



### Collective responsibility

"The average consumer assumes the product they take off the supermarket is safe. That's why food safety auditing at supplier level is so important," says Donna Crockart, managing member of Food Safety Assessment (FSA).

A threat to all retailers is consumer ignorance in safe food handling. "Very little public education appears to enlighten the consumer on their responsibility of extending the cold chain, checking the temperature of household refrigeration, correct freezing and defrosting and other safe food handling practices," says Robyn Wallace, national technical manager of corporate foods at Pick n Pay. "Food safety is the joint responsibility of all parties involved in the food supply chain, from farm to fork, to ensure that food safety practices and protocols are adhered to in order to safeguard the health of consumers," says Ronel Burger, head of the Food Safety Initiative (FSI) at the CGCSA.

### The importance of the CPA

All retailers would have stringent food safety measures in place but the 'threat' of the Consumer Protection Act would no doubt have made this even more a priority. Especially as there are already chancers out there trying their luck with excessive monetary demands often with no proof of purchase.

"Pick n Pay has always considered the guarantee of safe, nutritionally adequate

BY LAURA DURHAM

**The implementation of the Consumer Protection Act (CPA) on 1 April has made food safety an absolute priority as both the manufacturers and/or retailers may be held liable should a consumer bring a complaint of deliberate food safety negligence. Food safety is therefore the joint responsibility of all parties in the food supply chain and as the final gatekeeper, stringent food safety measures in place at store level are vital.**

and culturally acceptable food paramount to its business and the Pick n Pay Supplier Food Safety Standard was developed with the aim of enhancing food safety, ensuring consumer protection and strengthening consumer confidence," explains Lara Barlow, Pick n Pay's national technical manager.

"The onset of the CPA has obviously heightened awareness and allowed us to focus on all factors of delivery of product

to the consumer, including product freshness and food safety," says Wallace.

Every three months every Pick n Pay store undergoes a third party audit and food safety is also part of the store managers KPI (key performance indicators).

The FSI advises its members (retailers) to make use of credible approved suppliers who ensure compliance to the relevant laws and regulations pertaining to foodstuffs. "To ensure that suppliers adhere to Food Safety Management requirements, verification of compliance is done by the conducting of independent food safety audits by accredited auditors of reliable audit bodies," says Burger.

"Retailers themselves should also comply with the applicable legislation in terms of regulatory and food safety aspects as regulated by the Department of Health and other regulatory bodies," she adds.

### The audit process

A food safety audit is therefore a very necessary but costly and lengthy process that suppliers have to go through every year. There are a number of hoops that suppliers need to jump through to receive a good report from the independent third party auditor. There are numerous regulations that dictate the practices of food manufacturers, such as R918, which specifies regulations governing general hygiene requirements for food premises and the transport of food. There are also regulations specific to the product, ►

## FOOD SAFETY ►

for example, the Foodstuffs, cosmetics & disinfectants Act, Meat Safety Act, Agricultural Product Standards Act.

The second level of compliance is Prerequisite Programmes (PRPs) and these detail the requirements for e.g. pest control, equipment, cleaning, facilities, personnel hygiene etc. The new edition South African National Standard for food safety management – Requirements for PRPs (SANS 10049) has just been published (available on the SABS website).

### Have you got your HACCP certificate?

"Although HACCP is not a mandatory requirement for most foodstuffs at this point in time, it is essential to maintain food safety integrity of food products available in supermarkets," says Burger.

"The World Cup in SA in 2010 has also helped to increase the awareness and the need to comply with the HACCP regulations. More manufacturers and retailers are applying pressure within their own industries to comply with these requirements to ensure continued business relationships," says Deena Govender, quality assurance manager at Rentokil.

"The CPA has really affected small- to medium-sized businesses and it is a huge leap for these small players in the industries to become HACCP certified," says Wouter Conradie, MD at NSF-CMi Africa. To be HACCP certified means that the safety and monitoring procedures are in place to ensure that the end-consumer is protected from any physical, chemical, biological or allergen harm. "It is a systematic approach to prevent risks that could seriously affect human health," he adds. It also ensures due diligence on the part of the supplier, creating a food safety paper trail. This requires buy-in from management, as well as sufficient resources – human, financial, work environment and infrastructural.

Mark Enslin, president of the South African Pest Control Association (SAPCA), says that process controls like HACCP are essential, particularly for supermarkets, which handle a wide range of perishables, particularly in the service departments. "As the store is the last stage in the food chain no matter the care that was taken during production and transportation of the finished product, all this could be undone if



*When handling food, it is essential that staff members have hair nets and gloves at all time.*

these fundamental programmes are not in place," he says.

### Pests under control

Wherever there is food stored, we will unfortunately find pests of some sort at some time or another. Retailers therefore have to ensure that this risk is kept to an absolute minimum by ensuring that strict hygiene processes are followed and contracting a pest control company to do regular checks. "We make sure that products are merchandised with breathable spaces in between them. This allows for air flow and reduces any type moisture that could form," says Prenella Govender, public relations officer at Boxer Superstores.

According to Rentokil's Deena Govender, it is common practice and a very good idea for stores to have an outside pest control company to take care of their pests. "Retailers understand that their products and premises are very attractive to pests and that they require professional pest control services. Their reputation is at stake and cannot be compromised by having untrained or unqualified staff applying pesticides," she explains.

"Store owners and managers need to ensure that the products brought into the store as stock are uncontaminated. This can be done by ensuring that the producer and transporters also ascribe to the food safety code and are therefore essentially providing clean products," says Enslin.

Stores need to then further inspect commodities that are brought into the store for possible infestation as pallets are unpacked in the holding area and any products that are suspect or contaminated should immediately be put in quarantine to prevent the spread of the insects.

### Retailer requirements

The customer (retailer) requirements of the audit – with specifications that details the required e.g. raw materials, testing and labelling – are all specific to each retail client. This takes up a large part of the assessment time. "It becomes really tricky for suppliers when they supply a number of retailers and have to comply with each one's specific requirements," says Crockett.

"It is a Pick n Pay business rule that all food suppliers are required to undergo the Pick n Pay Food Safety Audit. The audits score and the risks that have been identified by the audit will determine the status of a supplier," says Barlow.

There is currently no industry standard for food safety although the CGCSA Food Safety Initiative (FSI) is working on a harmonised standard or guideline for standards. Genesis QA is an independent standards body, which has recently launched the first two entry-level standards for the local industry – Genesis GMP for food manufacturing sites, and Genesis

*Strict hygiene practises are followed at the KwaZulu-Natal retail operation, Jwayelani's meat processing and packaging plant. Staff members have to have their hands sprayed with disinfectant soap before the turnstile will operate.*



WSD for food warehousing, storage and distribution businesses. According to Tinus Potgieter, Africa representative of Genesis QA, these standards has been benchmarked with the GFSI entry-level standards, R918, SANS 10049, SANS 10330 and the checklists being currently used by local retailers. Potgieter explains that any local inspection or certification body can apply to become approved to conduct audits against this standard. Currently NSF-CMi is the only Genesis approved certification body in South Africa.

### If suppliers fail an audit?

They might then be audited again in three or six months, depending on the significance of the non-conformance based on risk. For example, the risk of a ready-to-eat food manufacturer is far greater than one who produces salt. Retailers can then decide on what action to take, with delisting being a possibility. "Legally, as the auditor we have to inform the customer (the retailer) of any potential risk to the consumer," FSA's Donna Crockett explains.

### Why the fuss?

"Our staff members are regularly trained on health safety and how to handle a food

complaint (should the occasion arise). Strict procedures have been enforced to assist in reducing, if not eradicating, complaints," says Boxer's Prenella Govender.

"It is essential to create a food safety culture in which the behaviour and understanding of the food industry is enhanced as to ensure food safety becomes a priority within South Africa," says FSI's Ronel Burger.

"Buyers and store owners need to have confidence in the product they've got on shelf – where it's from, under what conditions it is manufactured and if it complies with all regulations – and if they just asked more pertinent questions of suppliers and their food safety compliance, they would know," says Crockett. This will also allow for more due diligence with which to defend should a CPA case come up.

"Retailers are advised to implement a basic pragmatic and sector specific PRP programme, verified by third party auditors that are independent of themselves, to ensure impartiality and to endeavour continuous improvement of systems and food safety training to all staff," says NSF-CMi Africa's Wouter Conradie. He also suggests that retailers encourage their suppliers to put into place a clean-as-you-

go programme, particularly for food preparation areas, as well as some way of recording and monitoring it.

### Customer education

"Another factor challenging the food retailer and hospitality industry is that most medical practitioners are quick to diagnose 'food poisoning' on hearsay of the consumer without confirming whether the cause could be environmental, resulting in false or unjustified claims," says Pick n Pay's Robyn Wallace.

According to 'Hand Washing for Life', 70% of consumers do not wash their hands. This is an example of how a habit can migrate to unnecessary food safety claims. Wallace says that health authorities in the US now sponsor TV ads educating consumers about this.

Creating an awareness campaign about food safety, using information cards and in-store demonstrations, would be a useful way for retailers to ensure that customers handle food correctly after leaving the store (no leaving it in the boot for hours, or re-freezing meals). This will also remove the opportunity for chancers to use the CPA against retailers just because "they didn't know".



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