

OVERVIEW REPORT

on the outcome of a survey in
Member States in 2025 on Food
Safety Culture official controls



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Health and Food Audits and Analysis

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OVERVIEW REPORT
ON
THE OUTCOME OF A SURVEY IN MEMBER STATES IN 2025
ON FOOD SAFETY CULTURE OFFICIAL CONTROLS

Executive summary

The report describes the outcome of a Commission project looking at Member States' approach to "food safety culture (FSC)" official controls.

In alignment with international standards, FSC requirements have been introduced in the European Union legislation in 2021. This relatively new concept taps into the importance of culture related aspects like values, mindset and behaviour in ensuring effective food safety management systems.

Some Member States have put in place initiatives to facilitate FSC implementation by the food industry. Based on outcome of official controls and to a limited extent on results of third - party audits, a small number of competent authorities have rated the implementation of the FSC requirements at establishment level. The (limited) results suggest an overall better level of implementation of the FSC requirements in large and medium sized establishments, potentially linked to third-party audits that cover FSC.

FSC official controls are in place in approximately two thirds of the Member States, at least in some of the food sectors, either targeting specifically the FSC requirements in the legislation or included in the (already existing) controls over food business operators' food safety management systems. The FSC controls take place in general as part of regular inspections and/or audits with a broader scope. A small number of competent authorities have reported having identified FSC non-compliances and having taken enforcement action related to these non-compliances.

Most Member States encounter challenges in performing FSC official controls. Beyond aspects common to other areas of controls, such as resources, the challenging aspects are mainly stemming from the relative novelty of the FSC requirements, in particular the "cultural" element and how to effectively control it in an objective way, ensuring consistency of these controls across the food industry. Faced with limited control resources and an unclear return for investing in specific FSC controls, some Member States do not perform them and are not supportive of investing further in developing specific FSC controls.

Approximately half of the Member States have made or continue to make efforts to find solutions for the identified challenges. Some of the approaches they took as well as outcomes of their work are made available for possible uptake and further development by other competent authorities.

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Abbreviations and definitions used in this report

Abbreviation	Explanation
EU	European Union
FBO(s)	Food Business Operator(s)
CA(s)	Competent authority(ies)
CCA(s)	Central competent authority(ies)
FNAO	Food of non-animal origin
FSC	Food Safety Culture
HACCP	Hazard Analysis and Critical Controls Points
ISO	International Organisation for Standardisation
MS(s)	Member State(s) of the EU

1 Introduction

Safe food is a matter of interest for all levels of society. Continuous efforts are made in national and international forums to ensure that food is safe and that the rules in place are kept aligned with the evolution of our societies and the experience gained with different food safety initiatives and research.

The latest revision of the Codex Alimentarius global standard “General Principles of Food Hygiene (CXC 1-1969)”¹, followed by the revision of the food hygiene European Union (EU) rules in 2021, tapped into the importance of culture related aspects like values, mindset and behaviour in ensuring effective food safety management systems. Thus, a new concept of “food safety culture” (FSC) was introduced together with specific provisions for FSC components: commitment of management and employees, leadership, awareness, communication and resources. The ISO 22000:2018² already placed an increased emphasis on leadership and management commitment with specific provisions for the different FSC components.

The 2020 General Principles of Food Hygiene (CXC 1-1969) considers the establishment and maintenance of FSC as fundamental to the successful functioning of any food hygiene system. In its preamble, Commission Regulation (EU) 2021/382³ mentions that “food safety culture enhances food safety by increasing the awareness and improving behaviour of employees in food establishments. Such impact on food safety has been demonstrated in several scientific publications”.

The Commission Notice on the implementation of food safety management systems (Commission Notice 2022/C 355)⁴ has been updated in 2022 to provide support for the implementation of FSC requirements and related controls in the Member States (MSs) of the EU.

Given the relative novelty of the FSC legal requirements, the adjustments needed - both at the level of food business operators (FBOs) and at the level of official controls - as well as the lack of information on implementation in the MSs, the General Directorate for Health and Food Safety carried out a desk-based project on the implementation of FSC requirements.

2 Objectives, scope and methodology

This report outlines the results of the FSC project conducted by the EU Commission’s Directorate for Health and Food Audits and Analysis in 2025. The main objective of the project was to obtain a EU wide view of the official controls over FBOs’ compliance with the FSC requirements, challenges/areas where more clarity or guidance may be required, as well as instances of “good practice” and measures aiming to address the existing challenges.

¹ <https://www.fao.org/fao-who-codexalimentarius/en/>

² ISO 22000:2018 Food safety management systems – Requirements for any organization in the food chain (<https://www.iso.org/standard/65464.html>)

³ Commission Regulation (EU) 2021/382 of 3 March 2021 amending the Annexes to Regulation (EC) No 853/2004 of the European Parliament and of the Council on the hygiene of foodstuffs as regards food allergen management, redistribution of food and food safety culture, OJ L 74, 4.3.2021, p. 3–6

⁴ Commission Notice on the implementation of food safety management systems covering Good Hygiene Practices and procedures based on the HACCP principles, including the facilitation/flexibility of the implementation in certain food businesses (2022/C 355/01), OJ C 355, 16.9.2022, p. 1–58

The scope is linked to the current EU food law, namely with the matters covered by Regulations (EU) No 852/2004⁵ and No 1771/2002. The project focuses on:

- Official controls on the requirements for FSC in FBOs of different nature and sizes and across different food sectors, including retail chains. Official controls over individual retail shops have been excluded from the scope of this questionnaire.
- Challenges on implementation of the requirements encountered by the CA and the FBOs, “good practices” and measures aiming to address the existing challenges.
- National initiatives to raise awareness on FSC.

The methodology of the project included an online questionnaire addressed to all MSs.

The questionnaire included specific questions on official controls and the implementation of FSC requirements in slaughterhouses, meat processing establishments, establishments producing dairy products, fishery products, composite products, food of non-animal origin (FNAO) as well as retail chains. FSC controls in other types of establishments have been grouped in the category “other establishments” and the CAs had the possibility to provide the relevant details, if applicable.

All MSs replied to the questionnaire. The findings and conclusions of this overview report are based on the MSs replies to the questionnaire. MSs had the opportunity to provide comments to the draft overview report and updates on national FSC initiatives in place. These comments and updates have been taken into consideration before finalising the overview report.

The report does not aim to be an exhaustive summary of the answers, rather to provide an overall picture of the state of play and to the extent possible, support for further measures.

3 Background

Legislative framework

Chapter XIa of Annex II to Regulation (EC) No 852/2004 establishes the legal obligation for FBOs to implement FSC. It also includes provisions on how to establish and maintain a FSC, by ensuring

- management and employee commitment to safe food production and distribution,
- leadership towards safe food production and engaging all employees in food safety practices,
- awareness of food safety hazards, the importance of food safety and hygiene by all employees,
- communication (including of expectations and deviations) between all employees, within and between activities,
- adequate resources for safe and hygienic food handling.

Management commitment includes clearly communicating roles and responsibilities, maintaining food hygiene system integrity during changes, ensuring timely and efficient control verification and documentary updates and providing appropriate training and supervision for personnel. It also involves ensuring regulatory compliance, encouraging

⁵ Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs, OJ L 139, 30.4.2004, p. 1–54

continual improvement in the food safety management system, and considering advances in science, technology and best practices.

Additionally, the Regulation provides flexibility in the implementation of a FSC, considering the nature and size of the food business.

Guidance

The Commission Notice 2022/C 355 explains the meaning of each of the components of FSC and how they fit with the existing provisions. It also provides examples of tools that may be used to develop and assess FSC as well as for auditing FSC.

Although the FSC components are considered subjective (perception based), tools may be used to measure them. One tool that may be used as a basis to develop and assess FSC is a survey with a number of indicators/statements for each of the components of FSC. Respondents (as many staff as possible) can express the extent to which they agree or disagree. Weaknesses in FSC can be identified by analysing the results. Other approaches and assessment tools are possible.

FSC specific audits are recommended in large businesses or for groups of establishments carrying out the same activities within a sector. Overall assessments can be made by comparing results across divisions within a large establishment, branches of the same group or different establishments within the same sector. In very small establishments, like a retail establishment owned by a family without or with a very limited number of external staff, flexibility applies and the FSC may become evident during inspections/audits (e.g. observation, interviews). Examples of a FSC checklist and how FSC auditing may be done are made available in the Commission Notice 2022/C 355.

4 Findings and conclusions

CAs responsible for FSC official controls and awareness of the FSC requirements

All MSs have provided the details of the CAs responsible for FSC official controls in slaughterhouses, meat processing establishments, establishments producing dairy products, establishments producing fishery products, establishments producing composite products, establishments producing FNAO and retail chains.

This was not always the case as regards CA responsible for FSC controls in other establishments: while 14 MSs provided the details of the CAs responsible for these controls, 3 MS provided a negative reply, 4 MSs did not provide an answer and 6 MSs replied “not applicable”. Nonetheless, the FSC requirements apply to other types of establishments too (e.g. egg processing establishments, cutting plants, cold stores, game handling establishments, etc). Three MSs mentioned also primary production, which goes beyond the EU requirements.

CAs in 12 MSs made all their food control staff aware of the FSC provisions of Regulation (EC) No 853/2004 and Commission Notice 2022/C 355 (across all food sectors). In 12 MSs the awareness raising exercise has not been completed yet and CAs that perform controls in certain food sectors have not been made aware of these provisions. In 3 MSs none of the official control staff was made aware of the FSC provisions. The overview per food sector is presented in Chart No 1, below.

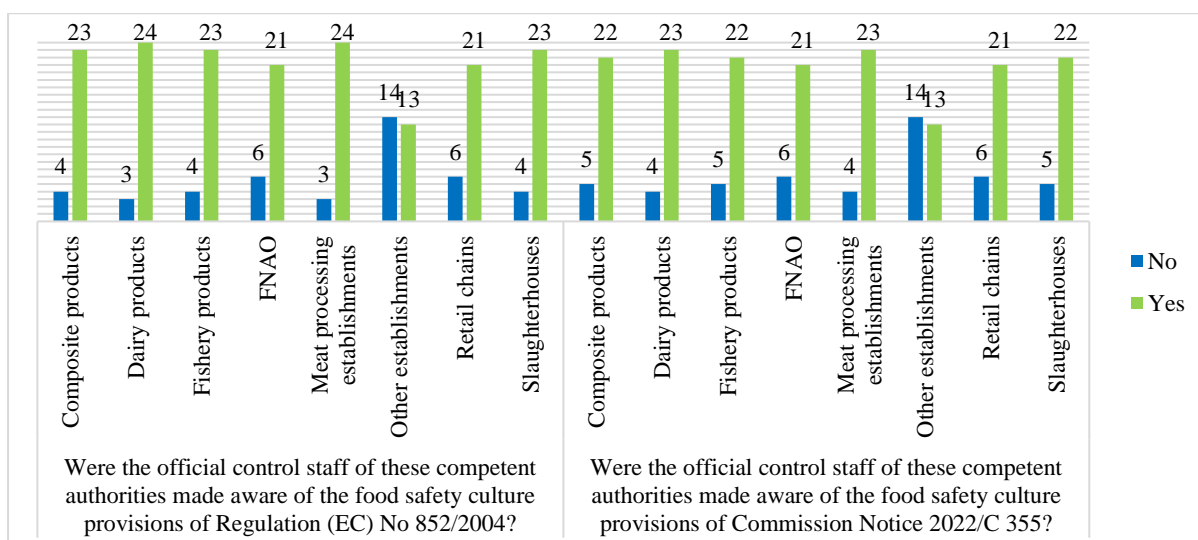


Chart No 1. Number of MSs in which CAs staff responsible for official controls was made aware of FSC requirements in the EU Legislation and Commission Notice 2022/C 355.

The awareness raising took place via guidance and/or training and/or other awareness raising initiatives. CAs in 12 MSs organised training and in 13 MSs provided guidance, with 19 MSs benefiting of at least one of the options for their staff (at least for some sectors). Some MSs adopted several initiatives. The overview is presented in Chart No 2.

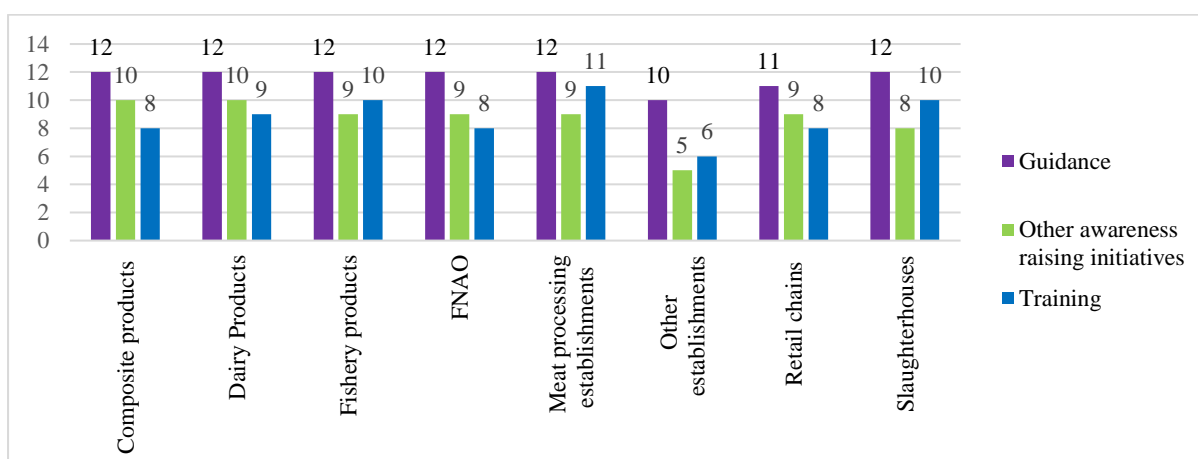


Chart No 2: Number of MSs that put in place the different awareness raising initiatives for official controls, per type of initiative and per (control staff for) type of food establishment.

11 MSs highlighted also “Other awareness raising initiatives”. Those that provided details, in general mentioned one or more of the following approaches: internal communication, updates via emails, during meetings organised by the central competent authority (CCA), during training, publication on website, integration of the FSC requirements in the control instructions/checklists, participation to a FSC workshop.

Example of good practices: FSC awareness raising initiatives - Spain

The Spanish CCA provided a multifaceted approach towards raising awareness on FSC. Besides disseminating information via informative emails and virtual coordination meetings, the Spanish CAs used also:

- collaborative platforms and dedicated workshops to deliver training and legislative updates/alerts;

- webinars, training sessions including sector-specific training and dedicated events;
- specific instructions and guidelines to incorporate FSC into official controls;
- participation in working groups on FSC, aimed at developing common strategies for implementation and supervision.

Conclusions:

MSs have assigned CAs responsible for FSC controls in food establishments specifically covered by this questionnaire. Approximately half of the MSs confirmed the details of the CAs responsible also in other types of establishments (across the food industry) and in three MSs in areas beyond EU requirements.

In most MSs, the CAs made their official control staff aware of the FSC requirements, in particular for controls in establishments specifically covered by the questionnaire. In two thirds of the MSs this took place via training and/or guidance. As regards official controls in other types of establishments, the awareness raising of the respective control staff took place in less than half of the MSs.

Tools/guidance/procedures for FSC official controls

Commission Notice 2022/C 355 (or a very similar approach) is used for official controls by (at least some of the) CAs in 14 MS.

- The example of a checklist for CAs provided by Table 1 of Commission Notice 2022/C 355 (or a very similar approach) is used as a tool for FSC controls in 8 of the 14 MSs. In 4 of the 8 MSs, also the example checklist in Appendix 3 of Commission Notice 2022/C 355 (or a very similar approach) is used as a tool for these controls.
- CAs in 6 of the 14 MSs reported using Commission Notice 2022/C 355 as a guidance during controls.

Some CAs in 9 of the 14 MSs mentioned using also other tools for FSC controls. In the category “other tools”, the MSs reported using checklists, guidance and/or official control procedures, either existing ones (e.g. on FBOs’ food safety management systems) and/or updated with FSC requirements. Some CAs use more than just one tool per food sector. CAs in 3 MSs (other than the 14) reported using only other tools for the FSC controls (e.g. checklists, internal audits with a broader scope, approval application and on-site inspection). In one MS a project on FSC controls by using a checklist was ongoing. Some of the CAs in 18 MS reported that they do not use any tools for FSC controls.

11 MSs reported that (at least some of) their CAs have procedures for the official controls on FSC (not always for all food sectors). The overview for official controls per food sector are presented in Chart No 3. The details provided by the MSs on these procedures suggest that in most cases the existing procedures for routine official controls and audits have been amended to include FSC aspects.

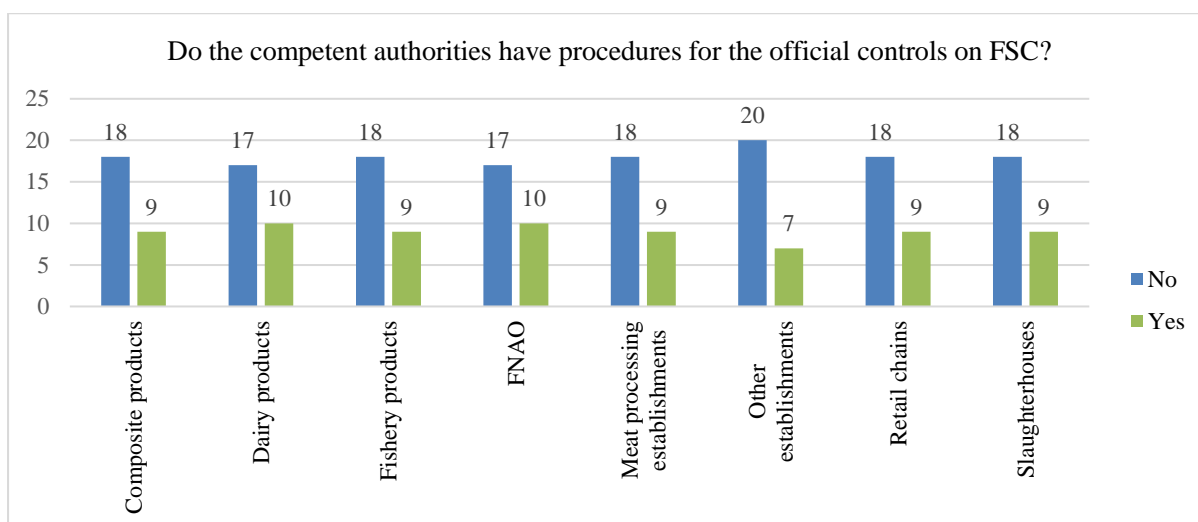


Chart No 3. Number of MSs that reported their CAs have procedures for official controls on FSC in different types of establishments

16 MSs reported that (at least some their CAs) use guidance for the official controls on FSC, though in some cases the replies made reference to general guidance for control of FBOs' own procedures. Commission Notice 2022/C/ 355 was the option selected by 11 MSs (in 5 MSs accompanied by other guidance).

CAs in 3 MSs (Hungary, Denmark, France) reported to use general national guidance on FSC for controls in several sectors. In 3 MSs (Ireland, Belgium, Finland) national FSC guidance was reported to be under development⁶.

CAs in 2 MSs reported to use sector specific national guidance on FSC: In Austria sector specific national guidance on FSC was reported to be used for controls in all food sectors except slaughterhouses. In the Czech Republic such sector specific FSC guidance is used only for controls in other types of establishments.

CAs in 6 MSs reported to use other guidance. Where more details of these national/sectoral/other guidance were provided by the MSs, reference was made to exiting technical instructions, methodological instructions, checklists and to the provisions of Regulation (EC) No 852/2004 and Commission Notice 2022/C/ 355.

Conclusions:

The uptake of FSC provisions is ongoing and Commission Notice 2022/C 355 is used by CAs in approximately half of MSs for FSC controls. In eight MSs, the examples of FSC checklists in the Commission Notice (or very similar) are used as controls tools. Other FSC control tools are also in place, with some MSs using more than one tool. Procedures for FSC official controls are in place in 11 MSs. Five MSs already use sector specific FSC guidance or national general guidance on FSC and in three MSs such guidance is under development. The FSC procedures/guidance/tools in place are mainly based on the provisions of Regulation (EC) No 852/2004 and Commission Notice 2022/C 355 or similar.

⁶ Finland provided an update informing that the guidance on the official control of HACCP has been updated and it includes instructions for the supervision of food safety culture. The guidance published by the Irish CA is referenced further in the overview report.

FSC initiatives for the FBOs

The CAs in 13 MSs have endorsed or run **initiatives on FSC for the FBOs**. These initiatives consist of:

- training in five MSs,
- guidance in four MSs,
- awareness raising in seven MSs and
- other initiatives.

Some MSs have more than one initiative in place.

Examples of good practice in one MS (Ireland) - national initiatives for FBOs

The Irish CCA has produced a specific webpage providing advice for FBOs on how to develop their FSC responsibilities (<https://www.fsai.ie/business-advice/starting-a-food-business/food-safety-culture>). It includes links to a FSC guidance note and a FSC e-learning module. That provides easily accessible support to help FBOs better understand their obligations to develop, maintain and demonstrate appropriate FSC in their business and thus meet the legal requirements.

Amongst the “other initiatives” in place for FBOs, several CAs highlighted that the available communication channels between CAs and FBOs and meetings with the industry are used to inform FBOs of the FSC requirements. This is also reiterated during official controls. Some MSs provided details of individual national initiatives:

Examples of good practice - initiatives for FBOs in different MSs

- Dedicated events and specialized forums:
 - FSC discussed at different bilateral contacts with sector organizations, open debate on FSC among stakeholders (Belgium).
 - Specific events on FSC for CAs and FBOs to reinforce the FSC implementation and oversight (CAs in Spain).
- Public communication channels (media outreach) have been used to raise awareness of the importance of FSC and its impact on the food chain (CAs in Spain and Belgium).
- Articles and manuals have been developed and made available on official web platforms to provide information on FBOs’ responsibilities and training tools for FBOs (CAs in Spain).
- Ongoing work to develop guides that enable businesses to evaluate their compliance with FSC requirements (CAs in Spain and Netherlands).

Conclusions:

Several initiatives have already been put in place or are in the process of being developed in some of the MSs to support the implementation of FSC requirements.

FSC official controls in place in the MSs

According to the replies received, FSC official controls are in place in 18 MSs. In 7 of the 18 MSs, the CAs perform FSC controls in all types of establishments and in 11 MSs only in certain types of establishments. Other nine MSs stated that they did not carry out FSC controls in any type of establishment at the time of the questionnaire. Chart No 4 below provides the overview per sector.

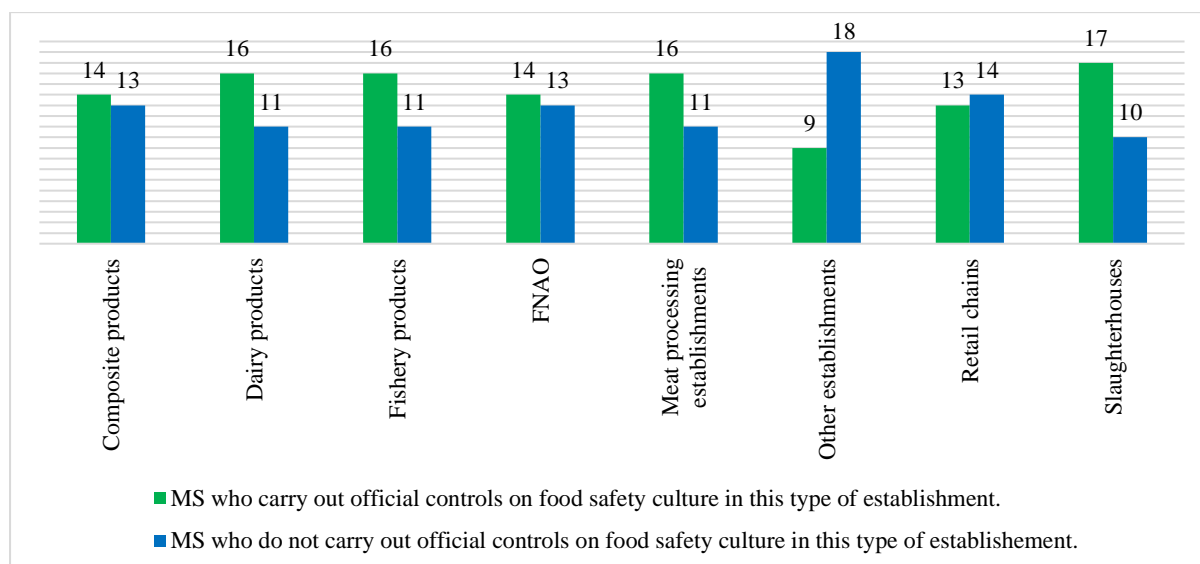


Chart No. 4: Number of MSs that carry out FSC official controls in different types of establishments

However, the figures on FSC controls must be interpreted in light of the clarifications provided in response to further questions. A number of MSs - regardless of whether they reported conducting FSC controls or not - noted that FSC requirements are integrated into existing control mechanisms, such as FBOs' HACCP-based systems, and that no separate FSC-specific controls are therefore carried out. Some CAs provided examples on how at least certain elements of FSC may be covered by the (already existing) controls on FBOs' food safety management systems. Other MSs mentioned they do not gather data in the format of the survey.

One of the MSs that reported to have FSC controls in place, specifically clarified that “no routine controls had been conducted on FSC, but the history of severe non-compliances was used as an indication of an inadequate FSC and is added to the list of infractions”. Another MS highlighted that, for small and micro businesses, official control only tracks general compliance and FSC is assessed within broader inspections under Regulation EC No 852/2004. This may explain different (and sometimes apparently contradictory) answers received from some MSs/CAs.

The clarification provided by some MSs suggests that, while certain elements of FSC are already part of CA's controls in place, there are differences of opinion between the MSs, for example as regards the practical effectiveness/justification of investment in explicit FSC controls and consequently the necessity to amend existing controls to include specific “culture” related aspects of FSC, as well as the training/qualifications needed for adequately performing these controls.

Some of the CAs that reported to have not performed FSC controls shared their views and challenges thus providing useful input for a reflection on further steps. Among those views:

- FSC controls are considered to already be included in the existing food safety controls.
- Although various scientific studies have shown that an established FSC correlates with good results in food safety controls it was considered still unclear whether this correlation is causally linked. CA avoids creating additional bureaucratic requirements for FBOs and CAs.
- In most cases the same outcome may be achieved more effectively and efficiently by focusing on other legislative requirements.
- FSC controls are considered time-consuming, ineffective and inefficient to justify. Taking action against non-compliance eg. pursuing in court measures to improve culture and following up on the improvements, poses significant difficulties. CA consider it difficult to justify prioritizing regular FSC controls especially for small and medium-sized companies (which in some countries represent a big part of the industry).
- CAs are further reflecting on how to objectively control cultural aspects, given that most research methods are qualitative. In coherently judging culture as "right" or "wrong", different aspects need consideration: e.g. family businesses may lack sufficient checks and balances in decision-making, bonus cultures might disregard public interests, and organizational culture's effectiveness varies by context. A checklist isn't considered objective. There is a lack of standardized methodology for assessing FSC.
- Assessing FSC by official control staff is a challenging task, as it involves more than just reviewing documentation and physical conditions. It also requires evaluating employee behaviour, attitudes, and the overall company approach to food safety.

In most MSs that reported to carry out FSC controls, the controls are carried out as part of **regular inspections and/or as part of an audit with a broader scope** (see Chart No.5). Only one MS (Austria) carried out specific FSC audits (combined with regular inspections) and only in one food sector. One MS (Portugal) mentioned an initiative by which a survey was launched to assess the application of FSC in FBOs of one sector and this is intended to be implemented periodically.

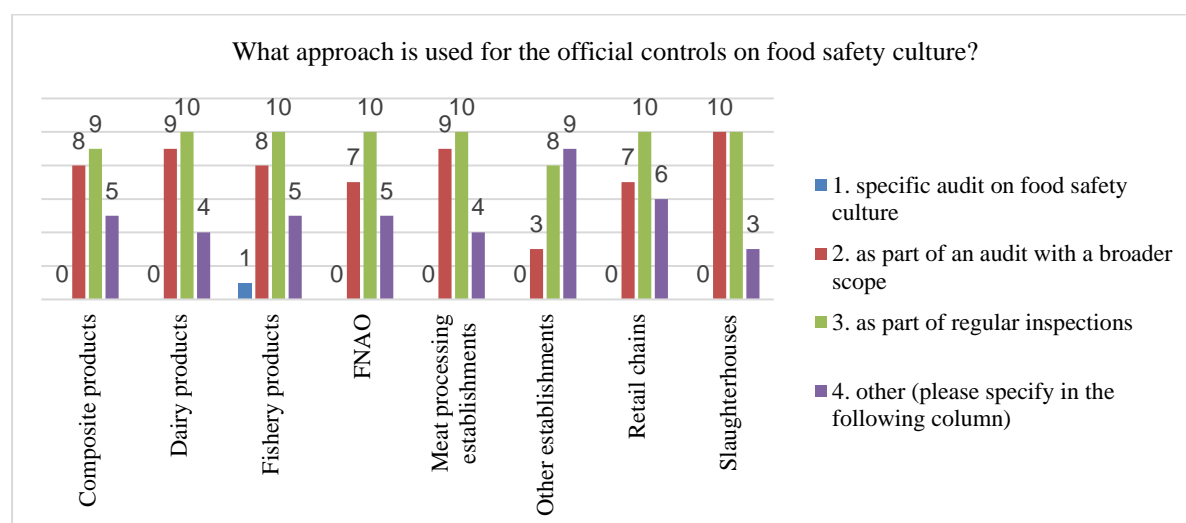


Chart No. 5: The number of MSs that use a certain approach for FSC controls in different food sectors

For the category other establishments, the replies varied between generically mentioning all establishments within the scope of the Hygiene Regulations/establishments of various sectors, or specifically mentioning specific sectors like wholesaler, butchers, wine sector, wild game establishments, establishments producing egg products, establishments producing insects for human consumption, mass catering establishments.

Some of the MSs that selected “other” approach for FSC controls highlighted that some of the aspects already checked in routine controls are relevant for assessing FSC aspects (even if that MSs reported no dedicated FSC routine controls). For example, that during comprehensive controls, the CAs assess the commitment of management, employees training and the reliability of the operator, including the correctness and timely implementation of CA requests and readiness to cooperate.

Some MSs provided examples on how they implement elements of FSC controls in practice. For example,

- interviews of operators/managerial staff/lower-level team members within the HACCP team;
- checks of documentation and considering anonymous tips/complaints;
- observing practical aspects of e.g. tasks’ execution across workstations, the correctness of procedures and their continuous implementation (good hygiene practices, good manufacturing practices, HACCP);
- assessing the commitment of the management and the credibility of the operator also through the correctness and timeliness of implementing CA orders and readiness to cooperate as well as the actions taken in the event of identified non-compliances.

Taking the example of training, one of the CAs mentioned that the checks aim to determine whether the training sessions are a formality or genuinely foster a FSC aligned with the overall organizational culture of the establishment. Additional training of certain staff members on FSC components, strengthening communication channels, investment in resources, etc. were examples of action in case of non-compliance provided by one CA.

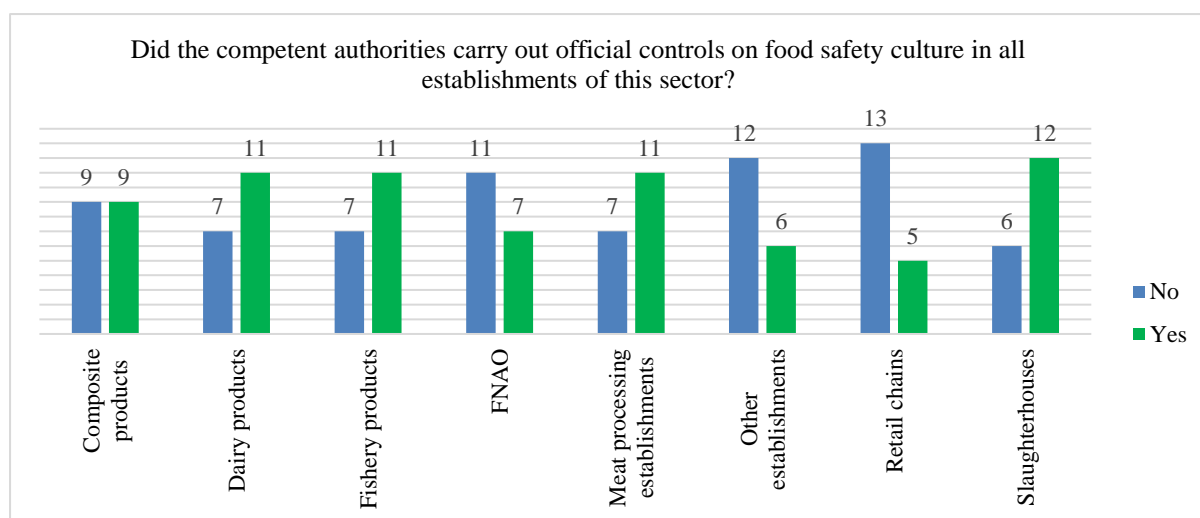


Chart No. 6: The number of MSs that carry out FSC controls in all establishments of different food sectors

Some MSs have reported to have carried out FSC controls in all establishments of certain sectors (see Chart No 6), while others are in the process of implementing FSC controls using different risk-based criteria (e.g. size of production, risk associated with the type of

product/process/activity, history of non-compliance, vulnerable consumers, etc). Depending on the outcome of the risk assessment as well as on the rules and procedures on organisation of the controls in the different sectors and countries, **the frequency** of controls varies between several times a year to once every few years.

12 (of the 18 MSs that reported to carry out FSC controls) provided information on the number of the planned and/or implemented controls between 2023-2025, at least for certain sectors. 6 MSs reported the number of FSC non-compliance identified during the 2024 controls and 4 of them also on the number of FSC non-compliance identified during the 2023 controls (see Chart No 7). Most of them reported having taken enforcement action for the identified FSC non-compliances.

The data provided by the MSs on FSC official controls suggest that overall,

- the number of controls and identified non-compliances was higher in 2023 compared to 2024; the 2025 planned controls are in overall figures similar to 2024.
- sector wise, while a higher number of controls took place in FNAO establishments and retail chains in 2023, most of the non-compliances have been identified in the establishments belonging to the food of animal origin sectors.

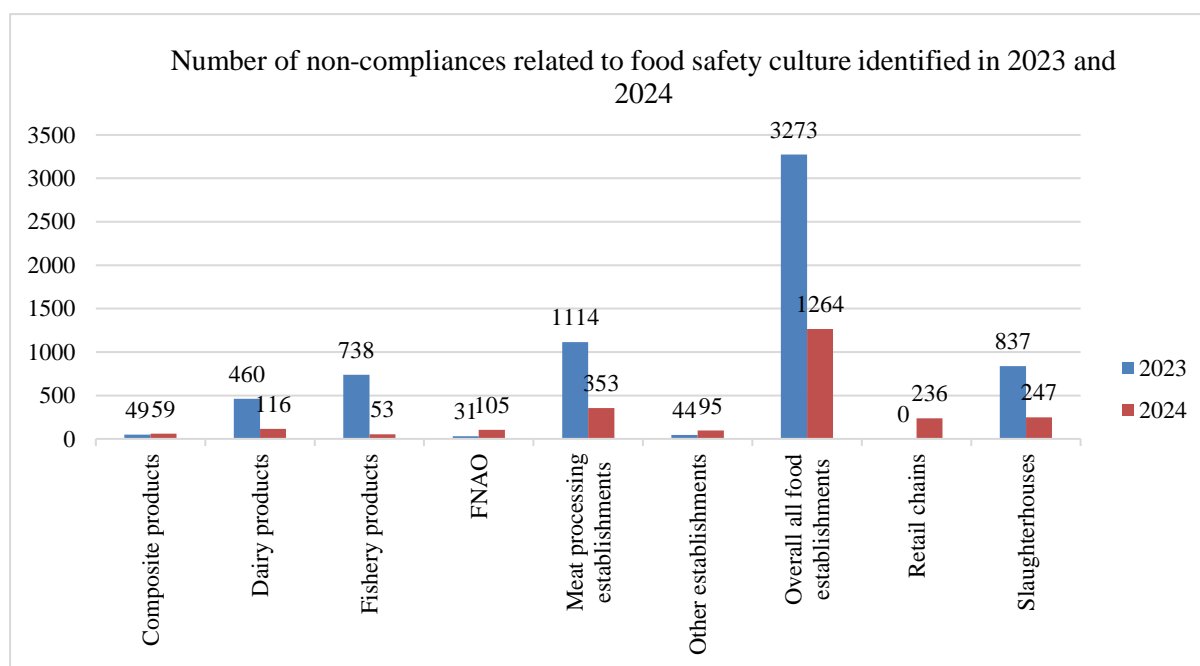


Chart No. 7: The number of FSC non-compliances reported by 6 MSs for 2023 and 2024, in different food sectors

While 12 MSs reported they have not identified FSC non-compliances in 2024 and 14 MSs in 2023, several highlighted that this may only reflect the reporting system and ongoing adjustments to better consider FSC. Some MSs explained that the way CA aggregate the control data did not allow them to extract the number of specific FSC non-compliances (FSC non-compliance are recorded collectively with other non-compliances). Other CAs have been developing their systems to make FSC explicit, with effect from different (more recent) dates or the process was still ongoing for certain sectors.

For the same reasons, some MSs could not always provide the details of the specific FSC non-compliances. When details on specific FSC non-compliances were made available, these referred to:

- lack of training in FSC/ limited employees' awareness of their responsibilities;
- lack of implemented plant procedures in the field of FSC/lack of system implementation;
- non-compliance related to specific requirements (e.g. hygiene requirements, traceability).

Third-party audits on FSC

13 MSs have replied that the CAs are aware of third-party audits on FSC, though not always for all types of establishments. Some of the CAs in 20 MSs reported not to be aware of third-party audits on FSC. Two MSs reported that their CAs take the result of third-party audits into consideration for the organisation of official controls and three MSs for the implementation of risk based official controls, however, not in all sectors. No CAs gather data on the non-compliances related to FSC identified by the third parties.

Conclusions:

FSC controls are considered to be in place in approximately two thirds of the MSs, at least in some of the food sectors, either as specific FSC controls or included in the controls over FBOs' food safety management systems. Some of the MSs shared their approach towards FSC as well as challenges that prevented the implementation of FSC controls thus providing useful input for reflection on further steps.

The FSC official controls in place are in general part of regular inspections and/or audits with a broader scope. A small number of MSs have reported having identified FSC non-compliances and having taken enforcement action related to these non-compliances.

While CAs in approximately half of the MSs are aware of third-party audits on FSC, only a small number thereof take into consideration the results of these audits in the organisation/implementation of official controls.

Implementation of FSC at establishment level

MSs were asked to rate the level of implementation of FSC requirements in different types of establishments. Some CAs provided at least partial answers/not for all food sectors.

In most cases the MSs answers/rating were based on the outcome of other official controls than specific ones on FSC. Some MSs mentioned they don't have specific FSC controls, although FSC is included in the scope of official controls. Two large MSs CAs mentioned third-party audit results as a source for this estimation and one small MSs mentioned information from FBOs.

Most CAs are not aware of the tools used by the FBOs. In the few cases where CAs were aware, the tools reported to be used are mainly based on Commission Notice 2022/C/355 and on recognized standards which include FSC requirements. As regards FSC implementation in establishments of different sizes, the overall CA rating suggests that FSC requirements are better implemented in large and medium sized establishments.

One large MS explained that the FSC implementation is based much more on commercial audit standards – like ISO 22000, International Featured Standards (IFS), British Retail Consortium) - than on CA controls. Consequently, large establishments, which have adopted

these audit standards, are more compliant than smaller establishments. Another large MS highlighted that FSC implementation requires training and outreach initiatives that take time to generate a measurable impact.

Conclusions:

Based on the outcome of official controls and to a limited extent on results of third-party audits, some CAs have rated the effective implementation of the FSC requirements at establishment level. The (limited) results suggest an overall better level of implementation of the FSC requirements in large and medium sized establishments, in particular when international standards with FSC requirements are implemented.

Challenges in implementing FSC official controls and measures to overcome them

22 of 27 MSs reported that their CAs encounter challenges in implementing FSC official controls and provided more details of these challenges. Most of the CAs highlighted several challenges.

Overall, and with some differences between sectors, the information provided by MSs suggests that insufficient CA resources may be the main challenge (highlighted by CA in 15 MSs), followed by the fact that the procedures for official controls have not yet been adjusted to the changes related to FSC (highlighted by some of the CAs in 12 MSs).

Some of the CAs in 10 MSs selected lack of awareness of the Commission Notice 2022/C 355 and/or its provision and FBOs' reluctance to the new provisions. Lack of (local CA's) awareness of the FSC changes in the legislation seems to be a challenge in slightly less MSs (7MSs).

CAs in 12 MSs highlighted also other challenges. Overall, they refer to:

- FSC is perceived as an administrative burden without a tangible impact on food safety.
- Challenges with assessment criteria, objectivity and consistency of the controls.
 - FSC is considered a broad and relatively undefined concept referring to cultural aspects while most research methods are qualitative. The criteria for how to evaluate and rate FSC are missing.
 - The absence of concrete and measurable parameters makes it challenging to establish uniform assessment criteria and evaluate consistently across FBOs.
 - Lack of guides to practical application (with practical examples and specific tools) and difficulties in assessing FSC/ what is appropriate in establishments of different nature and size as well as of the flexibility clause.
 - Challenges at the level of smaller FBOs, mainly due to lack of resources, training, guidance and understanding as well at the level of approved vessels.
- Specific training needed to verify cultural aspects: Local CA staff are not sufficiently trained in practical application - verifying cultural aspects (now under legislative requirements) which is a different task than what they are trained for.
- Regulatory and quality requirements: CAs consider that FSC integration should be aligned with compliance with EU legislation, quality standards, and export requirements for third countries.

- The absence of an IT system to collect and report quantitative data on compliance makes it difficult to objectively assess its implementation.
- The lack of a fully developed system to allow an effective and systematic assessment of FSC implementation which impacts the evaluation consistency and continuous improvement.
- The need for further clarification on FSC and raising awareness of FBOs as FSC is relatively new as an explicit legal requirement.

14 MSs provided more information on **measures envisaged or already put in place at national level to overcome the challenges** related to FSC controls. In brief the measures refer to:

- amendments to the official control procedures/technical instructions/internal procedures to better reflect FSC requirements and/or Commission Notice 2022/C 355 have been, are in progress or planned to be carried out by different CAs;
- initiatives to raise awareness on FSC have been put in place and are further planned together with training in different MSs;
- ongoing progress in updating national IT system to record FSC compliance/non-compliance;
- cross agency working group on FSC developing national guidance on FSC;
- ongoing efforts to develop strategies for effectively integrating FSC into official controls and to further explore effective approaches for FSC assessment and enforcement,
- plans for a gradual introduction of FSC verification into scheduled inspections, starting with high-volume industries.

Examples of good practice - work on tools and methods

- Ireland published Guidance to assist CAs in the incorporation of FSC assessment within official controls. This is available at <https://www.fsai.ie/getmedia/807ea744-3270-4d94-8a63-f101ad71190a/guidance-note-44-food-safety-culture.pdf?ext=.pdf> .



- A national pilot program to develop a feasible method for the control on FSC is in progress in Belgium.
- Some CAs in Spain and Netherlands work on developing an FBOs' self-assessment

tool to support FSC implementation.

- Different MSs joined the Heads of Food Safety Agencies work group on FSC that aims to create a guidance document for FSC development and compliance in food businesses, evaluate tools for assessment and if possible, provide a toolbox for CAs.
- Some MSs (Finland, Poland⁷, Italy, Belgium) intend to update procedures and/or issue guides relevant for FSC controls.

Some of the MSs provided also examples of other **innovative initiatives** they have identified at national level, which would implicitly be beneficial for FBOs.

Examples of good practice - FSC innovative initiatives in MSs:

- In France, the CA contributed financially and technically to the national standards agency's work to produce a guide setting out the specifications required to comply with the FSC requirements. A FSC guide developed by different stakeholders under AFNOR coordination is available at <https://www.boutique.afnor.org/en-gb/standard/afnor-spec-2406/food-safety-culture/fa211709/456717> .

Guide à l'usage des dirigeants pour la mise en œuvre d'une culture positive de la sécurité des aliments



- Belgium provided the link to a doctoral dissertation relevant for FSC - "Conceptualization, Assessment, and Maturation of FSC in food processing companies" - available at <http://hdl.handle.net/1854/LU-01JJ1NDDV1ADTQDKX3ZHRGN10D> .
- FSC was highlighted as one of the main topics under the Belgian EU presidency (2024).
- In Croatia, draft national legislation on HACCP based systems includes FSC amongst prerequisites and it requires FBOs to describe how they will establish FSC in their establishments.

⁷ In a further update, the Polish CCA informed that the guidelines issued in 2025 for inspections of FBOs' compliance with Good Hygiene Practice requirements include FSC provisions and are available at: <https://www.wetgiw.gov.pl/publikacje/bezpieczenstwo-zywnosci-pochodzenia-zwierzecego>.

Conclusions:

Most MSs encounter challenges in performing FSC official controls. Beyond aspects common to other areas of controls, such as resources, the challenging aspects are mainly stemming from the relative novelty of the FSC requirements, in particular the “cultural” element and how to effectively control it in an objective way and to ensure consistency of these controls across food industry. Faced with limited control resources and an unclear return for investing in FSC controls, some MSs do not perform them.

Approximately half of the MSs have made or continue to make efforts to find solutions for the identified challenges. Some of the approaches they took as well as outcomes of their work are made available for possible uptake and further development by other CAs.

5 Matters for consideration by Member States

- 1. To ensure that the responsibility for FSC official controls is assigned to CAs for all sectors/types of establishments in which these requirements apply.**
- 2. To increase FBOs’ awareness of FSC requirements and uptake across different sectors, particularly where FSC is still a challenge.**
- 3. To increase CAs awareness of FSC requirements and incorporate FSC in the official controls across the relevant food sectors in all MSs.**
- 4. To consider examples of good practice for further uptake and development to support implementation of FSC requirements and related official controls.**

6 Actions from the Commission

- 1. The Commission has requested the European Food Safety Authority to provide a scientific opinion on FSC and its microbiological food safety impact in the EU. The mandate includes a series of elements that may support FSC implementation and related official controls.**
- 2. The Commission discussed with the MSs the outcome of the questionnaire and suitable ways to progress in addressing the identified challenges.**
- 3. Consideration will be given to including verification of FSC in future scope of product specific DG(SANTE) audits.**

Annex I Legal references

Legal Reference	Official Journal	Title
<i>Regulation (EC) No 852/2004</i> <i>Food hygiene Reg.</i>	OJ L 139, 30.4.2004, p. 1–54	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
Reg. (EU) 2017/625 <i>Official Controls Reg.</i>	OJ L 95, 7.4.2017, p. 1	Regulation (EU) No 2017/625 of the European Parliament and of the Council of 15 March 2017 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

Legal acts quoted in this report refer, where applicable, to the last amended version.

Annex II Guidance

Reference	Official Journal	Title
<i>Commission Notice</i> <i>2022/C 355/01</i>	OJ C 355, 16.09.2022, p 1–62	Commission Notice on the implementation of food safety management systems covering Good Hygiene Practices and procedures based on the HACCP principles, including the facilitation/flexibility of the implementation in certain food businesses (2022/C 355/01)

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