

Safe Food for Canadians, Good Agricultural Practices Guide

A GUIDE TO MEETING THE
SAFE FOOD FOR CANADIANS
REGULATIONS FOR FRESH FRUIT
AND VEGETABLES





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DOWNLOADABLE FORMS

To download the forms that are **highlighted** throughout this book please go to <https://www.perennia.ca/foodsafetyresources/> or review the last page in this book for a full list.

SAFE FOOD FOR CANADIANS REGULATIONS

Consumers want to know their food is safe. The SFCR supports this with mandatory preventive controls, traceability and better controls for imported foods, to name a few. In 2019, the SFCR consolidated 14 sets of food regulations into one. The intent is to improve consistency between all food businesses and types of food, reduce administrative burden and enable outcome-based provisions. However, it is important to understand that many commodities have food-specific requirements that must also be met. It is your responsibility to be familiar with your products' specific requirements. The Safe Food for Canadians Act (SFCA) and SFCR came into effect on January 15, 2019; however, timelines for compliance vary based on food commodity, activities conducted and business size. The SFCR uses preventive controls and preventive control plans to control potential hazards associated with production. While preventive controls control hazards associated with the environment in which a product is processed, the preventive control plan is specific to controlling potential hazards associated with the process and production of food.



The Safe Food for Canadians Act (SFCA) and SFCR came into effect on January 15, 2019; however, timelines for compliance vary based on food commodity, activities conducted and business size.

TYPES OF FOOD SAFETY HAZARDS CONTROLLED BY A PREVENTIVE CONTROL PLAN

Hazard concerns with food production and processing are biological, chemical and physical hazards.

Biological hazards include bacteria, viruses, parasites or fungi (yeast and molds) that can cause food-borne illness if they or their toxins are ingested. Biological hazards can be found anywhere when conditions favour their growth. Such conditions include temperature, humidity, pH, water activity and oxygen availability. Bacteria can be found in soil, mud, air (i.e. aerosols or dust suspended in air), water, decaying matter, fecal matter, and sewage, the gut of warm-blooded animals, even in our nose, mouth and on our skin. Fungi are typically found in warm and humid environments.

Chemical hazards can fall into three broad categories; naturally occurring toxins and allergens (e.g. shellfish toxins and mycotoxins); chemicals intentionally added to food (e.g. preservatives and additives); chemicals unintentionally added to food (e.g. pesticides, chemicals from packaging material, chemicals used for cleaning or maintenance and veterinary chemicals such as antibiotics). Chemicals that are intentionally added to food are not intended to be hazardous. However, higher than desired amounts may render them harmful to human health.

A physical hazard is any extraneous or foreign material or object that can cause injury or illness to a consumer such as (but not limited to) glass, plastic, metal, wood, animal droppings or insects.

HOW DO I USE THIS GUIDE?

This guide is meant to be a tool to help your farm/pack house meet the Safe Food for Canadians requirements. It can be used to assist you with interpreting and determining if you are currently meeting regulations or where you may need some work. It is designed to include the current regulations (as of the edition date on the footer) as they apply to Fresh Fruit and Vegetable production, packing, storing and transport in Nova Scotia and in particular for those that ship interprovincially.

This guide begins at Part 4 of the Safe Food for Canadians Regulations detailing the Preventive Controls (PCs) and Preventive Control Plan (PCP) that are required to be in place to control potential hazards at your operation. Depending on your farm's activities, some aspects of the regulations and sections in this guide may not apply to you. Mark these sections as Not Applicable (N/A) and move on to the next section. This guide will complement those resources already posted in the Food Safety Resources section on the Perennia Food and Agriculture website. For those resources not on our website, an appendix was created to capture this information. There are also sample forms/records you can use, or you can create your own and use the samples provided as a guide to help you draft your preventive control plan and supporting documents.



This guide is meant to be a tool to help your farm/pack house meet the Safe Food for Canadians requirements.

GUIDE LAYOUT

Each section is laid out to match the flow of the Safe Food for Canadians Regulations as they apply to Fresh Fruit and Vegetables.

The **title** of each section matches that of the sections in the Safe Food for Canadians Regulations.

Requirements are the specific regulations as they are written in the Safe Food for Canadians Regulations.

Rationale is the reasoning (the why) these requirements must be met.

Interpretation is our interpretation of how you can meet these requirements.

The Checklist details what documents you need in your PCP to meet the requirements of each section. It can also be used as a "to-do list" while actively using this guide to check off what has been completed.

The Appendix has guidance and resources to frequently asked questions we have received from Nova Scotia Producers, Packers and Processors. It can be used like the Food Safety Resource section on our website.

The Forms are editable Excel files that can be used as-is or as a guide when developing your own forms and customized records.

You will need to review the table below to determine what requirements you need to comply with in the Safe Food for Canadians Regulations as they apply to Fresh Fruit and Vegetables.

DETERMINING WHAT IS APPLICABLE TO YOUR OPERATION

In order to determine which sections of the SFCR apply to your operation, we have streamlined the Timeline for Fresh Fruit and Vegetables from the Canadian Food Inspection Agency (CFIA) website. This enables you to decide which applies to your situation, as the requirements are very specific to the activities conducted at your operation. For example, if your only activity is intraprovincial trade and your gross sales are \$100,000 or less but your retailer or customer requires you to have traceability; you would then proceed directly to the Traceability section in this guide.

WHAT IS YOUR ACTIVITY?	DO I NEED A LICENSE?	DO I NEED A PREVENTIVE CONTROL PLAN?	DO I NEED PREVENTIVE CONTROLS?	DO I NEED TRACEABILITY?
My only activity is growing or harvesting fresh fruit or vegetables for interprovincial trade	No	Yes , if your gross annual food sales are greater than \$100,000 – deadline January 15, 2020 (if your gross annual food sales are greater than \$100,000) ** No , if your gross annual food sales are \$100,000 or less **	Yes – deadline January 15, 2020	Yes – deadline January 15, 2020
I package and label fresh fruits or vegetables in the field for interprovincial trade	Yes , if they will not be subsequently manufactured, processed, treated, preserved, graded by a licence holder in another province) - deadline January 15, 2019 No , if they will be subsequently manufactured, processed, treated, preserved, graded by a licence holder in another province	Yes , if your gross annual food sales are greater than \$100,000 ** – deadline January 15, 2020 No , if your gross annual food sales are \$100,000 or less **	Yes – deadline January 15, 2020	Yes Deadline of January 15, 2019, if you have a license to package and label the product in the field. Deadline of January 15, 2020, if you do not have a license to pack and label the product in the field.
I manufacture, process, treat, preserve, grade, package or label fresh fruits or vegetables for interprovincial trade	Yes , deadline January 15, 2019	Yes , if your gross annual food sales are greater than \$100,000 ** – deadline January 15, 2020 No, if your gross annual food sales are \$100,000 or less **	Yes , deadline January 15, 2020	Yes , deadline January 15, 2019
My only activity is interprovincially trading fresh fruits or vegetables	No	No	No	Yes , deadline January 15, 2019
My only activity is to grow or harvest fresh fruit or vegetables for export	No	No , unless you would like an export certificate or other export permission from CFIA	Yes , deadline of January 15, 2020, or earlier if you would like an export certificate or other export permission from CFIA	Yes , deadline January 15, 2020

I package and label fresh fruits or vegetables in the field for export	Yes , deadline January 15, 2019	No, unless you would like an export certificate or other export permission from CFIA	Yes , deadline of January 15, 2020, or earlier if you would like an export certificate or other export permission from CFIA	Yes , deadline January 15, 2019
I manufacture, process, treat, preserve, grade, package or label fresh fruits or vegetables for export	Yes , deadline January 15, 2019	No, unless you would like an export certificate or other export permission from CFIA	Yes , deadline of January 15, 2020, or earlier if you would like an export certificate or other export permission from CFIA	Yes , deadline January 15, 2019
I import fresh fruits or vegetables	Yes , January 15, 2019	Yes , if your gross annual food sales are greater than \$100,000 – deadline January 15, 2020 ** No , if your gross annual food sales are \$100,000 or less **	Yes , deadline January 15, 2020	Yes , deadline January 15, 2019
My only activity is to export fresh fruits or vegetables	No, unless you would like an export certificate or other export permission from CFIA	No , unless you would like an export certificate or other export permission from CFIA	No	Yes , deadline January 15, 2019
My only activity is to sell fresh fruits or vegetables to consumers at retail	No	No	No	Yes , deadline January 15, 2019
I manufacture, process, treat, preserve, grade, package or label fresh fruits or vegetables for intraprovincial trade	No , not required (unless your provincial or territorial regulations require you to have a federal licence)	Yes , if your provincial or territorial regulations require you to have a federal licence and your gross annual food sales are greater than \$100,000 ** deadline January 15, 2020 No , not required if your provincial or territorial regulations require you to have a federal licence and your gross annual food sales are \$100,000 or less**	Not required January 15, 2020 (if your provincial or territorial regulations require you to have a federal licence)	Not required January 15, 2019 (if your provincial or territorial regulations require you to have a federal licence)

**excerpt from SFCR timelines - Fresh Fruit or Vegetables; visit the section “Calculating your gross annual food sales” to determine your gross annual food sales <https://www.inspection.gc.ca/food-safety-for-industry/timelines/fresh-fruit-or-vegetables/eng/1527857479822/1527857481117#a2>

The following is a list of terms with accompanying definitions. This glossary elaborates on specific terms you will see referenced throughout this guide.

Agricultural chemicals: non-food agents used to control crop pests such as insects, diseases, weeds (e.g. pesticides such as herbicides, fungicides and insecticides).

Agronomic inputs: include manure, compost tea, mulch, row covers, biological controls, pollinators, agricultural chemicals, commercial fertilizers, soil amendments and pulp sludge.

Allergen: a protein that causes physiological reactions due to an immunological response. CFIA priority allergens are peanuts, tree nuts, sesame, soy, fish, crustaceans and molluscs, wheat and triticale, eggs, milk, mustard and sulphites.

Calibration: measuring the accuracy of a device to a known standard and adjusting, as necessary, so that it conforms to the standard.

CCP – Critical Control Point: a step at which a control measure is essential to prevent, eliminate or reduce any biological, chemical or physical hazard that presents a risk of contamination of a food to an acceptable level.

Consumer: the final user of the purchased goods.

Consumer Prepackaged: packaged in a container in the manner in which the food is ordinarily sold to or used or purchased by an individual - or in which the food may reasonably be expected to be obtained by an individual - without being repackaged, to be used for non-commercial purposes.

Corrective action: actions taken to correct a deviation from a written procedure.

Crop Biosecurity: written procedures that prevent, minimize and control the introduction and spread of plant pests at the farm level.

Cross Contamination Points: points throughout the process where if control measures are not put in place, a hazard associated with one process, product, or item may contaminate another.

Deviation: a variation from a written procedure, specification, standard or regulation.

Establishment: any domicile where a food is manufactured, prepared, stored, packaged or labelled.

Exporting: sending food to another country.

Food contact surface: any surface where opened (unpackaged) or packaged product will come into direct contact.

Growing: the development process of planted crops intended to be harvested.

Harvesting: the process of gathering crops.

Hazard: any biological, chemical or physical risk that has the potential to cause illness or injury to a consumer.

Hazard Analysis: the process of identifying and assessing potential hazards by determining the risk level associated with the likelihood and severity level.

High-Risk Area: foods that are ready to eat, do not require further cooking and provide an environment for bacteria to live, grow and thrive.

Importing: bringing food into Canada from a foreign country.

Interprovincial: the trade of food from one province to another.

Intraprovincial: the trade of food within a home province.

Labelling: the act of applying information on a product.

Licence: a permit from CFIA allowing an establishment to conduct registered activities.

Monitor: a designated individual who plans to observe or measure control parameters to assess whether a control measure is effective.

Non-Food Agent: chemicals that are not considered to be a food or food ingredient. These include cleaning chemicals, detergents, lubricants, agricultural chemicals and pest control products.

Packing: physically placing harvested product into packaging materials.

PC - Preventive Controls: control measures (i.e. sanitation, maintenance, calibration, training, pest control, etc.) used to prevent risk of contamination to food and achieve compliance with regulatory requirements.

PCP – Preventive Control Plan: a written document that demonstrates how risks to food are identified and controlled through preventive controls/prerequisite programs/good agricultural practices or critical control points (similar to a HACCP plan).

Personal effects: refers to privately owned items (i.e. jewellery, earbuds, phone, lunches, clothing, medication, etc.).

Potable water: water that is considered safe to drink and meets Health Canada's Drinking Water Quality Guidelines.

Pre Harvest Interval (PHI): In Canada, the Pest Management Regulatory Agency (PMRA) regulates pesticides under a division of Health Canada. Pesticides used in Canada must be registered for use on that crop in Canada or be permitted as part of the Grower Requested Own Use Program (GROU) or Own Use Import Program.

PHI is the time, typically specified in calendar days, not hours, between the last application of a pesticide and the allowable harvest date of the crop. In Canada, a PHI of one day means that the grower can harvest the day after application.

Safe Food for Canadians Regulations (SFCR): is a single set of rules for all food commodities to ensure that food prepared domestically, imported or exported is safe for consumers, complies with grade requirements and is labelled and presented in a way that is not false or misleading. These regulations are enforced by CFIA.

Sanitation standard operating procedure (SSOP): written procedures that address sanitation conditions and practices before, during and after processing.

Standard operating procedure (SOP): written procedures for preventive control measures, production and process control designed to assure the production of safe food.

Storing: keeping product in a pre-determined location (ambient – dry storage, refrigerated storage, frozen storage) for a pre-determined amount of time.

Traceability: the ability to track the movement of product one step forward (person to whom you provided the food) and one step back (supplier) in the supply chain.

Recall: the removal from sale or use, or correction, of a marketed product that poses a health risk or is non-compliant with respect to legislation.

Retail: refers to the sale of food to consumers for consumption.

Verifier: a designated individual who ensures the monitor is effectively observing or measuring control parameters of a control measure. This individual is referred to as the double checker and should not be the same person as the monitor unless absolutely necessary.



PREVENTIVE CONTROLS, PART 4 OF THE SFCR

**Division 4: Maintenance and
Operation of Establishment**

Requirements: An operator must maintain and operate an establishment so that the requirements of sections 50 to 81 are met (for maintenance and operation of an establishment are met).

Rationale

Without senior management's commitment and adequate resources in place to support the development, implementation and ongoing maintenance of a food safety program, a successful Preventive Control Plan is not possible.

Interpretation

An operator's responsibilities of maintaining and operating an establishment to meet requirements are to:

- Ensure that the establishment complies with CFIA requirements: Safe Food for Canadians Regulations;
- Ensure that food safety is fully embedded in every level of their business (all members, including senior management, contractors, services providers, etc. are required to follow good agricultural practices. There are no exceptions);
- Provide the necessary resources (i.e. staffing, training) and the time required for the development, implementation and effective maintenance of the Preventive Control Plan;
- Provide the necessary training of staff and clearly define their responsibilities;
- Provide financial resources to ensure that the facility's design meets regulatory requirements.

Checklist

- 
- ☐ **Letter of commitment** signed and dated by senior management
 - ☐ Maintenance and Reassessment Procedure (SOP) (should have the following):
 - ☐ Frequency of at least annually
 - ☐ Detail how the entire preventive control plan is reviewed and by whom
 - ☐ (How the Food Safety/HACCP Plan, Preventive Controls, Regulatory and Administrative policies are updated, identify the food safety hazards; detail how the control measures in place for all food safety hazards are reviewed; a check to ensure that the plan conforms to current regulatory and program requirements as well as conforms to customer requirements.)
 - ☐ Verification and Deviation details, as well as a list of records used.
 - ☐ **Maintenance and Reassessment Record**
 - ☐ **Change Log**

Clean and sanitary condition/ Cleaning and sanitation

Requirements: An establishment, and any conveyance or equipment in it that is used in connection with an activity that is regulated under the Act, must be clean and in a sanitary condition. 50(1)

The cleaning and sanitation of the establishment and of any conveyance or equipment in it that is used in connection with an activity that is regulated under the Act must be conducted in a manner that does not present a risk of contamination of a food. 50(2)

Rationale

Improper or inadequate sanitation or use of improper concentrations can lead to contamination of food, ingredients, packaging materials and food contact surfaces.

Interpretation

An establishment must be maintained in a clean manner. Cleaning and sanitation must be achieved through cleaning schedules and procedures, including concentrations. To meet this requirement you should:

- Ensure schedules and clear procedures are in place;
- Ensure chemicals are approved for use in a food establishment (i.e. harvest equipment and packhouse);
- Clean field equipment away from harvest areas, remove/move packaging and product away from area being cleaned prior to cleaning packhouse equipment and surrounding areas;
- Field areas are checked for signs of debris, wildlife activity and foreign material prior to harvesting activities taking place;
- Provide the necessary training of staff.



Checklist

- ☐ Sanitation Program
 - ☐ Sanitation schedule/frequency for all equipment and facility, harvest and pack equipment/reusable containers, utensils/tools (i.e. harvest knives), waste, work gear, wagons/carts etc. (i.e. daily, weekly, monthly, pre and postseason)
 - ☐ Cleaning and sanitizing procedures (methods for dry cleaning, pressure washing, chemicals, concentrations, PPE, proper handling, etc.)
 - ☐ Pre-operational/Post-operational inspection procedures: after cleaning and before product is handled, the harvest/pack area, storages and equipment (where applicable) are clean and free from dust, dirt, food debris and excessive grease.
- ☐ **Sanitation Records**
 - ☐ Environmental sampling plan (procedures and records) conducted to test for the presence of pathogens, if applicable (see appendix)
 - ☐ Harvest procedure and corresponding record. Brief steps regarding what is done before harvesting occurs, for example PHI checked, field area is checked and free from visible debris, evidence of wildlife activity or other foreign material that could contaminate product, etc.
- ☐ Employee training



Pest Control – Animals

Requirements: An establishment must be protected against the entry of any animal that presents a risk of contamination of a food, except if, in the case of any land that forms part of an establishment, there are no reasonably practicable measures that may be taken to prevent the entry of such animals onto the land. 51(1)

An animal must not be in a facility or conveyance where a food is manufactured, prepared, stored, packaged or labelled.

(a) a food that is intended to be manufactured, prepared, stored, packaged or labelled in the facility or conveyance; 51(2)

Any measures that are taken for the purposes of complying with subsections (1) and (2) must not present a risk of contamination of a food. 51(3)

Rationale

Pests can contribute to biological and physical contamination of food, packaging materials and food contact surfaces. Inadequate biosecurity/ biocontainment can lead to the contamination of products, facility, packaging materials or the spread of diseases.

Interpretation

Pest management is required for the entire site, including temporary or seasonal storage units.

- Where you have personal property that coexists with land that forms your establishment (i.e. house and harvest area/ greenhouse/packhouse/ storage buildings are in the same vicinity), then measures need to be in place that are within reason/practical to prevent entry of domestic, livestock or wild animals into those areas and fields.
- Some practical options include but are not limited to keeping doors/ entrances closed or screened, screening windows and outside air vents, using netting, fences, bird or animal scares, limit pest harbourages near the fields/buildings (i.e. keep grass trimmed, unused equipment away from areas, no pooling of water, gravelling the perimeter of buildings to discourage rodent travel).
- Where biological pest management or pollinators are used, they are excluded from this requirement.
- Animals cannot be used as a form of pest control.

Checklist

- | | |
|---|--|
| <ul style="list-style-type: none"> <input type="checkbox"/> In house/self-managed pest control <ul style="list-style-type: none"> <input type="checkbox"/> Person responsible for pesticide application <input type="checkbox"/> Copy of pesticide applicators certificate <input type="checkbox"/> Schedule/frequency (monthly inspection at minimum, preseason and during season or while product is stored) <input type="checkbox"/> Device map, signed and dated <input type="checkbox"/> Training <input type="checkbox"/> Corrective action reports <input type="checkbox"/> Proper handwashing is completed after handling bait, devices and pests. <input type="checkbox"/> Safety Data Sheets for pesticides <input type="checkbox"/> Pest Control Records must be kept <input type="checkbox"/> Pest Control Products, labels/ identification intact and legible if applicable (e.g., name of product, active ingredient(s), concentration, PCP#) <input type="checkbox"/> Biosecurity and biocontainment program <ul style="list-style-type: none"> <input type="checkbox"/> Procedures in place to prevent the introduction or spread of pests and/or disease. <input type="checkbox"/> Contracted Pest Control, including name and contact information <ul style="list-style-type: none"> <input type="checkbox"/> Contract, signed and dated, including scope (insects, rodents, birds, beetles, etc.) <input type="checkbox"/> Schedule/frequency (monthly inspection at minimum, preseason and during season or while product is stored) <input type="checkbox"/> Device map, signed and dated <input type="checkbox"/> Copy of insurance <input type="checkbox"/> Copy of pesticide applicators certificate | <ul style="list-style-type: none"> <input type="checkbox"/> Service reports, including pesticide usage and concentration and trending <input type="checkbox"/> Safety Data Sheets for pesticides <input type="checkbox"/> Contractor training <input type="checkbox"/> Recommendations and corrective action reports <input type="checkbox"/> Records must be kept <input type="checkbox"/> Contractor reports findings to operator after inspection is completed. Operator must sign off and complete any corrective actions. <p>For Both</p> <ul style="list-style-type: none"> <input type="checkbox"/> DO NOT allow animals, either wild or domestic (including pets), or pests (e.g., birds, rodents) into buildings or storages (i.e. sea cans). <input type="checkbox"/> DO NOT harvest where signs of wild or domestic animals are seen in the field. <input type="checkbox"/> Traps are located against the wall on each side of entrances to the outside; bait is preferably not used inside buildings unless inside a trap. <input type="checkbox"/> Fly control (lights or strips) are not used directly over top of product, packaging or food handling areas. <input type="checkbox"/> Old traps, bait, glue boards and pests that are disposed of are done so in a sealed container and placed in the garbage. <input type="checkbox"/> All pest control devices are clearly numbered/labelled/identified on the trap and the wall above the trap location. <input type="checkbox"/> Pest control products are registered for use in Canada and are used according to label directions. |
|---|--|

Non-food Agents – Sanitizers, agronomic inputs and non-food chemical agents

Requirements: Any sanitizer, agronomic input, or non-food chemical agent that is in an establishment must

- (a) be properly and clearly identified;
- (b) be suitable for its intended use and not present a risk of contamination of a food; and
- (c) be handled and used in a manner that does not present a risk of contamination of a food, and that is in accordance with any manufacturer's instructions. (52)

Rationale

Improper use of non-food agents, concentrations and/or improper application or rinsing procedures can lead to both chemical and biological contamination.

Interpretation

Non-food agents present a risk of chemical and biological contamination if they are not used, handled and/or stored properly. An establishment must demonstrate controls through procedure and employee training.

- Ensure procedures are in place;
- Ensure chemicals are approved for use in a food establishment (farm). For example, oils and greases used to lubricate harvest and pack equipment where it comes in contact with food must be food grade; detergents and sanitizers used on food contact surfaces are approved for use on food contact surfaces.
- Agricultural chemicals used are approved for use on the products you grow and harvest.
- PHI is adhered to and communicated to harvest employees.
- Provide the necessary training of staff.



Checklist:

- ☐ Non-Food Agents Policy
 - ☐ Approval list, approval letters
 - ☐ Safety Data Sheets (SDS)
 - ☐ Proper labelling (clearly labelled, identified with product name, it's active ingredients, PCP#, concentration, manufactures, instructions for use) and identification of chemicals
 - ☐ Concentrations
 - ☐ Designate storage area - separation of food-grade vs. non-food grade; stored separately, well labelled, secure from food products, packaging and equipment. Mulch and row covers, new or reused, must also be stored away from fuel, oil and chemicals. They must be stored so that they are clean, free from pest excrement, foreign materials.
- ☐ Receipts are on file and signed.
- ☐ Pesticide Applicator License on file, formally trained (i.e. online, self-study, examinable course)
- ☐ Records of application of agronomic inputs (i.e. mulch, row covers, manure, agriculture chemical, fertilizers) are kept (i.e. log book), PHI is followed where applicable, and records support this.
- ☐ Manure is properly composted and applied greater than 120 days before harvest.
- ☐ **Agricultural Chemicals/Inputs Record**
- ☐ Employee training



Conveyances and equipment — food

Requirements: Any conveyance or equipment that is used in the manufacturing, preparing, storing, packaging or labelling of a food must

- a. be appropriate for the food, as the case may be, and for the activity being conducted;
- b. be designed, constructed and maintained to prevent contamination of the food;
- c. be constructed of, and maintained using, materials that are suitable for their intended use and, if those materials present a risk of contamination of the food, that are
 - i. corrosion-resistant,
 - ii. durable,
 - iii. capable of withstanding repeated cleaning and, if necessary to prevent contamination of the food, repeated sanitizing, unless the equipment is intended for single-use, and
 - iv. free of any noxious constituent;
- d. be equipped with instruments to control, indicate and record any parameters that are necessary to prevent contamination of the food;
- e. function as intended;
- f. be accessible and, if necessary for its cleaning, sanitizing, maintenance or inspection, able to be easily disassembled;
- g. be used, maintained and, if necessary, calibrated in accordance with the manufacturer's instructions and in a manner that does not present a risk of contamination of the food; and
- h. have surfaces that, if they come into contact with a food, are smooth, free from pitting, cracks and flakes and non-absorbent, except when the surface does not present a risk of contamination of the food. (53)

Other conveyances and equipment

Any conveyance or equipment in an establishment that is used to handle any contaminated materials, any waste or any other thing that is inedible must, unless that conveyance or equipment does not come into contact with those materials, waste or things,

- a. be used only for that purpose;
- b. be identified as being reserved for that purpose; and
- c. meet the applicable requirements of section 53. (54)

Rationale

Well-constructed and maintained equipment minimize the potential for biological, chemical and physical hazards. Equipment must be calibrated to ensure accuracy of the device.

Interpretation

Conveyances and equipment may present a biological, chemical and/or physical contamination if they are not maintained properly. Maintained and well-constructed equipment minimize risks. Devices that require calibration must be accurate to ensure they are functioning as intended (i.e. delivering correct dosage, reading the correct measurement, etc.)

- Ensure procedures are in place;
- Ensure proper chemicals (lubricants, oil, grease, etc.) are used on equipment and conveyances;
- Avoid using equipment or surfaces intended to be used for food contact that are made of wood (exception is harvest bins used in the field or wagons used to transport), galvanized metal, painted surfaces especially painted with lead-based paint, or lighting that is not protected or shatter proofed.
- Provide the necessary training of staff.

Checklist

- ☐ Maintenance and Preventive Maintenance Program (details the following)
 - ☐ Equipment design and construction is maintained and in good condition, allows for easy cleaning (i.e. no dead zones (hidden/hard to clean areas), open ends, away from walls, easy access)
 - ☐ Food contact surfaces that are easy to clean, non-porous, smooth (free from cracks, crevices, pitting or flaking) (i.e. stainless steel, hard plastic, corrosion-free), lights on equipment are shatter proof or protected from breakage.
 - ☐ No temporary repairs (i.e. string, cardboard, wire), missing nuts, screws, bolts, cracks in surfaces.
 - ☐ Handheld, trimming tools are single blade, intact/no chips or missing pieces, rust-free.
 - ☐ Maintenance schedule
 - ☐ Maintenance program and equipment list
 - ☐ Equipment inspections
- ☐ **Maintenance & Calibration Record**, service reports from outside contractors
- ☐ Calibration Program
 - ☐ List of calibration devices (may include but not limited to sprayers, spreaders, scales, thermometer, pH or ORP meters.)
 - ☐ Calibration schedule
 - ☐ Calibration procedures
- ☐ Employee training

Land

Requirements: If any land that forms part of an establishment presents a risk of contamination of a food, measures must be taken to eliminate the risk. 56(1)

Location

Requirements: If an establishment is located near any place or thing that presents a risk of contamination of a food, measures must be taken to eliminate the risk. 56(2)

Rationale

Farm location can lead to contamination of food. For example, a compost facility located beside a farm or barn and run off located beside crops. Well-constructed and maintained facilities reduce the risk of contamination to food, ingredients and packaging materials (e.g. free of debris, refuse, pooling water and pest harbourage).

Interpretation

The Farm shall be an adequate size and located to reduce risk of contamination. The Farm shall be constructed and maintained to reduce risk of contamination.



Checklist

- ☐ Facility and Premises Inspection Procedure
- ☐ Field/Site Assessment
 - ☐ Previous use (i.e. heavy metal contamination, sewage sludge, industrial activities).
 - ☐ In the migratory path or experiencing high levels of bird or animal activity.
 - ☐ Location to roads or public pathways (you may need to install a buffer to prevent roadside debris and road salt as well as traffic and domestic animals from entering).
 - ☐ Flood zone, incompatible neighbouring properties and potential of drifting or runoff into areas used to grow and harvest fruits and vegetables (i.e. livestock activities, dust).
- ☐ **Exterior building inspection checklist** (preseason and monthly during the season)
 - ☐ Located away from or protected against potential sources of contamination (landfills, livestock barns, floodplains, etc.).
 - ☐ Vegetation is controlled and not growing against building.
 - ☐ No debris, old pallets, equipment, etc. lying against buildings.
 - ☐ Adequate drainage, no pooling water.
 - ☐ No holes or cracks in the foundation.
 - ☐ Exterior entrances and windows are well-sealed, screened (i.e. no holes around door seals).
 - ☐ Waste is contained with secure lids to ensure animals and pest entrance is deterred. Compost and cull piles are situated away from fields in production and buildings to prevent attracting pests.
 - ☐ Exterior of building do not have evidence of nesting birds or areas for wildlife to make a den. Pest control devices are in place and secured.

Interior of facility or conveyance

Requirements: The interior of any facility or conveyance where a food is manufactured, prepared, stored, packaged or labelled must be

- a. designed to prevent the accumulation of substances that present a risk of contamination of the food, including dust, dirt, micro-organisms and food particles, and to permit effective maintenance, cleaning and sanitizing;
- b. designed, constructed and maintained in such a manner that
 - i. the size and layout is adequate to accommodate the activity being conducted and the equipment used in the activity,
 - ii. the entry of insects, rodents and other vermin is prevented,
 - iii. any floors, walls, ceilings, windows and doors are smooth, non-absorbent and impervious to moisture, except if those floors, walls, ceilings, windows or doors do not present a risk of the contamination of the food, and
 - iv. any floors provide or permit good drainage, except if there is no risk of liquid accumulation;
- c. constructed of, and maintained using, materials that are
 - i. suitable for their intended use,
 - ii. appropriate for the food, as the case may be, and for the activity being conducted,
 - iii. durable,
 - iv. capable of withstanding repeated cleaning and, if necessary, to prevent contamination of the food, repeated sanitizing, and
 - v. free of any noxious constituent; and
- d. of sound construction and in good repair. 57

Rationale

Well-constructed and maintained facilities reduce the risk of contamination to food, ingredients and packaging materials.

Interpretation

The Farm shall be constructed and maintained to reduce risk of contamination.



Checklist

- ☐ **Interior Inspection Checklist**
(preseason and monthly during the season)
 - ☐ Doors are self-closing and close-fitting (i.e. no gaps or visible light when closed).
 - ☐ Floors, walls, ceilings, windows and doors are cleanable, constructed of appropriate materials, junctions are smoothly sealed and designed to allow maintenance, cleaning and sanitizing.
 - ☐ Windows are screened and shatter proofed if located in food handling and storage areas.
 - ☐ Sound construction and good condition.
 - ☐ Air intakes and vents are screened.
 - ☐ Drains are accessible for cleaning and maintenance.
 - ☐ Floors are sloped to drain, no pooling of water, no cracks or crevices.
 - ☐ No leaking of overhead pipes or cooling units.

Design, construction and maintenance

Requirements: A facility or conveyance where a food is manufactured, prepared, stored, packaged or labelled must be designed, constructed and maintained in such a manner that the movement of persons and things within, into and out of it is controlled. 59(1)

Movement — no risk of contamination

Requirements: The movement must not present a risk of contamination of the food. 59(2)

Rationale

Operational flows such as employee entry to the establishment and flow to workrooms, ingredient/product flows and/or adequate separation or control between incompatible operations will prevent biological, chemical or physical contamination of the product.

Interpretation

Operational flows must be controlled to prevent the risk of contamination. Consider the following traffic flows:

- Employees
- Visitors
- Product (harvested or market-ready)
- Waste/compost
- Ingredients
- Packaging
- Chemicals
- Allergens



Checklist

- ☐ Operational flows do not pose a risk of cross-contamination. Identify points where they overlap and pose a potential source for cross-contamination (e.g. market-ready product and chemicals)
- ☐ Operational flows are identified on plant schematic
- ☐ Cross-contamination points are identified on facility/building/greenhouse schematic
- ☐ Handwashing sinks, employee welfare rooms (lunchroom, washrooms, change rooms) storages, chemical storages, equipment layout should be identified
- ☐ Cross-contamination points are identified on hazard analysis forms with control measures in place to minimize the risk of cross-contamination (Your PCP, see appendix)
- ☐ Seasonal storage use
- ☐ **Visitor sign in** and policy (can be combined with Hygiene Policy)
- ☐ Employee training

Incompatible activities

Requirements: Physical or other effective means must be used to separate incompatible activities in order to prevent contamination of a food. 60

Separation of food

Requirements: Physical or other effective means must be used to separate a food from

- anything that presents a risk of contamination of the food;
- any food that does not meet the requirements of the Act or these Regulations; and
- anything that is manufactured, prepared, stored, packaged or labelled in an establishment and not intended or sold for use as food. 61

Arrival of certain food at establishment

Requirements: Any food that presents a risk of injury to human health, that is exempted under section 22 from the application of the import requirements that are set out in the Act and these Regulations or that does not meet the requirements that are set out in the Act or these Regulations must be identified as such and placed in a designated area when it arrives at an establishment. 62 (1)

Measures to prevent contamination

Requirements: Any measures that are necessary to prevent the food described in subsection (1) from contaminating any other food that is in the establishment must be taken. 62(2)

Rationale

Incompatible activities may result in cross-contamination.

Interpretation

Incompatible activities must be controlled to prevent the risk of contamination. Consider the following:

- Allergens (Canada's Priority Allergens: eggs, milk, mustard, peanuts, crustaceans and molluscs, fish, sesame seeds, soy, sulphites, tree nuts, wheat and triticale). Different countries have different priority allergens, make sure you check their government websites prior to exporting.
- Additives
- Preservatives
- Pesticide Application and withdrawal (PHI)
- Returned/suspect product
- Washed vs. unwashed fruits and vegetables
- Storage of starter products, manure, cull and compost piles
- Washing agriculture chemical applicators away from fields and water sources
- Multi-use farms where livestock and vegetable or fruit production can occur, keep activities separate



Checklist

- ☐ Allergen Management Program
 - ☐ Proper production scheduling (i.e. process non-allergenic products first or on separate days, where applicable)
 - ☐ Allergens in employee lunches (handwashing is key, leaving work effects at the worksite to avoid cross-contamination)
 - ☐ Designate allergen storage areas (where applicable)
 - ☐ Allergen-free clean up and inspections (where applicable)
 - ☐ Employee training
 - ☐ Correct labelling and verifications
- ☐ Pesticide Application and Withdrawal Procedure (this may be included on the PHI and Harvest records)
- ☐ Return Products/Non-conforming Items Policy
- ☐ Held items identified

Lighting

Requirements: An establishment must be equipped with natural or artificial lighting that is appropriate for the food and for the activity being conducted. 63(1)

Light fixtures

Any light fixtures in the establishment must

- a. be capable of withstanding repeated cleaning and, if necessary, to prevent contamination of a food, repeated sanitizing; and
- b. not present a risk of contamination of the food in the event of breakage. 63(2)

Ventilation system

A facility or conveyance where a food is manufactured, prepared, stored, packaged or labelled must be equipped with a ventilation system that

- a. provides natural or mechanical ventilation with sufficient air exchange to provide clean air and to remove unclean air and odours that might affect the food;
- b. is accessible and, if necessary for its cleaning, maintenance or inspection, can be disassembled;
- c. is capable of withstanding repeated cleaning; and
- d. functions as intended. 64

Temperature and humidity

The temperature and humidity level in a facility or conveyance where a food is manufactured, prepared, stored, packaged or labelled must be maintained at levels appropriate for the food, as the case may be, and for the activity being conducted. 65(1)

Heating, cooling or humidity-control system

If the facility or conveyance is equipped with a heating, cooling or humidity-control system, the system must

- a. if necessary to prevent contamination of a food, be equipped with instruments to control, indicate and record the temperature and humidity levels;
- b. be accessible and, if necessary for its cleaning, maintenance or inspection, is able to be disassembled;
- c. be capable of withstanding repeated cleaning; and
- d. functions as intended. 65(2)

Rationale

Inadequate lighting, ventilation, temperature and humidity can lead to contamination of food, ingredients, packaging materials and food contact surfaces.

Interpretation

Lighting, ventilation, temperature and humidity must be in good condition and maintained to prevent the risk of contamination. When the colour of product is being assessed, the lighting must not alter or affect the natural colour of the food. Lighting located overhead or on equipment must be sufficient for the activity being conducted (i.e. harvesting, inspection, grading). Lighting intensity guidelines are as follows: Storages 110 LUX, General Production Areas 220 LUX, Inspection Areas 550 LUX.



Checklist

- ☐ **Interior Inspection Checklist**
 - ☐ Adequate lighting is provided (as per guidelines above), and lighting is shatterproof or protected from breakage
 - ☐ Ventilation provides sufficient air exchange to prevent accumulation of steam, condensation and dust, to remove contaminated air and maintain positive pressure in high-risk areas
 - ☐ Air intakes are screened and filtered, if applicable
 - ☐ Temperature and humidity are maintained at appropriate levels (refrigerated food stored at 4°C or less, frozen food -18°C or less.). Product stored in coolers or freezers needs to be spaced so that it does not restrict airflow to prevent product from reaching and staying at the appropriate temperature. Humidity levels must be low enough to prevent condensation from forming.
 - ☐ Condensation is not an issue in pack areas or storages
 - ☐ System is equipped with devices to control, monitor temperature or humidity levels
- ☐ **Glass and Brittle Plastic Checklist (can be combined with the interior inspection checklist)**
- ☐ **Temperature Log**

Removal and disposal of contaminated materials and waste

Requirements: An establishment must have means for the removal and disposal of contaminated materials and waste and, if necessary, to prevent contamination of a food, be equipped with a drainage, sewage and plumbing system that functions as intended. 66(1)

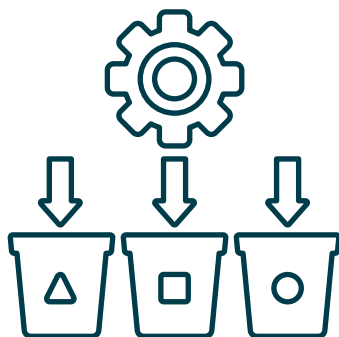
Frequency and manner Contaminated materials and waste must be removed and disposed of at a frequency that is sufficient to prevent contamination of a food and in a manner that does not present a risk of contamination of a food. 66(2)

Rationale

Effective procedures will prevent the accumulation of waste, inedible or food waste products and the potential contamination of food handling areas, and minimize the attraction of pests.

Interpretation

Removal and disposal of contaminated materials and waste must ensure that the risk of contamination to products is minimized through the control of cross-contamination and control of pests.



Checklist

- ☐ Waste management program
 - ☐ Bins are identifiable (colour coded or labelled)
 - ☐ Bin cleaning and sanitizing
 - ☐ Emptied at appropriate frequencies (does not allow waste to overflow)
- ☐ Drainage, sewage (plumbing blueprints/ drawings) adequate with no pooling of water, are trapped and vented to prevent backflow.
- ☐ Culls are not left in or disposed of near the production site (may attract pests and disease)



Cleaning stations, lavatories, etc

Requirements: If necessary to prevent the contamination of a food, an establishment must be equipped with hand cleaning and sanitizing stations, lavatories, showers, drinking water stations, break rooms or change rooms that

- a. are appropriately equipped and adequate in number and size for the number of persons using them;
- b. are located so that they are readily accessible to the persons using them; and
- c. are capable of withstanding repeated cleaning and, if necessary, to prevent contamination of a food, repeated sanitizing. 67(1)

Hand cleaning and sanitizing stations

The hand cleaning and sanitizing stations must permit the effective cleaning of hands. 67(2)

Lavatories

The lavatories must be located and maintained so that they do not present any risk of contamination of a food. 67(3)

Rationale

Cleaning stations and lavatories installation can become a source of contaminants if they are not properly maintained.

Interpretation

Cleaning stations and lavatories shall be maintained to prevent the risk of contamination.



Checklist

- ☐ Washrooms are adequate in size, kept clean and sufficient for the number of staff (do not create lineups, general rule of thumb is minimum 1 per 35 employees) provided at the site or within a short walk or provide transportation from the location. If located at the production site, they are situated, so they do not create a food safety hazard to product or water sources (i.e. should not be located directly in the field or next to water sources where runoff can occur or open into pack areas). Work effects must not be worn into washrooms. Provide a spot for these to be stored.
- ☐ Hand washing and sanitizing stations permit effective cleaning of hands in the field/greenhouse:
 - ☐ Handwashing signage posted with clear steps for proper handwashing
 - ☐ Waste receptacle (covered)

And one of the following options

- ☐ Hand wipes & approved hand sanitizer (wipes must be unscented and appropriate for use on skin)

Or

- ☐ Potable water (hot or cold), single-use paper towel, sanitizer

Or

- ☐ Potable water (hot or cold), approved soap, single-use paper towel with or without approved hand sanitizer

** if water is used in the field for handwashing, then wastewater must be collected and disposed of (i.e. not permitted to run off into the ground).

- ☐ In packhouses/storages where running water is available (if running water is not available, then the hand wipes and sanitizer option listed above is an option):
 - ☐ Handwashing signage posted with clear steps for proper handwashing
 - ☐ Approved (intended for use in a food processing environment) soap is available
 - ☐ Single-use paper towel is available
 - ☐ Warm potable water
 - ☐ Waste receptacle
 - ☐ Approved hand sanitizer, if applicable
- ☐ Cleaning stations and washrooms (lavatories) are on the sanitation schedule (Sanitation program and **Sanitation record**)

Water

Requirements: Any water that might come into contact with a food must be potable, unless it does not present a risk of contamination of the food, and must be protected against contamination. 70(1)

Steam and ice

Any steam or ice that might come into contact with a food must be made from water that meets the requirements of subsection (1) unless the steam or ice does not present a risk of contamination of the food. 70(2)

Water

Any system that supplies water that meets the requirements of subsection (1) must not be cross-connected with any other system unless measures are taken to eliminate any risk of contamination of a food as a result of the cross-connection. 70(3)

Supply of water, steam and ice

An establishment must be supplied, as appropriate for the food, and for the activity being conducted, with

- a. water that is adequate in quantity, temperature, pH and pressure to meet the needs of the establishment;
- b. steam that is adequate in quantity and pressure to meet those needs; and
- c. ice that is adequate in quantity to meet those needs. 71(1)

Treatment of water, steam or ice

Any treatment of water, steam or ice must be applied in a manner that does not present a risk of contamination of a food. 71(2)

Rationale

Water, ice and steam can be a source of biological, chemical, or physical contaminants. Treated water can be a source of contaminants if the chemical treatment or treatment process is incorrectly performed and/or monitored.

Interpretation

Water, ice and steam must be of adequate supply and pose no risk of contamination. Things to consider:

- Water sources (listed lowest to highest risk): municipal, well, groundwater fed dugouts and ponds, rainwater, lake, ponds fed from runoff, streams, rivers, flood water.
- Intended use: handwashing, equipment washing, product washing (if recirculated must be kept potable and monitored), and final rinse, making ice, irrigation, for application of agricultural chemicals or fertilizers.
- Delivery method: overhead spray, drip, trickle
- Water storage tanks (need to clean at the start of the season, after emptying (with approved chemicals or power washed) and added to the Sanitation Program)
- Tampering of water supply
- Adequate supply, temperature and pressure (i.e. irrigation)
- Back-flow prevention, vacuum breakers on hoses, if applicable



Checklist

- ☐ Potable water, steam and ice supply testing procedure (where applicable)
 - ☐ Source of the water, steam or ice
 - ☐ Treatments used and how they are maintained or monitored (i.e. UV, filters, chlorination)
 - ☐ Testing frequency and collection method
 - ☐ Up to date schematic of water supply (where applicable)
- ☐ Potable water, steam and ice analysis reports
- ☐ Accredited lab used for testing, certificate of accreditation and scope of accreditation
- ☐ Agricultural water source assessed for risk (lakes, rivers, streams, ponds) and steps taken to mitigate risk (do not use, fence, irrigate in the morning, etc.)
 - Heavy wildlife/migratory traffic, domestic and livestock access
 - Season use for recreation
 - Possible contamination upstream (i.e. runoff from fields or neighbouring properties)
 - Contamination from irrigation pipes (not stored properly)
- ☐ Where ice is made, stored and used, the ice machine doors must be kept closed when not in use. The ice machine must be cleaned and maintained (included in Sanitation Program & Preventative Maintenance Program). Ice must not be a source of contamination where it is used to remove field heat or package fruits and vegetables.

Conveyances

Requirements: Any conveyance that is used to convey a food to or from an establishment and that is unloaded or loaded at the establishment

- a. must be designed, constructed and maintained to prevent contamination of the food;
- b. must be constructed of, and maintained using, materials that are suitable for their intended use and, if the materials present a risk of contamination of the food, that are
 - i. durable,
 - ii. capable of withstanding repeated cleaning and, if necessary, to prevent contamination of a food, repeated sanitizing, and
 - iii. free of any noxious constituent;
- c. must be capable of maintaining the temperature and humidity at levels that are appropriate for the food and, if necessary, to prevent contamination of the food, be equipped with instruments that control, indicate and record those levels;
- d. must not contain any animal, other than an animal referred to in paragraph 51(2)(a), any pest control product as defined in

subsection 2(1) of the Pest Control Products Act or any other material or substance that presents a risk of contamination of the food; and

- e. must be clean and in a sanitary condition at the time of unloading or loading. 72

Unloading and loading

Requirements: Any unloading and loading of a food from or onto a conveyance at an establishment must be conducted in a manner that does not present a risk of contamination of a food. 73

Storing

Any storing of a food must be conducted in a manner that does not present a risk of contamination of the food. 74(1)

Storing — other

Any storing of conveyances, equipment, sanitizers, agronomic inputs, chemical agents, starter products, packaging material, labels or any other thing that is used in the manufacturing, preparing, storing, packaging or labelling of a food must be conducted in a manner that does not present a risk of contamination of the food. 74(2)

Definition of starter products

In subsection (2), starter products means the materials that are used to start growing fresh fruits or vegetables and includes seeds, seedlings, plants, cuttings, canes, seed potatoes and nursery stock. 74(3)

Rationale

Improper loading, unloading and storage practices can lead to biological, chemical or physical contamination of food, ingredients and packaging materials.

Interpretation

Loading, unloading and storage practices must be controlled to ensure they do not pose a biological, chemical or physical contamination risk to products, ingredients and packaging materials. Things to consider:

- In the field, produce should be transported in a covered vehicle to protect it from bird droppings and large amounts of dust.
- Agricultural chemicals must be stored separately from seeds, transplants, row covers, harvested and market-ready products and packaging. Seeds, transplants, row

covers must be stored separately from harvested and market-ready products and packaging.

- Production site equipment must be stored separate from packaging, product and harvest containers as fuel, gas, fumes, oil and non-food grade lubricants can pose a risk of contamination.
- Food products and packaging must be transported separately from agriculture inputs, incompatible food products (meat, fish).
- Chemicals storage must be locked and labelled. Chemicals must be stored separately from product and packaging in a dry, well-ventilated area.
- Harvested product is stored separate from market-ready product.
- Seeds for sprouts, food product and market-ready packaging is kept off the floor or ground such as on pallets or shelves. Shelving units and pallets must be kept away from the walls to facilitate inspection and cleaning.

Checklist

- ☐ Loading, Unloading and Storage Procedures
 - ☐ Approved supplier/source
 - ☐ Product inspections
 - ☐ Food carrier inspections

- ☐ Food carrier temperature inspections (where applicable)
- ☐ First In First Out/First Expired First Out Stock rotation
- ☐ Where and how product, packaging and chemicals are stored

- ☐ **Receiving Reports**
- ☐ **Shipping Reports/Invoices/Shipping Logbook**
- ☐ **Temperature Logs**



Competencies and qualifications

Requirements: Any person who is involved in the manufacturing, preparing, storing, packaging or labelling of a food must have the competencies and qualifications that are necessary to carry out their duties. 75

Rationale

Competencies and qualifications increase awareness of potential hazards and the responsibilities that personnel have to minimize contamination risks.

Interpretation

Personnel performing tasks shall be competent and qualified to carry out their roles and responsibilities.

Training should occur at the start of the season for returning employees, with each new hire prior to starting work. For non-seasonal operations, training must occur at least annually. It must be conducted in a language understood by employees.



Checklist

- ☐ Personnel Training Program
 - ☐ Describes how training effectiveness checks will be completed and recorded (written test, observing staff perform tasks correctly after training or another means of evaluation that is appropriate for the trained task)
 - ☐ What kind of training is completed, who trains and at what frequency.
- ☐ Employee Training Certificates, if applicable (i.e. pesticide applicators license)
- ☐ **Personnel Training Records** (date, who was trained, what they were trained on, by whom, effectiveness check)

TRAINING MAY INCLUDE (IS NOT LIMITED TO):



Grading



Preventative Maintenance
and/Calibration



Pest Control/Pest Sightings



Harvesting and Market
Ready Packing, Transport
and Storage Activities



Sanitation and
chemical handling



How to fill
out records



Good Agricultural Practices



Personnel Hygiene



Allergens



Visitor policy

Clothing, footwear and protective coverings

Requirements: Any person who enters or is in an area where a food is manufactured, prepared, stored, packaged or labelled must wear clothing, footwear and protective coverings, including gloves, a hairnet, a beard net and a smock that are in good condition, clean and in a sanitary condition and that are appropriate for the food and the activity being conducted. 76

Personal cleanliness

Any person who enters or is in an area where a food is manufactured, prepared, stored, packaged or labelled must maintain personal cleanliness to prevent contamination of the food, including by cleaning and, if necessary, by sanitizing their hands

- a. immediately on entering the area;
- b. immediately after using a lavatory;
- c. immediately before beginning to conduct the activity; and
- d. at a frequency appropriate for the food and the activity being conducted. 77



Spitting, chewing gum and other

Any person who enters or is in an area where a food is manufactured, prepared, stored, packaged or labelled must refrain from spitting, chewing gum, using tobacco products, eating, having unnecessary contact with the food and doing any other act that presents a risk of contamination of the food. 78

Objects and substances

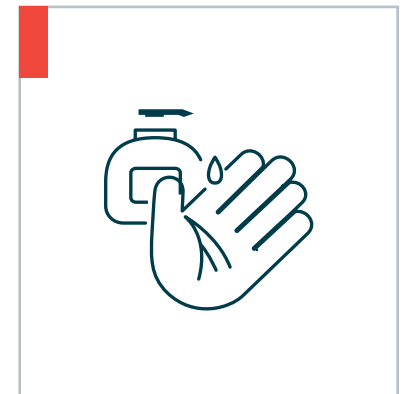
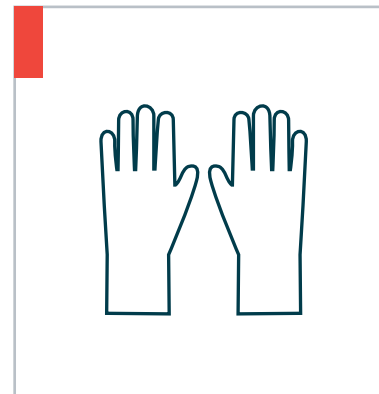
Any person who enters or is in an area where a food is manufactured, prepared, stored, packaged or labelled must refrain from wearing or using any object or substance that presents a risk of contamination of the food. 79

Reporting of disease, illness, symptoms and lesions

Any person who works in an area where a food is manufactured, prepared, stored, packaged or labelled and has a disease or illness, symptoms of a disease or illness or an open or infected lesion must report them to the operator. 80

Communicable disease and lesions

The operator must prevent any person who is suffering from, or is a known carrier of, a communicable disease or who has an open or infected lesion from entering or being in an area of an establishment where a food is manufactured, prepared, stored, packaged or labelled if the person's condition presents a risk of contamination of the food. 81



Rationale

Personnel play an important role in producing safe quality food; improper hygienic habits can lead to biological, chemical, or physical contamination of food, ingredients, packaging materials and food contact surfaces.

Interpretation

Personnel hygienic standards minimize the risk of product contamination and shall be adopted by all personnel, temporary workers, contractors and visitors. Good Agricultural Practices that should be in place at your operation for all of the approved personnel are:

- Long hair should be tied back, and hair should be covered with a hat in the field. In the packhouse, hairnets and beard nets should be worn.
- All work effects (gloves, shoes, clothing) must be clean and in good condition (i.e. no loose buttons or snaps).
- Re-useable gloves, if used, must be regularly washed. If disposable gloves are worn, they are not to be reused. Gloves need to be removed during breaks and stored away from break areas in a clean location.
- No food, drink, chewing gum, candy, spitting, sampling of produce, using tobacco, or vape products are to be done in the field or the packhouse/

storage locations. Where water is permitted due to temperatures or a dry environment, then a beverage station should be set up away from pack and harvest areas with access to handwashing after water is consumed.

- Hands must be washed after touching floor contact surfaces, after touching your face or hair, eating or drinking, using tissues.
- Persons harvesting and packing product should not wear jewellery of any kind that is visible, nail polish, artificial nails, eyelashes or eyelash extensions, pins, or buttons. Medical alert bracelets and jewellery are an exception. Plain wedding bands, religious apparel, piercings, if they cannot be removed, may be permitted. However, they need to be covered.
- Medicine that is required to be kept with a person for accessibility in case of an emergency must be secured so that it does not accidentally fall into product.
- Illnesses must be reported. Anyone with a communicable disease, carrier of a communicable disease, cough, sneezing, and/or fever, open or infected lesions should not work with food, food equipment or packaging. Open wounds or exposed areas of the skin must be covered with a waterproof dressing prior to working with food.



Checklist

- | | |
|---|---|
| <input type="checkbox"/> Personnel Training Program | <input type="checkbox"/> Personal objects – jewellery and personal effects. Personal effects must be stored away from the production site and pack areas. |
| <input type="checkbox"/> Personnel GAP and Hygiene Policy | <input type="checkbox"/> Reporting of health condition |
| <input type="checkbox"/> Personnel Protective Equipment - Clothing and footwear | <input type="checkbox"/> Communicable disease and lesions |
| <input type="checkbox"/> Personal Cleanliness – handwashing and sanitizing, where applicable | <input type="checkbox"/> Proof of training effectiveness checks |
| <input type="checkbox"/> Personal conduct – no food, drinks, smoking, vaping, spitting in production sites or packhouses. If water is allowed or required for health and safety reasons, then it must be consumed and stored away from product areas, and proper handwashing followed after handling. | <input type="checkbox"/> <u>Personnel Training Records</u> |
| | <input type="checkbox"/> <u>Visitor's Log</u> |

Requirements: An operator who suspects on reasonable grounds that a food presents a risk of injury to human health or does not meet the requirements of the Act or these Regulations must immediately investigate the matter. 82(1)

Notification and mitigation of risk

If the investigation establishes that the food presents a risk of injury to human health, the operator must immediately notify the Minister and immediately take action to mitigate the risk. 82(2)

Complaints procedure

An operator must prepare, keep and maintain a document that sets out a procedure for receiving, investigating and responding to complaints that are received in relation to a food. 83(1)

Complaints

If a complaint is received, the operator must implement the procedure and prepare a document that sets out the details of the complaint, the results of the investigation and the actions taken based on those results and keep it for two years after the day on which the actions are completed. 83(2)

An operator must prepare, keep and maintain a document that sets out a recall procedure that enables the effective recall of a food, the name of a contact person who is responsible for the procedure and the name of a contact person who is responsible for conducting recalls. 84(1)

Recall simulation

The operator must, at least once every 12 months,

- a. conduct a recall simulation, based on the recall procedure, and
- b. prepare a document that sets out the details of how the recall simulation was conducted and the results of the simulation, and keep that document for two years after the day on which the recall simulation is completed. 84(2)

Recall — notice to Minister Rappel

If an operator determines that a food should be recalled because it presents a risk of injury to human health, the operator must immediately notify the Minister 84(3)

Recall — implementation

If a food is the subject of a recall because it presents a risk of injury to human health, the operator must

- a. immediately implement the recall procedure; and
- b. prepare a document that sets out the details of the recall, including any information that substantiates its effectiveness and keep the document for two years after the day on which the recall is initiated. 84(4)

Imported food

The holder of a licence to import must comply with sections 82 to 84 in respect of a food that is imported. 85



Rationale

Food recalls can be triggered by a number of hazards within or external to a facility. Quickly regaining control of implicated lots of products is crucial in preventing the risk of hazard to consumers.

Interpretation

The Company shall have a recall and complaints plan in place to manage complaints and recalls effectively should an issue arise.

Mock Recalls are used to test your program. Use the recall forms created that would be used in the event of an actual recall situation and walk through your procedure as you conduct the test. Determine a realistic scenario that would trigger a recall and select a date where you know that a specific lot code was sent to a customer. Trace that particular lot to the customers affected. Check those contacts to ensure that they are up to date (if you need to call the customer to double-check this, DO NOT tell them you are conducting a mock recall as this may accidentally trigger a recall with that customer). An effective recall test will allow you to address the following questions: was the procedure clear? Is your customer contact list correct? Were you able to find 100% of the product you harvested and packaged? Did you run into any potential roadblocks in finding all your product? Depending on how you answer these questions will determine if you need to improve your traceability and retest the process.

Checklist:

- ☐ Customer Complaint Procedure
 - ☐ Who records the complaint
 - ☐ Who investigates and categorizes the complaint (must be someone competent to do this)
 - ☐ Brief procedure for receiving and conducting the investigation and follow-up with CFIA and or customer.
- ☐ Recall and Mock/Simulation Recall Program
 - ☐ Roles and responsibilities
 - ☐ Recall team and contact information
 - ☐ Recall steps/procedure. Steps should be brief and outline what needs to happen in a recall situation, list the records at each step that you will need to review to be able to find your product. Clear, concise steps will be easier to follow in a stressful recall situation. See CFIA's step by step recall procedure <https://www.inspection.gc.ca/food-safety-for-industry/recall-procedure/eng/1535516097375/1535516168226>
 - ☐ CFIA contact information
- ☐ Traceability Program
 - ☐ Product coding (lot code/identifier)
 - ☐ Product labelling
- ☐ Customer Complaint Records
- ☐ Recall Management Records
- ☐ Mock Recall/Recall Simulation Records (test your recall program at least once per year)
- ☐ Employee training



Licence holders

Requirements: A licence holder must prepare, keep and maintain a written preventive control plan that meets the requirements of section 89 for any activity identified in their licence that they conduct in respect of a food. 86(1)

Exception — food to be exported

Despite subsection (1), a preventive control plan is not required to be prepared, kept or maintained for any activity that the licence holder conducts in respect of a food, other than fish or a meat product, that is exported, unless a certificate or other document referred to in section 48 of the Act is sought in respect of the food. 86(2)

Exception — sales of \$100,000 or less

Despite subsection (1), if a licence holder's gross sales that are derived from food are \$100,000 or less for the 12 months before the day on which they most recently made an application for the issuance, renewal or amendment of a licence, a preventive control plan must be prepared, kept and maintained only for any activity that they conduct in respect of

- a. a food animal, meat product, fish, dairy product, egg, processed egg product or processed fruit or vegetable product that is identified in their licence; and
- b. a food in respect of which a certificate or other document referred to in section 48 of the Act is sought. 86(3)

Growers or harvesters of fresh fruits or vegetables

Any person who grows or harvests fresh fruits or vegetables must prepare, keep and maintain a written preventive control plan that meets the requirements of section 89 for any activity that they conduct in respect of those fresh fruits or vegetables if they are

- a. to be exported and a certificate or other

document referred to in section 48 of the Act is sought in respect of the fresh fruits or vegetables; or

- b. to be sent or conveyed from one province to another and the person's gross sales that are derived from food are more than \$100,000 for the previous 12 months. 87

Implementation

Any person who is required to prepare, keep and maintain a preventive control plan must implement that plan. 88

Content of preventive control plan

The preventive control plan must include

- a. a description of the measures for ensuring that the applicable requirements of sections 201 and 205, subsection 206(1), sections 208, 218, 221, 296, 306, 307, 316, 317, 321, 322, 324 to 326 and 328 are met;
- b. a description of the measures for ensuring that the food is packaged and labelled in a manner that does not contravene subsection 6(1) of the Act;
- c. in relation to the applicable requirements of these Regulations,
 - i. a description of the biological, chemical and physical hazards that are identified under subsection 47(1) as presenting a risk of contamination of a food, of the control measures for preventing or eliminating those hazards or reducing them to an acceptable level and of the evidence that the control measures are effective,
 - ii. a description of the critical control points, of the related control measures and of the evidence that the control measures are effective,
 - iii. a description of the critical limits for each critical control point,

iv. the procedures for monitoring the critical control points in relation to their critical limits,

v. the corrective action procedures for each critical control point,

vi. the procedures for verifying that the implementation of the preventive control plan results in compliance with the provisions of the Act and these Regulations, and

vii. documents that substantiate that the preventive control plan has been implemented with respect to subparagraphs (i) to (vi); and

d. in relation to the applicable requirements of sections 128 to 136, paragraphs 140(b) and (c) and sections 141 to 144,

iii. a description of the performance criteria for evaluating the effectiveness of each of those measures,

iv. the procedures for monitoring each of those measures,

v. the corrective action procedures for each of those measures,

vi. the procedures for verifying that the implementation of the preventive control plan results in compliance with the provisions of the Act and these Regulations,

vii. the procedures for auditing, on a regular basis, the outcome of the implementation of the preventive control plan, and

viii. documents that substantiate that the preventive control plan has been implemented with respect to subparagraphs (i) to (vii); and

e. supporting documents that show evidence of the information recorded under paragraphs (a) and (b), subparagraphs (c)(i) to (vi) and (d)(i) to (vii). 89(1)

DIVISION 6: PREVENTIVE CONTROL PLAN

Retention period of documents

Each document referred to in subparagraphs (1)(c)(vii) and (d)(viii) must be kept for two years after the day on which it is prepared. 89(2)

Additional content — import

The preventive control plan of the holder of a licence to import must also include the information specified in subparagraphs (1)(c)(i) to (vii) in relation to the requirements of section 11. 89 (4)

Additional content — export

The preventive control plan of the holder of a licence to export must also include the information specified in subparagraphs (1)(c)(i) to (vii) in relation to the requirements of subsection 15(1). 89 (5)

Rationale

Preventive Control Plans identify potential hazards associated with the process and production of products. By identifying and assessing all potential hazards, control measures can be designed and implemented to reduce, prevent or eliminate hazards.

Interpretation

A Preventive Control Plan shall be developed and implemented to reduce, prevent or eliminate hazards associated with process and production. A Preventive Control Plan is similar to a HACCP Plan but incorporates preventive controls/prerequisite programs/good agricultural practices, including traceability and the HACCP plan.



Checklist:

- | | |
|---|---|
| <ul style="list-style-type: none"> <input type="checkbox"/> Preventive Control Plan Team/HACCP Team <input type="checkbox"/> Product Description <input type="checkbox"/> Incoming Ingredients and Materials <input type="checkbox"/> Process Flow <ul style="list-style-type: none"> <input type="checkbox"/> Inputs and outputs (i.e. waste, compost, rework, returns, rejects, etc.) <input type="checkbox"/> List of biological, chemical and physical hazards <input type="checkbox"/> Plant Schematics <ul style="list-style-type: none"> <input type="checkbox"/> Traffic flows <input type="checkbox"/> Cross Contamination Points <input type="checkbox"/> Water supply lines <input type="checkbox"/> Sewage and drain lines <input type="checkbox"/> Pest Control Devices <input type="checkbox"/> Hand wash stations <input type="checkbox"/> Hazard Identification and Critical Control Point(s) determination <ul style="list-style-type: none"> <input type="checkbox"/> Incoming Materials <input type="checkbox"/> Cross Contamination Points <input type="checkbox"/> Process Steps (Inputs) <input type="checkbox"/> Outputs (i.e. waste, compost, rework, returns, rejects, etc.) <input type="checkbox"/> Preventive Controls controlling hazards <input type="checkbox"/> Critical Control Point(s), if applicable | <ul style="list-style-type: none"> <input type="checkbox"/> Hazards not controlled by the Operator/Company <input type="checkbox"/> Critical Control Point Form (if applicable, see above) <ul style="list-style-type: none"> <input type="checkbox"/> Process Step <input type="checkbox"/> Hazard Description and control measure <input type="checkbox"/> Critical limit <input type="checkbox"/> Monitoring Procedure <input type="checkbox"/> Deviation Procedure <input type="checkbox"/> Verification Procedure <input type="checkbox"/> Record Keeping <input type="checkbox"/> Process Control Form, if applicable <ul style="list-style-type: none"> <input type="checkbox"/> Process Control number and associated Critical Control Point <input type="checkbox"/> Hazard description <input type="checkbox"/> Standards <input type="checkbox"/> Monitoring Procedure <input type="checkbox"/> Deviation Procedure <input type="checkbox"/> Verification Procedure <input type="checkbox"/> Record Keeping <input type="checkbox"/> Document Control Procedure <ul style="list-style-type: none"> <input type="checkbox"/> Retention of documents <input type="checkbox"/> Electronic or hard copies <input type="checkbox"/> Maintenance and Reassessment Procedures <input type="checkbox"/> Corrective and Preventive Action Plan <input type="checkbox"/> <u>Corrective and Preventive Action Report</u> |
|---|---|

A close-up photograph of a vibrant green leaf, likely from a lettuce or similar leafy vegetable. The leaf's surface is covered with numerous small, clear water droplets, giving it a fresh, dewy appearance. The leaf's veins are clearly visible, and there is a small, irregular hole in the center of the leaf, possibly from an insect. The background is dark and out of focus, emphasizing the leaf's texture and color.

TRACEABILITY, PART 5 OF THE SFCR

Documents

90 (1) Any person who sends or conveys a food from one province to another, or who imports or exports it, any holder of a licence, to manufacture, process, treat, preserve, grade, store, package or label a food in its imported condition and any person who grows or harvests fresh fruits or vegetables that are to be sent or conveyed from one province to another or exported must, if they provide the food to another person, prepare and keep documents that set out

- a. the common name of the food, a lot code or other unique identifier that enables the food to be traced and the name and principal place of business of the person by or for whom the food was manufactured, prepared, produced, stored, packaged or labelled;
- b. except if they provide the food to another person as a sale at retail, the date on which it was provided and the name and address of the person to whom it was provided;
- c. if they were provided the food by another person, the name and address of that person and the date on which it was provided; and
- d. the name of any food commodity that they incorporated into the food or from which they derived the food and, if they were provided the food commodity by another person, the name and address of that person and the date on which it was provided.

Documents — retail sale Documents

(2) Any person who sells a food at retail, other than a restaurant or other similar enterprise that sells the food as a meal or snack, must prepare and keep documents that include the information specified in paragraphs (1)(a), (c) and (d).

Retention period of documents

(3) The documents referred to in subsections (1) and (2) must be kept for two years after the day on which the food was provided to another person or sold at retail, and must be accessible in Canada.

Production of documents

91 (1) Any person who has received a request from the Minister for a document referred to in section 90, or any part of such a document, must provide it to the Minister

- a. within 24 hours after receipt of the request, or within
 - i. any shorter period that is specified by the Minister, if the Minister believes that it is necessary in order to identify or respond to a risk of injury to human health associated with a food commodity, or
 - ii. any longer period that is specified by the Minister, if the Minister believes that the document is not necessary for a recall that is or may be ordered under subsection 19(1) of the Canadian Food Inspection

Agency Act; and

- b. if provided electronically, in a single file and in plain text that is capable of being imported into and manipulated by standard commercial software.

Definition of plain text

(2) In paragraph (1)(b), plain text means data that is not encrypted and whose semantic content is available.

Rationale

Effective traceability programs allow companies to trace their product and efficiently recall products that are suspect or identified as unsafe. Labelling or coding can make product recall situations less difficult when implemented correctly.

Interpretation

The operation shall have methods developed and implemented to trace product throughout the process until final packaging; one step back (supplier) and one step forward (customer). Take note that records must be kept, as hard copy or electronically, for at least two years after that lot was provided to you or you provided the food to a customer. They must be accessible in Canada.

If this section pertains to your operation and product, then you are required to have the following on your consumer prepackaged product (i.e. basket, clamshell, case of product sold to a consumer):

- Common Name
- Name and principal place of business of the person by or for whom the food was manufactured, prepared, produced, stored, packaged or labelled;
- Lot Code

The following situations are exempt from the traceability requirements (i.e. having a label attached, applied, or accompany the product) for consumer prepackaged product:

- Bulk fresh fruit and vegetables sold to consumers
- Fresh fruits or vegetables packaged in a wrapper or confining band less than 13 millimetres (1/2 inch) in width (e.g. bunch of asparagus with a band less than 13mm or 1/2 inch);

- Fresh fruits or vegetables packaged in a protective wrapper, or a protective bag, that is clear and transparent and on which no information is shown other than a price, bar code, number code, environmental statement or product treatment symbol

The following are exempt from declaring a common name on the product

- prepackaged fresh fruits or vegetables that are visible and identifiable in their container
- bulk fresh fruits and vegetables sold to consumers
- fresh fruits or vegetables packaged in a wrapper or confining band less than 13 millimetres (1/2 inch) wide
- fresh fruits or vegetables packaged in a protective wrapper, or a protective bag, that is clear and transparent and on which no information is shown other than a price, bar code, number code, environmental statement or product treatment symbol

Please keep in mind that retailers may require something specific regarding labelling to supply their stores (PLU codes, specific labelling format, etc.). So please check with those retailers prior to producing product for them.



Checklist:

- ☐ Traceability Program, detailing the following:
 - ☐ Product coding
 - ☐ Product labelling
 - ☐ Employee training

Labelling

92 (1) Any person referred to in subsection 90(1) or (2) must ensure that a label that bears the information specified in paragraph 90(1)(a) is applied or attached to any food, or accompanies any food, that is provided to another person.

Consumer prepackaged food

(2) In the case of consumer prepackaged food that is not packaged at retail, the unique identifier referred to in paragraph 90(1)(a) must be a lot code.

Exception

(3) Subsections (1) and (2) do not apply in respect of

- a food at the time of its export;
- a food, other than a consumer prepackaged food, at the time of its sale at retail; or
- a prepackaged food described in paragraphs 213(a) to (c) at the time of its sale at retail.

Exception — foods described in paragraphs 219(1) (a) and (b)

(4) Despite subsection (1), any food described in paragraph 219(1)(a) or (b) is not required to be labelled with the common name of the food at the time of its sale at retail.

Exception — foods described in section 220

Exception
(5) Despite subsection (1), any food described in section 220 is not required to be labelled with the name and principal place of business of the person by or for whom the food was manufactured, prepared, produced, stored, packaged or labelled.

Rationale

Labelling or coding can make product recall situations less difficult when implemented correctly. Correct labelling and coding enable the next person to handle, display, store and use the product safely.

Interpretation

The operation shall have methods developed and implemented to ensure that products will be correctly labelled and coded. Lot codes should be recorded on your harvest and/or pack records as well as shipping records/invoices.

Lot codes may be alphabetic, numeric, or alphanumeric. Examples of allowable lot coding options for fresh fruit and vegetables are as follows. See appendix for more details.

- Harvest date
- Grower identification number
- GPS coordinates
- Growing region where the product was grown and harvested (sub-provincial, province, not country of origin)
- Production/pack date
- Best before date (if applicable)
- Establishment number
- SFC license number
- Or any other code that can be used for traceability reasons





Checklist: the following can be compiled into one Quality SOP*

- ☐ Labelling Procedure should detail the following
 - ☐ Product coding
 - ☐ Product labelling
- ☐ Grading Procedure, if applicable, should detail the following and how they are met
 - ☐ Grading requirements
- ☐ Weights Procedures, if applicable, should detail the following and how they are met
 - ☐ Weight requirements
- ☐ Employee training
- ☐ **Harvest and/or Pack Records**

*The Commodity Specific Requirements mentioned in the next section must be incorporated where applicable to your product.



DOWNLOADABLE FORMS

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A close-up photograph of a person's hands holding a clear plastic clamshell container filled with fresh blueberries. The hands are positioned on the left and right sides of the container, with the thumbs visible at the bottom. The blueberries are dark blue and appear to have a natural bloom. The background is blurred, showing what looks like a kitchen or food processing area with some equipment and a yellow object.

COMMODITY- SPECIFIC REQUIREMENTS, PART 6 OF THE SFCR

Fresh Fruits or Vegetables

Definitions

109 The following definitions apply in this Division.

Apple means a fresh apple for which a grade is prescribed by these Regulations.

Onion means a fresh onion for which a grade is prescribed by these Regulations.

Potato means a fresh potato for which a grade is prescribed by these Regulations.

Fresh fruits or vegetables packaged together

110 The requirements of sections 113 to 121 and 269 — as well as any requirements under Division 2 of Part 10 and Part 12 that apply in respect of fresh fruits or vegetables — do not apply in respect of consumer prepackaged fresh fruits or vegetables if the container contains more than one type of fresh fruit or vegetable but no other food and if

a. the label that is applied or attached to the container bears the expression “Fresh Pack” or “emballage frais” or, in the case of consumer prepackaged fresh vegetables, the expression “Stew-pack” or “legumes mixtes” or the expression “Vegetables for Stew” or “legumes pour ragoût”;

b. no one type of fresh fruit or vegetable in the container exceeds 1 kg net weight; and

c. the net weight of the fresh fruits or vegetables in the container does not exceed 10 kg.

111 The requirements of sections 113 to 121 and 269 — as well as any requirements under Division 2 of Part 10 and Part 12 that apply in respect of fresh fruits or vegetables — do not apply in respect of consumer prepackaged fresh fruits or vegetables if the container contains more than one type of fresh fruit or vegetable together with other food and if

a. the label that is applied or attached to the container bears the expression “Gift Pack” or “emballage-cadeau” or the expression “Combo Pack” or “emballage mixte”;

b. no one type of fresh fruit or vegetable in the container exceeds 1 kg net weight; and

c. the net weight of the fresh fruits or vegetables and other food in the container does not exceed 10 kg.

Import

Whole fresh fruits or vegetables

112 The requirements of this Subdivision apply in respect of any fresh fruits or vegetables that are whole.

113 (1) Potatoes that are imported must meet the requirements for the grade Canada No. 1 that are set out in the Compendium.

(2) Potatoes that are imported from the United States are considered to meet the requirements for the grade Canada No. 1 that are set out in the Compendium if the potatoes have been graded in the United States and meet the applicable requirements that are set out in the document entitled Grade Standard Requirements for Fresh Fruits or Vegetables Imported from the United States, prepared by the Agency and published on its website, as amended from time to time.

Apples from a foreign state other than the United States

114 (1) Apples that are imported from a foreign state other than the United States must meet the requirements for the grade Canada Extra Fancy, Canada Fancy or Canada Commercial that are set out in the Compendium.

(2) Apples that are imported from the United States must meet the requirements for the grade Canada Extra Fancy or Canada Fancy that are set out in the Compendium.

(3) Apples that are imported from the United States are considered to meet the requirements for the grade Canada Extra Fancy or Canada Fancy that are set out in the Compendium if the apples have been graded in the United States and meet the applicable requirements that are set out in the document entitled Grade Standard Requirements for

Fresh Fruits or Vegetables Imported from the United States, prepared by the Agency and published on its website, as amended from time to time.

Presumption — general

115 Fresh fruits or vegetables, other than potatoes or apples, that are imported from the United States are considered to meet the applicable requirements that are set out in the Compendium if the fruits or vegetables have been graded in the United States and meet the applicable requirements that are set out in the document entitled Grade Standard Requirements for Fresh Fruits or Vegetables Imported from the United States, prepared by the Agency and published on its website, as amended from time to time.

Foreign states — onions, potatoes and apples

116 Onions and potatoes that are imported from a foreign state other than the United States, and apples that are imported from a foreign state other than the United States and New Zealand, must meet and be certified by the Minister as meeting the following requirements:

(a) the applicable requirements that are set out in Parts 10 to 12;

(b) in the case of onions, the requirements for a particular grade of onions that are set out in the Compendium;

(c) in the case of potatoes, the requirements for the grade Canada No. 1 that are set out in the Compendium; and

(d) in the case of apples, the requirements for the grade Canada Extra Fancy, Canada Fancy or Canada Commercial that are set out in the Compendium.

Onions, potatoes and apples from United States 117
(1) Onions, potatoes and apples that are imported from the United States must

COMMODITY-SPECIFIC REQUIREMENTS

(a) be accompanied at the Canadian port of entry by a serially numbered certificate or evidence, in the form of a facsimile or a copy of an email message, issued by the federal department responsible for agriculture in the United States, that establishes that the following requirements are met:

- (i) the applicable requirements that are set out in Parts 10 to 12,
 - (ii) in the case of onions, the requirements for a particular grade of onions that are set out in the Compendium,
 - (iii) in the case of potatoes, the requirements for the grade Canada No. 1 that are set out in the Compendium, and
 - (iv) in the case of apples, the requirements for the grade Canada Extra Fancy or Canada Fancy that are set out in the Compendium; or
- (b) meet and be certified by the Minister as meeting the requirements that are set out in subparagraph (a)(i) and, in accordance with any general tolerances for inspection at the time of shipping or repackaging that are set out in the Compendium, the requirements that are set out in subparagraph (a)(ii), (iii) or (iv).

Endorsement Mention

(2) The certificate and evidence referred to in paragraph (1)(a) must be endorsed with the expression “Meets Canadian Import Requirements for Grades, Packaging, Labelling and Standard Container Size” or “Meets Canadian Import Requirements for Grades, Packaging, Labelling and Standard Container Size.”

Apples from New Zealand

118 (1) Apples that are imported from New Zealand must

(a) be accompanied at the Canadian port of entry by a serially numbered certificate or evidence, in the form of a facsimile or a copy of an email message, issued by the ministry responsible for agriculture in New Zealand, that establishes that the following requirements are met:

- (i) the applicable requirements that are set out in Parts 10 to 12, and
- (ii) the requirements for the grade Canada Extra

Fancy, Canada Fancy or Canada Commercial that are set out in the Compendium; or (b) meet and be certified by the Minister as meeting the requirements that are set out in subparagraph (a)(i) and, in accordance with any general tolerances for inspection at the time of shipping or repackaging that are set out in the Compendium, the requirements that are set out in subparagraph (a)(ii).

Endorsement Mention

(2) The certificate and evidence referred to in paragraph (1)(a) must be endorsed with the expression “Meets Canadian Import Requirements for Grades, Packaging, Labelling and Standard Container Size” or “Meets Canadian Import Requirements for Grades, Packaging, Labelling and Standard Container Size.” Exception 119 Sections 116 to 118 do not apply in respect of onions, potatoes or apples that are part of a shipment that consists of not more than

- (a) 15 containers of onions with an aggregate net weight of not more than 250 kg of onions;
- (b) 15 containers of potatoes with an aggregate net weight of not more than 250 kg of potatoes; and
- (c) 15 containers of apples with an aggregate net weight of not more than 250 kg of apples.

In transit 120 for the purposes of sections 113 to 119, if fresh fruits or vegetables are sent or conveyed to Canada in an in bond shipment from a foreign state other than the United States and pass only in transit through the United States, the fresh fruits or vegetables are not considered to have been imported from the United States.

Application for certificate

121 (1) An application for the issuance of a certificate referred to in section 116 or paragraph 117(1)(b) or 118(1)(b) must be made to the Minister in a form approved by the President.

Inspection

(2) The Minister may require an inspection for the purpose of deciding whether to issue the certificate.

Inspection — accessibility Inspection

(3) If an inspection is required, the applicant must make the onions, potatoes or apples readily accessible to an inspector at the time of inspection.

Trade of Fresh Fruits or Vegetables

Prohibition

122 (1) It is prohibited for a person to (a) sell any fresh fruits or vegetables that are to be exported or sent or conveyed from one province to another; (b) purchase or negotiate the purchase on another person's behalf of any fresh fruits or vegetables that are to be imported or sent or conveyed from one province to another; (c) receive any fresh fruits or vegetables that have been imported or sent or conveyed from one province to another; or (d) send or convey from one province to another or import or export any fresh fruits or vegetables.

Exception — persons Exception

(2) Subsection (1) does not apply in respect of

- (a) any person who is a member in good standing of the Fruit and Vegetable Dispute Resolution Corporation, a corporation incorporated under Part 2 of the Canada Not-for-profit Corporations Act, as described in its by-laws;
- (b) any person who only sells fresh fruits or vegetables directly to consumers if that person paid less than \$100,000 for the fresh fruits and vegetables that they sold to consumers within the previous 12 months;
- (c) any person who only purchases, sells or negotiates the purchase or sale on another person's behalf, sends or conveys from one province to another or imports or exports less than one metric ton of fresh fruits and vegetables per day;
- (d) any person who only sells fresh fruits or vegetables that they have grown themselves; or
- (e) a registered charity as defined in subsection 248(1) of the Income Tax Act or a club, society or association described in paragraph 149(1)(l) of that Act.

COMMODITY-SPECIFIC REQUIREMENTS

Exception — nuts, wild fruit and wild vegetables
(3) Subsection (1) does not apply in respect of nuts, wild fruit and wild vegetables.

Damaged or defective fresh fruits or vegetables Fruits

123 (1) If a claim is made that all or part of a shipment of fresh fruits or vegetables that is imported or sent or conveyed from one province to another has arrived at its destination in a damaged or defective condition, any person who has a financial interest in that shipment may make a request to the Minister for

(a) a written report that describes the condition of any damaged or defective fruits or vegetables at the time of the inspection; or

(b) a written notice of the disposition of any damaged or defective fresh fruits or vegetables that describes the amount of fresh fruit or vegetables that have been disposed of and the place and time of their disposal.

Request for report or notice

(2) The request for a report or notice referred to in subsection (1) must be made to the Minister in a form approved by the President.

Inspection — accessibility Inspection

(3) The person who makes the request for a report regarding the condition of fresh fruits or vegetables must make the fresh fruits or vegetables readily accessible to an inspector at the time of inspection.

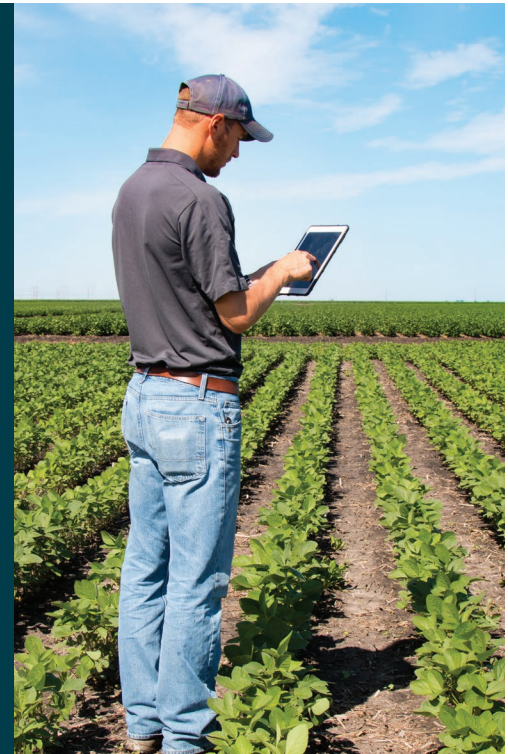
Disposition of fresh fruit or vegetable

(4) The person who makes the request for a notice regarding the disposition of damaged or defective fresh fruits or vegetables must ensure that their disposition is witnessed by an inspector.



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APPENDIX

How to draft an SOP/Policy/Procedure

The purpose of documenting a standard operating procedure (SOP) or policy regardless of the size of the operation is for consistency, transparency and to ensure everyone is clear on what is expected to occur in the run of a day.

Every document must have the company's name, the document title, issue/revision date, date of the previous version, who approved or documented the policy and page numbers. Best practice for page number formatting is page 1 of X, so everyone knows how many pages are included.

The key is to include important information while keeping it short and simple to follow. It should be written so that a new employee can understand it.

It's important to include the reason why the procedure is in place (purpose), who is responsible, if there is a backup person (trained designate) and how often the task is to be completed. A simple step by step instruction is best to describe the procedure. You will need to include a procedure for when things do not go as planned (deviation), as well as who is going to check to make sure the task is done correctly (verification) and any corresponding paperwork to be filled out.

Company's Name or Logo	Title of SOP/Procedure	Issue/Revision Date:
		Supersedes Date:
		Approved By:
Purpose:	What is to be accomplished?	
Responsibility:	Who is responsible – designated staff? Who is the alternate?	
Frequency:	How often is it to be done?	
Procedure:	What is to be done? How is it to be done? Detailed instruction.	
Deviation/Corrective Action:	Action(s) to be taken if out of specification.	
Verification:	Who is responsible for the double-check? How is it to be done?	
Records:	List associated records	
Page 1 of X		

What to Expect During Your CFIA Inspection

If you intend to ship outside of the province, you will need to apply for a license. When you apply for a license, CFIA will likely contact you to start the inspection process. The process involves three main steps; pre-inspection, during inspection and post-inspection. The following steps are a general guideline of what to expect when you are inspected.

Pre-inspection

1. You receive a CFIA Inspection Notice
2. Inspector will meet with you and review the scope of the inspection. If you have any changes or updates to your company information or profile on My CFIA and/or your preventive control plan, this is the time to inform the inspector.
3. The inspector will do an initial walkthrough of your operation and identify areas that do not meet requirements. It's in your best interest to always accompany an inspector and take notes during this process.
4. The scope of the inspection is confirmed during the walkthrough.

During Inspection

1. The Preventive Control Plan is verified that it is complete and accurate. This is completed through onsite observations, employee interviews, reviewing the written program (policies, procedures and records) and depending on your product grading and measuring.
2. The inspector will make notes either manually or electronically.
3. The inspector will determine if the operation meets regulatory requirements and completes the report.

Post-Inspection

1. The inspector will meet with you to review the results and give you the report.
2. Your operation completes the corrective actions for any non-conformances given for non-compliant aspects at your facility or written program. Have your corrective actions documented with supporting information ready for your next inspection or if your inspector requests them.
3. A follow-up inspection is scheduled by the inspector.

How to Respond to a Non-Compliance

For each non-compliance, you will need to draft a Corrective Action or Deviation Report. You will need to detail the area of non-compliance, any immediate corrective actions taken, document the root cause analysis, permanent (preventive) corrective action taken and then follow up with an effectiveness check to ensure that the issue has been fully addressed and corrected. For tips on how to do a root cause analysis, please see the Perennia Quality & Food Safety Resource section of our website.



Labelling for Traceability

Fresh fruits and vegetables are typically sold in four different formats.

- Consumer prepackaged
- Bulk
- Cases or carton that contain the consumer prepackaged product
- Cases, carton, wooden bins or triwall bins containing bulk product

As a result, requirements are slightly different for each option. They can also vary depending on the visibility of the product in the market ready packaging. In the graphic below, the requirements are identified as well as some examples.



Consumer Prepackaged Product (e.g. box of fresh berries or bag of spinach)

Label must have the following:

- Common Name *
- Name & principal place of business *
- Lot code

*see exemptions below

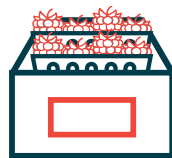
It is advised that a label be applied to the product packaging sold to retail; however, a label can be applied, attached, or accompany the product. Applying a label to your product helps consumers find your product on the shelves and buy local/support your operation.



Bulk Product

(e.g. individually sold eggplant or apples that are on displays at retail)

- No labelling is required; however, a retailer may require you to have a PLU label applied prior to shipping.



Case Containing Consumer Prepackaged Product

(e.g. flat containing raspberries in baskets)

The label must have the following:

- Common Name *
- Name and principal place of business *
- Lot code which must be on one of the following
 - The label or
 - A document that accompanies the product such as a bill of lading that is with the case of produce

*see exemptions below

It is advised that a label be applied directly to the case of product when shipping to a retailer as this is best practice and may be required by the retailer.



Cases of Bulk Product

(e.g. triwall bins or wooden bins of pumpkins)

The label must have the following:

- Common Name *
- Name and principal place of business *
- Lot code which must be on one of the following
 - The label or
 - A document that accompanies the product such as a bill of lading that is with the case of produce

*see exemptions below

It is advised that a label be applied directly to the case of product when shipping to a retailer as this is best practice and may be required by the retailer.

*Exemptions:

Common name does not need to be applied if the following apply to the fresh fruit and vegetables being sold at retail:

- The prepackaged product is visible and identifiable in the container

- Packaged in a wrapper or confining band less than 13 millimetres (1/2 inch) wide
- Product is packaged in a protective wrapper/bag that is clear and transparent and on which no information is shown other than a price, bar code, number code, environmental statement or product treatment symbol

- Bulk products sold to consumers

Name and principal place of business does not need to be applied if you are packaging them at a farm market or grocery store and the packaging is clear and transparent so that the fresh fruit and vegetable is identifiable.

Environmental Swabbing Plan (procedure and records)

Ready-to-eat (RTE) fresh-cut fruits and vegetables (shredded bagged lettuce, coleslaw, fresh-cut melons or fruit salad, etc.) are subject to the provisions of the Health Canada 2011 Policy on *Listeria monocytogenes* in Ready-to-Eat Foods. Therefore, RTE food processors must have effective good agricultural practices, preventive controls and a preventive control plan developed and implemented, which includes an environmental swabbing plan (procedure and records).

The Environmental swabbing plan should include the following information:

Purpose: What is to be accomplished?

Proficiency Testing: verification that equipment is working correctly and identifying issues. Also, to ensure employees are properly trained and following procedure.

Responsibility: Who is responsible – designated staff? Who is the alternate?

Target Organism(s): which biological organism(s) are you swabbing for?

Procedure: What is to be done? How is it to be done? Are swabs required to be sent to an accredited laboratory, or are they analyzed in house? The procedure should include:

- Sampling site identification and location (For example direct/indirect product contact surface areas (hoppers, conveyor belts, cutting boards, knives, cleaning tools)

- Zoning (For example Zone 1 - Direct/indirect product contact surface areas)

• Zoning Definitions:

- Zone 1 - Direct/indirect product contact surface area covered under the current sanitation and swabbing program, but does not incorporate pathogen swabbing.
- Zone 2 - Environmental surfaces in close proximity to product-contact surfaces in the production/packing area could compromise product/line areas by regular production room practices.
- Zone 3 - Environmental surfaces further removed from product-contact surfaces in production/packing areas but are far away from possible product/line contamination points but could spread by mechanical means or personnel movement.
- Zone 4 - Outside primary process/packing area (forklift traffic).

Test: name of the test being performed (i.e. ATP, InSite Listeria, 3M Listeria)

Frequency: How often will each sampling site be tested?

Deviation/Corrective Action: Action(s) to be taken if test results are unsatisfactory.

Verification: Who is responsible for the double-check? How is it to be done (record review, observations, interviews) and how often?

Records: List records to be completed

Do you feel that an Environmental Sampling Plan does not apply to your operation?

If you feel that an environmental sampling plan isn't required for your operation, can you answer NO to all of the following?

- Do you handle or store Market Ready Product?
- If you produce sprouts for sale, are the seeds not purchased from a reputable seed supplier that can supply certificates of analysis for microbial pathogens?
- Do you have surfaces that are wet?
- Does your operation have high humidity?
- Do you have refrigeration onsite?
- Do you wash your fruits and vegetables?
- Are your products considered High Risk (i.e. microgreens, sprouts, RTE fruits and vegetables)?
- Do you have high traffic areas (i.e. equipment and people)?
- Does your operation have areas that are dirtier than others?
- Does your operation not have documented and implemented process controls in place to control these hazards listed above (Employee Hygiene, Sanitation, Preventative Maintenance, Premises, etc.)?

If you answered YES to more than one of the questions above, you might need to check the effectiveness of your Sanitation Program. An Environmental Monitoring Plan is one way of verifying effectiveness.

Fresh fruit and vegetables (that fall into the RTE marketed prewashed produce as well as microgreens and sprouts) are considered to be high-risk products due to the increased frequency of recalls.

To help lessen that risk, employing good agricultural practices when producing these products goes a long way.

How to include cross-contamination points on the hazard analysis and CCP determination form

The purpose of documenting cross-contamination points on the hazard analysis and CCP determination form is to identify and assess all potential cross-contamination points. Start by listing all potential cross-contamination points, type of hazard and how it will be controlled. Once these have been identified and assessed, you must determine how each one will be controlled to mitigate the risk of contamination. If the cross-contamination point can be fully controlled, the title of the preventive control(s) or standard operating procedure(s) should be listed.

Cross Contamination Point(s)	Hazard	B	C	P	Category and Identified Hazard Determine if fully controlled by Preventive Controls/ Prerequisite Program(s)	Q1	Q2	Q3	Q4	Q5	CCP or PC
Employee Flow	1B – Risk of cross-contamination from employees not washing their hands when leaving washroom	X			Yes – Employee Training Program and Hygiene & Good Agricultural Practices						
Employee Flow	2B – Risk of cross-contamination from employees not washing upon entering production/ packing areas	X			Yes – Employee Training Program and Hygiene & Good Agricultural Practices						
Employee Flow	3B – Risk of cross-contamination of product and/or employees due to improper movement of waste & compost during processing/packing	X			Yes - Employee Training Program and Waste Management & Disposal SOP						
Chemical Flow	1C – Risk of cross-contamination of packaging and people with cleaning chemicals		X		Yes - Employee Training Program and Chemical Control Policy						

Q1. Could a control measure(s) be used by the establishment at any process step? If no, indicate how the hazard will be controlled before and after the process on form 9 (which outlines the hazards not controlled by the operator). Then proceed to the next identified hazard. If yes, describe the control measure and proceed to Q2.

Q2. Is it likely that contamination with the identified hazard could occur in excess of the acceptable level or could increase to an unacceptable level? If no (not a CCP), identify reason(s) why it is not likely to occur and proceed to the next identified hazard. If yes, identify the acceptable level of the hazard in the finished product, wherever possible, then proceed to Q3.

Q3. Is this process step specifically designed to prevent, eliminate or reduce the likely occurrence of the identified hazard to an acceptable level? If yes, (CCP) enter the CCP number in the last column. If no, proceed to Q4.

Q4. Will a subsequent step eliminate the identified hazard or reduce its likely occurrence to an acceptable level? If no, (CCP) enter the CCP number in the last column then proceed to the next identified hazard. If yes, (not a CCP) identify the subsequent controlling step and proceed to Q5.

Q5. Does this step provide partial control of the identified hazard? If yes, (PC) enter the PC number in the last column and proceed to the next identified Hazard. If no, proceed to the next identified hazard.

Throughout this guide we have highlighted the names of each record.

To download the records that are referred to in this guide please go to:

www.perennia.ca/foodsafetyresources/

PLEASE NOTE: Links will not download if using Internet Explorer. Please ensure your browser is up to date if you encounter issues downloading the files.

Downloadable Forms

The following sample records can be used as is or used as a reference in creating your own documents. You may need to modify these records to fit your operation and some records may not apply. For example the Shipping Record may not need to be used if you have an invoicing system that you can modify to include aspects that are required to meet the SFCR such as truck/trailer inspection, lot codes shipped.

- [Letter of Commitment](#)
- [Maintenance and Reassessment Record](#)
- [Exterior & Interior Inspection](#)
- [Agronomic Inputs](#)
- [Receiving Record](#)
- [Sanitation Record](#)
- [PM & Calibration](#)
- [Pest Control Record](#)
- [Harvest Record](#)
- [Packing Record](#)
- [Temperature Record](#)
- [Shipping Record](#)
- [Farm Gate Sales](#)
- [Visitor Record](#)
- [Personnel Training Record](#)
- [Labelling Checklist](#)
- [CAR, Preventative Action Report](#)
- [Consumer Complaint Record](#)
- [Recall Management Record](#)
- [Mock Recall Record](#)
- [Change Log](#)



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