading, appropriate controls will need to be applied

Packaging and Finished Goods
- Contracts with external agents (suppliers and hauliers) should stipulate compliance with Food Hygiene Regulations
- Agreed packaging specifications should include the conditions of materials on receipt

Legal Requirements

Regulation (EC) No. 2023/2006 on Good Manufacturing Practice for Materials and Articles intended to come into contact with Food
- Materials and articles in contact with food should be of appropriate quality so not to endanger human health or cause unacceptable change in the composition of the food or causing deterioration in the organoleptic characteristics
- EC Directive 2005/79/EC - amends the EC Directive 2002/72/EC relating to Plastic materials and articles intended to come into contact with Food
- Regulation (EC) No. 852/2004 on the Hygiene of Foodstuffs – Annex II Chapter IV Transport
- Vehicles and/or containers used to transport foods must be kept clean and maintained in good repair and condition, to protect foods from contamination. Where necessary, they must be designed and constructed to allow adequate cleaning and/or disinfection
- Items used to hold food (e.g. boxes) in vehicles and/or containers must not be used for transporting anything other than foods where this may cause contamination
- Where vehicles and/or containers are used for transporting anything other than foods, or for transporting different foods at the same time, you must separate products effectively, where necessary
- Foods transported in bulk as liquids, granules or powder must be transported in items used only to hold foods and/or containers/tankers used only for transporting foods. These containers must be marked in a way that is clearly visible and 'indelible' (i.e. cannot be rubbed out/removed), in one or more European Community languages (including English), to show that they are used for transporting foods, or be marked 'for foodstuffs only'
- Where vehicles and/or containers have been used for transporting anything other than foods or for transporting different foods, you must clean effectively between loads to avoid the risk of contamination
- Foods in vehicles and/or containers must be placed and protected in a way that minimises the risk of contamination
- Where necessary, vehicles and/or containers used for transporting foods must be capable of keeping foods at appropriate temperatures and allow those temperatures to be monitored
Advice on Best Practice

- Agreed packaging specifications should state compliance with current food safety regulations
- Employees should be trained in cleaning activities including the method/procedure to be used, safety and environmental considerations, materials and equipment required, standard to be achieved and the reason for cleaning
- Suitable protective packaging, provided and supplied by the manufacturer, should remain intact until point of use
- Although temperature controlled transportation is not generally required for spirit drinks, any temperature sensitive product will need a risk assessment to determine the correct temperature required. Due diligence to be exercised through the supply chain to minimise exposure to extreme temperatures and ensure the product remains within the required limits
- Any damage or leakage from finished good containers must be removed immediately and any spillages should be cleaned up
- It is good practice for finished goods to have tamper evident closures
3.8 Production Waste

Legal Requirements

Regulation (EC) No. 852/2004 on the Hygiene of Foodstuffs Annex II – Chapter VI Food Waste

- Food waste, non-edible by-products and other refuse are to be removed from rooms, where food is present as quickly as possible, so as to avoid accumulation.

- Food waste, non-edible by-products and other refuse are to be deposited in closable containers, unless food business operators can demonstrate to the competent authority that other types of containers or evacuation systems used are appropriate. These containers are to be of an appropriate construction, kept in sound condition, be easy to clean and, where necessary, to disinfect.

- Adequate provision is to be made for the storage and disposal of food waste, non-edible by-products and other refuse. Refuse stores are to be designed and managed in such a way as to enable them to be kept clean, and, where necessary, free of animals and pests.

- All waste is to be eliminated in a hygienic and environmentally friendly way in accordance with Community legislation applicable to that effect, and is not to constitute a direct or indirect source of contamination.

Spirit drinks production will produce several different types of waste such as packaging waste, process effluent and general refuse. Some of this waste will be recycled. To ensure waste is adequately managed waste streams should be identified and the risk to food hygiene assessed. The collection, storage, segregation and disposal of each waste stream should be appropriate to control the risk to products and be conducted in a hygienic manner to prevent infestation and/or contamination.

Guide to Compliance

- Food waste and other rubbish shall be removed from production areas as quick as reasonably practical, to avoid them building up.

- There shall be adequate facilities for storing and disposing of food waste and other rubbish e.g. containers that can be closed. Stores for waste must be designed and managed in a way that enables them to be kept clean and free of animals, pests and infestation.

- Any waste shall not be a direct or indirect source of contamination e.g. touching surfaces in bottling/containing areas or attracting pests.

- Potentially contaminating waste e.g. used filter sheets, process chemicals, face masks and gloves shall be disposed of in a hygienic manner.

- Waste of a potentially contaminating nature e.g. glass, glue, wet cardboard, debris from floor etc. shall be placed in covered bins and/or removed promptly on a routine basis.

- All waste shall be disposed of according to the relevant waste legislation using only licensed waste contractors.

Advice on Best Practice

- A suitable secure open area should be available within the premises boundary to store such food waste. Alternatively an enclosed ventilated bin store situated away from the food rooms should be provided.

- Bins should be emptied at least daily and cleaned on a regular basis.

- Bin storage areas should be directly accessible for removal of waste and waste must not be taken through process areas from storage areas.

- A distillery generates significant quantities of by-products – these will usually be controlled by a sub-contractor. Systems should be in place to ensure a prompt removal of this material from the production site and a contingency plan in place in case of breakdowns to prevent build-up of this material.
3.9 Pest Control

**Legal Requirements**

*Regulation (EC) No 852/2004 on the Hygiene of Food Stuffs, Annex II Chapter 1*

- The layout, design, construction, siting and size of food premises should permit good hygienic practices including pest control.

*Regulation (EC) No 852/2004 on the Hygiene of Food Stuffs, Annex II Chapter II*

- Where necessary windows and other openings should be fitted with insect-proof screens. These screens should be easily removed for cleaning and where there are no insect screens over windows/openings then these must remain closed and fixed during production.

*Regulation (EC) No 852/2004 on the Hygiene of Food Stuffs, Annex II Chapter VI*

- There should be adequate provision for both storage and disposal of food waste and other refuse (e.g. packaging waste). Refuse stores should be kept clean and free of animals and pests.

*Regulation (EC) No 852/2004 on the Hygiene of Food Stuffs, Annex II Chapter IX – Provisions applicable to foodstuffs*

- Adequate procedures should be in place to control pests. Adequate procedures must also be in place to prevent domestic animals having access to areas where food is prepared handled or stored.

The Food Safety Act 1990 – makes it an offence to sell food unfit for human consumption or containing foreign bodies e.g. pests, parts of pests, pest droppings.

**Food**

Food should be protected against contamination from pests to ensure consumer safety and to meet legal requirements. A preventative approach should be employed. The principles of good pest control are to eliminate food supply for pests, curtail movement of pests within site and prevent areas for harbourage of pests.

Premises should be designed and sited so as to protect food ingredients and products against pests. To assist spirit drinks companies with good hygienic practice to prevent pest activity. Several key points are detailed below:

**Guide to Compliance**

- Waste and refuse stores must be well managed and maintained so that they do not attract pests, particularly in packaging areas
- Pest control procedures must be in place in food manufacturing and storage areas to prevent access of pests and domestic animals
- The premises must be adequately proofed against the potential ingress of pests
- Good housekeeping around the site and in manufacturing premises is essential for pest control
- An in depth pest control programme shall be in place. Whether provided by in-house staff or external contractors all personnel must be appropriately qualified and competent
- Regular and frequent assessments for signs of pest activity (rodents, birds and insects) must be undertaken
- Contact your pest control contractor for recommendations
- In production areas thorough inspection for signs of rodent activity should be undertaken and only insect monitors be present
- All pest control assessments and treatments must be recorded. Records must contain full details of all findings, chemicals used and a bait plan indicating the location of all baits. All bait points should be checked and dated on each visit
- Where rodent bait boxes are permitted they should be deployed at likely entry points and other strategic locations throughout the site
- Windows and doors which open to the outside environment must where necessary be kept closed or fitted with insect-proof screens or strip curtains to prevent access of pests to production areas
- Where appropriate, electronic insect control devices shall be fitted in areas where there is no risk of explosion. They should be suitably located away from the top of tanks, hoppers and conveyors and fitted with catch trays and switched on at all times
Pest Control (Continued)

- All areas, including external areas close to manufacturing units, must be kept free of debris, building materials, defunct equipment, pallets or wooden boxes which may attract pests or provide harbourage. Accumulations of refuse shall be avoided in all areas.

- Domestic animals shall be excluded from production areas by keeping doorways and entrances closed.

Advice on Best Practice

- Incoming materials and ingredients should be inspected prior to storage for signs of pest infestation. These checks should be part of the pre-requisite programme.

- Materials should be stacked at least 50cm away from walls to allow sufficient space for cleaning and pest control activities. External vegetation should be kept short and should not be allowed to grow close to buildings.

- External perimeter baits should be heavy duty lockable boxes firmly secured to the substrate.

- Grain intake and storage areas are high priority areas for ingress of pests. Appropriate maintenance and cleaning should be sufficient if they are well managed.

- Dry goods such as herbs and spices used for compounding with spirits and manufacturing of low alcohol beverages require extra vigilance for pests and infestation. Any fumigants or pesticides used must meet legal requirements as defined in Regulation (EC) No 396/2005 Pesticide Residues (and subsequent amendments).

- Ensure all external waste storage is enclosed so as not to encourage pests.

- Ensure adjoining land does not have signs of infestation or activities that may attract infestation.

- Rodent baits should be in tamperproof boxes.

- To minimise the ingress of pests, casks stored externally should have storage bung in place and bulk storage containers should be sealed appropriately.
3.10 Personal Hygiene

Legal Requirements

Regulation (EC) No 852/2004 on the Hygiene of Foodstuffs: Annex II Chapter I – General requirements for food premises

3) An adequate number of flush lavatories are to be available and connected to an effective drainage system. Lavatories are not to open directly into rooms in which food is handled.

4) An adequate number of washbasins are to be available, suitably located and designated for cleaning hands. Washbasins for cleaning hands are to be provided with hot and cold running water, materials for cleaning hands and for hygienic drying.

Chapter VIII Personal hygiene

Every person working in a food-handling area is to maintain a high degree of personal cleanliness and is to wear suitable, clean and, where necessary, protective clothing.

No person suffering from, or being a carrier of a disease likely to be transmitted through food or afflicted, for example, with infected wounds, skin infections, sores or diarrhoea is to be permitted to handle food or enter any food-handling area in any capacity if there is any likelihood of direct or indirect contamination. Any person so affected and employed in a food business and who is likely to come into contact with food is to report immediately the illness or symptoms, and if possible their causes, to the food business operator.

Guide to Compliance

All employees and visitors to spirit drinks premises should maintain a high standard of personal hygiene such that any risk to product integrity is minimised.

All personnel working in or passing through post distillation areas shall maintain a high standard of personal cleanliness

Work clothing shall be kept clean by frequent laundering, and where necessary this shall include protective clothing. Changing facilities and suitable storage areas for personal belongings shall be made available

Adequate toilet and washroom facilities shall be provided. Toilets must not lead directly into any of the post distillation areas. Washroom facilities shall include washbasins, hot water, soap and suitable hygienic drying facilities. Where spirit drinks are being produced, hands shall be washed after use of toilet facilities, after eating and after smoking

Any sickness or injury shall be reported to managerial or supervisory staff. This may result in the exclusion of sufferers from any of the production areas in order to;

a) ensure the protection of spirit drinks at risk from contamination;

b) and also to minimise the risk of contact transfer contamination with the packaging

Advice on Best Practice

Whilst all post distillation processing and packaging areas should fully comply with above requirements for personal hygiene, applying the same requirements to pre distillation would be seen as best practice

Protective clothing should be restricted for use on site only. Contract cleaning of protective clothing may be considered to facilitate a high standard of cleanliness. Open pockets should be restricted to below waist and should accommodate items required for work only. If gloves are required, for example for protection against cuts, they should be frequently replaced as needed, otherwise consider alternatives to gloves such as hand disinfection preparations

All spirit processing and packaging areas should have a policy that limits the risks from strong smelling aftershave and perfumes, hair and hair accessories, make-up and nail varnish. Long hair should be neatly contained with no grips outside the hair covering. If working in open bottle areas it is advisable to cover long hair with a net or snood
Eating and drinking should be prohibited in spirit processing and packaging areas. Designated areas for eating and drinking should be provided. Smoking should not be permitted in any area other than designated external smoking areas. Local procedures should be put in place to ensure that where food is brought onto a site that all waste is disposed of safely to prevent putting product safety at risk.

Potential physical hazard such as jewellery, should not be allowed in the spirit processing and packaging areas.

Sores, cuts and grazes should be covered with a conspicuously coloured waterproof dressing before entering a spirit processing and packaging area. Manual accountability is required.

Hands should be washed when entering spirit packaging areas, especially where open containers are handled.
3.11 Training

Legal Requirements

Regulation (EC) No 852/2004 on the Hygiene of Foodstuffs: Annex II – Chapter XII

Food business operators are to ensure;

1) that all food handlers are supervised and instructed and/or trained in food hygiene matters commensurate with their work instruction.

2) that those responsible for the development and maintenance of the procedure referred to in Article 5(1) of this regulation or for the operation of relevant guides have received adequate training in the application of the HACCP principles; and

3) compliance with any requirements of national law concerning training programmes for persons working in certain food sectors.

A food business operator/proprietor must address the supervision and instruction and/or training of both food hygiene and food safety management. All spirit drinks are classified as foodstuffs and are consequently covered by the Hygiene of Foodstuffs legislation. Food safety is the responsibility of everyone involved in the manufacture, transport and packaging of spirit drinks or low alcohol beverages and all relevant staff must have an appropriate understanding of good food hygiene and food safety hazards.

Guide to Compliance

- The aim of food hygiene and safety training is to ensure the production of safe food, by using competent food handlers, who have been adequately trained.

- The food business has a responsibility to determine the level of training, instruction, and supervision of food handlers. This training should form an important part of the basis of the hazard analysis system.

- For training to be effective, it must be;
  a) Relevant to the job role
  b) Clearly linked to food safety hazards and controls
  c) Capably delivered, understood, assessed, supervised and resourced

- Training shall cover food safety essentials such as;
  a) Overview of company’s food safety policy, commitment to hygiene etc
  b) Personal health and hygiene, responsibilities of food handlers, reporting of illness
  c) Prevention of contamination
  d) Cleaning procedures and storage
  e) Awareness of pest activity
  f) Awareness of good manufacturing (GMP)

- For those handlers whose first language is not English, suitable provision should be made to support them and additionally any employees identified with learning difficulties

- Where staff have a responsibility for, development of, maintenance of HACCP (or related) food safety management principles, suitable training must be demonstrated.

- Management must ensure that the training is effective by monitoring the trained staff, and confirming that work is being carried out safely and hygienically in line with the company’s food safety procedures. Legislation does not identify a requirement for staff to attend a formal training course or obtain a qualification.
Training (Continued)

Advice on Best Practice

- Personnel working in the food processing areas either as an operator or contractor should be trained and the training should be completed prior to them commencing work.

- The company should put in place documented programmes covering the training needs of relevant personnel. These should include necessary competencies for specific roles; providing training or other action to ensure staff have the necessary competencies; review and auditing the implementation of training and competency of the trainer.

- Records of training should be available and should contain date/duration, training provider, name of trainee and confirmation of attendance.

- The company should regularly review the competencies of staff and provide relevant training as appropriate (including refresher training).
Packaging is items used for the protection, transportation, preservation and presentation of finished products. Packaging has to comply with relevant food safety legislation and must not be a source of contamination to the food which it contains. By their nature packaging materials should be inert.

Primary packaging is directly in contact with the spirit - glass or PET bottles, cans, ceramics, caps, closures, corks and others. Also included in this category are items such as wax used on cork or coating/varnishes found on closures and plastic fitments/wads inside non refillable closures.

Secondary packaging is not in direct contact with the spirit but protects the primary pack from damage or may add value to the presentation. These items must not introduce contamination to the product but it is acknowledged that the risk is much lower than with primary packaging for our industry.

Other materials in contact with the spirit should be considered such as pipe work, gaskets, pumps, promotional materials etc. For more information refer to Plant section 3.2.

Casks used for maturation or storage are not considered to be packaging. They are fundamental to spirit drinks production processes and by their nature they are not inert. Their purpose is to change the characteristics of the product albeit in a positive way. For more information on the risks related to cask use please refer to Appendix E: Allergens.

Guide to Compliance

- Packaging specifications shall be adequate to prevent contamination and meet legal obligations
- Packaging shall not introduce any type of contamination into the product
- Packaging shall comply with regulations for food contact material and food safety
- Finished goods for sale shall be tamper evident to prevent accidental contamination
- The organisation shall verify this is the case and keep records
- Closures shall be debagged away from high risk areas
- All packaging shall be covered until required for use
- Printed surfaces shall not come into contact with food
- Containers must be cleaned before use – blowing, rinsing or other means may be employed
- Primary packaging shall be stored under conditions that ensure it is fit for purpose at point of use
- Glass breakage procedures shall be in place to prevent accidental contamination during packaging
Packaging Materials in Contact with the Product (Continued)

Advice on Best Practice

- A packaging supplier audit programme should be employed which covers selection and ongoing appraisal.

- Packaging should be designed to ensure the risk of contamination is eliminated where possible.

- Bottles should be designed to minimise breakage.

- Fragile containers should be designed to minimise impact during packing operations.

- Equipment controls such as neck guides should be assessed to minimise impact and reduce breakage, ie plastic nozzles of suitable material could be used.

- Store packaging in clean, ventilated, dry places which are free from odours.

- Glass should be used in rotation and stored under conditions that prevent formation of 'bloom'.

- Obtain compliance certificate from supplier.
Effective documentation and record keeping is an essential and integral part of any food safety and hygiene system. There is a legal requirement to document and maintain the HACCP system. This includes keeping records of hazard analysis, monitoring records, corrective actions, verification reports and system review activities.

The key benefits of a robust documentation and record system are:

1) They demonstrate that the business is operating responsibly and is committed to meeting the legal requirements
2) They provide evidence to demonstrate food hazards have been identified and are being controlled (due diligence)
3) They assist in identification of areas for improvement of the food safety management system

Guide to Compliance

- As a minimum, the documents and records needed to comply with legal requirements for food hygiene are -
  a) A procedure(s) detailing the responsibilities and key elements of the operation of the food safety system
  b) A hazard analysis based on Codex Alimentarius principles (HACCP)
  c) Records of monitoring and verification activities
  d) Records of non conformances and subsequent actions taken
  e) Records of review of the food safety system and HACCP processes
  f) Evidence of training and competence on food hygiene issues

- Evidence of cleaning regimes and plant maintenance documentation such as procedures, specifications, work instructions which contain information to ensure control of food hazards should be authorised and managed to ensure information is current, legible, unambiguous and relevant

- Recording of checks carried out to verify CCPs are being controlled
- Records of monitoring shall not be altered or any alterations must be authorised
- It is essential that any records that are kept are accurate and truly reflect what is happening in the business
- The records shall be reviewed to ensure controls are operating effectively and if not, relevant corrective actions must be taken. These actions must be recorded
- The records shall be retained for a defined period, from date of manufacturing i.e. bottled
- HMRC requirements shall also be considered when determining record omission

Legal Requirements

Regulation (EC) No 852/2004 on the Hygiene of Foodstuffs: Article 5 (2)

g) Establishing documents and records commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined in subparagraphs (a) to (f).
Advice on Best Practice

- Further guidance on document and record control for management systems can be found within BS EN ISO 9000 or BS EN ISO 22000. Companies who produce spirit drinks for retailers may find the British Retail Consortium (BRC) standard can assist in clarifying documentation and record keeping requirements.

- A formalised approach to document and record control is useful in complex or large multi-site organisations. A document control process should include steps which cover:
  - Creation: documents which communicate clearly and unambiguously
  - Review: to validate the information contained in the document
  - Approval: by nominated authorised person
  - Issue: to users and remove old editions, train users on changes

- A documentation control software package is a useful tool to consider. Electronic records must have an adequate backup system in place to prevent loss. Both paper management systems and electronic document management systems should be tested periodically to ensure they are effective.

- In addition to the minimum legal requirements outlined there are benefits in capturing evidence on activities which support good hygiene practices to demonstrate they are being controlled.

- The benefits of controlling additional documentation will be dependent on the size and complexity of the organisation and the products made. Appendix D contains a detailed list of documents that are commonly found in thorough HACCP systems.
Appendix A

Overview of (EC) No 852/2004 Regulations on the Hygiene of Foodstuffs
Premises of food businesses should be kept clean, and in good repair and condition.

The following table sets out more specific requirements for premises.

<table>
<thead>
<tr>
<th>Subject</th>
<th>What you must do</th>
<th>Part of the Regulation</th>
<th>Relevant Section of this Guide</th>
</tr>
</thead>
<tbody>
<tr>
<td>Layout, design, construction and size</td>
<td>Make sure the premises permit adequate maintenance, good hygiene practice and cleaning and/or disinfection, and protect food against external sources of contamination, such as accumulation of dirt, contact with toxic materials, shedding of particles of food, formation of condensation or undesirable mould on surfaces and also pests and that there are, where necessary, suitable temperature-controlled handling and storage conditions of sufficient capacity for maintaining foodstuffs at appropriate temperatures and designed to allow those temperatures to be monitored and, where necessary, recorded.</td>
<td>Annex II Chapter I.2</td>
<td>3.2</td>
</tr>
<tr>
<td>Toilets</td>
<td>There must also be an adequate number of toilets connected to an adequate drainage system and these must not lead directly into rooms in which food is handled.</td>
<td>Annex II Chapter I.3</td>
<td>N/A</td>
</tr>
<tr>
<td>Hand washing facilities and washbasins</td>
<td>Make sure there are an adequate number of washbasins available, designated for cleaning hands. Make sure that basins have hot and cold (or appropriately mixed) running water. You must provide materials for cleaning and hygienically drying hands. Where necessary, facilities for washing food must be separate from hand washing facilities.</td>
<td>Annex II Chapter I.4</td>
<td>3.10</td>
</tr>
<tr>
<td>Ventilation</td>
<td>Make sure there is suitable and sufficient ventilation, either natural or mechanical. Ventilation systems must be accessible for cleaning and/or replacement of parts.</td>
<td>Annex II Chapter I.5</td>
<td>3.6</td>
</tr>
<tr>
<td>Ventilation of toilets</td>
<td>All toilets inside food premises must have adequate ventilation, either natural or mechanical.</td>
<td>Annex II Chapter I.6</td>
<td>N/A</td>
</tr>
<tr>
<td>Lighting</td>
<td>Make sure the premises have adequate natural and/or artificial lighting.</td>
<td>Annex II Chapter I.7</td>
<td>3.2</td>
</tr>
<tr>
<td>Drainage</td>
<td>Make sure there are adequate drainage facilities. Where drainage channels are open, waste must not flow from a contaminated area towards or into a clean area.</td>
<td>Annex II Chapter I.8</td>
<td>3.2, 3.6</td>
</tr>
<tr>
<td>Changing facilities</td>
<td>Where necessary, you must provide adequate changing facilities for staff.</td>
<td>Annex II Chapter I.9</td>
<td>3.10</td>
</tr>
<tr>
<td>Cleaning agents and disinfectants</td>
<td>Make sure these are not stored in areas where food is handled.</td>
<td>Annex II Chapter I.10</td>
<td>3.2, 3.6</td>
</tr>
</tbody>
</table>
The design and layout of rooms where food is prepared, treated or processed, excluding food storage rooms, packaging areas for wrapped food, dining areas but including rooms contained in means of transport, must permit good hygiene, including protection against contamination between and during operations.

<table>
<thead>
<tr>
<th>Subject</th>
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</thead>
<tbody>
<tr>
<td>Floors, walls and surfaces</td>
<td>Make sure floors, walls and surfaces in contact with food are maintained in a sound condition. They must be easy to clean and, where necessary, to disinfect. They should be constructed of impervious, non absorbent, washable, corrosion resistant and non toxic materials unless the component authority agrees that other materials are appropriate.</td>
<td>Annex II Chapter II.1 (a) (b) and (f)</td>
<td>3.2, 3.6</td>
</tr>
<tr>
<td>Ceilings</td>
<td>The design and construction of ceilings should prevent accumulation of dirt, condensation, growth of moulds and shedding of particles.</td>
<td>Annex II Chapter II.1(c)</td>
<td>3.2, 3.6</td>
</tr>
<tr>
<td>Windows</td>
<td>Windows must be constructed to prevent the accumulation of dirt. Where necessary, windows that can be opened to the outside must be fitted with insect-proof screens or remain closed.</td>
<td>Annex II Chapter II.1(d)</td>
<td>3.2, 3.6, 3.9</td>
</tr>
<tr>
<td>Doors</td>
<td>Doors must be easy to clean and, where necessary, to disinfect.</td>
<td>Annex II Chapter II.1(e)</td>
<td>3.6</td>
</tr>
<tr>
<td>Ventilation of toilets</td>
<td>All toilets inside food premises must have adequate ventilation, either natural or mechanical.</td>
<td>Annex II Chapter I.6</td>
<td>3.6</td>
</tr>
<tr>
<td>Cleaning, disinfecting and storage of tools,</td>
<td>You must provide adequate facilities for cleaning, disinfecting and storing tools, utensils and equipment, where necessary. There must be an adequate supply of hot and cold water and the facilities must be constructed of corrosion resistant materials and easy to clean.</td>
<td>Annex II Chapter II.2</td>
<td>3.2, 3.6</td>
</tr>
<tr>
<td>utensils and equipment</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Washing food</td>
<td>Where appropriate, you must provide adequate facilities for washing food, including a supply of hot and/or cold potable (drinking) water as required.</td>
<td>Annex II Chapter II.3</td>
<td>N/A</td>
</tr>
</tbody>
</table>
There are different requirements for:

- movable and/or temporary premises e.g. marquees, market stalls etc.
- vending machines
- domestic premises used primarily as a “private dwelling house”
- premises used occasionally for catering purposes

Movable and/or temporary premises include marquees, market stalls and mobile sales vehicles.

<table>
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</thead>
<tbody>
<tr>
<td>Premises and vending machines</td>
<td>Make sure that these are sited, designed, constructed, kept clean and maintained</td>
<td>Annex II Chapter III.1</td>
<td>3.2, 3.6, 3.9</td>
</tr>
<tr>
<td></td>
<td>in good repair, so as to avoid the risk of contaminating food, especially by</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>animals and pests.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Personal hygiene facilities</td>
<td>There must be appropriate facilities to maintain adequate personal hygiene,</td>
<td>Annex II Chapter III.2</td>
<td>3.10</td>
</tr>
<tr>
<td></td>
<td>where necessary.</td>
<td>(a)</td>
<td></td>
</tr>
<tr>
<td>Surfaces</td>
<td>Where necessary, make sure that surfaces in contact with food are easy to clean</td>
<td>Annex II Chapter III.2</td>
<td>3.2, 3.6</td>
</tr>
<tr>
<td></td>
<td>and, where necessary, to disinfect.</td>
<td>(b)</td>
<td></td>
</tr>
<tr>
<td>Cleaning of utensils and equipment</td>
<td>All toilets inside food premises must have adequate ventilation, either natural</td>
<td>Annex II Chapter III.2</td>
<td>3.6</td>
</tr>
<tr>
<td></td>
<td>or mechanical.</td>
<td>(c)</td>
<td></td>
</tr>
<tr>
<td>Cleaning of foodstuffs</td>
<td>You must make adequate provision for the cleaning of foodstuffs, where necessary.</td>
<td>Annex II Chapter III.2</td>
<td>N/A</td>
</tr>
<tr>
<td>Hot and cold running water</td>
<td>Make available an adequate supply of hot and/or cold potable (drinking) water,</td>
<td>Annex II Chapter III.2</td>
<td>3.4</td>
</tr>
<tr>
<td></td>
<td>where necessary.</td>
<td>(e)</td>
<td></td>
</tr>
<tr>
<td>Waste storage and disposal</td>
<td>Make adequate arrangements for storage and disposal of waste, where necessary.</td>
<td>Annex II Chapter III.2</td>
<td>3.8</td>
</tr>
<tr>
<td>Temperature control</td>
<td>You must have adequate facilities for maintaining and monitoring suitable</td>
<td>Annex II Chapter III.2</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>temperature conditions.</td>
<td>(g)</td>
<td></td>
</tr>
<tr>
<td>Avoiding Contamination</td>
<td>Place foods where the risk of contamination will be avoided, as far as</td>
<td>Annex II Chapter III.2</td>
<td>3.8, 3.12</td>
</tr>
<tr>
<td></td>
<td>is practical.</td>
<td>(h)</td>
<td></td>
</tr>
</tbody>
</table>
Food must always be transported in a way that minimises the risk of contamination.

<table>
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</thead>
<tbody>
<tr>
<td>Containers and vehicles used for transport of food</td>
<td>Any container or vehicle used for transporting foodstuffs must be kept clean and maintained in good repair to protect food from contamination. Where necessary, the container or vehicle must be designed and constructed to permit adequate cleaning and/or disinfection.</td>
<td>Annex II Chapter IV.1</td>
<td>3.7</td>
</tr>
<tr>
<td>Dedicated containers</td>
<td>Receptacles in vehicles and/or containers must not be used for transporting anything other than foodstuffs, where this may result in contamination of foodstuffs.</td>
<td>Annex II Chapter IV.2</td>
<td>3.7</td>
</tr>
<tr>
<td>Containers or vehicles used for different foodstuffs or for both food and non-food products at the same time</td>
<td>You must separate products effectively, where necessary, to protect against the risk of contamination.</td>
<td>Annex II Chapter IV.3</td>
<td>3.7</td>
</tr>
<tr>
<td>Bulk transport of food in liquid, granulated or powder form</td>
<td>Bulk foodstuffs in liquid, granulated or powder form must be transported in receptacles and/or containers/tankers reserved for the transport of foodstuffs, if otherwise there is a risk of contamination. Containers reserved for foodstuffs must be marked ‘for foodstuffs only’.</td>
<td>Annex II Chapter IV.4</td>
<td>3.7</td>
</tr>
<tr>
<td>Containers or vehicles used for</td>
<td>You must separate products effectively, where necessary, to protect against the risk of contamination.</td>
<td>Annex II Chapter IV.5</td>
<td>3.7</td>
</tr>
<tr>
<td>Minimises the risk of contamination</td>
<td>Foodstuffs in conveyances or containers must be placed and protected in a way that minimises the risk of contamination.</td>
<td>Annex II Chapter IV.6</td>
<td>3.7</td>
</tr>
<tr>
<td>Maintaining and monitoring temperatures</td>
<td>Where necessary, vehicles and/or containers used for transporting foodstuffs must be capable of keeping foodstuffs at appropriate temperatures. Where necessary, the vehicle and/or container must be designed to allow those temperatures to be monitored.</td>
<td>Annex II Chapter IV.7</td>
<td>3.7</td>
</tr>
</tbody>
</table>
All articles, fittings and equipment that come into contact with food must be kept clean.

<table>
<thead>
<tr>
<th>Subject</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Cleaning of equipment</td>
<td>Equipment, articles and fittings must be effectively cleaned and, where necessary, disinfected. Cleaning and disinfection are to take place at a frequency sufficient to avoid any risk of contamination.</td>
<td>Annex II Chapter V.1(a)</td>
<td>3.6</td>
</tr>
<tr>
<td>Minimising contamination</td>
<td>Make sure that all articles, fittings and equipment that come into contact with food are constructed, made of such materials and kept in good repair, so as to minimise the risk of any contamination of the food.</td>
<td>Annex II Chapter V.1(b)</td>
<td>3.2, 3.3 &amp; 3.12</td>
</tr>
<tr>
<td>Construction to allow cleaning and disinfection</td>
<td>All articles, fittings and equipment that come into contact with food must be constructed, made of such materials and kept in good repair, so as to enable them to be kept thoroughly cleaned and, where necessary, disinfected.</td>
<td>Annex II Chapter V.1(b)</td>
<td>3.2, 3.6</td>
</tr>
<tr>
<td>Installation</td>
<td>All articles, fittings and equipment that come into contact with food must be installed in a way that allows adequate cleaning of the surrounding area.</td>
<td>Annex II Chapter V.1(d)</td>
<td>3.2, 3.3 &amp; 3.6</td>
</tr>
<tr>
<td>Control devices</td>
<td>Where necessary, equipment is to be fitted with any appropriate control device to guarantee fulfillment of this Hygiene of Foodstuffs Regulation’s objectives.</td>
<td>Annex II Chapter V.2</td>
<td>N/A</td>
</tr>
<tr>
<td>Chemical additives</td>
<td>Where chemical additives have to be used to prevent corrosion of equipment and containers, they are to be used in accordance with good practice.</td>
<td>Annex II Chapter V.3</td>
<td>3.3</td>
</tr>
</tbody>
</table>
The storage and disposal of waste can present a risk of contaminating food, so you must make sure you follow the requirements of the Regulation.

<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>Food and other waste</td>
<td>Food waste, non-edible by-products and other refuse are to be removed from rooms where food is present as quickly as possible, so as to avoid their accumulation</td>
<td>Annex II Chapter VI.1</td>
<td>3.8</td>
</tr>
<tr>
<td>Containers for waste</td>
<td>Make sure that containers can be closed, unless the environmental health services are satisfied that this is not appropriate. The containers must be kept in a sound condition and be capable of being cleaned and, where necessary, disinfected.</td>
<td>Annex II Chapter VI.2</td>
<td>3.8</td>
</tr>
<tr>
<td>Arrangements for the storage and removal of waste</td>
<td>You must make adequate provision for storage and disposal, in a hygienic and environmentally friendly way, of waste. The latter is not to constitute a direct or indirect source of contamination. Refuse stores must be designed and managed so as to enable them to be kept clean and, where necessary, free of animals and pests.</td>
<td>Annex II Chapter VI.3 and 4</td>
<td>3.8</td>
</tr>
</tbody>
</table>
### Water Supply

<table>
<thead>
<tr>
<th>Subject</th>
<th>What you must do</th>
<th>Part of the Regulation</th>
<th>Relevant Section of this Guide</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water supply</td>
<td>There must be an adequate supply of potable (drinking) water. Use potable water in food preparation so that the food is not contaminated.</td>
<td>Annex II Chapter VII.1(a)</td>
<td>3.4</td>
</tr>
<tr>
<td>Water unfit for drinking</td>
<td>Water unfit for drinking, e.g. for fire control, must be conducted separately from potable water.</td>
<td>Annex II Chapter VII.2</td>
<td>3.4</td>
</tr>
<tr>
<td>Recycled water</td>
<td>Recycled water used in processing or as an ingredient is not to present a risk of contamination. It is to be of the same standard as potable water, unless the environmental health services are satisfied that the quality of the water cannot affect the wholesomeness of the foodstuff in its finished form.</td>
<td>Annex II Chapter VII.3</td>
<td>3.4</td>
</tr>
<tr>
<td>Steam</td>
<td>Steam used directly in contact with food must not contain substances hazardous to health or likely to contaminate the product.</td>
<td>Annex II Chapter VII.5</td>
<td>3.3 &amp; 3.4</td>
</tr>
<tr>
<td>Subject</td>
<td>What you must do</td>
<td>Part of the Regulation</td>
<td>Relevant Section of this Guide</td>
</tr>
<tr>
<td>--------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------</td>
<td>--------------------------------</td>
</tr>
<tr>
<td>Personal hygiene</td>
<td>Everyone working in a food handling area must maintain a high degree of personal cleanliness. They must wear suitable, clean and, where necessary, protective clothing.</td>
<td>Annex II Chapter VIII.1</td>
<td>3.10</td>
</tr>
<tr>
<td>Infected food handlers</td>
<td>Anyone suffering from or being a carrier of a disease likely to be transmitted through food or afflicted, for example, with infected wounds, skin infections, sores or diarrhoea must not be permitted to handle food or enter any food handling area in any capacity if there is any likelihood of direct or indirect contamination. Any person so affected and employed in a food business and who is likely to come into contact with food is to report immediately the illness or symptoms, and if possible their causes, to the food business operator.</td>
<td>Annex II Chapter VIII.2</td>
<td>3.10</td>
</tr>
<tr>
<td>Subject</td>
<td>What you must do</td>
<td>Part of the Regulation</td>
<td>Relevant Section of this Guide</td>
</tr>
<tr>
<td>---------------------------------</td>
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<td>---------------------------------</td>
<td>--------------------------------</td>
</tr>
<tr>
<td>Accepting raw Materials</td>
<td>Do not accept any raw materials or ingredients if you know or suspect that they are contaminated and would still be unfit after normal sorting or processing.</td>
<td>Annex II Chapter IX.1</td>
<td>3.13 Annex F &amp; H</td>
</tr>
<tr>
<td>Storing raw materials</td>
<td>Raw materials and ingredients must be stored in appropriate conditions designed to prevent harmful deterioration and protect them from contamination.</td>
<td>Annex II Chapter IX.2</td>
<td>3.2</td>
</tr>
<tr>
<td>Protecting against contamination</td>
<td>At all stages of production, processing and distribution, food is to be protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state.</td>
<td>Annex II Chapter IX.3</td>
<td>3.13</td>
</tr>
<tr>
<td>Control of animals and pests</td>
<td>There must be adequate procedures to control pests and to prevent domestic animals from having access to places where food is prepared, handled or stored, unless the environmental health services permit special cases.</td>
<td>Annex II Chapter IX.4</td>
<td>3.9</td>
</tr>
<tr>
<td>Hazardous and/or inedible substances</td>
<td>Hazardous and/or inedible substances, including animal feeds, must be adequately labelled and stored in separate and secure containers.</td>
<td>Annex II Chapter IX.8</td>
<td>N/A</td>
</tr>
</tbody>
</table>
## Wrapping and packaging of foodstuffs

<table>
<thead>
<tr>
<th>Subject</th>
<th>What you must do</th>
<th>Part of the Regulation</th>
<th>Relevant Section of this Guide</th>
</tr>
</thead>
<tbody>
<tr>
<td>Packaging materials In general</td>
<td>Material used for packaging and wrapping is not to be a source of contamination.</td>
<td>Annex II Chapter X.1</td>
<td>3.12</td>
</tr>
<tr>
<td>Storage of wrapping/packaging materials</td>
<td>Packaging materials are to be stored in such a manner that they are not exposed to a risk of contamination.</td>
<td>Annex II Chapter X.2</td>
<td>3.2 &amp; 3.12</td>
</tr>
<tr>
<td>Wrapping and packaging operations</td>
<td>Packaging and wrapping operations are to be carried out so as to avoid contamination of the products. Where appropriate and in particular in the case of glass bottles, the integrity of the container’s construction and its cleanliness is to be assured.</td>
<td>Annex II Chapter X.3</td>
<td>3.12</td>
</tr>
<tr>
<td>Re-usable material</td>
<td>Wrapping and packaging material re-used for foodstuffs is to be easy to clean and, where necessary, to disinfect.</td>
<td>Annex II Chapter X.4</td>
<td>N/A</td>
</tr>
</tbody>
</table>
The following requirements apply only to food placed on the market in hermetically sealed containers.

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Temperature achievement and contamination control</td>
<td>Any heat treatment process used to process an unprocessed product or to process further a processed product must raise every part of the product treated to a given temperature for a given period of time and prevent the product from becoming contaminated during the process.</td>
<td>Annex II Chapter XI.1(a) and (b)</td>
<td>N/A</td>
</tr>
<tr>
<td>Monitoring</td>
<td>To ensure that the process employed achieves the desired objectives, food business operators must check regularly the main relevant parameters, particularly temperature, pressure, sealing and microbiology.</td>
<td>Annex II Chapter XI.2</td>
<td>N/A</td>
</tr>
<tr>
<td>Process specification</td>
<td>The process used should conform to an internationally recognised standard (for example, pasteurisation, ultra high temperature or sterilisation).</td>
<td>Annex II Chapter XI.3</td>
<td>N/A</td>
</tr>
</tbody>
</table>
Food business operators must ensure the following:

<table>
<thead>
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<th>Relevant Section of this Guide</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supervision, instruction and training</td>
<td>All food handlers are supervised and instructed and/or trained in food hygiene matters to a level appropriate to their job.</td>
<td>Annex II Chapter XII.1</td>
<td>3.11</td>
</tr>
<tr>
<td>Training in HACCP Principles</td>
<td>Those responsible for the development and maintenance of the food safety management procedure based on the HACCP principles, required by this Regulation (Article 5), or the operation of relevant guides must have received adequate training in the application of the HACCP principles.</td>
<td>Annex II Chapter XII.2</td>
<td>3.11</td>
</tr>
<tr>
<td>Sector specific training</td>
<td>Compliance with any requirements of UK national law concerning training programmes for persons working in certain food sectors.</td>
<td>Annex II Chapter XII.3</td>
<td>3.11</td>
</tr>
</tbody>
</table>
Appendix B – Brown Spirit Flowcharts

Example of a Whisky Flowchart

- Cereals
- Mashing
- Fermentation
- Distillation
- Cask Filling
- Maturation
- Disgorging
- Blending
- Reduction
- Chill Filtration
- Bottling & Packaging
- Cased Goods

- Process Water
- Steam
- Casks
- Filtration
- Rousing
- Air Supply
- Coolant
- Attemperation
- Bottle Cleaning
- Air Supply
- OR
- Product
- Yeast
- Caramel
- Water
- Priming
- Filter Media
- Packaging Components
Appendix B – White Spirit Flowcharts

Example of a Gin Flowchart

- Grain Neutral Spirits (GNS)
- Botanicals
- Raw Water
- Filter Media
- Demineralised Water
- Filter Media
- Packaging Components

**Option:** Dilution of the concentrated botanical extract with Grain Neutral Spirits (GNS)

- Steeping
- Distillation
- Filtration
- Rousing
- Bottling & Packaging
- Cased Goods

Option: Unflavoured white spirit production Grain Neutral Spirits (GNS) + compounding agents

- Air Supply
- Product
- Bottle Cleaning
- Reduction
- Blending
- Tanker Filling
Appendix C – Codex Decision Tree

Do preventative control measures exist?

Yes

No

Modify steps in the process or product

Is control at this step necessary for safety?

Yes

No

Not a CCP

Stop

Is the step specifically designed to eliminate or reduce the likely occurrence of a hazard to an acceptable level?

Yes

No

Not a CCP

Stop

Could contamination with identified hazard(s) occur in excess of acceptable level(s) or could these increase to unacceptable levels?

Yes

No

Not a CCP

Stop

Will a subsequent stop eliminate identified hazard(s) or reduce likely occurrence to acceptable level(s)?

Yes

No

Not a CCP

Stop

Critical Control Point (CCP)
Appendix D – Documents and Records

As a guide to companies setting up new hygiene systems or auditing existing systems this list of documents and records may be useful. Each company must determine the level of controls required dependant on the activities being carried out.

European and UK Regulatory Guidance

Policies/Standards
- Food safety policy
- Personal hygiene policy
- Glass breakage policy
- Risk analysis food hazards
- Risk analysis allergens

Standards/Information
- Raw material specifications
- Ingredient specifications
- Dry goods specifications
- In-process specifications
- By-product specifications (FEMAS)
- Finished product specifications
- Equipment specifications and operating manuals
- Customer requirements/contracts
- Chemical data sheets (MSDS’s – Material Safety Data Sheets)
- Cleaning programmes/instructions

Procedures or Pre requisite Programmes
- Customer ordering processes
- Procurement procedure
- Supplier approval
- Training and induction programmes
- Chemical approval process
- Defect control procedures e.g. glass breakage
- Cleaning procedures

Records
- Preventative maintenance
- Pest control
- Internal audit
- Change control
- Recall or withdrawal procedures
- Crisis management
- Corrective and preventative actions
- Incoming goods and materials inspections
- Pest control
- QC records
- Maintenance records (planned and reactive)
- CCP monitoring records
- Calibration records
- External audit
- Allergen register
- Process records
- COSHH register
- Product withdrawal or recall records
- Internal audits
- Weight and content control records
- Traceability records
- Alcohol accounting and volume checks
- Cleaning records
- Customer complaint
Appendix E – Allergens

Allergens are substances (normally proteins) in a food which sensitive individuals can have an undesirable reaction to. The recent changes to the Food Labelling Regulations covering this issue have brought the topic into public awareness. In general for the spirit drinks industry this is a food safety, quality and labelling issue rather than a hygiene topic and this is the reason for it being included as an Appendix.

Although allergens are not hazardous to all consumers, a susceptible individual’s response can range from minor discomfort to serious illness and in extreme circumstances even death. Therefore, we need to be responsible in the manufacture of our products. We should treat allergens as a serious issue when considering the consumer safety of our products and where relevant provide the required information on our product labels.

In distilled spirits the cereals used as raw materials are exempt from labelling because they have been shown to be excluded from the process by distillation. This is also true for spirits distilled from other allergenic raw materials as detailed in Annex IIIa of Commission Directive 2007/68/EC. The use of any materials that may contain an allergen post distillation must be considered as it could remain in the product that is consumed. Spirit caramel produced from glucose syrups manufactured from wheat based raw materials have also been exempt from the allergen labelling although this exemption is within the EU only, but may not be applicable in markets out with the EU. Users should confirm market requirements relevant to their customers.

Legal Requirements

EU Directive 2000/13/EC – on the labelling, presentation and advertising of foodstuffs and the following amendments to this Directive:

EU Directive 2003/89/EC – indication of the ingredients present in foodstuffs (introduced a list of 12 food allergens and labelling of these allergens and their derivatives in pre packed foods and alcoholic drinks)

EU Directive 2006/142/EC – added mollusks and lupin to the list of food allergens

EU Directive 2007/68/EC - replaces the list of food allergens to include information on permanent exemptions

These Directives are implemented by The Food Labelling Regulations 1996 (as amended)

Guide to Compliance

- Directive 2007/68/EC contains information on permanent exemptions from labelling and users of this guide should consult the full list within the Directive

- Identify allergens which are intentionally used in your products

- Products containing recognised allergens (or their derivatives) as an intentional ingredient shall require mandatory labelling to be applied

- Details of the labelling requirement (e.g. wording, legibility) can be found in the Directive 2000/13/EC (as amended)

- The comprehensive list of recognised allergens can be found in the Directives specifically amending Directive 2007/68/EC but includes the following:-
  - Cereals containing gluten (i.e. wheat, rye, oats, barley, spelt, kamut (or their hybridised strains) and products thereof
  - Eggs and products thereof
  - Milk and products thereof (including lactose)
  - Nuts i.e. almond, hazelnut, walnut, cashew, pecan, brazil, pistachio, macadamia and queensland
Allergens (Continued)

- Sulphur dioxide and sulphites at concentrations of more than 10mg/kg or 10ml/litre expressed as SO2
- Others as indicated in the Directive

Advice on Best Practice

- Where casks are used for storage or maturation of spirit, companies should ensure no wheat pastes have been used on the cask or allergenic fining materials used within the cask. Presence of these items would indicate an allergen concern.

- A best practice guideline is published by the FSA – Guidance on allergen management and consumer information. This guidance provides advice on the management of allergens in the manufacturing of food products and the adoption of a risk based approach to avoid allergen cross contamination.

- Distilled spirits made from cereals are exempt from requirements for allergen labelling, as the allergenic components are not carried over through distillation. Evidence should be documented to ensure risks in relation to allergens are being controlled.

- Consideration should also be given to employees who have known allergenic sensitivities and to ensure they are not exposed to the risk during processing or handling of allergenic materials.

- Site visitors should be made aware of any allergen risks when visiting a sensitive area.

- Companies using allergenic ingredients in some of their products must consider and apply appropriate controls to ensure no cross contamination.
The following topics should be considered if allergens are present in any product:

**Eliminate Allergens**

- Best practice would be to avoid the use of allergens completely by formulating spirit drinks so as far as possible to avoid inclusion of allergens. This aspect should be considered at the product design and product formulation stage.

**Reduce the total number of allergens**

- If possible a substitute non-allergenic alternative should be considered. A reduction in the number of allergens on site should reduce the risks to the organisation.

- Ensure suppliers are aware of the need to advise on materials containing allergens to the business in advance of supply. Purchasing and internal specifications are recommended for ingredients used in product formulations.

**Prevent accidental mis-formulation**

- The accidental presence of an allergen in a product can occur by errors in formulation. Producers should organise and control production activities and personnel to prevent cross contamination of allergen containing materials/products with non-allergen containing materials/products.

- This can be prevented by control of manufacturing activities and operator awareness. Approve work methods to ensure correct formulation should be validated and written into policies, procedures and work instructions.

- Operators should be trained on the relevant instructions and training should be recorded. Supervision should be provided where high risk activities are carried out. (Management Controls)

**Prevent cross contamination with a food allergen from a different product**

- Products which ‘may contain’ allergens could be labelled as part of best practice. Advice on advisory labelling is set out in the FSA ‘Guidance on allergen management and consumer information’. Controls should be considered to isolate potential contaminants like allergens from products which do not contain allergens. Controls may include identified, dedicated raw material intake, pipes and vats, equipment and production lines where allergen contain products are made or cross contamination can occur.

- Cleaning schedules and CIP programmes should be utilised to ensure areas where potential for cross contamination exists are effectively cleaned.

- Cleaning regimes should be validated to ensure they are efficient and methods and schedules for cleaning should be documented. Records should be kept.

- Consideration should be given to airborne dust from allergenic materials cross contaminating other products. One solution would be a dust extraction system.

- Consideration should be given to ensuring the packaging and related labelling is also correct.
Appendix F - Ethyl Carbamate and Nitroso Dimethylamine

Legal Requirements

No legislation to date.

Ethyl carbamate (EC) and Nitroso dimethylamine (NDMA) are compounds that have been found in alcoholic beverages in trace quantities (parts per billion). Their mechanisms of formation have been well researched and their concentration can be controlled by correct specification of raw materials and process handling conditions.

Ethyl Carbamate

Ethyl carbamate is a naturally-occurring compound present in many fermented foods and beverages. To minimise levels in distilled spirits and to maintain the current low levels of this compound which is well below current standards set by some countries, the SWA has produced a Guidance for their member companies on the Control of Ethyl Carbamate which is available from the SWA’s Members only DRAMS Reference Library (under the topic “Food Safety”). Routine monitoring by spirit drinks companies of the EC content of their products continues to manage the levels of EC well below the standard set by some countries.

The primary area of control for EC is minimisation of the precursor in raw materials. The main precursor of Ethyl Carbamate is epiheterodendrin (EPH), which originates from the malted barley. Research in to barley varieties has identified a class of barleys which have low levels of the precursor and are described as “low GN” (Glycosidic Nitrile). In addition to choosing suitable raw materials, careful monitoring of the distillation will ensure any precursors are removed from the process and the distilled spirit will not subsequently develop any EC.

Nitroso Dimethylamine (NDMA)

Nitroso Dimethylamine is a combustion compound that is formed as malted barley is dried using traditional direct fired kilns. Since the source and mechanism were identified, indirect heating methods have been widely adopted, effectively removing the contamination. In cases where direct kilning is needed to transfer the ‘peated aroma’ to malted barley a small amount of sulphur, in the form of a sulphur candle, is burnt along with the peat and this reduces the contamination. Since the widespread adoption of these two methods of control, companies continue to monitor NDMA levels as part of their due diligence product checks.
Appendix G – Product Recall and Traceability

Traceability is a requirement of EU food law. In simple terms the law requires manufacturers of food products to know where food ingredients came from, the processing history and who the finished goods were sent to. This information can assist in the event of a food safety incident which would impact on a consumer or brand by enabling the producers to identify and isolate any problem materials or products.

Guide to Compliance

Article 14 Food Safety requirements
- Food shall not be placed on market if unsafe
- Food shall be deemed to be unsafe if it is considered injurious to health or unfit for human consumption
- Where unsafe food is part of a batch the whole batch shall be considered unsafe

EU Directive 89/396/EEC requirements
- A lot code which meets the legal definition shall be applied. ‘Lot’ means a batch of sales units of a foodstuff produced, manufactured or packaged under practically the same conditions. Lot codes start with the letter ‘L’

Article 18 Traceability
- Traceability shall be established at all stages of production, processing and distribution (minimum one up / one down)
- The organisation shall be able to identify any person or company from whom they have been supplied with a food or any substance intended to be or expected to be incorporated into a food

Records shall be maintained
- The organisation shall have in place systems and procedures which can identify any businesses to which their products have been supplied. This information must be made available to competent authorities on demand
- The organisation is required to ensure the flow of goods can be traced from supplier to site, through operations and to the customer (excluding final consumer). Systems and procedures must be in place to allow for this information to be made available to the competent authorities on request eg. Environmental Health Officer
- Foods placed on the market must be adequately labelled or identified to facilitate its traceability

Article 19 - Responsibilities of food business operators
- If the organisation considers or has reason to believe a product is not in compliance with food safety requirements it shall immediately initiate procedure to withdraw or recall the products in question
- If the product has reached the final consumer, the operator shall inform the consumers of the reason for its recall

Legal Requirements
EU Directive 178/2002 Article 14 – Food Safety Requirements
EU Directive 178/2002 Article 18 – Traceability
EU Directive 89/396/EEC – Lot Coding
Advice on Best Practice

- In event of an incident which would affect spirit drink products, any trade association of which you are a member should be advised. Relevant trade associations in the spirit drinks sector are:

<table>
<thead>
<tr>
<th>Association</th>
<th>Website</th>
<th>Telephone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scotch Whisky Association</td>
<td><a href="http://www.scotch-whisky.org.uk">www.scotch-whisky.org.uk</a></td>
<td>0131 222 9200 (Edinburgh) 020 7629 4384 (London)</td>
</tr>
<tr>
<td>Wine &amp; Spirit Trade Association</td>
<td><a href="http://www.wsta.co.uk">www.wsta.co.uk</a></td>
<td>020 7089 3877</td>
</tr>
</tbody>
</table>

- Companies should maintain product recall procedures

- This procedure should indicate types of incidents which may lead to recall. These include customer and consumer complaints, internal production issues, supplier notifications, media contact, malicious threats and government notifications etc.

- To determine the classification and provide evidence to support decisions it is recommended a risk assessment process is followed and documented when determining the severity of the issue

- A log should be maintained during an incident detailing decisions and actions taken

- Member of recall teams should have defined roles and responsibilities and training of team members should be carried out
Appendix G – Product Recall and Traceability (Continued)

- Companies should maintain and test traceability systems to verify all components of products and primary packaging can be traced backward to suppliers and forward to customers within an effective timeframe.

- The procedures should be tested at least annually and include an effectiveness check on traceability systems.

- The regulations only require traceability one step backward to the supplier and one step forward to your customer. It is good practice to be able to trace products through the process. In many instances there is a requirement for internal traceability from HMRC for revenue purposes.

Definitions

Withdrawal – removal of an unsafe product from supply chain – excluding the consumer.

Consumer Recall – removal of an unsafe product from supply chain – including those in the possession of the consumer.
Appendix H- Reference of further guidance – Code of Practice/Advice/Legislation

In addition to the information provided in the main body of the document, supplementary on this topic area can be found below:

At time of print these references were correct

European and UK Regulatory Guidance


Principles for Preventing and Responding to Food Incidents Adequate security measures should be taken to ensure unauthorised entry to the production premises is avoided (www.food.gov.uk/multimedia/pdfs/incidentsprinciples.pdf)

Guidance On The Plastic Materials And Articles In Contact With Food (Scotland) Regulations 2009; Version 1 January 2009

FSA Food Handlers: Fitness to Work Regulatory Guidance and Best Practice Advice For Food Business Operators 2009

Water Regulatory Advisory scheme directory of approved water fitting http://www.wras.co.uk/Directory/

• ISO 22000 Food Safety Management System

• ISO 9000 Quality Management System Standards

• CODEX Alimentarius

<table>
<thead>
<tr>
<th>Legislation Title</th>
<th>Year</th>
<th>SI Number</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consumer Safety</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Regulation (EC) 852/2004 on Hygiene of Foodstuffs</td>
<td>2004</td>
<td>SSI No. 2006/3</td>
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