Explanatory notes
FOOD SAFETY CULTURE: "IMPLEMENTATION OF VO (EU) 2021/382 IN THE QS SYSTEM"

THIS IS WHAT THE NEW REGULATION SAYS	THIS IS WHAT THE LEGAL REGULATION REFERS TO	QS ALREADY COVERS THIS	IMPLEMENTATION IN PRACTICE (EXAMPLES)
1. Food business operators shall establish, maintain and provide evidence of an appropriate food safety culture by fulfilling the following requirements:	The introduction of and compliance with a food safety culture system is a matter for the boss, but it can be delegated.	The food business operator ensures that the food safety culture is implemented and up to date in the QS scheme. The required principles are part of QS participation and QS certification.	The fulfilment of this requirement is always confirmed in the QS scheme with the issued eligibility of delivery.
(a) commitment of the management, in accordance with point 2, and all employees to the safe production and distribution of food;	The specific interpretation of this commitment is explained under point 2 of the regulation (see below). The requirements for the commitments of the company management are set out in Regulation (EC) No. 852/2004. The commitment of the employees includes that all employees of a food company fulfil the required scope of cooperation and participation with regard to food safety.	The QS scheme participant is responsible for ensuring that the requirements of the QS scheme are met at all times and that this can also be verified in audits at any time. In addition to the QS requirements, he must also fulfil the applicable legal provisions, both in the country in which the products are manufactured and in the country in which they are placed on the market by the scheme participant.	This commitment is included in the function/job descriptions of the relevant positions in the company. This commitment is expressed in staff training programmes.
(b) leadership towards the production of safe food and to engage all employees in food safety practices;	Management defines and demonstrates its leadership role so that it is clear to what extent management commits employees to comply with food safety requirements. The leadership role can be defined as the extent to which the food business manager/leader is able to involve employees in ensuring food safety, compliance with food safety requirements and ensuring an appropriate response to risks, deviations and changing circumstances.	see 1 a.)	Food safety is stated as a goal of the company and "in policies". The company management sets a "good example". Authentic behaviour is a prerequisite. Measurable e.g. via: surveys, training, reviews.

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(c) awareness of food safety hazards and of the importance of food safety and hygiene by all employees in the business;	The topic of food safety is communicated within the company as part of a defined set of values. The company's staff are sensitised to food safety hazards and the importance of food safety. This means that all employees of a food company are aware of the relevant risks within their work processes with regard to food safety and that these are mastered.	QS requirements require training or instruction in defined areas, such as: cleaning and disinfection, contamination risks, allergens in the further processing of intermediate and end products and foreign body management, annual training on hygiene and infection protection.	Training (training programme and evidence), instructions, teachings,order, but also error communication, e.g. via returns meetings, MiBi meetings Measurable e.g. via: Returns, complaints, inspections, analyses
(d) open and clear communication between all employees in the business, within an activity and between consecutive activities, including communication of deviations and expectations;	Relevant information on food safety is passed on internally in all areas involved, including deviations from relevant product and process requirements. Communication is understood as the perception of the extent of the transmission or dissemination of information regarding food safety within the organisation.	Structured work processes, responsibilities and in-process controls are defined in the QS scheme for areas relevant to food safety and their implementation is mandatory.	Notice board, screens, timed and documented meetings, process maps and activity descriptions/work instructions/job descriptions Measurable e.g. via: Employee surveys, minutes
(e) availability of sufficient resources to ensure the safe and hygienic handling of food.	Sufficient financial and human resources must be made available within the company to maintain food safety and food hygiene in relation to the infrastructure and the process. Sufficient resources should be defined here in the sense that it is recognised to what extent the necessary resources (e.g. time, personnel, infrastructure, education/training) are available for food-safe operations.	The QS scheme defines requirements for the individual areas regarding the technical and structural condition as well as premises, facilities and devices and also for zone separation and hygiene sluices. Structured work processes, responsibilities and in-process controls are defined for defined areas in order to avoid potential risks to food safety or adverse influences.	The operating premises must be sufficiently large and suitably arranged. Sufficient personnel must be available so that a continuous process can take place. Maintenance and servicing must be guaranteed. Measurable e.g. via: Working hours, staff numbers, infrastructure inspections, maintenance, faults, breakdowns, investments, training, education, training

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			courses, analytics, consulting, operating facilities and equipment
2. Management commitment shall include: (a) ensuring that roles and responsibilities are clearly communicated within each activity of the food business;	Definition of tasks, competences and responsibilities, which can then be assigned in organisational charts and job descriptions, for example.	QS scheme participants must clearly define responsibilities and record them in an organisation chart. Furthermore, the QS guidelines specify requirements for tasks and responsibilities, e.g. for production release, when dealing with non-conforming products (release, blocking, rejection/disposal) and for incoming and outgoing goods.	Organisation chart, function descriptions, assignments, hierarchy, structural and procedural organisation
(b) maintaining the integrity of the food hygiene system when changes are planned and implemented;	Food business operators are already obliged under the HACCP principles to check the procedure in the event of changes to the product, the manufacturing process or the production stages and to adapt it as necessary. The food business operator shall review the procedure and adapt it as necessary.	If QS companies make changes to a product or the manufacturing process that are relevant to HACCP, they must review the HACCP concept and amend it if necessary. At least annual HACCP verification is mandatory in the QS guidelines.	Measurable e.g. via: HACCP verification, internal audits and inspections
(c) verifying that controls are being performed timely and efficiently and documentation is up to date;	Requirement as part of the food safety management system and the HACCP principles for monitoring critical control points (cf. Art. 5 Regulation (EC) No. 852/2004 Hazard analysis and critical control points).	Companies in the QS scheme must create, apply and maintain a risk control system in accordance with the HACCP principles in order to maintain the necessary food safety. This must also be comprehensible to third parties.	Implementation of HACCP concept Measurable e.g. via: Verification, internal and external audits, official inspections, complaints
(d) ensuring that the appropriate training and supervision are in place for personnel;	see 1 c.)	see 1 c.)	Determination of training requirements, training plan, training success, shift logs
(e) ensuring compliance with relevant regulatory requirements;	This refers to compliance with the relevant legal regulations (meat industry: this is basically fulfilled by the	see 1 a.)	complaints from authorities, internal procedures

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	EU authorisation and the official inspection in accordance with national regulations.		Measurable e.g. via: Complaints, recalls, withdrawals, results of official inspections
(f) encouraging continual improvement of the food safety management system of the business, where appropriate, taking into account developments in science, technology and best practices.	Promoting and supporting a continuous improvement process in food processing practices. Corrections and corrective measures follow the principle of the "Continuous Improvement Process (CIP)". According to the effect principle: Cause - Measure - Result	All QS scheme participants are obliged to carry out their self-assessments and must rectify any deviations identified within the specified deadlines. Responsibilities for this must be specified.	Measurable e.g. via: Error logs, reviews, training in the sense of further education/training
3. The implementation of the food safety culture shall take account of the nature and size of the food business.		Specific guidelines are formulated in the QS system for the respective production stages and scopes. In these, the necessary measures are adapted to the type and size of the company.	For centrally organised companies, a presentation of the organisational structure in connection with the responsibilities for implementing the food safety culture in relation to locations or branches is helpful. Documentation structure: Presentation of relevant documents, e.g. in the form of references, tables, matrices

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