

**14 Invitation Letter to BTSF National Contact Points seeking applications for BTSF training activities on  
“Organisation and implementation of training activities on food hygiene and the flexibility provisions  
provided in the food hygiene package”**

**Phase 2**

Valid as of 14/02/2023

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## **1. Course objectives**

### **General objective**

The training will aim at raising awareness and at improving the understanding of the flexibility provisions within the competent authorities of the Member States.

### **Specific objectives**

- Raise awareness and improve understanding of flexibility provisions of the Hygiene Package;
- Highlight how provisions are not always used completely and not in the proper manner;
- Promote exchange of experience in order to increase the level of expertise and harmonization in the approach to flexibility;
- Ensure a better use of flexibility provisions;
- Disseminate best practices for official controls when flexibility is applied;
- Raise awareness on notification procedures and importance of their adoption.

The training will be addressed both to officials from Competent Authorities involved in planning and control activities and field inspectors involved in control activities on food hygiene.

## 2. Training dates and locations

The training will be of 5 full days of which 2 days dedicated to field visits (2 different sites) and hands-on-training.

3 five-day training session will be delivered between April and June 2023.

Locations has been selected to facilitate field exercises within establishments.

The attendance will be approximately 30 people.

The training will be addressed both to officials from public health authorities and veterinary/food safety authorities of the Member States, EEA/EFTA countries and European Union candidate and potential candidate countries involved in food inspections. It is again highlighted that each invited country on the different training sessions will be requested to select two officials coming respectively from each of the above-mentioned authorities.

The course agenda is attached (Annex 3).

Subject to possible variations, the dates and locations of the training sessions are the following:

**Table 1: Training dates and Location**

Year	Training sessions	Course title	Locations	Proposed dates	Registration deadline
2023	TS13	Food Hygiene and Flexibility	Portugal (Porto or Viseu)	17-21 April	17/03/2023
	TS14	Food Hygiene and Flexibility	Croatia (Zagreb)	8-12 May	7/04/2023
	TS15	Food Hygiene and Flexibility	Italy (Turin)	5-9 June	5/05/2023

**For organisational purposes, names of participants should be communicated at the latest 20 days before each workshop. A reminder will be sent to NCPs before each event.**

### 3. Selection criteria for participants

- Participant must:
1. Meet the minimum requirements
  2. Be selected using the evaluation criteria

Participants must meet the minimum requirements below to ensure they can follow and fully participate in this course. Participants who do not meet the minimum requirements should not be proposed for the training.

1. Minimum requirements for Food Hygiene and Flexibility	Yes/No
Participant must: <ul style="list-style-type: none"> <li>• Have minimum 3 years of professional experience in official control on food safety</li> </ul> <u>OR</u> <ul style="list-style-type: none"> <li>• Have experience in organising or executing inspections and official controls</li> </ul>	Yes/No

The evaluation criteria should be used as a tool to prioritise participation (higher score indicates higher priority), but there is no minimum score necessary.

2. Evaluation criteria for Course 2		Enter Score
a)	Professional experience of more than 3 years in official control on food safety <i>Scoring</i> <i>less than 3 years = 0 points; ≥ 3 years = 2 points; 5 - 10 years = 3 points; &gt; 10 years = 5 points</i>	5
b)	Experience as field staff involved in day-to-day official controls of food establishments benefitting from flexibility measures <i>Scoring</i> <i>no experience = 0 points; &lt; 2 years = 2 points; 2-5 years = 3 points; &gt; 5 years = 5 points</i>	5
c)	Experience in auditing food establishments <i>Scoring</i> <i>no experience = 0 points; ≥ 3 years = 2 points; 5 - 10 years = 3 points; &gt; 10 years = 5 points</i>	5
d)	Contribution towards drafting on guidelines, national laws and/or derogations notified to the Commission pursuant to Hygiene Package flexibility provisions. <i>Scoring</i> <i>no experience = 0 points; ≥ 3 years = 4 points; 5 - 10 years = 8 points; &gt; 10 years = 10 points</i>	10
e)	Experience in preparing control plan for food hygiene controls where flexibility provisions are applied <i>Scoring</i> <i>no experience = 0 points; ≥ 3 years = 4 points; 5 - 10 years = 8 points; &gt; 10 years = 10 points</i>	10
f)	Evaluation of GHP/HACCP manuals for producers where flexibility provisions are adopted <i>Scoring</i> <i>no experience = 0 points; ≥ 3 years = 4 points; 5 - 10 years = 8 points; &gt; 10 years = 10 points</i>	10

g)	<p>Experience in training of field inspectors on food safety and official controls</p> <p><i>Scoring</i>  no experience = 0 points; &lt; 2 years = 2 points; 2-5 years = 3 points; &gt; 5 years = 5 points</p>	5
<b>Maximum total score</b>		<b>50</b>

#### 4. Country allocations

A total of 60 seats will be allocated according to the tables below. Please note that the number of allocated seats for each country may vary.

**Table 2: Suggested allocation for EU Member States, Candidate Countries, Potential and EFTA Countries**

	Country	WISEU or PORTO	ZAGREB	TURIN
		17-21 April 2023	8-12 May 2022	5-9 June 2023
Member States	Austria	1	1	1
	Belgium	1	1	1
	Bulgaria		1	1
	Croatia	1	3	1
	Cyprus	1		
	Czech Republic	1	1	1
	Denmark	1	1	1
	Estonia			
	Finland		1	1
	France			1
	Germany	1	1	1
	Greece	1	1	1
	Hungary	1	1	1
	Ireland	1	1	1
	Italy	1	1	3
	Latvia	1	1	1
	Lithuania			1
	Luxembourg	1		
	Malta	1	1	1
	Netherlands	1	1	1
	Poland	1	1	1
	Portugal	3		1
	Romania	1	1	2
	Slovakia	1	1	
	Slovenia	1	2	
	Spain	2	1	1
Sweden			1	
	<b>Total MS</b>	<b>24</b>	<b>23</b>	<b>25</b>
Candidate Countries	Albania			1
	North Macedonia	1	1	1
	Montenegro	1	1	
	Serbia	1	1	1
	Turkey	1		
	<b>Total Candidate</b>	<b>4</b>	<b>3</b>	<b>3</b>
EFTA Countries	Iceland			
	Norway			
	Switzerland	1	1	1
	UK (Northern Ireland)		1	
	Liechtenstein			
	<b>Total EFTA</b>	<b>1</b>	<b>2</b>	<b>1</b>
Potential Candidate Countries	Bosnia and Herzegovina	1	1	1
	Kosovo		1	
	<b>Total Potential</b>	<b>1</b>	<b>2</b>	<b>1</b>
	<b>Total</b>	<b>30</b>	<b>30</b>	<b>30</b>

You are welcome to nominate more participants for the reserve list than indicated in the table above. If seats will become available you will be informed in due time.

**5. *Face-to-face logistical arrangements***

In the face-to-face training sessions, the European Commission will fund in full the visa, travel, accommodation, meals, and field visit costs for all training participants. No daily allowance will be paid on top of this. Any other costs are to be paid by the participants themselves.

Participants will arrive at the training venues during Sunday and training will commence on Monday morning. Return travel will be on Friday afternoon or Saturday morning according to flight connections.

The OPERA team will liaise further with the nominated participants for all logistics and practical aspects.

## **Annex 1: Background and main topics covered in training**

In order to foster different food products present in the Union, to allow small-scale producers continue operating without being negatively affected by the provisions of the Food Hygiene Package and, at the same time, ensure the rights of consumers to safe food, the relevant Regulations provide diversified possibilities to adapt the technical requirements of the Food Hygiene Package in function of the nature of the food business concerned. In particular, these flexibility provisions have been tailored to facilitate the trade of foods produced at a local level and/or by traditional methods.

From a global point of view, the flexibility contained in the Hygiene Regulations offers three possibilities:

1. to grant derogations/exemptions from certain requirements laid down in the Food Hygiene Package
2. to grant adaptations of certain requirements laid down in the Food Hygiene Package
3. to exclude some activities from the scope of the Hygiene Package (Regulation 178/2002, Regulation 852/04 and Regulation 853/04)

The present training proposal will address the topics listed above through the adoption of a practical approach, aimed to increase knowledge of Competent Authorities and field inspectors on flexibility provisions included in the Food Hygiene Package, and to harmonise the approach to flexibility.

It should further be considered that the importance of proper and full use of flexibility in application of the Hygiene Package is becoming increasingly important as a result of the growth of “short food supply chains”. These are promoted by DG AGRI both as a tool to support EU farmers and also as a tool to preserve heritage of local food products. The consumption of products obtained through “short food supply chains” is expected to grow in the coming years. However, a large portion of producers is represented by small scale establishments that will most probably need to benefit from flexibility measures. This obliges consequently to ensure that these measures are properly applied in all Member States.

### **Main topics covered in the training**

- Flexibility through the Hygiene Regulations: general overview and concept (legal basis and guidance document);
- Activities excluded from the scope of the Hygiene Regulations, including practical examples;
- Scope and practical examples of flexibility with regard to the implementation of procedures based on the HACCP principles and on Regulation (EC) 2073/2005;
- Scope and practical examples of flexibility measures to enable the continued use of traditional methods at any of the stages of production, processing or distribution of food;
- Scope and practical examples of flexibility measures to accommodate the needs of food businesses situated in regions that are subject to special geographic constraints;
- Scope and practical examples of flexibility provisions pursuant to Article 7 of Regulation (EC) 2074/2005 for food operators producing food products with traditional characteristics;
- Assessment of the implementation of flexibility provisions by competent authorities taking into account the possible use of guides to good practice and implications for official controls;
- National measures and notification process;
- Exchange of views and experience about the approach to flexibility in each country.



## Annex 2: Legislation and guidance

Text No	Title	Relevance / Topic
Reg. (EC) N° <b>178/2002</b>	Laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, as amended	“General Food Law”
Reg. (EC) N° <b>852/2004</b>	On the hygiene of foodstuffs, as amended	Food safety
Reg. (EC) N° <b>853/2004</b>	Laying down specific hygiene rules for food of animal origin of food safety, as amended	Food safety
Reg. (EU) N° <b>2017/625</b>	On official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products	Food safety
Regulation (EC) No <b>2074/2005</b>	laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004, as amended	Foods with traditional characteristics
Reg. (EC) N° <b>2073/2005</b>	On microbiological criteria for foodstuffs , as amended	Microbiological criteria for foodstuffs
Directive <b>98/34/EC</b>	Laying down a procedure for the provision of information in the field of technical standards and regulations	Notification procedure
Directive (EU) <b>2015/1535</b>	Laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services (codification)	Notification procedure
Regulation (EC) No <b>1151/2012</b>	On quality schemes for agricultural products and foodstuffs, as amended	Quality schemes

## GUIDELINES

- Guidance document on the implementation of procedures based on the HACCP principles, and on the facilitation of the implementation of the HACCP principles in certain food businesses (16 November 2005);
- Guidance document on the implementation of certain provisions of Regulation (EC) No 852/2004. (SANCO/1731/2008 Rev. 6);
- Guidance document for the implementation of certain provisions of Regulation (EC) No 853/2004. (SANCO/1732/2008 Rev. 7);
- Report from the Commission to the Council and the European Parliament on the experience gained from the application of the hygiene Regulations (EC) No 852/2004, (EC) No 853/2004 and (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 (13 October 2009) {SEC(2009) 1079};
- Commission Staff Working Document on the Understanding of certain provisions on flexibility provided in the Hygiene Package - Frequently Asked Questions - Guidelines for food business operators (SEC(2010) 985 final);
- Commission Staff Working Document on the Understanding of certain provisions on flexibility provided in the Hygiene Package - Frequently Asked Questions - Guidelines for the Competent Authorities (SEC(2010) 986 final);
- General report of a mission series carried out in six Member States in the period November 2009 to March 2010 in order to gather information regarding the application of the hygiene Regulations in small establishments producing meat and meat products of mammals and dairy products (DG(SANCO)/2010-6150 - MR FINAL);
- Final Overview Report on the State of Implementation of HACCP in the EU and Areas for Improvement (DG(SANTE) 2015-7752 – MR);
- Commission Notice on the implementation of food safety management systems covering prerequisite programs (PRPs) and procedures based on the HACCP principles, including the facilitation/flexibility of the implementation in certain food businesses (2016/C 278/01);
- EFSA Scientific Opinion - Hazard analysis approaches for certain small retail establishments in view of the application of their food safety management systems (10.2903/j.efsa.2017.4697)
- Commission Notice providing guidance on food safety management systems for food retail activities, including food donations (2020/C 199/01)

## Annex 3: Agenda

### DAY 1 –General overview, exclusion from the scope, flexibility and HACCP

Time	Topic	Tutor
08.30	Registration of participants	
08.40	Welcome addresses, course background, objectives & expected results	Training Coordinator (TC)
08.50	Preliminary discussion with participants, aimed to enquire about their expectations on the training initiative	All tutors
09.00	Introduction from DG SANTE representative	DG SANTE representative
09.10	Better Training for Safer Food: presentation of a video	
09.20	Self-assessment test	
09.30	1. Flexibility through the Hygiene Regulations: general overview and concept. Legal bases, flexibility provisions included in the FHP, EC guidance documents <i>Presentation including videos and pictures, Automatic response systems (ARS)</i>	TC
10.10	2. State of the art of implementation of flexibility in the Member States: DG SANTE reports <i>Presentation</i>	Tutor 2
10.40	Open discussion session	
11.00	Coffee break	
11.20	3. Activities excluded from the scope of the hygiene Regulations: general provisions, practical examples <i>Presentation including videos and pictures, Automatic response systems (ARS)</i>	Tutor 2
11.50	4. Flexibility in relation to building, lay out and equipment: small business <i>Presentation including videos and pictures, Tablet supported exercises</i>	Tutor 3
12.20	Open discussion session	
12.30	5. Flexibility with regard to the implementation of procedures based on the HACCP principles: scope and practical examples <i>Presentation including videos and pictures, Short group exercises</i>	Tutor 5
13.10	Open discussion session	
13.30	Lunch break	
14.30	6. Breakout Session – Case Studies on Flexibility with regard to the implementation of a Food Safety Management System: presentation and teamwork	
16.00	Coffee break	
16.30	Plenary Session: presentation of the results of case studies from representatives of the Working Groups	
17.00	Discussions and interactive participants' response (audience response system), focused on the topics presented during the day	All tutors
17.30	Conclusions of Day 1 (summary of main topics)	TC
17.45	End of Day 1	
20.00	Dinner	

***DAY 2– Flexibility, microbiological criteria, traditional products, traditional methods, geographic constraints***

<i>Time</i>	<i>Topic</i>	<i>Tutor</i>
08.30	7. Flexibility with regard to Regulation (EC) n° 2073/2005: scope and practical examples <i>Presentation, Automatic response systems (ARS)</i>	Tutor 5
09.00	Open discussion session	
09.10	8. Breakout Session – Case Studies on flexibility with regard to Regulation (EC) n° 2073/2005: presentation and teamwork	
09.50	Plenary Session: presentation of the results of case studies from representatives of the Working Groups	
10.10	9. Flexibility provisions pursuant to Article 7 of Regulation (EC) n° 2074/2005, foods with traditional characteristics: scope and practical examples <i>Presentation including videos and pictures, Short group exercises</i>	Tutor 4
10.50	Open discussion session	
11.10	Coffee break	
11.30	10. Flexibility measures to enable the continued use of traditional methods: scope and practical examples <i>Presentation including videos and pictures, Automatic response systems (ARS)</i>	TC
12.10	11. Flexibility measures to accommodate the needs of food businesses situated in regions that are subject to special geographic constraints: scope and practical examples <i>Presentation including videos and pictures, Short group exercises</i>	Tutor 4
12.40	Open discussion session	
13.00	Lunch break	
14.00	12. Breakout Session – Case Studies on flexibility for small businesses, traditional methods and traditional foods: presentation and teamwork	
15.30	Coffee break	
16.00	Plenary Session: presentation of the results of case studies from representatives of the Working Groups	
16.30	Discussions and interactive participants’ response (audience response system), focused on the topics presented during the day	All tutors
17.00	Conclusions of Day 2 (summary of main topics)	TC
17.15	End of Day 2	
18.00	Guided tour	
20.00	Social dinner	

### **Day 3- Field visits**

Participants will be divided in 2 groups, each of them will be divided in two subgroups so as to allow for easy access to establishments and maximise benefit for participants.

	<i>Group 1A</i>	<i>Group 1B</i>	<i>Group 2A</i>	<i>Group 2B</i>
08.00	Departure from hotel		Departure from hotel	
08.30	Field visit to a small establishment benefitting from flexibility provisions operating in the milk sector		Field visit to a small establishment benefitting from flexibility provisions operating in the meat sector	
10.30	Transfer		Transfer	
11.00	Field visit to a small establishment benefitting from flexibility provisions operating in the meat sector		Field visit to a small establishment benefitting from flexibility provisions operating in the milk sector	
13.00	Lunch break			
14.00	Debriefing, discussion on the outcomes of the field visit, questions and answers			
16.30	Return to hotel / training venue Coffee break		Return to hotel / training venue Coffee break	
17.00	End of Day 3			
20.00	Dinner			

### **Day 4- Field visits**

Participants will be divided in 2 groups, each of them will be divided in two subgroups so as to allow for easy access to establishments and maximise benefit for participants.

	<i>Group 1A</i>	<i>Group 1B</i>	<i>Group 2A</i>	<i>Group 2B</i>
08.00	Departure from hotel		Departure from hotel	
08.30	Field visit to a small establishment benefitting from flexibility provisions (fish or food of non-animal origin)		Field visit to a small establishment benefitting from flexibility provisions operating in the meat or milk sector	
10.30	Transfer		Transfer	
11.00	Field visit to a small establishment benefitting from flexibility provisions operating in the meat or milk sector		Field visit to a small establishment benefitting from flexibility provisions (fish or food of non-animal origin)	
13.00	Lunch break			
14.00	Debriefing, discussion on the outcomes of the field visit, questions and answers			
16.30	Return to hotel / training venue Coffee break		Return to hotel / training venue Coffee break	
17.00	End of Day 4			
20.00	Dinner			

***DAY 5- Flexibility and Official Controls, experiences in the Member States, dissemination***

<i>Time</i>	<i>Topic</i>	<i>Tutor</i>
08.30	13. Participants contributions: <ul style="list-style-type: none"> <li>• The implementation of flexibility in the Member States</li> <li>• Flexibility and official control, experiences in the Member States</li> <li>• Case Studies on flexibility from participants</li> </ul> <i>Presentations, case studies</i>	Selected participants
09.10	14. Assessment of the implementation of flexibility provisions by Competent Authorities <ul style="list-style-type: none"> <li>• Best practices for official controls when flexibility is applied</li> <li>• Use of guides to good practice and implications for official controls</li> <li>• Flexibility measures and documentation in individual establishments</li> </ul> <i>Presentation including videos and pictures, Automatic response systems (ARS)</i>	Tutor 3
09.50	15. Break out session – Case studies on Auditing FBOs where flexibility is applied: presentation and teamwork	
10.20	Plenary Session: presentation of the results of case studies from representatives of the Working Groups	
10.40	16. Analysis of the notifications in the TRIS database and examples from the last notifications <i>Presentation</i>	TC
11.00	Open discussion session	
11.10	Coffee break	
11.30	17. National measures and notification process <i>Presentation</i>	Tutor 2
11.50	Questions and answers	
12.00	19. Dissemination of the contents of the training <i>Presentation</i>	TC
12.20	<i>Lessons learned – topics covered</i>	TC
12.40	Conclusions <ul style="list-style-type: none"> <li>• Test</li> <li>• On-line evaluation of training</li> <li>• Training certificates</li> </ul>	
13.00	End of the training session	
20.00	Dinner (for participants who have their flight on Saturday)	

## **Annex 4: Training material, outcomes and dissemination activities**

### Training material

All participants will receive the training material well in advance of the training. The material will include additional pre-recorded material for offline studies. Preparatory videos will introduce the specific topic and provide background information to participants.

All participants will receive a Dissemination Kit electronically to enable them to actively disseminate course knowledge upon their return from BTSF training. Participants attending face-to-face courses will receive the information on the USB key.

### Dissemination Kit

This contains the following training materials:

- All course presentations
- Study notes on field trips and group activities/discussions and conclusions thereof
- The course syllabus
- The training information sheet
- Glossary of terms and abbreviations used in the course
- Additional references for further study
- Written guidance on how to actively disseminate course knowledge to colleagues upon participants' return to their home countries, different methodologies/examples/best practice
- Other information and material delivered at the course such as quizzes, FAQs etc.

### Dissemination questionnaire

Two to three months after the respective training session, participants will receive a standard questionnaire requesting information on the dissemination activities of the participant after the training, and details on differences in the approach adopted in day-to-day work following the training.

### Test of knowledge

Furthermore, the programme will include an anonymous knowledge test to be carried out at the beginning and at the end of each training session in order to measure the impact of the training on the understanding of the participants of the subjects taught.

Participants are expected to agree to carry out the above tests and to reply to the surveys and questionnaires.

## Annex 5: Contractor contact details

The project is managed by OPERA Srl



Project manager:

**Claudio BOMPARD**

Training coordinator:

**Alberto MANCUSO**

Separate notifications will be sent to National Contact Points for each course and will contain the names and contact details of the Event Manager and Assistant Event Manager as well as logistical details on the event.

All information on BTSF training can be found at the BTSF Academy website and the following website: [www.btsftraining.com/btsf-flexibility](http://www.btsftraining.com/btsf-flexibility). The website will be regularly updated with details of forthcoming courses.

### Data Protection Notice for the BTSF online Trainings

This processing operation concerns the participation in BTSF online training activities which are held within the context of the Better Training for Safer Food Initiative (BTSF) and hosted in the BTSF ACADEMY to provide wider accessibility to training in the areas of food law, feed law, animal health and animal welfare rules, as well as plant health rules by using a state-of-the-art and interactive e-learning system. The BTSF is a Commission DG Health and Food safety (DG SANTE) Initiative managed by the Consumers, Health, Agriculture and Food Executive Agency (Chafea) and aimed at organising a EU training strategy in the areas mentioned above.

This data protection notice explains the reason for the processing of all personal data provided and how Chafea collects and handles them and ensures their protection. It also details how that information is used and what rights the data subject may exercise in relation to the data. Your personal data is processed in accordance with Regulation (EU) No 2018/1725. Please find more details on the following link <https://btsfacademy.eu/training/mod/page/view.php?id=417> .