



# FOOD SAFETY POLICY AND THE DEVELOPMENT OF SUSTAINABLE CITY-REGION FOOD SYSTEMS



Photo: FoodE photo library

## INTRODUCTION

Food safety is one of the most important regulatory arenas of the food system. Maintaining a healthy and safe food supply for citizens is a huge undertaking that comes with an equally large number of rules and regulations. As the FoodE project focuses on smaller-scale producers, many of these initiatives have expressed difficulties in understanding food safety rules, gaining approval of food safety authorities, and obtaining infrastructure needed to follow food safety guidelines. There is also the opposite extreme, where locally and traditionally grown food from small businesses have a better reputation to consumers, despite being, in many cases, less regulated and less systematically controlled than larger retail and imported food (Herman et al., 2012; Pussemier et al., 2012). Creating a better policy environment that accommodates smaller producers who do not have access to large start-up capital is essential if we want to maintain food safety standards on a small-scale.

## CHALLENGES FOR SUSTAINABLE CRFS

Starting a small food production business is hard enough in terms of obtaining the proper skills and resources. However, figuring out how to comply with food safety regulations designed for industrial production is just as big or even more challenging. With the emergence of many sustainable small-scale producers across Europe focusing on the local market, finding their place within food safety regulations has proved challenging. Food safety regulations have different implications for businesses from large to very small. Larger companies have dedicated staff and other resources to develop a separate team to coordinate implementation of the regulatory requirements to be compliant. However, this approach has proven effective for large companies, but for those that fall into the small and very small categories this approach is challenging. As many of these producers are pioneering either technology or production methodology, it can be difficult to obtain best practice case studies from government authorities. Many food safety regulations require encompassing infrastructure for cleaning or packing food, knowledge of new farming practices (for example, integrated pest management) and improved supervision of labour used on the farm, as well as greater capacity for record-keeping and documentation of decision-making. This has proven to be a barrier for small-scale producers who operate with little start-up capital and have developed business models that will never reach the scale to justify such investments in infrastructure. Finally, growing food in urban areas is also a challenge as it poses new risks that are not present in rural production systems.

## EXAMPLE OF CHALLENGE

[Nabolagshager AS](#), a social enterprise based in Oslo, Norway began experimenting with rooftop farming in 2017. After building a demonstration garden on a rooftop in the centre of Oslo, the group moved to develop business models that could ensure financial sustainability of the project while creating jobs for the local, minority youth. The most logical business model was the sale of vegetables and herbs grown on the rooftop to local restaurants and consumers.

A number of challenges quickly arose with this model. The first was that the rooftop was not private, but rather open for the public. This made it impossible to ensure that the food did not come in contact with other people who did not follow best hygiene practices.

Another challenge was the lack of infrastructure for post-production processes. Without professional sinks, fridges and packing rooms, Nabolagshager was unable to comply with the current food safety regulations. However, the scale of production did not justify the level of infrastructure investment required under the current regulatory framework.

Another example of a specific policy that creates a challenge is the [German Foods, Consumer Goods and Feedstuffs Code](#) (LFGB), enacted in 2005. It ensures compliance with hygiene standards in food production and includes regulations on production, storage, processing and preparation, separation of the means of production from the products when storing different products and on all transport routes. In addition, a specific legal permit (health certificate) is mandatory for the persons working with the processing of the products. This is legally enforced through regular controls and has a negative impact on urban agriculture as it is difficult for small businesses to comply with.

Photo: [Canva.com](#) by Alex Rath.



## EMERGING INNOVATION

### 1. Digital innovations

As [proposed by FAO](#), advances in digital innovations can enable more affordable periodic testing for early detection of foodborne pathogens and improve traceability mechanisms to identify and remove contaminated products.

### 2. Collective action

Development of collective actions at different points of the agricultural cycle for meeting food safety challenges may enable the group to achieve economies of scale that would be unavailable to individual producers as proposed by [Humphrey \(2017\)](#).

### 3. Training and other support

Support should be given to smallholder farmers and other small-scale food producers, processors and traders, given the disadvantages they face with respect to scale, finance and capabilities. One possible solution are training programmes, another is the provision of support services to help with implementation of food safety systems and especially, with compliance to administrative procedures (these could be provided by governments, development agencies or business organisations).

### 4. Policy adaptation

The EU Commission issued a "[Notice providing guidance on food safety management systems for food retail activities](#)" in 2020, acknowledging that existing food safety regulations are not adapted to the situation of small-scale producers and providing for some simplified procedures. This being a very recent change, it remains to be seen if and how it will be implemented at the local level, and whether it will have the intended effect.

## RECOMMENDATIONS

1. Adapt food safety regulations to take into account smaller-scale and innovative producers who are working in new arenas such as vertical farming or urban agriculture.

2. Simplify food safety management for small operators. The European Food Safety Authority (EFSA) has [proposed a simplified approach to food safety management](#) in small retail businesses such as grocery shops, butchers, and bakeries. The approach includes guidelines on how to identify the most relevant biological, chemical and physical hazards at each stage of the food production process, the activities or practices that make hazards more likely to occur and appropriate control measures.

3. Simplify control systems. Burdensome bureaucratic processes and technology prescriptions need to be adjusted to address the situation of small-scale producers. Doing so will help these sustainable food production organisations maintain good practices for consumer safety while also producing at a scale that better fits emerging business models.

4. Provide subsidies, training and administrative support to reduce the cost of capital investment, and certification to small-scale farmers and other urban food producers.