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GOOD MANUFACTURING PRACTICE IN AGRICULTURAL RETAIL®

Dobra praktyka produkcyjna w rolniczym handlu detalicznym®

Food, regardless of the entity that produces it, must be safe for the health of the consumer. Good Manufacturing Practice is a system based on production and control procedures, the aim of which is to ensure quality, which guarantees that the food meets specific as well as quality assurance, which guarantees that the manufactured products meet specific quality requirements. This activity aims to ensure the repeatability and homogeneity of products by closely supervising the production process, from the stage of sourcing raw materials, through their storage, production, packaging and labelling, to the stage of storing and distributing finished products. Ensuring safe food must be achieved through the joint efforts of all participants in the food chain. Farmers engaged in agricultural retail trade are also obliged to use methods and systems that guarantee the production of safe food that meets the safety levels set out in food law.

Key words: agricultural retail trade, food production, good manufacturing practice.

INTRODUCTION

By laying down orders and prohibitions of behaviour, the legislator decides which goods are to be protected and to what extent. In the Community food law, the following goods are considered to be protected: human life and health, consumers' economic interest, fairness of commercial transactions, animal health and living conditions and plant health. The goods protected by law are of a diverse nature and value and therefore form a hierarchy. The protection or enjoyment of one good may adversely affect another good, which may cause conflicts, so both the goods and the hierarchy between them are protected [10]. The duty of the state is to protect the goods and to mitigate conflicts arising from the enjoyment of these different goods. The state is to prevent threats to the life and health of citizens, protect them from unfair practices and is obliged to guarantee security and order to its citizens. This duty of the state is particularly important in relation to the production and marketing of food. State protection is manifested in appropriate legal regulations, which regulate the necessary requirements for the production and marketing of

Żywność bez względu na podmiot, który ją produkuje musi być bezpieczna dla zdrowia konsumenta. Dobra Praktyka Produkcyjna jest systemem opartym na procedurach produkcyjnych, kontrolnych, których celem jest zapewnienie jakości, która gwarantuje, że żywność oraz wytworzone produkty spełniają określone wymagania jakościowe. Działanie to ma na celu zapewnienie powtarzalności oraz jednorodności wyrobów poprzez ścisły nadzór nad procesem produkcji, od etapu zaopatrzenia w surowce, poprzez ich magazynowanie, produkcję, pakowanie oraz znakowanie, aż do momentu składowania i dystrybucji gotowych wyrobów. Zapewnienie bezpiecznej żywności musi być osiągnięte wspólnym wysiłkiem wszystkich uczestników łańcucha żywnościowego. Rolnicy prowadzący handel detaliczny także zobowiązani są do zastosowania metod i systemów gwarantujących produkcję żywności bezpiecznej zdrowotnie, która spełnia poziomy bezpieczeństwa określone przepisami prawa żywnościowego.

Słowa kluczowe: rolniczy handel detaliczny, produkcja żywności, dobra praktyka produkcyjna.

food. Food producers are obliged to respect the requirements set out in the legislation in order to produce safe food that meets consumers' expectations regarding its quality[5].

This article presents the Good Manufacturing Practice as a safety management system in food production in the framework of agricultural retail trade.

GOOD MANUFACTURING PRACTICES

EU food law refers to the FAO/WHO Codex Alimentarius -Codex Alimentarius, which was developed by the Codex Alimentarius Commission, set up by the Food and Agriculture Organization of the United Nations (FAO) and the World Health Organization (WHO) Fundamental to food law is Regulation (EC) No 178 of the European Parliament and of the Council of 28 January 2002 [7]: "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". This regulation imposed an obligation on Member States to implement a system for traceability of food and its ingredients. In Article 3(15) of that Regulation, traceability

was defined as the ability to trace and follow food, feed, food-producing animals or substances intended to be, or expected to be, incorporated into food or feed, through all stages of production, processing and distribution. However, in order to ensure food safety, it was necessary to consider all aspects of the food chain, i.e. “from farm to fork”. This concept was introduced in 1970 and is to be extended under the European New Green Deal [1]. The food chain is defined as a sequence of stages and processes taking place in production, i.e. starting from primary production, through processing, transport, distribution, storage and handling of food and its ingredients, and ending with consumption. Such an approach results in the fact that at each stage of production until consumption, specific product safety and quality management systems must be fulfilled. In the food chain, it is important to analyse and manage risk factors at all stages of the chain and ensure a higher level of safety [2].

Good Manufacturing Practice is the actions that must be taken and the conditions that must be met in order for the production of food and food contact materials and articles to be carried out in a manner that ensures the appropriate health quality for the intended use. Good Manufacturing Practice refers to the basic areas of food production activities that must be maintained to a certain level in order to produce food of adequate health quality. In the USA, the principles of Good Manufacturing Practice were first developed and adopted as mandatory in 1973 [11].

The application of Good Manufacturing Practice standards in food production guarantees consumers a higher level of comfort and confidence in the quality of the manufactured product. The principle of Good Manufacturing Practice is to exclude any accidental activities from the production process and to ensure that the process is carried out in accordance with the requirements found in, among others, instructions and procedures. Good Manufacturing Practice requires that every element of food production is defined and that all inputs are provided in the right quantity, at the right place and at the right time and are used for their intended purpose [4]. This means the development of written procedures and instructions for the entire production process, as well as requirements for the basis of the production process, i.e. personnel, training, sourcing of raw materials, buildings and the production environment, machinery and equipment, storage, transport, distribution, cleaning and disinfection, and pest control. These records should be included in the Production Books. It is commonly believed that what is not written has never been done, and what is not written does not exist. Maintaining Production Log Books makes it possible to properly control the technical and sanitary system of premises, as well as production and control equipment, it is possible to continuously analyse technological parameters, environmental conditions, which may contribute to the reconstruction of the entire production process. It is also important that the book enables identification of persons responsible for execution, supervision and control of individual stages of production [12].

Good Manufacturing Practice requires that all activities both in the production and marketing of foodstuffs be carried out under conditions that ensure foodstuffs of proper health quality. Therefore, it is so important to comply with the principles related to the basic factors of maintaining hygienic

conditions of the environment, ensuring adequate space for the arrangement of production and storage equipment and appropriate ventilation. It is equally important to ensure appropriate conditions for storing equipment, food products and chemical substances, to maintain machinery and equipment in a proper technical condition, proper lighting, maintenance of cleaning and disinfection procedures, ensuring proper water and sewage management. It is very important for employees to follow hygiene rules [3].

AGRICULTURAL RETAIL TRADE

Agricultural retail trade was introduced into the Polish legal order by the Act of 16 November 2016 on amending certain acts to facilitate food sales by farmers and the Regulation of the Minister of Agriculture and Rural Development of 16 December 2016 on the maximum quantity of food sold within the framework of agricultural retail trade and the scope and manner of its documentation. From 1 January 2019, the provisions of the Act of 9 November 2018 on amending certain laws to facilitate the sale of food by farmers to shops and restaurants which contains further legislative solutions to facilitate food production and its marketing by entities operating in the so-called “short supply chains”, including agricultural retail trade, also apply to agricultural retail trade. Within the framework of such trade, it is possible, inter alia, to process and sell produced food to final consumers to establishments conducting retail trade intended for final consumers, including shops, restaurants, canteens and other establishments with similar characteristics, located in a limited area. This area includes the province in which the production of food in the framework of agricultural retail trade takes place, as well as counties or towns which are the seat of the provincial governor or provincial assembly, adjacent to this province. The condition is that such food must come wholly or partially from own cultivation, breeding or rearing, and the sale is conducted in compliance with the limits specified in the above-mentioned regulation on the maximum quantity of food sold within the framework of agricultural retail trade and the scope and manner of its documentation, as well as the limit of revenue from such sales to the amount of PLN 40,000, if the manufacturer wishes to benefit from tax preferences. Agricultural retail trade is retail trade within the meaning of Article 3(7) of Regulation 178/2002, consisting in the sale to the final consumer referred to in Article 3(18) of that Regulation or (from 1 January 2019) to retail establishments for the final consumer of food coming “in whole or in part from the food business operator’s own cultivation, rearing or breeding.”

Retail trade is defined in the literature, inter alia, as the uninterrupted and simultaneous making available in small quantities to a large number of purchasers at a convenient selection, quantity, place and time of goods from a wide variety of sources.

As stated in Article 3(7) of Regulation 178/2002, retail trade means the handling or processing of food and its storage at the point of sale or delivery to the final consumer. The term includes distribution terminals, catering operations, factory canteens, institutional catering, restaurants and similar food service operations, shops, supermarket distribution centres and wholesale outlets.

In accordance with Article 44a(1) of the Act of 25 August 2006 on the safety of food and nutrition, the production and sale of food within the framework of agricultural retail trade may be carried out in quantities adapted to consumer needs, and may not pose a threat to food safety or adversely affect the protection of public health and is subject to supervision by the authorities of the State Sanitary Inspectorate or Veterinary Inspectorate respectively [13].

It is permitted to sell foodstuffs (within certain limits) raw materials of non-animal origin, food of non-animal origin other than raw materials and food containing at the same time foodstuffs of non-animal origin and products of animal origin, raw materials of animal origin, products of animal origin other than raw materials [9]. Disposal of food within the framework of agricultural retail trade: to establishments conducting retail trade for the final consumer takes place if these establishments are located on the territory of the province in which production of such food within the framework of agricultural retail trade takes place, or on the territory of districts or towns constituting the seat of the voivode or voivodship assembly, adjacent to this province; is documented in a manner enabling determination of the quantity of food sold; may not be performed with the participation of an intermediary, with the exception of the sale of such food during exhibitions, festivals, fairs or fairs organized for the purpose of food promotion, if the intermediary sells food produced by that intermediary in the course of agricultural retail trade or produced by another operator of agricultural retail trade in the county in which that intermediary produces food in the course of agricultural retail trade or in a county adjacent to that county [14].

In order to register agricultural retail trade in products of animal origin, an application for entry of an establishment in the register of establishments must be submitted in writing to the relevant district veterinarian at least 30 days before the date of commencement of the planned activity. In the case of agricultural retail trade in products of plant origin, an application for entry of an establishment in the register of establishments subject to official control by the authorities of the State Sanitary Inspectorate must be submitted to the competent district sanitary inspector within 14 days before the commencement of the activity. The specimen of the application for registration of agricultural retail trade in products of plant origin, to be submitted to the competent district or border sanitary and epidemiological station, is specified in Appendix No. 2 of the Ordinance of the Minister of Health of 29 May 2007 on specimens of documents concerning registration and approval of establishments producing or marketing food subject to official control of the State Sanitary Inspection.

The place of sale of food to the final consumer by the operator of agricultural retail trade, including through a broker, shall bear, in a manner which is clearly visible to the consumer, the words 'agricultural retail trade', indicating the name and address of the operator of agricultural retail trade, the place of production of the food, and the agricultural retail operator's veterinary approval number, if any [6].

An operator producing food within the framework of agricultural retail trade is obliged to keep records concerning the principles of good manufacturing practice, and in particular procedures for cleaning and disinfection, protection against pests, waste disposal, supervision of employee hygiene,

procedures for handling raw materials, semi-finished products, finished products, food additives used, packaging, marking of finished products, transport. This documentation should be proportionate to the nature and volume of production. The area of production rooms and their equipment should be adapted to the type and size of production, and activities must be carried out in a hygienic manner, according to established procedures in order to minimise the risk of contamination of raw materials and manufactured products.

It is worth noting that an operator in the agricultural retail trade is obliged to have the results of tests carried out on the finished product as part of owner supervision. The lack of appropriate documents violates the provisions of Commission Regulation (EU) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs, which stipulates that food business operators are required to ensure that foodstuffs comply with relevant microbiological criteria, and their owners are obliged to conduct tests to confirm compliance with microbiological criteria throughout the shelf-life period [8].

An agricultural retail trader shall keep and maintain records enabling the quantity of food disposed of annually in the course of such trade to be determined for each calendar year, showing the number of the successive entry; the date of disposal of the food and the quantity and type of food disposed of. An agricultural retail broker disposing of food produced by another trader at an exhibition, fair, market or fairs shall keep records enabling the quantity of food so disposed of to be determined separately for each trader and shall forward those records to the trader whose food he disposed of immediately after the exhibition, fair, market or fairs have ended. Such documentation shall include the number of the successive entry, the date of disposal of the food and the quantity and type of food disposed of, the place of disposal of the food and the name, surname and address or the name, registered office and address of the broker who disposed of the food at the exhibition, fair, market or bazaar. Such records are kept for 2 years, counting from the end of the calendar year for which they were drawn up.

SUMMARY

In food production, it is essential to implement and develop food safety management systems, the primary objective of which is to ensure the safety of the health and life of the consumer. At all stages of the food chain, it is important to eliminate hazards. The system of good manufacturing practice is widespread. It ensures that the production process is manufactured and controlled in accordance with the requirements contained in their specifications and documents. The system covers all aspects of production from the main assumptions concerning the facility (construction, technical and technological), through the requirements for raw materials, machinery, personnel, to the production process itself (procedures and methods), and then to the storage and distribution of the manufactured product. Good Manufacturing Practice is aimed primarily at ensuring the repeatability and quality of the product with regard to its safety, purity and effectiveness, preventing the mixing of intermediate products, products and materials, thereby preventing contamination of one product or raw material with another.

Obtaining an appropriate level of product quality is also becoming extremely important for agricultural retailers, not only because of the legislation in force, but also because of increased competitiveness. Guaranteed and good quality of products and services becomes the basis for their development.

PODSUMOWANIE

W produkcji żywności istotne jest wdrażanie i rozwijanie systemów zarządzania bezpieczeństwem żywności, których nadrzędnym celem jest zapewnienie bezpieczeństwa zdrowia i życia konsumenta. Na wszystkich etapach łańcucha żywnościowego, istotne jest eliminowanie zagrożeń. System dobrej praktyki produkcyjnej jest rozpowszechniony. Gwarantuje wytwarzanie i kontrolowanie procesu produkcji zgodnie z wymaganiami zawartymi w ich specyfikacjach oraz dokumentach. System ten obejmuje wszystkie aspekty produkcji począwszy od głównych założeń dotyczących

obiektu (budowlanych, technicznych oraz technologicznych), poprzez wymagania w stosunku do surowców, maszyn, personelu, aż do samego procesu produkcji (procedur i metod), a następnie magazynowania i dystrybucji wytwarzanego produktu. Dobra Praktyka Produkcyjna ma na celu przede wszystkim zapewnienie powtarzalności i jakości produktu z uwzględnieniem jego bezpieczeństwa, czystości i efektywności, zapobieganie pomieszeniu się półproduktów, produktów i materiałów, tym samym zapobieganie zanieczyszczeniom jednego produktu lub surowca innym.

Uzyskanie odpowiedniego poziomu jakości produktów staje się niezwykle istotne również dla podmiotów prowadzących rolniczy handel detaliczny, nie tylko z powodu obowiązujących przepisów prawnych, lecz także w związku ze wzrostem konkurencyjności. Gwarantowana oraz dobra jakość produktów i usług, staje się bowiem podstawą do ich rozwoju.

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