

COMMENTS ON THE DOCUMENTS

Sr. No.	Name and Address of Organization/Institution /Individual	Comment		
		Guidelines	Checklist	Criteria
1.	National Institute of Nutrition (NIN), Jamai-Osmania PO Hyderabad – 500 007, India.			<ol style="list-style-type: none"> 1. The document is very exhaustive covering all the guidelines. 2. There is a need to define terminology like major and minor. 3. Many of the criteria are subjective and are not auditable. For example, under section (iv) Control of Operations, they have provided the guidelines and not the criteria for auditing.
2.	Bureau of Indian Standards (BIS), Manak Bhavan, 9 Bahadur Shah Zafar Marg, New Delhi – 110002.			<ol style="list-style-type: none"> 1. There should be two categories of critical & major as all the factors are essential and no points are minor. 2. Several repetitions are there which should be clubbed.
3.	Mr. Sohrab Managing Director Quality Care Services PVT Ltd 2391 Pocket 2 Sector D,	<ol style="list-style-type: none"> 1. The purpose of this document is to elaborate the requirements for better understanding of the criteria requirements by the users 	<ol style="list-style-type: none"> 1. The checklists cannot have different coverage/sequencing as they are designed to evaluate the criteria requirements to reach to conclusions on each 	<ol style="list-style-type: none"> 1. The word “code” used in the text may be replaced by criteria as codes are not certifiable 2. The title of third column of the table/ section 3 may be changed

	<p>Vasant Kunj, New Delhi-110070.</p> <p>General Remark: The three documents appear to have been prepared by different set of people without much interaction among them. These three have inconsistent and incoherent approaches-in titling, sectoral /division classifications and gaps exist.</p> <p>Concluding Remark: These documents are for national and international review. I would submit for the consideration of all concerned that please do not reflect that we cannot agree to follow one approach in the national interest on such a well known issue for which international guidance is available.</p>	<ol style="list-style-type: none"> 2. The title should be consistent with the criteria document for which it has been prepared. In document itself main title is different from the title at the beginning of the text. 3. Sectioning/chapters and the sequencing must be consistent with the sections /clauses of the criteria document 4. The contents should be in line with criteria document 5. The areas of coverage also vary. They should be made consistent 	<p>requirement. In fact they should not add any new requirements but follow criteria requirement and add columns for evaluation</p> <ol style="list-style-type: none"> 2. This document must add a column for level of compliance and then existing three columns for better guidance to the users of the checklist. 	<p>to level of compliance/conformance</p>
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<p>4.</p>	<p>Pankaj Sharma, Chief Trustee, Center for Transforming India, 50E, Hauz Khas Village, New Delhi-110016 Ph:011-46019721 Mobile: 9811433720</p>	<ol style="list-style-type: none"> 1. The three documents appear to in coherent in some aspects. It is important to establish a linkage between them as they are interdependent and for sound implementation they need to be synchronised. 2. The guidelines needs to more specific in terms of actual implementation of them at the ground level. Currently they are too general. 3. A segregated approach needs to be adopted different class of food outlets as the modus operandi of their operations differ. 	<ol style="list-style-type: none"> 1. Garbage disposal facility needs further elaboration. It is important to ascertain that a proper disposal mechanism is put in place. Currently most of the outlets dispose them in vicinity of their outlets which causes contamination around the storage or cooking area. 2. Employees be tested at regular interval for communicable diseases spreading through water or food 	<ol style="list-style-type: none"> 1. Important aspects of reusing of utensils (which are washed and used), semi cooked materials, pre cooked material are not covered in details. They are major source for contamination at time of cooking 2. “Only sound, suitable raw materials or ingredients shall be used. (4.2.2 a)” – The quality and suitability needs further definition and elaboration. 3. It is advisable to instruct the outlets that a book of vendors (supplying raw material & other) be maintained by the outlet with contact details of the supplier. In case of discrepancy/untoward happening it will act as an important information in nailing the culprits and also put a pressure on the supply chain for maintaining quality 4. Points 4.4(b,c)- As most of the food outlets purchase ice from outside and do not possess requisite space for refrigeration purposes . The point can be revisited and reframed in a
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				manner to ensure the context of food safety
5.	<p>Jyoti Bhasin Head - Marketing and Customer Service</p> <p>NSF Safety and Certifications India Private Ltd. 108, Time Centre,Golf Course Road,Sector-54 Gurgaon India. T: +91(0)124-4820100 M: +919717100339 E: jyoti.bhasin@nsf-cmi.com www.nsf-cmi.com</p>		<ol style="list-style-type: none"> 1. In the checklist needs to have a column on observations and detailing for conformance/non-conformance. 2. Question 11 the complete checklist is about what we should do and this is a question on what we should not do we should maintain the same syntax throughout and not change it to as below “utensils are not wiped with aprons ,soiled clothes unclean towels or hands” 	<ol style="list-style-type: none"> 1. Section I, 1.1 Purpose Quote “To all intents and purposes, this Code is not a substitute for the food regulations and the licensing requirements and conditions imposed to individual licenses.” So in-case of Non compliance is there feasibility for reassessment after education and a stipulated time frame on compliance. 2. Relation /sequencing between Checklist vis a vis Criteria is not very evident and needs to be aligned for coherence
6.	<p>Dr. Dhir Singh, ADG, PFA</p> <p>Ministry of Health & Family Welfare.</p> <p>General Remark: rest of the document are seems</p>	<p>After introduction, definitions of the scientific words used in the document should be given first like</p> <ol style="list-style-type: none"> 1. unsoiled equipments 2. safe water 3. sanitary state 4. thawed 5. chemical, biological 		

	to be in order.	<p>hazards</p> <ol style="list-style-type: none"> 6. antibacterial cleansing agent 7. fermented & acidified foods 8. hazardous elements. 		
7.	<p>Kamal Kumar Director</p> <p>LBIHIM</p> <p>DELHI CAMPUS: LBIHIM TOWER, B-98, PUSHPANJALI ENCLAVE, OUTER RING ROAD, PITAMPURA, DELHI- 110034</p> <p>Ph: 011-27011495, 65155113, e-mail: info@lbiihm.com</p>	<p>The guidelines given on the site document (www.fssai.gov.in) cover entire aspect of food production and processing activities. It is easy to understand and can be widely used by small and big food establishments. Some suggestions which may form a part of this section are:</p> <ol style="list-style-type: none"> 1) Not purchasing meat or poultry products in a torn or leaking package. 2) Avoid serving raw meat, raw eggs and raw seafood in any of the dishes. 3) Avoid the usage of artificial colours in food preparation. 	<p>The checklist given for food safety is exhaustive and covers all criteria for a safe food service. It should be implemented by all the food handlers. However few points which may be added to the checklist include-</p> <ol style="list-style-type: none"> 1) All lighting fixtures should be covered by an unbreakable translucent material. 2) Glare free and white light should be used for illumination in food preparation areas. 3) Garbage bags made up of bio degradable material should be placed in garbage bins so that the bins not get infected. 4) Products having strong odour should be covered and kept labeled in separate rack of refrigerator. 5) Colour coding of bins is important for correct disposal of waste products. 6) Food prepared in any 	

			establishment should be healthy and nutritious and a calorie count for each recipe should be made.	
8.	<p>P.Madhusuthanan EHS - Food Vigilance Officer Genpact India 99,Surya Park, Outer ring Electronic City, Blr - 100 #09886416086 E-mail : chf.blr@genpact.com</p>	<p>The Guidelines precisely states the points were there should be a frequent check for food safety in terms of indentifying the CCP's. It's comparable to the HACCP Standards or ISO 22000 FSMS.</p> <p>Following points may be added upon the guideline.</p> <ol style="list-style-type: none"> 1. A screening system for entry of any type of food product at the procurement level so as to prevent potential hazards at their entry level itself. 2. The ICE instead of preparing by portable water it advisable to be made of UV- RO treated water. The potentiality of microbial growth can be prevented. 3. At the selling Pest – O – flash needs to be installed to prevent entry of insects as a 	<p>The checklist is more focusing towards food safety which when followed would help out any type of food based establishment to maintain and monitor the process in regards to food safety</p> <p>Some checks can be added in the same:</p> <ol style="list-style-type: none"> 1. Proper color coding system is used to differentiate in case of cutting board, knives storage containers etc in food preparations especially Veg and Non Veg system including their cutting boards and storage unit to prevent cross contaminations. 2. Check for small unit water purifiers at the kitchen is more important to prevent possible contaminations from water. 3. Air croton machine is provided at the receiving and delivering 	<p>The criteria audit of food establishment is very clear according to the clause wise.</p> <p>But still criteria should be clearer on covering all levels of food safety aspect</p>

		precautionary measure	<p>area and any other more sterile area to prevent contamination from dust.</p> <p>4. Calibrated thermometer is used for checking temperature.</p>	
9.	<p>Bejon Misra, Managing Trustee Healthy You Foundation, D 14 First Floof, Greater Kailash Enclave II, New Delhi 110048. <i>26 years in the consumer movement</i> www.bejonmisra.com Mobile:+91-9311044424 or 9811044424</p>	<p>I have carefully read the draft and the comments made by some of the stakeholders, which are relevant and appropriate. My comments are as follows, which could be incorporated in a manner you and your team feels could be added into the final document:</p> <ol style="list-style-type: none"> 1. The food establishments once they qualify and are certified as a particular grade should display the information/logo in bold on the signage of the establishment at the entrance so that consumers can see the certified logo prominently prior to entering the establishment. This should be done as part of the compliance after they have been approved as Gold, Silver or Bronze. This will also enable the consumers to check the level of compliance and enable the establishments to ensure efficient implementation as per the guidelines and Criteria. This will also facilitate an informed choice to the consumers and bring competition at the marketplace. 2. All the Food Establishments MUST display the rate charts if not a printed Menu Card of all the items inclusive of all taxes and official levies. 3. All the establishments must display a Consumer Charter giving details about where to complain if things go wrong and who are the owners/Manager of the establishment with their mobile and phone numbers including the services offered. The Complaint and Suggestion book/box should be prominently displayed with response time and person responsible for prompt redressal. (A draft User Charter Can be provided as a Template) 4. All the employees dealing with customers must display the name badge written in Hindi and English to enable consumers to reward and recognise the excellent behaviour of the employees and their level of service delivery. 5. Throughout the guidelines and criteria an important aspect has got totally ignored is the hygenic condition of the swap used for cleaning the hands and the utensils. We have to indicate the minimum level of cleanliness required for the swap used and the swaps needs to get checked regularly to detect unhygenic conditions and contamination. 		

		6. Finally the definition or standard of the portable water has to be well defined so that it is not left to the establishments to define portable water standards.		
10.	<p>(Dr.P.K.JAISWAL)</p> <p>Food Consultant and ISO auditor, 9000,22000,HACCP and 17025</p> <p>Former (Director of Laboratories, Central Agmark Laboratory, Govt. of India,Local Health Authority,P.F.A., Delhi Govt)</p> <p>B 197, Sector-41, Noida 201303</p> <p>Cell-09958286537</p> <p>09268471615</p> <p>Fax-0120-2502197</p> <p>Email-premkumar.jaiswal@gmail.com</p>	<p>Introduction-</p> <p>1. Required action to be taken if deviation from guidelines are noticed,should be elaborated. Means of keeping check after certification with their intervals should be described.</p> <p>General requirements-</p> <p>1. For health check up and their periodicity , are food vendors supposed to follow local bodies rule or the proposed guidelines have to be more stringent.</p> <p>Raw materials-</p> <p>1. For ensuring during audit, as to whether or not, guidelines as mentioned are being followed , would it not be necessary to maintain document how safety of raw materials are being assured.</p> <p>Physical examination by a lay man can not ensure safety and quality of a food. Take the example of milk and milk products. One can not blindly depend upon the quality of a food even if it is purchased from a reputed shop specially articles being sold in loose form.</p>	<p>1. Quality and safety of raw materials can not be assured unless it is certified after testing or a certified food chain approach has been adopted. Detail mentioned in the check list can not guarantee for a safe food.</p> <p>2. Detail mentioned in check list need awareness programs to educate the personnel in the food chain.</p> <p>3. Non food should not be stored in the food storage area.</p> <p>4. There should be a traceability system of the raw materials.</p> <p>5. Insect prone items should be segregated from other food .</p> <p>6. Pest control measures need to be specified specially for store.</p> <p>7. Hygiene for store should be stated.</p> <p>8. Sieving can not be followed in all powdered material . For example, sieving of Atta will remove bran which has its own nutritional value.</p> <p>9. Hygiene for cooking place</p>	<p>1. This document is basically made on content of ISO 220000 and global gap.</p> <p>2. Categorization is very confusing. For example fresh extracted juice has been kept under Category A. Most of the exclusively fresh juice shops are established in an area of 6x6 feet. Their criteria for audit has to be different and practical. In category C, there are many big food industries, which have base kitchen and simultaneously have their own outlets for serving food. Many times semi cooked food/ ready to cook/ ready to eat food are made in base kitchen and then transported to their out lets / restaurants for service. All the categories should be properly made to serve the requirements of food safety.</p> <p>3. Major must, minor must, critical will be different for each type of food preparation and extent of business. Making criteria for gold etc.</p>

		<p>2.Potentially high risk food should be defined.</p> <p>3. Many food vendors bring ready to eat food or partially cooked food from their place of cooking. How during an audit such compliance can be ensured .</p> <p>Water and ice-</p> <p>1. How one can ensure quality of water and ice with out regular testing in a lab. Does food vendor needs to maintain record of it for audit purpose.</p> <p>Formulations-</p> <p>1. Most of the prepared foods are made and served as per choice of the consumer e.g. Salt, sugar, chillies, acidity, oily etc. Special attention need to be given by vendors and authorities should be elaborated with implementable guidelines ,solutions and check from audit view-points. How it is practicable from legal angle or otherwise to display ingredients for consumer knowledge. If a menu indicates 100 or more items, practicable solution from all angle including audit should be described.</p>	<p>should be specified.</p> <p>10. Surplus food in context of nature of food and its usable period at defined storage should be prescribed.</p> <p>11. Under sale or display of food, details of the label declaration to be made must be indicated. In case that particular display product is not for sale ,only for display as an advertisement with name. This aspect should be elaborated.</p> <p>12. With out testing, quality of ice and water is not possible to check. This needs to be clarified.</p> <p>13. Surrounding cleanliness and good environment can not be within scope of food vendor specially street food vendor. How it is implementable.</p> <p>14. Small food vendors can not be expected to follow a series of hygienic requirements. It is better to categorize them in different group and then state check list.</p>	<p>has to be logical and practicable. For a number of food establishment, so many requirements are not needed for food safety, then it is not logical to put under non conformity and reduce their percentage conformance.</p> <p>4. Further packaging of food is not applicable in many restaurants/dabha. So this can not constitute a criteria for their assessment. Training aspects have been put under minor must. This is very important from hygiene angle. Lack in training can result in contamination, unsafe food etc.</p> <p>5. Criteria/ categorization should be done in an scientific ,logical and practicable manner which could be auditable on the basis of records and evidences. Testing is very important aspect for verification and ensuring compliance of food safety. But the document has not given any importance to analysis for conformance. Kindly note that no food quality including</p>
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		<p>How a consumer choice for change of ingredients can be followed Because a food has to be served as per choice of the consumer not as per ingredients displayed which can be indicative in nature, but can not be used for audit/legal purpose for analysis of samples and declaring it misbranded/adulterated.</p> <p>2. Under precaution, at several place the word preferably has been used. In a matter of food safety there can not be options. So such issue should not be ambiguous.</p> <p>Preparation and processing-</p> <ol style="list-style-type: none"> 1. How preparation and processing can minimize all the contaminants in raw materials to acceptable level for example, pesticide, metals, toxins etc. Does it mean infected food can be used for cooking. This is giving a wrong signal. Any raw material which is to be used in preparation of food must comply with the quality and safety standard of food. 2. This has been mentioned that salad should be kept below 5 degree Celsius. Time limit 		<p>safety can be established without analysis in the food chain.</p>
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		<p>should be prescribed. Further it is appropriate to cut fruits and vegetable at the time of use/service.</p> <ol style="list-style-type: none">3. Regarding reuse of cooked, detailed guidelines should be issued. Rancidity of oil depends upon nature of oil and purpose for which it is being used and how it is being used.4. In fermented food time goes with temperature and method of cooking.5. For package food, first of all packed food, pre-packed food, food packed for the purpose of safety and for carrying like sweet, parcels from restaurants have to be defined in the present context keeping in view requirements of the law. Then a practicable and implementable guidelines should be issued.6. The word preferably should not be used in the matter of food safety as has been mentioned at several places.7. This has been mentioned that vegetables should be washed		
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		<p>with with 50 ppm chlorinated water. A lay man can not understand ppm, it has to be given in simple language. Further it should be again washed with potable water.</p> <p>8. It has been mentioned that cut fruits etc. should be kept in refrigerated----. Preservation goes with time. Time period should be prescribed. This should also be kept in view that Power break down is common feature. This should also be noted that after keeping the food in fridge for a long time,it changes its real taste and texture as compared to fresh food.</p> <p>Transportation -----</p> <p>1. In case of cooked left over food , clear guidelines should be issued in the light of nature of food,if it can be sold next day after keeping in refrigerated condition or unused cooked food should be destroyed in the same night.Some countries have strong legislation.</p> <p>2. From ethical angle and also from scientific angle, it is not appropriate</p>		
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		<p>to keep veg and non veg food in the same fridge/ deep fridge.</p> <p>Special requirements for high risk food</p> <ol style="list-style-type: none">1. Fresh juices can not be allowed to retain in fridge,as it changes its taste and characteristics.2. There are certain food which are kept in refrigerated/ deep fridge condition and eaten with out heat treatment as such after taking it out (fresh chilled and frozen food). These are really high risk food from safety angle. These have not been discussed here.3. All high risk food should be specified for best before use / time period for its consumption/use in food preparation even when kept in refrigerated condition. Normal practice of reheating / cooking a food is much higher than 70 degree Celsius. <p>Safety of a food also depends a lot by the user/consumer. There is a need to have an adequate guideline for the consumer to be given by seller as to how to use the food /</p>		
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		store so that it does not become unsafe and subsequently the reputation of vendor is at stake.		
11.	<p>Rajeev Sharma E-mail : rajeevsharma_2006@rediff.com Phone : 011 26564318 Mobile : 9971203584</p>	<p>Guidelines for food safety Content 1. Following may be considered for modification 2. General Requirements 3. Cleanliness, hygiene in eatery and surroundings 4. Physical health of person engaged in preparation and serving food 5. Raw material including ice and water 6. Process of preparation, use of best practice 7. Storage of semi cooked and cooked food 8. Packaging of food 9. Transportation of semi cooked /cooked food 10. Utensils and equipments 11. Waste collection, storage, handling and disposal 12. Pest management 13. Special requirement for high risk food-Knowledge, resources & capability An exercise is required to systematically place the contents and reduce</p>	<p>The checklist can be made user friendly by dividing into only following four parts A. Management i) Premises ii) Personnel iii) Equipments & utilities iv) Hygiene & insect pest v) Waste(segregation, handling, disposal) vi) Quality(Preparation, Knowledge & skills, Service delivery, health & hygiene) B. Procurements, Storage, Preservation & Use i) Raw material ii) Water iii) Intermediate products iv) Finished product C. Processing & food service i) Use of raw material ii) Cooking iii) Storage of cooked food/Packing of takeaway products iv) Preparation and Serving</p>	<p>Though evaluation criteria indicates only answers in yes or no, it can also specify numbered evaluation to workout poor, average, good, very good and excellent for accreditation / certification improvements and bench marking purposes. Minimum marks can be fixed to come to the expected level. Sensitive issues like Control of contamination Hygiene at place where food is cooked and served Requirement of temperature maintenance Self-life of raw material & cooked food Health & personnel hygiene of workers and personnel engaged in all processes Need to be given specific attention. Food Safety Rating Systems The rating system is defective in the sense Five Star Restaurant cannot be compared with road side</p>

		<p>duplication, the simplification is one of the first requirement of easy acceptance of guidelines</p> <p>1. General requirements Display of signboard Type of food served-Veg /Non-veg Authorization (License /Certificate) Health of person engaged in preparation and service Cleanliness and hygiene Separation of area of raw material, preparation and processing, service , eating place Un used / Used utensils and equipments Waste bin Pest control Raw material Source Quantity to be procured Use on fifo basis / before expiry date Storage as per instruction on level / maintaining contamination free Temperature maintenance for high risk ingredient Hygiene and pest control at the place of storage of raw material 3. Water and Ice Source, transportation, handling,</p>	<p>the cooked food v) Storage of surplus food</p> <p>D. Trainings i) Personnel working in the workshop ii) Personnel in the shop, restaurant at service window iii) Venders</p>	<p>eatery, there must be a minimum criteria for certification keeping in mind numerous such eateries spread throughout the country serving different strata of the population each on isolated by its own economic status and usually without infringement in any other area. As such critical must be given due importance, general minimum requirement may be defined and adhered to. What will be of those eateries that do not come in the criteria meant for certification, I do not know whether the eatery unable to maintain critical parameters will be allowed to operate. Due consideration may be given to above. Being certifiable aspect more feedback will follow shortly.</p>
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		<p>storage, utensils cleanliness during consumption</p> <p>Dangers of using contaminated water</p> <p>4. Formulation</p> <p>No comments</p> <p>5. Preparation and processing of food</p> <p>More elaboration needed covering specific requirements for different type of food</p> <p>HACCP principles needs to be incorporated</p> <p>Best Hygienic Practices, Best Manufacturing Practices, Best Processing Practices need to be given importance at first place and repetition needs to be avoided</p> <p>7. Personal Hygiene</p> <p>Communication flow needs to be smooth, any person having infectious disease avoid contact with food in the food chain at any stage.</p> <p>Separate health insurance for workers engaged in food business will help the implementation; cost should be shared between state government and food business operator</p> <p>9. Requirements at the point of sale</p> <p>The classification into high risk and</p>		
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		<p>low risk is itself confusing, once government agencies are aware about the risks this should be stopped at the point of origin it-self. Instead critical control must be applied and units free from any hazards should be allowed to do the food business. Efficacy of Government machinery for monitoring such a risk free food business needs to be evaluated first. Trainings-Even for the highly trained person, fresh trainings add something new. Every person engaged in food business needs to be given training, frequency, type and duration of training needs to be worked out. Attending workshop be made mandatory before issue of license to any food business operator, monitoring of people so trained at interval by trained officers will ensure in plugging loop holes in the system.</p> <p>Communication with the public Public awareness will help avoidance of purchase of food from eateries unable to maintain desired standard. And integrated feedback system</p>		
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		<p>will consolidate implementation. IT based two-way communication Will be most suitable and must be implemented. Complaint management, displaying to whom to complaint on the notice board of eatery will help public involvement and improvement.</p>		
12.	<p>Dr. V. Prakash Director, Central Food Technological Research Institute CFTRI Mysore 570 020</p>	<p>The documents have been prepared covering important aspects such as (a) Raw materials / ingredients, (b) Premises, (c) Preparation and Processing, (d) Handling, Storage and Transportation, (e) Personal Hygiene, (f) Cleanliness and Sanitation, (g) Pest Control and (h) Waste disposal.</p> <p>However, following points may be considered:</p>	<ol style="list-style-type: none"> 1. Proper definition of Medium to Small eating establishments in terms of business volume and turn-over. 2. To include scope and objectives. 3. The first document to cover definitions on – Food Safety, Hygiene, Contaminants, Contamination, Food Chain, food Additives, etc., 4. While dealing with Food Processing, some points need elaboration, e.g., <ol style="list-style-type: none"> a. Food grade utensils: Stainless-steel or anodised aluminium vessels to be used. While using aluminium vessels some safe practices such as “storing salty and acidic foods to be avoided” and to be highlighted. b. The role of ph or Acidity of processed foods vis-a-vis risks and hazards need to be explained with examples. c. These establishments commonly use colours in R.T.E, dishes, sambars/dhals, chutney etc., which has to be discouraged. List of permitted food grade colours be mentioned along with the product in which colours are permitted. Similarly, there is a need to provide information on the use of other additives such as synthetic sweetners, flavours or flavour enhancers so that additives are not abused. d. The documents – “Suggested checklist for food safety” and “Criteria for audit of food establishments need 	

		<p>to be aligned so that these establishments adopt the guidelines properly.</p> <p>5. Audit food establishments should also</p> <ul style="list-style-type: none"> • Cover checking the process control plans and Food flow charts • Audit to be conducted randomly. <p>The above programme can be successfully implemented only by integrating the inspection and compliance programmes of different state agencies and by conducting proper Awareness-cum-education programmes to all the stakeholders.</p>		
13.	<p>Deepak Saxena</p> <p>CUTS Centre for Consumer Action, Research and Training (CUTS CART) D-222, Bhaskar Marg, Bani Park Jaipur 302 016, India. Email: ds@cuts.org/cart@cuts.org</p> <p>Web: www.cuts-international.org</p>	<ol style="list-style-type: none"> 1. There is a need to interlink the three documents. 2. The guidelines need to be made more user specific rather than vague or general. 3. Divisions of chapters and the sequencing to be made consistent with the sections/clauses of the criteria document for the purpose of making more reader friendly. 	<ol style="list-style-type: none"> 1. There is a need to have proper color coding system in order to differentiate in case of cutting board, knives storage containers etc in food preparations especially Veg and Non Veg system including their cutting boards and storage unit to prevent cross contaminations. 2. More descriptive details on thawing, storing, refrigerating and cooking of food of different levels, varieties and qualities be spelt out. 3. Garbage disposal mechanism to be further specified. 4. The document is well drafted and hence no further 	<ol style="list-style-type: none"> 1. The document is very exhaustive covering all the guidelines. 2. Difference between major and minor should clearly come out. 3. Criteria of auditing has to be spelt out under control of operation. 4. Cooking near the unhygienic places like aside nala or any drainage area should be completely banned. 5. Aspects like reusing of utensils, semi cooked materials, pre cooked material are to be elaborated, which

			comments.	could be hazardous as being major source for contamination at time of cooking.
14	<p>Dr. S. Dave Director</p> <p>Agricultural and Processed food Products Export Development Authority (APEDA)</p> <p>(Ministry of Commerce & Industry, Govt of India)</p>	<ol style="list-style-type: none"> Guidelines should contain a section on definitions to make it more convenient for stakeholders to understand the guidelines. Training is fundamentally important to any food hygiene & safety system. So it should be covered in the guidelines. Guidelines should address the customer complaints. 	No Comments	<ol style="list-style-type: none"> Validity of certificate & surveillance audit should be mentioned in the document to fulfill the objective of the standard. Section 2.2 (Definitions) should also include the meaning of following expressions : <ul style="list-style-type: none"> Traceability Product withdrawal & Recall Pre-packaged foods Food Quality
15	<p>Umesh Naik, Food Technologist,</p> <p>Food Safety and Quality</p>	<ol style="list-style-type: none"> Harmonisation is perhaps required to ensure that Guideline (that documents ‘what’ is expected), Criteria (<ol style="list-style-type: none"> The word ‘criteria’ here has a different meaning to the similar word in the actual Criteria document. In the 	<ol style="list-style-type: none"> The title of third column of the table/ section 3 may be changed to ‘Significance of Requirement’ (since this

<p>-Consultant, Auditor Email : cadburyumesh@gmail.com Contact : 09990399825</p>	<p>that captures the requirements and expectations in more detail) and the Checklist (that assists in the evaluation of compliance level) are talking from ‘ the same page’.</p> <ol style="list-style-type: none"> 2. Quality of ice has featured as one important point. Ice in most cases (except few upclass outlets where ice cubes are delivered), is brought in from Ice factories where the quality of water is mostly bore well. To add to the problem, the ice factory owner or his staff never consider it as an item of consumption and treat it with least respect. Any stringent clauses focussing therefore at the usage point for ice will have little benefit unless the source issues (raw water, facility, people and processes) are addressed and rectified. 3. Awareness and harmful effects of reusing cooking oil for repeated times need to be imparted thru guidelines and training. 4. Some criteria needs to be incorporated which stipulates 	<p>checklist document, it perhaps can be replaced with ‘ aspect ‘ or ‘subject’, for that is what it is.</p> <ol style="list-style-type: none"> 2. Similarly ‘checks’ could be replaced by ‘requirements’ and ‘ Y/N/NA’ be ‘Compliance Status’. 3. The checklist is expected to evaluate the conformance status of the criteria requirements to help in rating and hence should have consistency to the criteria document. 4. Checklist has additional points on which the ‘check ‘is carried out. Similarly Criteria document has additional requirements that need to be incorporated in the Checklist. 5. A quick test / thumb rule needs to be incorporated to check cooking oil reuse at the time of assessment / audit. 	<p>qualifies the requirement to be Critical, Major or Minor).</p> <ol style="list-style-type: none"> 2. One attempt can be made to use the Criteria document in a Checklist format by adding additional ‘Yes, No, N/A’ columns to facilitate this process. (One example using Pest Control is attached to explain this better towards end.) 3. Use of Temp. display (both for cold and hot foods) as well as thermographs / data loggers should be introduced to ascertain those situations where compliance to temp / time is important for food safety (food kept at ‘X’ temp for ‘Y’ time) and can be verified using these kits. This should also counter power outages and ‘power / cost saving’ attempts by the establishment. 4. The requirement for portable water can be redefined as Municipal water (other than for drinking water) so that it is not left to the establishments to define
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		<p>sending of food samples to accredited food labs at pre determined frequency for food safety / microbial testing and records to be maintained.</p>		<p>portable water standards.</p> <ol style="list-style-type: none"> 5. This indirectly will also make Municipal water connection a requirement by default. 6. Section 9 – Training can never be a Minor requirement. Especially when dealing with Food safety and particularly w.r.t entrepreneur / family run eateries with unskilled staff. 7. Likewise for 3.3.1 (b) Water storage tanks, 3.3.2- drainage and waste disposal, 3.3.4 – hygiene/ toilet facilities, 4.7 – Mgt and Supervisor Food hygiene knowledge – these can never be Minor requirements
16.	<p>R.G. Gupta, M.Sc. (Food Tech.), DIM, ADM, DMM President, Food Analysts Association [F.A.A. (India)] Head Office Ghaziabad, Public Analyst, Rajasthan State P.H. Lab, Nayapura KOTA -324001 Mob. 94605-66544 No Email Facility, No Fax</p>	<ol style="list-style-type: none"> 1.1 Display License etc With Photograph of owner or Nominee, I.D. proof for movable vendors. 1.2 Knowledge ... Supported by Training/Diploma in food safety e.g. IGNOU. 1.3 Record of health check-up & Name of Medical Examiner, record Available for your satisfaction 	<p>(Gen.) Inclusion in check list must be made</p> <p>1.0 Weather Purchased from certified points? e.g. Mother Dairy, Organic Farm?</p>	<ol style="list-style-type: none"> 1.1 Code should be framed in the light of food laws FSSA-2006/PFA/MMPO etc If, not : How one can be made punctual to follow code, which has no legal base?

		<p>1.4 Food Safety Messages... Display Charts Must be made available by Govt.</p> <p>1.6 No Sale/Purchase without cash Memo/Voucher.</p>	<p>Include in Check List</p>	
		<p>2.1 Obtain Raw Material from Certified points by QCI or Agmarked or ISI or FPO holders.</p> <p>2.6 Facilities for spot test must be made available like petrol pumps e.g. L.R. of Milk.</p> <p>2.8 Packaged food... check for – Name of food, ingredients, colour or additives, Manufacturer Address, Packer, Mode of use/Store, Batch, DOP, Best Before, Nutrition, (see min of Cons. Affairs advt. for awareness).</p> <p>2.9 Display of Datewise procurement of RM</p>	<p>2.0 Display in Storage Area Required Cold Storage-Needs display of temperature zones and cooked food/Raw Food store Cabin/Shelves.</p>	<p>2.1 Category wise classification and allotted category, must be visible to all Inspection body and foreigners like trains with PC, ISO-Co. Hence Suitable Symbol Must be Compulsorily Displayed on entrance/reception.</p> <p>2.2 Definition Must include examples e.g. Sanitizers : Steam, Iodophores, Chlorine water</p> <p>Add – Pasteurization, Boiling, Sterilization etc.</p>
		<p>3.0 Water must be kept category wise/Labelled e.g. Drinking, Washing, Preparation or all</p>	<p>3.0 - Type of water available ISI/</p>	<p>3.1.1 Certified and licensed by any Government agency, ISO / ISI</p>

		<p>water should be in ISI certified container, Packs like Drinking or Mineral Water (See : in Delhi “Pani-Puri” Restaurants use mineral water)</p> <p>3.1 Source of water must be displayed e.g. municipal supply, own tubewell, ISI/Mineral Water or R.O. water.</p> <p>3.7 Ice must be purchased from QCI certified ice-plants: Warning : Most ice factory sale non-food ice but used as ingredient in food preparation e.g. sugar cane Juice/fruit juice sellers.</p> <p>3.8 ICE-transporting vehicles must get cleanliness certificate or must be specific type e.g. milk tankers or ice-cream vans.</p>	<p>Municipal/R.O system installed.</p> <ul style="list-style-type: none"> - Best Before etc. noticeable? - Thawing (Separate Veg./ Non-veg.) Chambers available? <p>Must be physically Verified?</p> <p>Physical verification?</p>	<p>/ FPO?</p> <p>3.2 Building examined by FPO/ PFA licensing officer?</p> <p>3.2.2.4 Floor have slope recommended by F.P.O. etc.</p> <p>3.2.2.4 Fly proof Door/Windows?</p> <p>3.3.1 (a) Type of water available ISI/R.O. system/municipal</p> <p>(b) Storage tanks cleaned on date _____ Like Railways.</p> <p>3.3.3. Cleaning - Type of soap/ detergent/ sanitizers used/ available.</p> <p>3.3.4 Dis-infactants</p>
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				<p>(After Toilet) available</p> <p>3.3.6 Dust - proof-fly-proof air-inlets. Exhaust fans covered with cloth bag/gauge like milk powder plant.</p> <p>3.3.8 Storage : Warring Display must : Don't touch food ingredients while handling chemicals, non food items!!</p>
		<p>4.0 Display Chart for consumer alertness to be prepared by FSSAI e.g. TRANS FAT not used here, avoid soya consumption if you have allergy.</p>	<p>4.0 Dust Proofing/ Fly proofing?</p> <p>Ice-food grade?</p>	<p>4.1.3 (D)(ii)</p> <p>Visitor's Register, Dress-code, washing hands etc bring maintained?</p> <p>4.2.2 Vehicle is clean & fit for food transportation?</p> <p>Vehicle – No other Material loaded? Vehicle-Covered/ fly proof or temperature controlled e.g. ice-cream van. All workers on vehicle/van are clean/medically fit? Bearing ID</p>

				<p>cards?</p> <p>4.4 (a) Separate water tanks available for washing, preparation cooking and drinking?</p> <p>(b) Ice from certified ice-plants?</p> <p>4.5 Storage Cabinets / shelves are marked as per category of food.</p> <p>4.7 Food safety dip. (from IGNOU) holders or food nut graduates must be employed if required.</p> <p>4.8 If must include transportation vehicle details and quality examination reports from food labs if required e.g. food grade packaging material certificate from C.F.T.R.I.</p> <p>4.9 Product recall on consumer complaint : keep suggestion book updated sale closed for specific item to be displayed e.g. poultry /eggs in Kolkata last year.</p>
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		<p>5.7 Keep old/left Edible oil in separate marked container – “NOT FOR USE”.</p> <ul style="list-style-type: none"> - Chlorination Method Must be known to fruit & veg. users before cooking - Washing Hands/Utensils/ knives with $KMno_4$ solution advisable 		<p>5.2 Display last pest control spray date / Name of Agency if any.</p>
		<p>6.1 Certificate from Nearest food Inspector, QCI or any Agency Must be Carried by Transporter “Vehicle for FOOD-TRANSPORT only”</p> <p>6.2 Log book for transporter must be kept in vehicle.</p> <p>6.3 Chambers of cooling temp. must be demarked e.g. 0-5°C (Milk), fruit/veg. 5°-20°C veg./ Non veg.</p> <p>6.10 Ensure that vehicle is dried/ wiped well after washing with chlorinated water/disinfectants etc.</p>	<p>6.0 Cooked food are heated up to 75°C (to kill pathogens).</p>	<p>6.1 Health check points during Common Wealth Games must be readily available to all food-sellers as they hire daily-wage workers.</p> <p>6.2 Proper dress code & change facility.</p> <p>Locker / box for personal belongings & own clothes.</p> <p>6.2.2(b) Washing hands with $KMno_4$ solution / disinfectants advised followed.</p> <p>6.2.3 Tobacco, Cigarettes etc. found with</p>

				<p>working staff? Staff eating home-made food in kitchen?</p> <p>6.3 Dress-code/washing hands code for visitors being followed :</p> <p>Personal belonging kept out side in lockers.</p>
		<p>7.0 Identity card for certified food handlers be must</p> <p>7.1 2-3 days training by QCI/FAA (India) Should be organized before Common Wealth Games, in each sector of Delhi/ surroundings of stadiums etc. FSO/F.I. with health workers may plan such demo/ exhibitions.</p> <p>7.7 Persons must be checked and chewing materials if found, must be thrown away : (F.I./ FSO'S Role).</p>	<p>7.0 Food Served in food-grade certified disposables.</p>	<p>7.1 Transportation vehicle free from mud, dust, flies etc. Entry after proper gate pass of cleanliness and workers health certificate / ID card etc.</p>
		<p>8.0 Vending/Selling units must be certified, Display of Some indicator colour/design/logo</p>	<p>8.0 Product Label : 7-8 information available (see</p>	

		<p>for every certified van/shop etc authorized by QCI/ FSSAI.</p> <p>8.11 Provide Lockers/small chambers for putting personal belongings while entering a restaurant/hotel e.g. we put bag/books at entrance gate in a library.</p>	PFA Section VII)	
		<p>9.0 Classification of high risk/ low risk vendors should be done by QCI/F.A.A. (India)/ FSO/FI with colour demarcation easily understood by visitors e.g. iodized salt pack have smiling sun logo – can be read by rural mass, students too.</p>	<p>9.0 Date of purchased (surplus food) and use by date displayed?</p>	<p>9.0 Food safety / Food / Nutrition Diploma Holders?</p> <p>Any authorized training?</p> <p>9.1.3 Supervision : By well qualified food professional or Experts or Consultants.</p>
		<p>9.3 Pets not allowed (Warning boards display must).</p> <p>9.10 Use small spice pouches like railway or keep marked small sprinkling pots for salt, pepper (well sealed from back after filling spices in it).</p>		

		<p>10.2 Trolley dustbins must be marked or have been specific coloured.</p> <p>10.5 Spitting/chewing not allowed-punishable-display warning is must.</p> <p>10.8 Demarcation/separation line/partition required with signboard.</p>	<p>10. <u>Ice-Water</u></p> <ul style="list-style-type: none"> • R.O/Municipal Supply? • ICE- Food grade/ Non food grade? • How ice-covered/stored (Jute-cloth) Wooden Pallets? 	
		<p>11.0 Training must be covered (as suggested at 7.1) e.g. difference between detergent and soap used for cleaning.</p>		
		<p>12.1 Biodegradable/Non Bio-Dustbins should be differentiable by colour design : Packaging companies must be informed to make such containers available on demand from food sellers/restaurants etc.</p> <p>12.7 Training : How to keep Insects – pests away? (be included as in 7.1)</p>	<p>12.0 Fly-proofing/air curtains available? Use of $KMno_4$/detergent/dettol–water?</p> <p>Floor slope for water-drainage sufficient?</p> <p>Walls are painted or white-washed?</p> <p>Are these washable daily up to 6 ft. height?</p> <p>Covered Lighting system</p>	

			<p>available?</p> <p>15.0 Separately demarked dustbins available?</p> <p>16.0 Auto-door closers available fly proof net/ sieves on windows/ exhaust outlet etc. available?</p> <p>17.0 For Hand wash <i>KMno₄</i> / dettol solution?</p> <p>Near Toilets : Disinfectant available?</p> <p>18.0 Staff member ID-cards? Record of medical examination?</p> <p>First-aid Box available? Dress-Change room?</p> <p>Lockers for personal-belongings and home-cloths/dress keeping?</p> <p>Safe lockers for jewellery/ mobile.</p> <p>Note : Habits during food handling (chewing / spitting / sneezing)? Important addition (Required)</p> <p>19.0 Complaint/suggestion and</p>	
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			<p>inspection book available?</p> <p>20.0 Phone/Address of Nearest FSO/ FI/Lab etc displayed?</p> <p>21.0 Food sampling/testing (on the spot) facility available like petrol pumps?</p>	
		<p>HIGH RISK FOODS : Special requirements sellers/ restaurants must be supplied a list of food : High risk identified under HACCP and FSO/FI/FSSAI must have list of such food sellers to avoid any incident of food-poisoning.</p> <p>1.2 Use certified ISI Water Cans /Containers/RO system in your Restaurant/Food Premises/ Kitchen.</p> <p>1.3 Ice-factories must be given authorization certificate for sale of ice during Common Wealth Games. Non certified ice factories must be locked as most of them sale “Non food ice” but used in food (juices</p>	<p>Note : Special parameters must be checked on the spot with the help of quick tests to be performed with 5 minutes</p> <ol style="list-style-type: none"> 1. Sensory Evaluation. 2. C.O.B. of milk for detection of acidity (developed). 3. Acidity BB/AB for neutralizer added in milk 4. Sediment test in milk 5. Fungus growth in juices 6. Colour of meat 7. Calcium carbide used in fruit-ripening 	

		<p>stalls) preparations.</p> <p>1.5 Keep chlorinated water or $KMno_4$ solution in some marked vessel/containers for such purpose.</p>	<p>8. Mineral Oil coating</p> <p>9. Iron fillings in tea</p> <p>10. Stone polish in pulses</p> <p>11. Colour In Pulses</p> <p>12. MBRT for milk/water</p>	
		<p>2.0 List of authorized slaughter house must be made available to small vendors/restaurants. Non-certified slaughter houses must be discouraged to operate during Common Wealth Games.</p>		
		<p>3.8 Separately marked dust bins must be placed.</p>		
		<p>4.0 Purchase milk from certified points e.g. mother dairy.</p> <p>4.1 All equipments / utensils... must... Sanitized.</p> <p>5.1 Wash tubs with $KMno_4$ water should be maintained daily.</p> <p>5.3 Personal Hygiene : Medical check up record must be kept</p>		

		<p>for observation. All should have I.D. cards.</p> <p>5.4 ISI marked food additives or with cash memo (proof of purchase) is must.</p> <p>5.6 Spoiled Product : Transfer to specified dustbins with lids.</p> <p>6.0 Consumption hours should be specified as per local ambient temperature.</p> <p>7.0 Same as 6.0</p> <p>8.0 Keep used / left oils in separate – marked container.</p> <p>10.0 Thawing pots for veg./ non-veg. foods be maintained & marked separately.</p>		
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<p>18.</p>	<p>Mrs. Vasundhara Pramod Deodhar President C/o Mumbai Grahak panchayat, Grahak Bhawan, Sant Dnyaneshwar Marg, J.V.P.D Ville Parle West, Mumbai 400056</p> <p>General: It is felt that in the interest of the Consumers' health the three major aspects viz. water, refrigeration & garbage must be made 100% compliance critical criteria. It will ensure safe food to a great extent.</p> <p>1. A bilingual display board making Consumers aware of the level of Cleanliness, quality of</p>	<p>2. In all the draft documents there is mention of Food Grade utensils, containers etc. Are the criteria for such material made available, e.g. SS-316, type of plastic & its life?</p> <p>It has been specifically pointed out during our trainings in UICT, that plastic &/ melamine utensils, plates & cutlery have specific life with respect to food-safety. There is a need to discard such items after regular intervals, lest micro contamination takes place every time food is served/ stored in these plates/ utensils. There is also research available with respect to Food-safety & Microwavable plastic. It suggests glass/porcelain instead.</p> <p>3. Under Guideline No.4, Formulations, it is expected that Consumers are kept informed of the ingredients. For this purpose the Menu-card has to be modified uniformly, just display as suggested is not enough.</p> <p>4. It is difficult to expect Self regulation for the guideline</p>		<p>Criteria for Audit (QCI draft) 3.3.1 gives “Adequate potable water...” as Minor must criteria. Here also, quantification depending on the type of food establishment has to be done, to ensure desired level of cleanliness/hygiene. Adequate can be very subjective.</p>
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<p>service/cutlery should form part of the establishments, as all consumers are not aware of matters like:</p> <ul style="list-style-type: none">• Reasonable care is taken to keep the premises clean & insect & pest free.• Any health hazard such as chipped/unclean glass, plate should be brought to the notice of management.• For health reasons consumers can enquire about ingredients/contents of any diet.• We maintain quality of Frozen foods and cooking oil.	<p>no.5.7 i.e. Re-use of cooking oil should be avoided. Therefore it is suggested to have record of the oil used and discarded, to ensure/monitor safety of Fried foods.</p> <p>5. The guideline under 6.3 be modified to have “two different refrigerators for non-veg & veg food”. Moreover, considering the status of Power supply in different parts of the country, it must be made Critical to have alternative arrangements to keep these refrigerators/freezers continuously on/running/functioning.</p> <p>6. Surplus food: Guideline 6.8 for cooked/ prepared food suggests “All surplus food & unused thawed food should be discarded”. However, No.9 of Checklist gives different check for surplus food viz.” Surplus food are stored in refrigerator.” This discrepancy needs to be removed. Moreover, mixing</p>		
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		<p>of left-over & freshly cooked foods has to be avoided, if surplus food is not being discarded.</p> <p>7. Garbage: 9.2 of Guidelines be modified by adding the words” & any other garbage” and 3.1 of Criteria by adding “all animal & human waste”. For both these item the word “away” is rather vague. It is very important, to ensure food safety, that there is a certain specific distance defined in meters between Eating establishments & garbage &/ waste.</p>		
19.	<p>Dr. Shalini Sehgal Associate Professor and H.O.D Department of Food Technology, Bhaskaracharya College of Applied Sciences University of Delhi, Sector-2, Phase-I</p>	<ol style="list-style-type: none"> 1. These need to be more specific in terms of implementation esp. depending on the type of the food serve by an establishment and risk category of foods involved. 2. There should be a uniform format for the display board. (In case of complaints, the details of the contact person should be mentioned clearly). 	<ol style="list-style-type: none"> 1. Checklist for small food vendors should be separate. 2. Column for the degree of compliance must be mentioned separately. 3. Safe raw material is very critical but checklist is not equipped for checking the 	<ol style="list-style-type: none"> 1. Criteria mentioned in the title whereas a code inside the document. 2. Classification of the types of food establishments esp. the small and medium food joints needs clarity.. Point (h) under establishment is incomplete. 3. Guidelines for mobile eateries / vendors not clear.

	<p>Dwarka, New Delhi - 110075. Email: shal_sehgal@lycos.com shalinisehgal72@gmail.com</p>	<ol style="list-style-type: none"> 3. Regular health checkups by which agency and at what intervals is very critical as majority of workforce is temporary even daily wagers. 4. Critical processing steps for different food products should be highlighted. 5. List of user friendly, cost effective and environment friendly cleaning, sanitizing agents, packaging and serving materials, temperature probes should be made available for better implementation. 6. Hand washing – right technique and duration of washing should be highlighted. 7. Wearing of aprons and head gear should be compulsory along with their regular washing schedule otherwise these will act as a source of contamination itself. 8. No mention of the guidelines for the food colors and additives used. 	<p>safety aspect of raw materials.</p> <ol style="list-style-type: none"> 4. Disposal of leftover food not clear. 5. Type of utensils to be used for each food type needs mentioning. 6. Assessment basis of quality of ice and water is not clear. 	<ol style="list-style-type: none"> 4. Major and minor must be clearly defined on the degree being critical. 5. Levels of implementation or compliance must be mentioned properly. 6. Definitions from the Codex need restructuring to be more user friendly. 7. Definitions of sanitation, cleaning and disinfection should be clear.
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		9. Standard colour coding system for the kitchen knives, boards etc.		
20.	P R A N A Y N A T H S I N G H, M. Tech (Food Technology), Jamia Hamdard, New Delhi- 62.	<p>1. Food seller should not be allowed to handle food without a permit or license.</p> <p>2. All food handlers should have a free medical checkup every 4-6 month in authorized hospitals and health centers. This should be made compulsory otherwise their permit should be cancelled.</p> <p>3. All food handlers should be educated or trained on matters related to personal hygiene, basic health problems and safe & hygienic handling of food. For this purpose, use of media and consumer organizations should be sought.</p> <p>4. Proper rules regarding the location and layout of the establishment should be made by the authorities, these must include:</p> <ul style="list-style-type: none"> • No establishment should be permitted near garbage dumps, urinals, etc. 	<p>FOOD SAFETY CHECKLIST</p> <p>Date_____</p> <p>Observer_____</p> <p>Directions: Use this checklist daily. Determine areas in your operations requiring corrective action.</p> <p>Record corrective action taken and keep completed records in a notebook for future reference.</p> <p>PERSONAL HYGIENE</p> <ul style="list-style-type: none"> • Employees wear clean and proper uniform including shoes. • Effective hair restraints are properly worn. • Fingernails are short, unpolished, and clean (no artificial nails). • Jewelry is limited to a plain ring, such as wedding band and a watch and no bracelets. 	<p>A regular audit should be there to ensure whether guidelines settled by the authorities are followed by the establishments or not.</p> <p>1. Details of license and certificates issued for the establishments should be made available online so that verification can be done onsite at the time of audit. It will also facilitate consumers to check that whether a particular establishment is authorized to sell food items or not.</p> <p>2. Audit team should have technical experts in it that should monitor each and every aspect important for food safety.</p> <p>3. Audit should be sudden but without giving prior notice.</p> <p>4. Samples should be collected and tested as soon as possible.</p>

		<ul style="list-style-type: none"> • All establishments should have closed and isolated serving area. • All establishments should be totally isolated from the polluted air. Proper air filters and air conditioning should be installed. • All establishments should have proper space for accommodation and setup. • Hot air curtains should be provided at entry. • Separate way for receiving of raw material, waste disposal and customer entry. <p>5. All license and certificates issued by the authorities should be placed on display board so that customer can feel assured for safety.</p> <p>6. Only permitted grade & quality of raw material should be used.</p> <p>7. All types of hot servings should be prepared fresh to avoid reheating, as it increases chance of spoilage and nutritional value get decreased</p>	<ul style="list-style-type: none"> • Hands are washed properly, frequently, and at appropriate times. • Burns, wounds, sores or scabs, or splints and water-proof bandages on hands are bandaged and completely covered with a foodservice glove while handling food. • Eating, drinking, chewing gum, smoking, or using tobacco are allowed only in designated areas away from preparation, service, storage, and ware washing areas. • Employees use disposable tissues when coughing or sneezing and then immediately wash hands. • Employees appear in good health. • Hand sinks are unobstructed, operational, and clean. • Hand sinks are stocked with soap, disposable towels, and warm water. • A hand washing reminder sign is posted. 	<p>5. All the records maintained by the seller should be properly checked.</p> <p>6. Proper database should be maintained of each and every audit.</p> <p>7. Onsite verification of license and other certificates should be done.</p> <p>8. Audit team should be given the authority of taking action if violation is there.</p> <p>9. Team should also have a doctor that can monitor the health status of the workers that whether he/she is eligible to work or not</p>
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		<p>gradually.</p> <p>8. Record of time, date, etc. (of preparation of servings) should be maintained properly, and also be displayed publically.</p> <p>9. All the unsold materials should be discarded properly.</p> <p>10. Servings made from milk should not be refrigerated for more than 24hrs.</p> <p>11. Display panel of different units should be installed at the point where customer can see it. (refrigerator, air conditioner, etc.).</p> <p>12. Only potable water should be used. Water should be kept in clean, covered tank or drum fitted with a tap. Hand or any utensils should not be dipped in the source of water. To disinfect water it should be chlorinated.</p> <p>13. Ready to eat food items (lose sweets, etc.) should be stored</p>	<p>FOOD PREPARATION</p> <ul style="list-style-type: none"> • All food stored or prepared in facility is from approved sources. • Food equipment utensils, and food contact surfaces are properly washed, rinsed, and sanitized before every use. • Frozen food is thawed under refrigeration, cooked to proper temperature from frozen state, or in cold running water. • Thawed food is not refrozen. • Preparation is planned so ingredients are kept out of the temperature danger zone to the extent possible. • Food is tasted using the proper procedure. • Procedures are in place to prevent cross-contamination. • Food is handled with suitable utensils, such as single use gloves or 	
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		<p>hygienically at appropriate temperatures and should be well protected from flies, dust, and other sources of contaminations.</p> <p>14. Samples should be kept separately from rest of the product, so that consumer can check it without touching the rest of the product.</p> <p>15. Ready to eat food items should not be touched bare hands. Instead, disposable gloves, tongs, spoons, etc. should be used. Proper hand washing facility for food handlers should be provided.</p> <p>16. Plates, spoons, etc and glasses and any other item that comes in contact with lips or with food, should be washed with detergent and clean hot water.</p>	<p>tongs.</p> <ul style="list-style-type: none"> • Food is prepared in small batches to limit the time it is in the temperature danger zone. • Clean reusable towels are used only for sanitizing equipment and surfaces and not for drying hands, utensils, or floor. • Food is cooked to the required safe internal temperature for the appropriate time. The temperature is tested with a calibrated food thermometer. • The internal temperature of food being cooked is monitored and documented. <p>HOT HOLDING</p> <ul style="list-style-type: none"> • Hot holding unit is clean. <input type="checkbox"/> <input type="checkbox"/> • Food is heated to the required safe internal temperature before placing in hot holding. Hot holding 	
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			<p>units are not used to reheat potentially hazardous foods.</p> <ul style="list-style-type: none">• Hot holding unit is pre-heated before hot food is placed in unit.• Temperature of hot food being held is at or above 135 °F.• Food is protected from contamination. <p>COLD HOLDING</p> <ul style="list-style-type: none">• Refrigerators are kept clean and organized.• Temperature of cold food being held is at or below 41 °F.• Food is protected from contamination. <p>REFRIGERATOR, FREEZER, AND MILK COOLER</p> <ul style="list-style-type: none">• Thermometers are available and accurate.• Temperature is appropriate for	
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			<p>pieces of equipment.</p> <ul style="list-style-type: none">• Food is stored 6 inches off floor or in walk-in cooling equipment.• Refrigerator and freezer units are clean and neat.• Proper chilling procedures are used.• All food is properly wrapped, labeled, and dated• The FIFO (First In, First Out) method of inventory management is used.• Ambient air temperature of all refrigerators and freezers is monitored and documented at the beginning and end of each shift. <p>FOOD STORAGE AND DRY STORAGE</p> <ul style="list-style-type: none">• Temperatures of dry storage area is between 50 °F and 70 °F or State public health department requirement.	
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			<ul style="list-style-type: none">• All food and paper supplies are stored 6 to 8 inches off the floor.• All food is labeled with name and received date.• Open bags of food are stored in containers with tight fitting lids and labeled with common name.• The FIFO (First In, First Out) method of inventory management is used.• There are no bulging or leaking canned goods• Food is protected from contamination• All food surfaces are clean. <input type="checkbox"/> <input type="checkbox"/>• Chemicals are clearly labeled and stored away from food and food related supplies• There is a regular cleaning schedule for all food surfaces.• Food is stored in original container or a food grade container.	
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			<p>CLEANING AND SANITIZING</p> <ul style="list-style-type: none">• Three-compartment sink is properly set up for ware washing.• Dish machine is working properly (such as gauges and chemicals are at recommended levels).• Water is clean and free of grease and food particles.• Water temperatures are correct for wash and rinse.• If heat sanitizing, the utensils are allowed to remain immersed in 171 °F water for 30 seconds.• If using a chemical sanitizer, it is mixed correctly and a sanitizer strip is used to test chemical concentration.• Smallware and utensils are allowed to air dry.• Wiping cloths are stored in sanitizing solution while in use.	
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			<p>UTENSILS AND EQUIPMENT</p> <ul style="list-style-type: none">• All small equipment and utensils, including cutting boards and knives, are cleaned and sanitized between uses.• Small equipment and utensils are washed, sanitized, and air-dried.• Work surfaces and utensils are clean.• Work surfaces are cleaned and sanitized between uses.• Thermometers are cleaned and sanitized after each use.• Thermometers are calibrated on a routine basis.• Can opener is clean.• Drawers and racks are clean.• Clean utensils are handled in a manner to prevent contamination of areas that will be in direct contact	
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with food or a person's mouth.

LARGE EQUIPMENT

- Food slicer is clean.
- Food slicer is broken down, cleaned, and sanitized before and after every use.
- Boxes, containers, and recyclables are removed from site.
- Loading dock and area around dumpsters are clean and odor-free.
- Exhaust hood and filters are clean.

GARBAGE STORAGE AND DISPOSAL

- Kitchen garbage cans are clean and kept covered.
- Garbage cans are emptied as necessary.
- Boxes and containers are removed

			<p>from site.</p> <ul style="list-style-type: none"> • Loading dock and area around dumpster are clean. • Dumpsters are clean. <p>PEST CONTROL</p> <ul style="list-style-type: none"> • Outside doors have screens, are well-sealed, and are equipped with a self-closing device. • No evidence of pests is present. ☐ • There is a regular schedule of pest control by a licensed pest control operator. 	
21.	<p>KAMALJIT SINGH Consultant Microbiologist & Food Safety/Regulatory Expert</p>	<p><u>Raw Material</u></p> <ol style="list-style-type: none"> 1. Imported food item should bear name and address of the importer PFA Rule -32 2. Ensure supplier gives warranty as per requirement of PFA rule -14 3. Need to develop checklist for regulatory requirement as 		<p><u>Section 2.1</u></p> <ol style="list-style-type: none"> 1. Mobile food carts& Ice cream carts to be included. <p><u>Section 3</u></p> <ol style="list-style-type: none"> 2. Equipment/utensils as per requirements of PFA Rule

		<p>many small vendors may not be fully aware of applicable rules & regulations.</p> <p><u>Personnel hygiene</u></p> <ol style="list-style-type: none"> 4. Recruitment of staff after medical examination. 5. Half yearly medical check up for food handling staff (stool culture) 6. Vaccination against typhoid every three years food handlers. 7. Hand washing facilities should be provided with non hand operable taps (single push, foot operated) <p><u>Cleaning and sanitizing</u></p> <ol style="list-style-type: none"> 8. Hygiene, washing, drying, wiping of cooking utensils. Crockery, Cutlery & Glassware. In case of manually operated washing system – 3 tier systems should be applied. 9. Walls, tiles, food preparation areas and equipment, cutlery, crockery, glassware's, chopping boards to be sanitized by dipping in 100-150 ppm available chlorine 		<p>49(1-5)</p> <ol style="list-style-type: none"> 3. Windows which can be opened should be fitted with fly proof screens. Air curtain at doors opening to atmosphere. 4. In case of manually operated washing system – 3 tier systems should be applied. 5. Non hand operable taps at hand washing stations. 6. Adequate natural and / or artificial lighting shall be provided in food premises to ensure safe production of food and facilitate cleaning of premises. <ul style="list-style-type: none"> • 400 lux (minimum) on working surface • 200 lux (minimum) in storage rooms <p style="text-align: center;"><u>Section 4</u></p> <ol style="list-style-type: none"> 7. Records of Warranty declaration as per form VI-A to be maintained. For each delivery/batch 8. Food grade packaging material
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		<p>solution for 3-5 min.</p> <p><u>Waste disposal and pest control</u></p> <p>10. All garbage cans should be covered, foot operated , cleaned daily, sanitized and collected at an assigned collection point at a public garbage collection system</p> <p><u>Microbiological Specifications for Ready to Eat Food, Water, Ice, Hand& Equipment Swabs</u></p> <p>11. Refer guidelines issued by Australia New Zealand Food standards & Food and Environmental Hygiene Department Hongkong for Ready To Eat Food</p> <p>12. FSSAI have to develop microbiological specifications for Ready to eat foods in order to ensure that end results are achieved & verified. Many countries have microbiological specifications in place</p> <p>13. Microbiological Specifications for water: Coliform/E.coli-absent /100ml</p> <p>14. Microbiological Specifications for Hand Swab Coliform – absent /per swab 25 square cm</p>		<p>9. Monitoring records of pot ability quality of water/ice (chlorination or microbiological)</p> <p>10. Stocks of raw materials and ingredients shall be subject to effective stock rotation. First in first out or first expiry first out as applicable</p> <p><u>Section 6</u></p> <p>11. Food handlers medically examined every six months and records kept there on</p> <p>12. Records of microbiological analysis of food/water/ice/hand& equipment swabs conducted periodically in order to demonstrate effectiveness of food safety system ensuring preparation of safe food</p> <p>13. FSSAI have to develop microbiological specifications for Ready to eat foods in order to ensure that end results are achieved & verified. Many countries have microbiological specifications in place.(Refer</p>
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22.	<p>Mr. R. Desikan, Trustee Concert (A Public Charitable Trust)</p> <p>General : The following suggestions may be considered for inclusion:</p> <ol style="list-style-type: none"> 1. The guidelines may be made available in regional languages. 2. A list of Government Testing Laboratories and NABL accredited Laboratories and their addresses may be given. 3. Continuous and periodical orientation training may be 	<p><u>Clause 2.3</u> – Define the food “unfit for consumption” with an example.</p> <p><u>Clause 2.5</u> – The word “foreign body” may be changed to “foreign matter”</p> <p><u>Clause 2.6</u> Difficult without lab – “A Spot Test kit” may be recommended for use.</p> <p><u>Clause 2.10</u> “High risk food” – Examples may be given – Milk etc.</p> <p><u>Clause 3.0</u> “Water for drinking” – specify quality parameter – boiled & cooled etc.</p> <p><u>Clause 4.0</u> pH – The word may not be understandable to all - Explain</p> <p><u>Clause 5.0</u> “Reduce hazards to acceptable level” – Hazards may be completely eliminated. There cannot be any acceptable level of hazard.</p>		

	<p>given.</p> <p>4. A certificate course on food hygiene may be recommended. Periodicity of training, who can give training etc, may be included.</p> <p>5. Only qualified persons with a certificate may be recommended. Periodicity of training, who can give training etc, may be included.</p> <p>6. A Toll free Food Safety National/State/District level helpline may be provided.</p> <p>7. In certain thickly populated areas of cities specified food zones with all infrastructure like quality water and waste disposal facilities may be</p>	<p>This must be clearly defined.</p> <p><u>Clause 5.9</u> Nutritional information may also be included in 5.9</p> <p><u>Clause 6.5</u> List of permitted colors and list where addition of color is permitted may be provided.</p> <p>SPECIAL REQUIREMENTS FOR HIGH RISK FOODS. (Clause 8.0 Fried Foods)</p> <p><u>Clause 8.3</u> The words “as far as possible” & “wherever possible” may be changed and reworded for definite guidelines.</p>		
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	<p>provided.</p> <p>8. The eating establishment may be insisted to keep and display quality test certificates of their products for consumer verification and inspection by authorities. Or the public and consumer activists.</p>			
23.	<p>Mr. S. K. Nanda Local Health Authority – I Department of PFA, Govt. of NCT of Delhi A – 20, Lawrence Road Industrial Area, Ring Road, Delhi – 110 035</p>	<p>1. In the introductory part of the guidelines, the definition of technical/scientific words used in this document should be given like for the words chemical and biological hazards, allergens, fermented and acidified food etc.</p> <p>2. Raw material; a. In para 2(1) the raw material should be obtained not only from reliable and known dealers but also from the licensed/registered (if applicable) dealers. b. In para 2(10) sub para 4 the word “potentially high risk food”</p>	<p>1. In the point No. 12, waste disposal and pest control, inclusion should be made requiring garbage bags prepared from bio-degradable material should be placed in garbage bins for preventing the bins to be got infected and also for proper disposal of waste products. The bins should be color coated for their easy disposal.</p> <p>2. In point no. 14 Lighting Facility, under Infrastructure: Besides the adequate lighting facility, the</p>	

		<p>mentioned needs to be properly defined.</p> <p>3. Water & Ice: The words “sanitary manners” mentioned at point no. 8 needs to be properly defined.</p>	<p>adequate ventilating is also required to be mentioned (proper air exhaust facility needs to be provided in the kitchen.)</p>	
24.	<p>DIVYA RADHAKRISHNAN QA Manager Breeze Hotel Chennai</p>	<ol style="list-style-type: none"> 1. Cleanliness and sanitization of icebucket, icescoop is very important because contaminated scoop or bucket may serve as a dreadful pathogen source 2. Sanitiser viz., chlorine, quaternary ammonium and its concentration shall be mentioned for equipments, working tables 3. Cooking vessels for veg and non-veg to be distinctly marked 4. Colour coded cutting boards, knives shall be used for veg and non-veg 	<ol style="list-style-type: none"> 1. Colour coding system shall be followed for Proper practice of FIFO E.G.Black sticker with January printed Pink sticker with feb printed on it so that the FIFO/FEFO will be practiced very easily,as the colour alarms the store keeper. 2. All coolers/Freezers to be provided with temperature indicators. 3. Specific temp above which the thawed foods must not cross shall be mentioned. 4. Any band-aid /dressing to be covered by finger caps/gloves 	<ol style="list-style-type: none"> 1. Microbiological criteria shall and sampling plan be included 2. One Equipment swab shall be taken at random per outlet a day 3. One hand swab shall be taken per outlet a day 4. One hot food, cold food a day from a shop

		<ol style="list-style-type: none">5. Handwashing procedure shall be developed,<ol style="list-style-type: none">A. Hands to be rinsed till elbowB. Sufficient amount of soap sol to be taken in the palmsC. Palms to be rubbed wellD. finger grooves and in between fingers to rubbedE. nails to be scrubbed wellF. Back side of the palm to be rubbedG. hands to be shown in running waterH. Hands to be wiped with single use wipers and tap to be closed using the same tissue.6. Hand washing to be done for 20 secs and Hand disinfectant rub shall be provided for the food handlers7. Food handlers shall not have front pockets in their coat and buttons to be avoided.	while on work.	
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25.	<p>Mr Hasmukh Amin Gujarat Laboratory F 17 Madhavpura Market, Shahibaug, Ahmedabad 380.004 079-25626040 gujlab@gmail.com</p>	<p>To ensure the effectiveness & implementation following requirement be included in the Document</p> <p>a. Compulsory testing of potable water as per WHO/IS 10500 or any other appropriate guideline, samples may be drawn by the Govt. official/Any authorized agency or any independent accredited Laboratory & at least once in beginning be tested for all the requirements as prescribed in IS 14543 (Packaged Drinking Water) including Pesticide Residues, Heavy Metals, Microbiological etc The test report received from the laboratory may be displayed in the establishment</p>		

		<p>b. In order to ensure the Hygienic conditions & Microbial contamination of sensitive products like Dairy Products etc guideline for at least testing of the raw material be prescribed as per the PFA requirement</p> <p>c. The Raw material used in the establishment must meet the requirement prescribed in PFA & should be supported by a test report from the accredited/Govt. laboratory</p>		
26	<p>Dr. S. K. Pradhan, Director All India Institute of Hygiene and Public Health Directorate General of Health Services 110, Chittaranjan Avenue, Kolkata – 700 073</p>	<p><u>Section 2. Raw Materials, Point No. 1 (Pg. 4)</u> “Reliable and known dealers” may be replaced by “Authorized dealers”</p> <p><u>Section 5 Preparation and Processing (Pg. 7)</u> Point 7: Whether reuse of cooking oil to be avoided even after single / double frying to be specified. Point 9: Address should be “full” and indication of green / brown dot should be printed on the label.</p>		<p><u>Section II, Subsection 2.2 Definitions</u> Definition for ‘Contamination’ should be at per as under section 3 (g) of the Food Safety & Standards Act, 2006.</p> <p><u>Section III, Subsection 3.3 Facilities, Sub Subsection 3.3.4 Personal hygiene facilities and toilets</u> Suggestion: Training on personal hygiene or only the trained personnel after due medical checkup should be appointed in any food preparation or serving of food for the customer.</p>