

Control activities for health and hygiene requirements in National Police collective catering

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Abstract

The primary aim of this work is to standardize the procedures for the handling, preparation, and distribution of food and beverages in collective catering within National Police structures. Therefore, its purpose is to offer aid for the assessment and implementation of procedures regarding the catering services activities carried out in canteens and bars located within the National Police areas. A checklist was elaborated to establish criteria and methods to verify these activities, to assess and enhance the effectiveness of the control system, and subsequently, to enable the implementation

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Publisher's note: all claims expressed in this article are solely those of the authors and do not necessarily represent those of their affiliated organizations, or those of the publisher, the editors and the reviewers. Any product that may be evaluated in this article or claim that may be made by its manufacturer is not guaranteed or endorsed by the publisher. of any corrective measure, with the aim of ensuring the consumption of healthy food and preventing the occurrence of food-borne diseases as a result. The study was carried out in 2022 in 6 National Police canteens located in Central Italy and managed by a contractor for the specific service. These structures serve an average of 300 meals daily, divided into 1-3 ordinary meals (breakfast, lunch, and dinner). The examined canteens reported 3 minor non-conformities, 3 major non-conformities, and no critical non-conformities. This report regards the analysis of detected issues and corrective measures concerning catering hygiene in the Police Force to ensure food safety. To date, no guidelines have allegedly been established for the regulation of the procedures for carrying out the periodical mandatory inspection of collective catering operations. The results of this paper showed a well-controlled management of these activities concerning the hygiene and infrastructural aspects of the food chain.

Introduction

The current food safety policy of the European Union is based on a series of principles established in the late '90s and later codified in the *White Paper on Food Safety* (European Commission, 2000).

These principles have been applied in the farm-to-fork approach, which takes into account the definition of the roles of all parties involved in the food chain, the traceability of foods and ingredients for human and animal consumption, the risk analysis, and the transparency of the scientific opinions issued (European Parliament and Council, 2002).

Over time, due to the growing awareness of food safety, various regulations have been issued, followed by correlated implementation measures.

As an integral part of the country system, the Ministry of the Interior is subject to the provisions of the aforementioned regulation; however, it requires a specific incorporation system for its correct application on account of its own organizational peculiarities and operational specificities, which are not provided for in the regulation (General Inspectorate of Military Health, 2014). For instance, in the case of operational services or special requirements, the number of ordinary meals can increase exponentially at short notice. This leads to a greater quantity of food being stored in the designated premises. As a consequence, there is a greater risk and a greater need for more frequent monitoring of product quality, product use, and expiration dates.

Therefore, it is essential to correctly manage the time between the processing and serving of ready meals, *i.e.*, the storage time before serving and the observation of dismicrobial temperatures.



A further detail is the impact on staff industriousness: the guarantee of staff health falls on the type of service and thus on the operativity of the recipient, a member of the Police Force, whose efficiency required by the functions performed must be guaranteed. However, there is no provision for an application of regulations different from those in use in normal collective catering.

This paper aims to provide a codified procedure that can be implemented during inspections of the collective catering activities of the National Police, based on the food safety regulations in force. This procedure may constitute valid applicative support for the professional figures currently recognized as responsible for the management of checks and inspections in the Administration's canteens (medical and veterinary doctors) (Italian Republic, 1997; Italian Republic, 2000; Ministry of the Interior, 2002). The core of this report is addressing the hygienic-sanitary problems connected to the various phases into which the food production and distribution processes are divided (from the supply of foodstuffs to waste disposal). Consequently, a specific operational protocol for the implementation of these controls has been formulated, i.e., a checklist showing the focal points to be verified during the activity. Nevertheless, the fundamental rules for good hygienic practice must be implemented when the adoption of the normal practices for the operation of food businesses is not possible due to the particular requirements related to the service performed, peculiarities of construction, and use of both fixed and mobile vehicles, infrastructure, and equipment.

Another fundamental aspect of this paper is the standardization of the control criteria for the hygienic, infrastructural, and technical aspects related to the various stages of the production process. It intends to settle down the rules for the application of regular operating procedures and to ensure the compliance of the finished product with both regulatory requirements and consumer expectations (Navy Health Inspectorate, 2015).

The suggested protocol contains a system of guidelines that is also shared by the other Police Forces and the Armed Forces, in the implementation of the current regulations on food safety within the Public Administration (General Command of the Carabinieri Corps, 2021). It also takes into account the different operational requirements related to its use. Therefore, it represents a technical instrument for the actors involved, as it contains indications for controls that allow both monitoring and technical evaluation of the hygienic-sanitary conditions of the entire food sector.

These controls are essential for the evaluation of the persistence of the previously authorized prerequisites, the application of the correct behavioral standards by the personnel, and the correct management of the supply chain.

Materials and Methods

This study was carried out in June 2022, and 6 canteens were examined. These canteens, identified in the study with letters of the Greek alphabet (α , β , γ , δ , ϵ , ζ) are located in Central Italy and are

managed by a contractor/concessionaire for the specific service. A full catering contract with a civil contractor is the type of agreement that is usually envisaged. These facilities administer a daily average of 300 meals, divided into 1-3 ordinary meals (breakfast, lunch, and dinner). The data collected during the controls were subsequently processed to create Table 1. The risk category of all the establishments included in the study is 3, since they are service canteens, as reported in the legend of the checklist (Navy Health Inspectorate, 2015). The controls were agreed upon with a minimum of notice, even on the same working day, with the staff in charge as well as with the contact people of the contractor to ensure their presence during the veterinary doctor's inspections.

In particular, the inspections were carried out following the production line from the unloading of incoming goods to their storage, processing, and distribution phases, with a focus on possible critical points and critical control points.

The checklist was made up of 20 sections divided into points and was drawn up following the order of the activities carried out during the inspections in a catering service. Therefore, it starts with the examination of the documentary part and continues with the various stages of the production line, from food storage to handling and distribution.

The checklist was designed considering the fundamental requirements to be verified during the inspection. In fact, the points were deemed essential to carry out a global evaluation of the activity of the food sector of the canteens and outlets. The analyzed areas concern the legal and documentary aspects, the contractor's self-control system, the selection and verification of food suppliers, the traceability and re-traceability system of products, allergen management, the training and hygiene of personnel involved in food preparation and distribution, the water potability, the maintenance and upkeep of the premises and facilities (kitchens, changing rooms, toilets, storage areas and cold rooms), hygienic conditions during processing, the implementation of cleaning and disinfection protocols in the working environment, pest control, microbiological control, logistics and complaint management, sampling of each meal, and the management of any non-conformities that may be found. Some points mentioned in the checklist were particularly deepened in this study. The research focused on the most operational phases and on the steps that were initially considered most important, such as staff training and hygiene, allergen management, maintenance of premises and facilities, and hygienic processing conditions. These are deemed to be pivotal points for consumer safety. The control activity covered all stages of the food production process (from food procurement to meal distribution) and entailed an in-depth control of all aspects related to the catering business of interest.

A new categorization of the detected non-conformities has been devised to facilitate the compilation of the verification sheet and increase control standardization. This new classification provides a larger range of maneuvers and gives the food business operator (FBO) the possibility to resolve the non-conformity within a pre-established timeframe. The outcome of each investigation

Table 1. Risk category.

Risk category legend			
1	Bars serving only packaged food (annual internal audits)		
2	Bars with food handling (6-monthly internal checks)		
3	Service canteens and similar (4-monthly internal checks)		

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must be inserted in the appropriate form according to the standardized codes (Food Safety System Certification, 2019; Italian Republic, 2021a): compliance (C); minor non-compliance (nc); major non-compliance (Nc); critical non-compliance (NC); not applicable if not applicable to the reality being visited (NA); not evaluated if no reliable data could be acquired (NV).

The difference between nc, Nc and NC is closely related to the risk assessment, which is carried out by the medical or veterinary doctors in each circumstance (Italian Republic, 1997; Ministry of the Interior, 2002; ISO, 2018). In this case, it was decided not to resort to a standardized method due to its lack of flexibility. Consequently, the assessment was not made based on the number of different non-conformities detected but rather by trying to anchor the discretion to objective parameters that respect safety standards, the situation and context, the timeframe envisaged for the resolution of the problem, and the strategies implemented by the personnel to remedy the situation as soon as possible.

The categorization of food businesses is closely linked to the risk assessment carried out by the official in charge of the inspection activities (European Parliament and Council, 2017); similarly to the drafting of veterinary forensic measures of a clinical nature, also in the case of an inspection report, the diagnostic aspects correspond to the non-conformities that have emerged, and the prognosis and therapy correspond to the indicated prescriptions and related resolution times.

In the presence of minor non-conformities, the detected nonconformities are promptly reported to the contracting company, and oral and/or written recommendations are made to the food service managers so that they can resolve them within a timeframe established according to the nature of the detected non-conformity (*e.g.*, 90 days). In some cases, immediate corrective action is sufficient to bring the process back within the established limits. However, in other cases, precise non-conformity management procedures, which are specific ways of managing the criticalities detected, must be activated (Tavassi, 2014).

In the event of major non-conformities, these are reported to the company and the National Police managers in charge of the process. As a consequence, it is required within the Administration that an initial oral and/or written recommendation be made, a warning (Italian Republic, 2021b) and/or administrative sanctions be imposed in case of failure to adapt levels of food safety. The treatment, corrective actions, and relative verification of effectiveness by the contractor must take place within 60 days from the date the non-compliance was found since the activity is strictly connected to the resolution of the non-compliance itself. In the event of non-compliance on the part of the contractor, the operation of the canteen service may be suspended.

Finally, if a critical non-compliance is found, an administrative sanction and restrictive measures, such as the temporary suspension of food production and distribution for a period proportionate to the resolution of the problem or its very cancellation, are carried out. The maximum time limit is 30 days since the activity is subject to the resolution of the detected non-compliance (Italian Republic, 2021b). Once the control is completed, according to the identification of non-conformities and/or highly critical situations, a final overall judgment is issued for the food business concerned, summarized according to the following legend: compliant (a), compliant with the implementation of corrective and improvement measures (b), non-compliant with deficiencies that make production unsafe (c), non-compliant with activity to be suspended (d). Table 2 reports the checklist used in the study (European Parliament and Council, 2004a, 2004b, 2011, 2017; European Commission, 2005; General Inspectorate of Military Health, 2014; Navy Health Inspectorate, 2015).

Table 2. The checklist used in th

Risk category legend				
1	Legal aspects - available documentation			
2	Self-control system			
3	Suppliers			
4	Traceability procedure			
5	Allergen management procedure			
6	Staff hygiene and clothing			
7	Training			
8	Water potability control			
9	Maintenance of premises and facilities			
10	Food storage (if applicable)			
11	Cold storage (if applicable)			
12	Food hygiene and processing conditions			
13	Cleanliness and disinfection of production areas			
14	Disinfestation			
15	Microbiological control			
16	Logistics			
17	Sample meal			
18	Complaints management			
19	Non-conformity management			
20	Conclusions - overall summary judgment			
a, comp	pliant; b, compliant with implementation of corrective and improvement measures; c, non-compliant with deficiencies that make production unsafe; d, non-compliant with activities			

a, compliant; b, compliant with implementation of corrective and improvement measures; c, non-compliant with deficiencies that make production unsafe; d, non-compliant with activities to be suspended.



Results

The results provide information about the degree of compliance of the production system with best practices. Table 3 shows the details, frequency, and causes of the non-conformities found, which are useful to guide the subsequent planning of activities based on the risk assessment and to identify possible corrective and/or preventive actions. The aim was to improve the compliance degree of operators and the effectiveness of the control activities themselves. The non-conformities were found in 6 sections of the checklist. Specifically, they regard the allergen management procedure, the structural state of the premises and installations, the presence of insect barriers, the presence of individual double compartment lockers, the presence of the monitoring and recording system for cold room temperatures, and finally the presence of flying pests in some premises. In terms of the allergen management procedure, a Nc was highlighted in 4 canteens: in 2 food businesses, there was no appropriate information signposting for users; in one canteen, there was the aforementioned signage, but it was partially hidden by the display of the daily menu and therefore not easy to consult; in one canteen, although present, the indication of allergens was positioned in an unpractical position (i.e., at the cash desk), and therefore, it was not consultable when choosing the dishes. In the remaining 2 canteens subject to inspection, the allergen signs complied with Regulation 1169/2011 (European Parliament and Council, 2011). Concerning the assessment of the various aspects concerning the maintenance of the premises and facilities, it was found that 3 canteens had an irregular structural state of walls, doors, floors, and/or tiles. Within the same section, 1 nc, concerning the presence and integrity of anti-insect devices at the doors and windows of the premises, was highlighted in one of the canteens examined due to the absence of the aforementioned barriers at some of the sector's windows.

Concerning the presence of individual double-compartment lockers, 1 nc was highlighted in all the facilities examined (6) due to the presence of single-compartment lockers, which are not suitable for the adequate separation of civilian clothes from work uniforms. Regarding the monitoring and recording system of the temperatures of cool cellars, 1 Nc was highlighted in 3 food companies. In particular, in one canteen, the temperature recording sheet had not been updated for several weeks, while in the other 2 canteens, these sheets had not been updated on the day the inspection activity was carried out. Finally, concerning the hygienic conditions of work processes, 1 Nc was highlighted in 1 canteen, caused by the presence of some pests adjacent to the premises.

In conclusion, canteen ζ was compliant, having reported only 1 nc, while the other 5 canteens (α , β , γ , δ , ϵ) were compliant with the implementation of corrective and improvement measures.

Discussion

The current procurement code stipulates the activation of selfcontrol procedures that the company must implement to comply with the Regulations in force.

A non-compliance situation can also be identified as a deficiency, error, or omission, whether intentional or culpable, and in any case, it denotes a limitation of the FBO's risk analysis capabilities and its ability to properly implement self-control procedures. Non-conformities may be detected during the execution of any official control method or at the end of it; the operator must be informed of the detection so that he can implement any necessary corrective action.

The degree of non-compliance depends on the importance, severity, and systematic manner in which the non-compliance occurs. The canteens examined in the study reported 3 nc, 3 Nc and no NC. In terms of nc, the most representative fields were the structural state of the environments, the absence of insect barriers, and the absence of double-compartment lockers in the staff changing rooms. In the presence of this type of non-conformities, the discrepancies found were reported to the company, and oral and/or written recommendations were made to the food service managers.

Nc concerned the management of food allergen information signs for staff using the canteen service, the updating of temperature monitoring tables, and the presence of flying pests in food storage areas. They were reported to the company and the responsible National Police managers. Within the Administration, it is provided that, in the event of such findings, they will initially proceed with an oral and/or written recommendation, a warning, and, finally, the adoption of administrative sanctions.

The use of the checklist drawn up for this study has been introduced on an experimental basis and involves medical and veterinary doctors during inspections of National Police catering activities.

In case studies, the non-conformities were mostly attributed to the non-recent application of the periodic self-control checks provided for in the self-control manual, *i.e.*, to a non-methodical check of the critical points or critical control points. If, on the other hand, the company had carried out such checks recently, the hypothesis was that the self-control manual contained minor flaws or that new risk factors had arisen and had not been taken into consideration. The non-conformity must be dealt with, no matter its nature, and the related causes must be quickly eliminated following its notification.

Through the records made in the internal traceability sheets, the entire production cycle is identified, and all the batches that have come into contact with the batch under inspection are determined. In this way, further investigations can be carried out if nec-

Table 3. Results.

Section of the checklist	Non-compliant section point	Canteen concerned
Allergen management procedure (Nc)	Presence of information signs for staff using the canteen service	α, γ, δ, ε
Premises and installations maintenance (nc)	Structural and hygienic state of walls, doors, windows, floors, tiles, worktops	β, γ, δ
Premises and installations maintenance (nc)	Presence and integrity of anti-insect devices at doors and windows	γ
Premises and installations maintenance (nc)	Presence of individual double-compartment lockers (outer garments/work clothes)	α, β, γ, δ, ε, ζ
Cold rooms (Nc)	Presence of T° monitoring and recording system (thermometers and thermostats in visible position)	α, β, γ
Hygienic conditions of foodstuffs and processing (Nc)	Presence of insects	β

Nc, major non-compliance; nc, minor non-complianc

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essary. All non-conformities must be managed using a corrective action plan, which must be accepted by the contractor within the established timeframe and whose correct and effective implementation must be assessed during subsequent inspections. If allowed by the risk assessment, the company may be granted an appropriate period of time for the resolution of the non-compliance, in agreement with the operator and proportionate to the risk determined by the detected non-compliance. If the risk is deemed acceptable, the enforcement officers may allow the company to continue its activity; if, on the other hand, the risk resulting from the non-compliance does not allow the activity to continue, the officer may independently impose the slowing down of the activity, its total or partial suspension, and/or any other justified impositions. Each prescription related to any kind of non-compliance (structural, managerial, documentary, etc.) must necessarily be followed by a subsequent documented verification that the critical issue has been resolved. Corrective actions refer to information on restrictions or prohibitions of the production and distribution of foodstuffs, on revocations or suspensions of authorizations necessary to carry out production activities, and on financial penalties. With an eye toward the process of improving the control system, this information is useful to verify that the measures taken are appropriate, proportionate, and dissuasive. In the event of non-compliance with regulations concerning food safety, consumer health protection, animal health, and urban veterinary hygiene, the sanctions provided for by the sectoral regulations should be applied.

The actions implemented to improve controls and encourage the professional growth of operators are the following: the preparation and updating of operating procedures, checklists, and guidelines, the implementation of information and computer systems, the specific allocation of resources and funds, the definition of protocols and procedures to be implemented, training and information for the staff involved in the management/implementation of controls and for FBOs.

These bases resulted in the mapping of the processes on which the assessment of risks and opportunities for work management was carried out.

Conclusions

This study, which is currently in progress, was initiated to extend the possibility for the National Police to carry out standardized checks, updated to the current legislation, on the health and hygiene requirements of the canteens in their collective catering activities. The checklist was drawn up as the basis for the standardization of the controls on the activities in question. Some of its sections highlighted non-conformities concerning the structural state of the rooms, the absence of insect barriers, the absence of doublecompartment lockers in the staff changing rooms, the management of allergen information signs, the updating of temperature monitoring tables, and the presence of flying pests in the food storage areas. In the exercise of supervisory functions, these non-conformities were reported to the contractor to provide a rapid and appropriate solution, without prejudice to the contractual provisions, dispute procedures, and sanctions (penalties) in the event of non-compliance. The principles outlined in this study could be applied to different areas of responsibility of the National Police, such as bars with only packaged food, bars with food handling, service canteens, and other food distribution systems.

The results obtained highlight the importance of continuing the study to verify the effective resolution and application of the prescriptions provided during the inspection and to investigate other issues not yet examined. In order to have all-around control, by duly deepening each phase of the checklist, it might be interesting to extend it and adapt it to each context in which the National Police operates, such as by carrying out a study on bars that handle food or on international theaters of operation. With this study, a precise analysis of individual process activities was carried out to optimize the National Police's collective catering by standardizing control actions to current regulations and updating the criteria dictated by sector legislation and best practices.

The short-term results underline the usefulness of further developing the project to implement and spread the use of the checklist. In this way, it would be possible to standardize the management modalities of the hygienic controls carried out at the food enterprises that operate at the Administration structures and to optimize the analysis of the relative findings.

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