Proposal

Establishing of Food Safety Professional as a Regulated Profession

The Working Group Ethics in Food Safety Practices proposes that the Global Harmonization Initiative (GHI) adopts a recommendation to governments worldwide to recognize Food Safety Professional (FSPro) as a regulated profession, in production, retail, logistics or as consultant or auditor. The purpose of this proposal is to establish educational and professional requirements and responsibilities for those in positions of responsibility in the food industry, and to support ethical behaviour in food safety practices.

“Ethics” and ethical behaviour may be understood differently in different environments and as a result we decided that for present purposes it should be understood to be a “scientifically informed awareness of what food safety is (you cannot act ethically, if you do not know what you are talking about), combined with an explicitly stated commitment to always act accordingly”.

Consistent ethical behaviour needs to be organized by regulating the profession and food safety is sufficiently important and science-based to merit a regulated profession status. This will involve requirements for the education of FSPro’s, a formal responsibility to act professionally, a professional framework, and matching responsibilities for food producers.

- **Education**: In accordance with the working definition as provided above, the only people who can act ethically in food safety matters are those who have a (sufficiently) scientifically informed awareness of what food safety is, which then requires a formal education. We see a role for GHI in advocating for the requirements for standardized education, however:
  - No role is foreseen for GHI in the detailed specification and/or organization of this type of food safety training programs (we do, e.g., mention food microbiology, but GHI will not write the course material).
  - GHI will not teach these courses.
  - GHI will not certify individuals or organizations.
  - GHI will not develop an individual company’s HACCP systems or run it.
  - GHI will not be in business to be a source for any of these aspects.

- **Responsibility for the individual**: A formal obligation for a FSPro is to always act professionally, i.e., in accordance with the best available scientific standards of food safety. This may take various shapes – it could be akin to the medical oath, it may be linked to a license to practice, it may be a requirement for membership in a professional body, but it must have a legal basis.
  Furthermore, various levels of FSPro practical responsibilities may be formally linked to specified educational standards and/or experience. Paragraph 4 of the addendum summarizes some existing responsibilities and levels.

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1 Specific requirements need to be formally specified and mandated in each country, and there are existing and credible programmes and initiatives in this field (listed in Addendum, paragraph 2). Relevant content for an FSPro curriculum and some additional considerations are summarized in paragraph 3 of the addendum.
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- **Professional framework**: A professional support structure is required, much in the way things are organized in the areas of, e.g., medicine or legal services\(^2\). This may take the form of an official national FSPro organization, which maintains a register of certified FSPro, provides supporting services, and has the authority to strike somebody from the register for unprofessional and/or unethical behaviour.

- **Responsibility for producers**: A legal requirement for food producers (probably above a certain tonnage or turnover) is to have an FSPro in charge of the design and operation of their FS system\(^3\).
  - In practice, a distinction may need to be made between small and/or simple operations that only have to follow standard pre-defined technical requirements (e.g., storing foodstuffs with defined conditions and basic hygiene requirements) and those that need to develop a more complex food safety plan, involving a FSPro. This distinction could be made at a national level and/or be agreed to in international trade agreements. See also paragraph 4 of the addendum.

Additional information about the background of this proposal, existing practice around the world, available education programs and curriculum is provided in the addendum.

*Peter Overbosch, on behalf of the GHI Working Group on Ethics in Food Safety Practices*
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\(^2\) Apart from the examples in medicine and the legal professions, regulated professions in the EU include: Accountant, architect, beautician or hairdresser, builder or plumber, electrician, osteopath, notary, veterinarian, running a campsite, equestrian centre, an art gallery, a travel agency and being an antiques dealer (France). Bicycle repairer: 3 countries in all of Europe (Germany, Liechtenstein, Belgium), and food hygienist: 0 in Europe.

\(^3\) See Paragraph (4) for an example of the positive effect of a “Certified Food Protection Manager” on the performance of food establishments.