This document introduces the theme of food safety to the Participants of Expo Milano 2015 and is preparatory to the publication of the Operating Manual «Food Safety & Consumer Protection Guidelines EXPO Milano 2015», prepared in accordance with the principles of Codex Alimentarius FAO-WHO, in respect of Italian law in force and European legislation.
The purpose of this document is to facilitate Participants in the application of good hygiene practices and procedures in the responsible conduct of food processing (preparation, storage, sales, service) within its exhibition space whilst respecting Italian regulatory and European legislation.

The shared objective between the Organizer and Participants is to organize a sustainable and highly visible event, protecting the image of each party and providing consumers with healthy and quality food.
MAIN LEGISLATIVE REFERENCES OF THE HYGIENE PACKAGE

- **REGULATION (EC) no. 178/2002** 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.
- **REGULATION (EC) no. 852/2004** on the hygiene of food products.
- **REGULATION (EC) no. 853/2004** laying down specific hygiene rules for food of animal origin.
- **REGULATION (EC) no. 2073/2005** on microbiological criteria for food products.
- **LEGISLATIVE DECREE no. 190/2006** rules on penalties applicable to infringements of the Regulation (EC) no. 178/2002.
- **LEGISLATIVE DECREE no. 193/2007** implementing Directive 2004/41/EC relating to food safety inspections and enforcement of EU regulations in the same field.
- **REGULATION (EU) no. 16/2011** laying down provisions for the application of the Rapid Alert System for Food and Feed (RASFF).
- **REGULATION (EU) no. 1169/2011** on the provision of food information to consumers.
- **REGULATION (EC) no. 1935/2004** on materials and articles intended to come into contact with food and repealing directives 80/590/EEC and 89/109/EEC.
- **REGULATION (EU) no. 10/2011** Materials and plastics intended to come into contact with food products.
- **REGULATION (EC) no. 2023/2006** Good manufacturing practice for materials and items intended to come into contact with food.
• **Audit**: documentation and operational activities carried out by specialists in order to verify the correct implementation of the Self-Monitoring Plan and enable effective management of Nonconformities.

• **Corrective Action (CA)**: action aimed at eliminating or reducing the causes of existing Nonconformities and preventing their recurrence.

• **Cross-contamination**: direct or indirect passage of pathogenic or spoilage micro-organisms from surfaces or food contaminated to other foods.

• **Managing Nonconformities**: documentary and operational action to be taken in respect of a Nonconforming situation (process, product, organization) in order to resolve the Nonconformity occurred.

• **Hazard Analysis and Critical Control Points (HACCP)** system internationally recommended to identify hazards, assess risks and their severity and plan actions for the safety of food in the various phases of the production process.

• **Food hygiene**: all the measures necessary to ensure the safety of food during the manufacturing process and/or the food chain.

• **Food Business (FB)**: any public or private entity, whether or not for profit, engaged in any of the activities related to any phase of production, processing and distribution of food, or the Participant.

• **Nonconformities (NC)**: failure to meet a specific requirement required by applicable law or deviation to the reference specifications.

• **Food Business Operator (FBO)**: natural or legal person responsible for ensuring compliance with the provisions of the law, within the Food Business under their control, or the Commissioner-General of the Participant.

• **Self-Monitoring Plan (HACCP Plan)**: document and operational plan based on the HACCP System, which describes the procedures and actions to ensure the safety of food, the hygiene of the workplace and equipment, the suitability of the processes of production, storage, sale and service of food.

• **Head of Food Safety (HFS)**: the person responsible for the implementation of the Self-Monitoring Plan, which is the
Coordinator of the food safety of the Participant.

- **Traceability**: ability to track any food, feed, food-producing animal or substance that will be used for consumption, through all stages of production, processing and distribution.
FOOD SAFETY KEY PLAYERS

The following are the main roles which coordinate the Participants and the key elements for the understanding and practical implementation of food safety management within the exhibition space.

**Food Business Operator (FBO)**
While the Commissioner-General of Section/Director of the Unofficial Participant is the solely responsible for the participation of the Country or the Unofficial Participant in Expo Milano 2015, he/she may delegate - in compliance with the Italian legal system in force - other persons the conduct of commercial activities within the allocated exhibition space. The physical or legal person responsible for the service or sale of food products within the Pavilion is referred to as “Food Business Operator” (FBO).

**Head of Food Safety (HFS)**
The Head of Food Safety (HFS) is the physical person delegated directly by the Food Business Operator (FBO), responsible for the preparation, documentation and operational implementation of the Self-Monitoring Plan (also referred to as HACCP Plan).

The Food Business Operator can choose the Head of Food Safety among staff members who possess the appropriate expertise and experience in the field and is responsible for the management, sale and service of food within the allocated exhibition space (ex: food & beverage manager, restaurant manager).

*By way of example an appointment facsimile is included under Annex A.*
Food safety and the protection of consumers’ health is a complex and articulated issue that in Italy falls within the competence of various Authorities and Central Government and Regional Authorities.

In order to perform effective and targeted controls on food products and production processes active within the EXPO Milano 2015 Exhibition Site, the «Regional table for the coordination of food safety and veterinary public health» was established with the participation of the following Italian authorities: Ministry of Health, Ministry of Agriculture, Food and Forestry, Lombardy Region Health, Local Health, NAS (department of Carabinieri responsible for controls of foodstuff, drinks, medicine, etc.), State Police, Customs Agency.
During the entire period of the event, the Organizer will establish a team of qualified professionals in the food industry with the task of monitoring through sample internal auditing, that the hygiene and sanitation profile and food handling of the food companies present in the Pavilions are in accordance with the provisions of the “Food Safety & Consumer Protection Guidelines EXPO Milano 2015”.
REQUIRED DOCUMENTATION

After having prepared the Self-Monitoring Plan on food safety, each Participant shall prepare and submit the following documents by February 2015 to Expo 2015:

- the Self-Monitoring Plan and provide it for inspection by the competent Health Authority during the six months of the Expo;
- the detailed design for the gourmet-dining offering with a list of the raw materials used in food processing.
SELF-MONITORING PLAN

The Self-Monitoring Plan is prepared by the Participant in accordance with the principles of the HACCP System and describes all the preventive and corrective actions adopted in the production processes to ensure food safety and protect of consumers’ health, whilst respecting Italian and European regulations in force.

It shall be kept at the disposal of the competent Health Authority and internal control organs of EXPO Milano 2015.

The Self-Monitoring Plan correctly applied within the commercial spaces used for food activity, is able to defend the Commissioner-General (the Food Business Operator) and the Participant (Food Business) and to protect the health of consumers; it shall therefore be available for inspection by the competent Health Authority in the six months of the Expo.

The Self-Monitoring Plan, based on the principles of the HACCP System shall be divided into the following sections related to the specific type of activity carried out in the dedicated areas of the Pavilion:

1. Layout of food areas and indication of hygienic flows
2. Operational organization chart of food activities
3. HACCP training certificate of Food Business Operators
4. Flow chart of the production process
5. Prevention plan and fight against Infestants
6. Environmental sanitation plan
7. Technical maintenance plan of equipment and furnishings
8. Waste handling and management
9. Managing operational Nonconformities
10. Traceability in the agribusiness supply chain (Reg. EC 178/02)
11. Managing health alerts

1. Layout of food areas and indication of hygienic flows
The layout of a food area defines a functional system where the processing phases follow each other without any overlap while respecting the principle of the “forward march” that guarantees adequate sanitary conditions in order to avoid possible “dirty-clean” cross-contamination. This guarantee is provided during approval of the final design of the layout of the Participant by the competent Local Health Authority (ASL).
2. Operational organization chart of food activities

Every Food Business is made up of various professionals specialized in different activities, which must be coordinated with one another to ensure efficiency. The organization chart is the main tool by which all food companies formalize responsibilities, reporting relationships between human resources (who is superordinate or subordinate) and related tasks.

Basically the organization chart shall be included in the Self-Monitoring Manual and shall outline “who does what” (the name of the Head of Food Safety, the name of the heads and Operators depending on the task).

By way of example, the following is a facsimile of operational organization chart of food activity:

3. HACCP Training Certificate of Food Business Operators

The staff responsible for food handling shall be trained with respect to the type of work done. Thus, all Food Business Operators shall have the training certificate in hygiene and food safety at the workplace.

For those without, Expo Milano 2015 will organize training sessions in Food Safety in February 2015. The relevant training certificate will be issued in accordance with applicable laws.

4. Flow-chart of the production system

The Self-Monitoring Plan shall outline the production phases planned for food catering, sales or service at Expo 2015.

Therefore, according to the commercial offer (sales/service) each Participant shall present the main types of food handled and the relative production phases.
5. Prevention plan and fight against infestants
In order to prevent the proliferation of unwanted animals (winged and crawling insects, parasites, rodents) in the storage, processing and sale areas, the Organizer requires each Participant that provides food sales/service to implement planned environmental hygiene treatment through specialized external technicians.
Therefore, the Self-Monitoring Plan shall specify the company responsible for the pest control service chosen with the related monitoring/intervention plan. For each monitoring/pest control activity the company in charge of the service shall issue an intervention report stating all operations performed.

6. Environmental sanitation plan
Sanitation involves all physical and chemical treatments that are carried out so that a surface is sanitized (free of visible dirt and residues of substances used in cleaning and sanitation). The purpose of sanitation is to destroy all pathogenic bacteria that may be present and to minimize generic bacterial contamination.
The personnel carrying out sanitation activities shall be provided with “sanitation plan” which indicates for each area of intervention, the type of action to be implemented, the frequency, the products to be used and the application procedures.  

By way of example, the following is a facsimile of environmental sanitation plan

<table>
<thead>
<tr>
<th>POINT OF INTERVENTION</th>
<th>TYPE OF INTERVENTION</th>
<th>FREQUENCY OF INTERVENTION</th>
<th>CHEMICAL PRODUCTS USED</th>
<th>METHOD OF APPLICATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>FOOD CONTACT SURFACES (ex. work stations, cutting boards, knives, accessories, containers)</td>
<td>CLEANING DISINFECTION</td>
<td>AFTER EACH USE</td>
<td>SEE CARDS TECHNICAL SAFETY</td>
<td>MANUAL FOR CONTACT</td>
</tr>
<tr>
<td>EQUIPMENT FOR COOKING/RECOVERY (ex. hot plates, ovens, fry top)</td>
<td>CLEANING ALKALINE DESCALING (residues of carbon)</td>
<td>AFTER EACH USE</td>
<td>SEE CARDS TECHNICAL SAFETY</td>
<td>MANUAL FOR CONTACT</td>
</tr>
<tr>
<td>WASHING EQUIPMENT (ex.: dishwasher, glass-washers)</td>
<td>CLEANING ACID DESCALING (LIMESTONE)</td>
<td>AFTER EACH USE</td>
<td>SEE CARDS TECHNICAL SAFETY</td>
<td>MANUAL FOR CONTACT OR FOR IMMERSION</td>
</tr>
<tr>
<td>ATTREZZATURE DI CONSERVAZIONE (es: frigoriferi, banchi, saladette)</td>
<td>CLEANING DISINFECTION</td>
<td>WEEKLY</td>
<td>SEE CARDS TECHNICAL SAFETY</td>
<td>MANUAL FOR CONTACT</td>
</tr>
<tr>
<td>SCAFFALI E RIPANI (es: mensole, armadietti)</td>
<td>CLEANING</td>
<td>WEEKLY</td>
<td>SEE CARDS TECHNICAL SAFETY</td>
<td>MANUAL FOR CONTACT</td>
</tr>
<tr>
<td>MATERIALI E SUPERFICI LAVABILI (es. pavimenti, rivestimenti, bidoni rifiuti, cestini)</td>
<td>CLEANING DISINFECTION</td>
<td>AFTER EACH USE</td>
<td>SEE CARDS TECHNICAL SAFETY</td>
<td>MANUAL FOR CONTACT MECHANICS</td>
</tr>
<tr>
<td>FINestre, suppellettili e corpi illuminanti (es: vetrate, infissi, lampade, plafoni)</td>
<td>DUSTING CLEANING</td>
<td>MONTHLY</td>
<td>SEE CARDS TECHNICAL SAFETY</td>
<td>MANUAL FOR CONTACT</td>
</tr>
</tbody>
</table>

7. Technical maintenance plan for systems and equipment

Every Food Business is required to prepare a plan for routine maintenance of systems and equipment. In view of the short duration of the EXPO Milano 2015 event (184 days) it may be sufficient to provide in the commercial spaces concerned of all user and maintenance manuals of each equipment/machinery used (including maintenance/replacement of filters in the presence of water dispenser), pursuant to Legislative Decree 81/08 on the protection of health and safety in the workplace.
8. Waste handling and management
During the production and service of foods, all Participants are required to correctly separate waste by using a sufficient number of bins, correctly identified by category of waste (ex: organic, paper and cardboard, plastic and aluminum, glass, undifferentiated) and fitted with pedal opening. EXPO Milano 2015, via a dedicated partner, will collect the waste during night-time hours outside the Pavilions, with the methods and timing of service that will be communicated to the Participants.

9. Managing Nonconformities
A “Nonconformity” is the failure to meet certain process/product requirements, with respect to the provisions outlined in the Self-Monitoring Plan. In the event that Nonconformities are identified in the various process or product phases, all corrective actions applied shall be recorded on special forms.

Facsimile of Nonconformity registration form

<table>
<thead>
<tr>
<th>DATE</th>
<th>WHAT WAS THE PROBLEM?</th>
<th>HOW AND WHEN WAS IT SOLVED?</th>
<th>SIGNATURE</th>
</tr>
</thead>
<tbody>
<tr>
<td>DD/MM/YYYY</td>
<td>ARRIVAL OF THE “TURKEY BREAST” MEAT SUPPLIER LOT 1234 HAS DAMAGED PACKAGING</td>
<td>PRODUCT DISPOSAL OR DIRECT COLLECTION BY SUPPLIER</td>
<td></td>
</tr>
</tbody>
</table>

10. Traceability in the agribusiness supply chain (Reg. EC 178/02)
Traceability refers to the operating document process that follows the product “from downstream to upstream” in the supply chain and is able to recall the information and activities recorded and to use them in the event of a health alert.
For each link in the production chain, Traceability allows identifying the manufacturer and distributor as well as the supplier and recipient. Traceability therefore ensures speed and effectiveness of the intervention of the competent Authority in case of risk to health; in order to block any health alert access to documents shall always be guaranteed to the Authority. Therefore, all Food Business Operators within the Exhibition Site shall know what and from whom they purchased, keep the label and original documents of the food and non-food products for the entire duration of the event.

11. Managing food alerts
The following are the most common situations that may occur:
- diseases and/or illnesses suffered by a consumer following the consumption of food at the Food Business;
- receipt of notice from a supplier in relation to non-conformity of raw material provided;
• receipt of notice from external sources (for example, through the mass media) for anomalies of raw materials normally used at the Food Business;
• detection by internal Operators of the Food Business during use and/or production, of anomalies in a food product;
• detection of anomalies at the Food Business during the course of monitoring and self-monitoring operations;
• other anomalies identified in food products passing through the Food Business.

The task of the Health Authority (departments of medical and veterinary prevention of ASL in Lombardy) is to verify that these actions are carried out properly and efficiently, ensuring the rapid exchange of information with the other components of the network: ASL Lombardy, Regions and the Ministry of Health.
INSTITUTIONAL CONTACTS

For information write to: fb_safety@expo2015.org
Dear Mr. Name and Surname
Qualification
c/o (Indicate Place of Work)

Subject: appointment of Head of Food Safety pursuant to Reg. EC 852/04, Reg. EC 853/04 and Reg. EC 178/02

The Undersigned ...................................., as employer/legal representative of the Company .........................................................., with registered office in ............................................ following discussions and expressly considering the fact that you fulfil the requirements of expertise and experience required by law and in relation to the type of activity of our Company.

THE APPOINTMENT, WITH EFFECT FROM .........................

HEAD FOR FOOD SAFETY

In order to ensure the correct application of the procedures described in the Self-Monitoring Plan pursuant to Reg. EC 852/04 and Reg. EC 853/04, with the aim of ensuring food hygiene safety and consumers’ health protection.

In particular, the following functions in the company production process shall be performed:

1. Comply with and enforce hygiene-sanitation standards at all stages of processing, storage, provision, sales by applying the HACCP system principles;
2. Apply and enforce the procedures based on the HACCP system principles.
3. Verify and store specific documents and records for each production phase.
4. Ensure the supply of raw materials from qualified suppliers;
5. Ensure food traceability and accurate information to consumers;
6. Cooperate with the competent Authority during inspections.

Place, ....................

SIGNATURE OF OWNER

____________________________________

SIGNATURE OF RSA

____________________________________