

# Added value for Swift's "hygiene" clients....

Swift is always investigating ways to add value to the comprehensive service we offer our clients. Our **HYGIENE DEPARTMENT** has become well-known in the industry for not merely providing an auditing ("policeman") function, but for providing the client with all the "tools" needed to achieve hygiene excellence at their premises. Apart from the obvious benefits of maintaining good hygiene in a production or restaurant environment, we must keep in mind that hygiene is one of the pre-requisite programmes on the road to implementing HACCP as well.

These "tools" include:

- ✓ **Hygiene consultants** who are highly qualified and experienced Environmental Health Practitioners and Food Technologists.
- ✓ Combining visual inspection with **scientific back-up** of findings: swabs and food samples are tested in our ISO 17025 accredited Microbiology Laboratory.
- ✓ **On-the-spot feedback** to clients during the inspection so that problem areas can be addressed immediately.
- ✓ Comprehensive **hygiene reports** which include quality ratings for evaluation of performance and progress, as well as an action plan to address deficiencies.
- ✓ Customised **training courses** provided from floor worker to management level. The hygiene related courses include: "Basic Hygiene for Floor Workers", a "Hygiene Refresher Course", "Hygiene for Supervisors", "Hygiene for Managers", and "Basic Hygiene and an Introduction to HACCP". Training can be presented in-house at customer premises or at Swift's training centres in Gauteng and Cape Town, and can be presented in English, Afrikaans, Xhosa or Zulu.
- ✓ Our SANAS (South African National Accreditation System) accredited laboratory can provide further assistance with **microbiological testing of products** for routine monitoring or for problem solving/customer complaints.
- ✓ Swift's Quality Management Systems (QMS) Department can help the client who has mastered their hygiene programme to take their pro-active approach towards Food Safety to the next level with the **implementation of further quality management systems** such as Supplier Quality Assurance (SQA) and Hazard Analysis of Critical Control Points (HACCP).

To further add value to our Hygiene service, Swift now underwrites the [EatSafe](http://www.eatsafe.co.za) campaign.



For further information on our hygiene service, or on how you can add the EatSafe benefit to your hygiene contract, contact Swift's marketing department or send an e-mail to [info@swift.co.za](mailto:info@swift.co.za).

Cape Town (021) 689 9344  
Pretoria (012) 349 2334  
[www.swift.co.za](http://www.swift.co.za)



*EatSafe* is a marketing company that gives recognition and offers benefits, such as promoting the fact that the establishment is graded as being "Eatsafe", to food operations (whether manufacturer, restaurant, deli, staff restaurant, take-away, butchery, etc) who have reached a certain standard of food sanitation and hygiene. Independent *EatSafe*-approved auditing companies such as Swift Micro Laboratories carry out "EatSafe audits" every 3 months. Upon reaching the 80% pass rate, *EatSafe* certificates (valid for 3 months until the next audit falls due) are issued. *EatSafe's* main focus is to promote its members and acknowledge their commitment towards food safety and hygiene, and to develop the *EatSafe* brand into a household name.

One of the first companies to subscribe to the *EatSafe* campaign and successfully maintain their *EatSafe* status was one of Swift's clients, the Primi Piatti group.



THE SWIFT MICRO LABORATORIES NEWSLETTER

[www.swift.co.za](http://www.swift.co.za)

Dec '04 / Jan '05

In the last issue of our newsletter for 2004, our guest article focuses on some of the interesting changes proposed by the much-revised second draft of our South African labelling regulations (in terms of the Foodstuffs, Cosmetics & Disinfectants Act), which are in some respects ahead of many developed countries. The new regulations have been drafted in line with the international Codex Alimentarius, and are about to go to print for comments. The article highlights the fact that the government is clamping down on the vague or sometimes even blatantly misleading labels and advertising that consumers have been subjected to in the past.

In recent issues of our newsletter we have highlighted the fast-growing interest in and demand for HACCP (Hazard Analysis Critical Control Points) in the Food Industry, as well as our very successful venture into this field with the buy-out of the CSIR's HACCP section in April this year. In our regular feature, "In the Spotlight...", we expand on some of the vital services Swift can offer in terms of HACCP and other quality management systems.

On the subject of quality management systems, we announce an interesting addition to the services offered by our Hygiene department in our back page article.

*We would like to take this opportunity to wish all our readers a very blessed festive season. We look forward to being of continued service to you in 2005.*

## Competition

With the festive season in mind, we offer TWO lucky entrants the opportunity to win a HOLIDAY HAMPER packed with goodies to the value of R500,00 each.

To enter, answer the question below and send it to us together with your name, company name, and telephone number. As usual, you can enter via our web-site or per fax at 021 689 6363. Entries close on 02 January 2005.

### QUESTION:

Give us a suggestion of a topic you would like us to cover in our newsletter in the new year!

Congratulations to Soekie Strydom (Biodat), Christina Carelse (Ocean Prince Marine Products) and Sumaya Dawood (Rich Products), who won the Ocean Basket vouchers in our previous competition.





# Focus on...

## New Draft Foods Labelling Regulations

Guest article by **Antoinette Booysen**, Assistant Director, Regulatory Nutrition, at the Directorate Food Control of the Department of Health.

The new Food Labelling Regulations, which are replacing the R2034 of 29 October 1993 are about to go to print for the second time for comments. Whilst the detail has changed in many regulations, the intentions of the legislator and the new principles which have been embodied in these regulations, have remained the same. The regulations are, in many respects, ahead of many developed countries. An example is the regulation on Glycaemic Index Claims, which made South Africa the first country in the world to include it in legislation. South Africa can be proud of the fact that the new Food Labelling Regulations are in line with global standards, thereby benefiting the manufacturer who wants to expand its territory abroad. The new legislation is also realistic, practical and very exciting. It enables food manufacturers to create greater awareness among consumers about the importance of good nutrition in the maintenance of good health and the prevention of chronic lifestyle-diseases.

### REGULATING "CLAIMS" MADE ON LABELS BY MANUFACTURERS

Consumers have been exposed to poor labelling practices for far too long. The message from the legislator is loud and clear: only honest, accountable and responsible **claims** will be allowed in future.

The new Regulations are all about give and take. Despite the fact that the regulations have become much stricter in certain instances, the legislator was also very generous by allowing claims now, which were not permitted before. The fact that conditions have been set for every type of claim, levels the playing field for everyone. These conditions are fair and practical and in line with global standards. In future, in South Africa, all mandatory *compositional standards* will be subjected to the conditions for *nutrient content claims*. This aspect was the source of great confusion in the past and will have to change over time to comply with these conditions. The Department of Health is overall responsible for nutritional claims and the safety of foods.

One of the most outstanding features of the new legislation is the amount of nutritional principles that are intimately interwoven into all the regulations dealing with claims. The time has arrived for manufacturers to consider appointing a registered dietician on their management team. Only persons with a thorough understanding and training in normal and therapeutic nutrition will be able to cope with the implementation of these claims. After all, food, health and nutrition are irrevocably intertwined. Manufacturers will also have to realize that marketing decisions should be subjected to the authority of scientists. Technical

staff (such as dieticians and food scientists) need to have greater input and authority, especially where health and nutritional claims are made on labels.

**SOME EXAMPLES** of changes to what may be claimed on labelling and advertising, as proposed by the second-draft regulations:

• **Letter sizes:** After being absent in the 1<sup>st</sup> draft, the table which determines how to pro rata decrease the letter size as your label size decreases, makes a welcome return in this 2<sup>nd</sup> draft. The minimum allowed letter size has also been changed to 1 mm.

• **"Serving" versus "daily serving":** Serving sizes will now be stipulated by government as a separate annexure to prevent manufacturers from manipulating serving sizes to create a false impression.

• **Fibre & carbohydrates:** This was expected to be finalised during the November 2004 meeting of the Codex nutrition committee, but no further information had been received at the time of going to print.

• **"Added water":** It will now be specified under which circumstances, and at which levels, the addition of water to a product has to be declared on the label. In the past this regulation only specified that more than 5% added water had to be declared.

• **Date marking:**  
➤ The type of product will determine whether to use the **"best before"** or **"use by"** method of marking. The "use by" method of marking places the toughest restriction on the manufacturer, as it implies that after expiry of this date, the product is not fit for human consumption any more. The "best before" date is more of a guideline for consumers, and it does not necessarily imply that the product cannot be consumed any more (it is left to the discretion of the consumer).

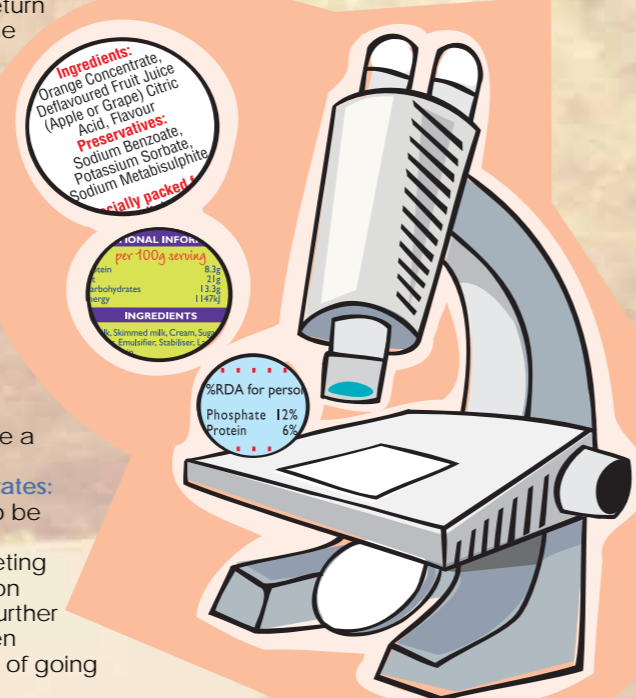
➤ Only the manufacturer may put a date marking on a product, and once it is on, it **may not be altered**.

➤ To avoid confusion, the month should be written in letters on the date marking.

➤ Imported foodstuffs on which the marking has expired will no longer be allowed into S.A.

### QUANTITATIVE INGREDIENT DECLARATIONS (QUIDS)

• This requires the percentage of the actual ingredient that you emphasize on your product label, to be specified (eg in the case of olive oil margarine, where the product is placing the emphasis on the fact that it is *olive oil* margarine to entice consumers to buy it rather than another margarine, the percentage of actual olive oil in the product must be clearly displayed on the label).



QUIDS should not be confused with nutritional labelling and does not replace it.

• This regulation also states that no ingredient can be emphasized in this way if the ingoing % is less than 2% in weight, except if it used for the sole purpose of flavouring (eg garlic in garlic bread).

• The regulation also lists certain instances where QUIDs are *not required*.

### POTENTIAL ALLERGENS

• A list of potential allergens is published in the regulations. An interesting development is that the often misleading term "may contain traces of..." may now only be used by manufacturers who can prove due diligence in their manufacturing processes (eg compliance to Good Manufacturing Practices (GMP) or HACCP, routine testing of products, etc). In cases where manufacturers cannot prove due diligence, the words "unavoidably contaminated with (name of allergen)" must be used.

• The claim for "hypo-allergenic/non-allergenic" is also addressed for the first time with a very specific definition for it's use.

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### REGULATING THE LABORATORY TESTS FROM WHICH CALCULATIONS FOR USE ON LABELS ARE MADE

Another major challenge for the manufacturer in future will be to apply the (statistically) correct sampling procedures before delivering the correct number of samples to the laboratory for analysis. Legislators will in future also **not accept** nutritional information on a label which was based on:

- Calculations from a recipe, or from
- Results obtained from a laboratory which does *not* have accreditation (for each and every method used for the calculations) by the South African National Accreditation System (SANAS) or another internationally reputable accreditation body.

In cases where a health or nutritional claim is made, it will be an offence if a manufacturer cannot produce the appropriate laboratory analysis reports

within 24 hours upon request by the relevant Authorities.

Exciting new developments are in the pipeline to upgrade competitive laboratory services for nutritional analysis testing that will have the necessary accreditation from SANAS for the methods used. Affordable, reputable laboratory services is something South Africa needs badly and the expectation is that these services will be ready by the time the new regulations are published finally.

**Shabby, incorrect and misleading labelling will from now on be something of the past. Implementation of and compliance to these new labelling regulations may be one of the most challenging aspects the food industry will have to deal with in the next few years. Intense training programs for manufacturers, law enforcers and professionals are about to begin as soon as the new draft regulations are published finally.**

### MORE ABOUT OUR GUEST WRITER:

Mrs Antoinette Booysen qualified as a dietician at the University of Pretoria, and currently holds the position of Assistant Director, Regulatory Nutrition, at the Directorate Food Control of the Department of Health.

Antoinette has since 1995 represented South Africa at the international Codex Alimentarius Committees for Food Labelling (Canada Committee) as well as the Committee for Nutrition and Foods For Special Dietary Uses (Germany).

She is responsible for the compilation of several sets of draft and final Regulations under the Foodstuffs, Cosmetics and Disinfectants Act (Act 54 of 1972), namely:

- Foods for special medical purposes;
  - Food labelling;
  - Food fortification;
  - and • Nutritional supplements
- Assisted with the compilation of the Regulations for Foodstuffs for Infants and Young Children.



# In the Spotlight...

## What Swift's "HACCP department" can offer you in addition to training!

By now Swift's broad spectrum of training courses, which can be further customized to suit each customer's individual needs, is well known in the industry. These very popular training courses, which cover various Quality Management Systems (QMS) including HACCP, GMP, Hygiene and SQA, are offered both in-house and at our training centres in Cape Town and Gauteng. Training is, however, only part of the service provided by our Quality Management Systems Department.

In this article we place the spotlight on the lesser-known, but equally important consultancy services provided by our Technical Specialists. These include:

- Pre-assessments
- Implementation support
- Verification audits

**1. PRE-ASSESSMENT:** For any client considering the implementation of a Hazard Analysis Critical Control Point (HACCP) system, this is the crucial first step. This assessment will answer the questions: "Where are we presently in terms of HACCP?" and "What needs to be done in order for us to comply with HACCP?" A pre-assessment is performed on existing policies and procedures within the company to evaluate the status of the existing quality management system, taking into account Prerequisite Programs (PRP's) needed before HACCP can be implemented, as well as the goal of implementing a full HACCP system.

The assessment is based on national and international legislation applicable to the specific industry. A detailed report with findings and recommendations is submitted after completion of the assessment.

**2. IMPLEMENTATION SUPPORT:** During this stage, Swift's technical specialists assist the client with the practicalities of implementing a workable HACCP system. This starts with the appointment of a HACCP implementation team comprising of the client's own staff. An action plan is compiled which divides the HACCP implementation stages into different tasks which are assigned to team members with specific milestone dates.

Assistance is provided throughout the process by Swift, in the form of regular progress meetings. During these meetings the existing quality systems, procedures and documentation of the company are moulded into a working HACCP and Prerequisite document. Information for the development of work instructions, procedures or records is obtained from the relevant employees who will be using these documents. In this way, ownership is achieved and the system filters through to all levels in the company.

**3. VERIFICATION ASSESSMENT:** After maturation of the implemented system, a verification assessment can be conducted to establish the efficacy and workability of the implemented system.

The assessment measures whether the company is ready for a HACCP certification audit by an accredited third party. A report with findings and recommendations is issued, highlighting which areas have not been addressed or need more detail - thus providing the final preparation steps needed before the audit.

For further information on the above-mentioned services, as well as our training courses, contact Yvonne Wood at our Cape Town office or via e-mail at: [yvonne@swift.co.za](mailto:yvonne@swift.co.za)

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