perennia
ideas • innovation • success

EDITION 1 – 2022-23

Safe Food for Canadians General Guide

A GENERAL GUIDE TO MEETING THE SAFE FOOD FOR CANADIANS REGULATIONS


perennia
ideas • innovation • success

TABLE OF CONTENTS

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.

INTRODUCTION

Our Quality and Food Safety Team is pleased to present a guide that has been developed to support Food and Beverage Businesses in Nova Scotia meet the requirements of the Safe Food for Canadians Regulations.

With this guide, we hope to enhance your knowledge of the requirements and provide resources to assist you in developing and implementing a food safety management program that meets the Safe Food for Canadians requirements or to assist you in strengthening your current program.

The resources mentioned throughout this guide can be found on Perennia's website under Quality & Food Safety/Food Safety Resources.

If you have questions, feel free to contact our Quality and Food Safety Specialists. We are here to help.

Perennia's Quality and Food Safety Team

Elaine Grant, Shelly MacDonald, Cheryl Andrews, Amanda Cameron

SAFE FOOD FOR CANADIANS REGULATIONS (SFCR)

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 must also meet food-specific requirements. 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 manage 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.

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 (e.g., aerosols or dust suspended in air), water, decaying matter, fecal matter, sewage, the gut of warm-blooded animals, and even in our nose, mouth and on our skin. Fungi are typically found in warm and humid environments.

Chemical hazards can fall into four broad categories; naturally occurring toxins and allergens (e.g., shellfish toxins and mycotoxins); chemicals intentionally added to food (e.g., water, 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); and radiological hazards, although they are rarely encountered in food, when they do occur they can present a risk (e.g., from contaminated soil, water or air, packaging materials, ingredients with radionuclides). 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 and its associated commodity companion documents are meant to be a tool to help your food or beverage business meet the Safe Food for Canadians requirements. It can be used to assist you with interpreting the regulations and determining if you are currently meeting them or identifying areas where you may need some improvement. It is designed to include the current regulations (as of the edition date in the footer) as they apply to food and beverage production, packaging, storing and transport within 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 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.

GUIDE LAYOUT

Each section is laid out to match the flow of the Safe Food for Canadians Regulations. The companion documents are meant to be inserted where identified in this guide.

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 food and beverage businesses. It can be used like the Food Safety Resource section on our website.

THE FORMS are editable excel spreadsheets that can be used as-is or as a guide when developing your own forms and customized records.

You will need to review the tables in the companion documents to determine what requirements you need to comply with in the Safe Food for Canadians Regulations as they apply to your business.

GLOSSARY

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

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.

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.

CROSS CONTACT: when an allergen is inadvertently transferred from a food containing an allergen to a food that does not contain an allergen or does not contain the same allergen.

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.

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.

HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP): a systematic, scientific approach to the identification, evaluation and control of food safety hazards during the production and manufacturing of food.

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 or territory to another.

INTRAPROVINCIAL: the trade of food within a home province or territory.

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 product into packaging materials.

PC - PREVENTIVE CONTROLS: control measures (e.g., 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 manufacturing 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.

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. Examples: supermarkets, farmers' markets, retail/grocery stores, bakeries and butcheries.

RISK ASSESSMENT: the documented process of identifying, measuring, and evaluating the level of risk associated with a product, process, procedure or environmental factor to determine the appropriate control measures.

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.

SPECIFICATION: a detailed description of a material, product or service that outlines important characteristics, attributes or requirements.

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.

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

SUBDIVISION A: RESPONSIBILITY OF OPERATOR

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).

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 manufacturing 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 (internal and external) meets regulatory and customer requirements.

Checklist

- ☐ **LETTER OF COMMITMENT** signed and dated by senior management
  - ☐ Detail of how the company plans to provide safe, quality products, provide necessary resources, meet regulatory requirements and appoint a trained and qualified food safety team leader
  - ☐ Letter of commitment should be communicated to all staff members, signed, dated and posted in a prominent location
- ☐ Regulatory Compliance
  - ☐ Applicable regulations are on file and up-to-date (i.e., Safe Food for Canadians Act and Regulations, Food and Drugs Act and Regulations
  - ☐ Ensure any updates or changes that affect the program as written are included
- ☐ 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
    - ☐ Identification of 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**

SUBDIVISION B: SANITATION, PEST CONTROL AND NON-FOOD AGENTS

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 chemical 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 chemical 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., for cleaning and maintaining food/beverage packing and processing equipment).
- Clean equipment away from areas where processing and packing are occurring and away from storage areas. Remove/move packaging and product away from area being cleaned prior to cleaning equipment and surrounding areas.
- Conduct a pre-operational/post-operational inspection of equipment production, packing and storage areas to ensure they are clean from dust, dirt, food debris, excessive grease, pest activity and foreign material.
- Provide the necessary training of staff.

Checklist

- ☐ Sanitation Program
  - ☐ Sanitation schedule/frequency for all equipment and facility areas, production and packaging equipment/reusable containers, utensils/tools (i.e., scoops, knives), waste, work gear, carts, washable pallets etc. (i.e., daily, weekly, monthly, pre and post-season)
  - ☐ Cleaning and sanitizing procedures (methods for cleaning (wet or dry), pressure washing, handling chemicals, chemical concentrations, PPE, etc.)
  - ☐ Pre-operational/post-operational inspection procedures: after cleaning and before product is handled, the production and packaging area, storage areas and equipment (where applicable) are clean and free from dust, dirt, food debris and excessive grease
- ☐ **Sanitation Records**
- ☐ Environmental Monitoring Program (procedures and records) conducted to monitor the presence or absence of pathogens, food spoilage organisms or allergens in the plant environment, if applicable (see appendix)
- ☐ Production and/or packaging procedure and corresponding record(s). Brief steps regarding what is done before production or packaging occurs, for example, are ingredients mixed or weighed, is the production/packaging equipment checked and free from visible debris, evidence of pest 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, or your location is in a residential area or farming community (i.e., house, farm, camps, and production facilities/ 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.
- Some practical options include but are not limited to keeping doors/entrances closed or screened, screening windows and outside air vents, using netting to prevent birds from nesting, fences, limit pest harbourages near 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

- ☐ In house/self-managed pest control
  - ☐ Person responsible for pesticide application, pest control
  - ☐ Copy of pesticide applicators certificate (if applicable, see Non-Food Agents section for details)
  - ☐ Schedule/frequency (monthly inspection at minimum, pre-season and during season or while product is stored)
  - ☐ Device map, signed and dated
  - ☐ Training
  - ☐ **Corrective and Preventive Action Reports**
  - ☐ Proper handwashing is completed after handling bait, devices and pests
  - ☐ Safety Data Sheets for pesticides
  - ☐ **Pest Control Records** must be kept
  - ☐ Pest Control Products, labels/ identification intact and legible if applicable (i.e., name of product, active ingredient(s), concentration, PCP#)
- ☐ Biosecurity and biocontainment program
  - ☐ Procedures are in place to prevent the introduction or spread of pests and/ or disease.
  - ☐ Proper and secure storage of pest control chemicals (keep away from raw materials, packaging and product)
- ☐ Contracted Pest Control, including name and contact information
  - ☐ Contract, signed and dated, including scope (insects, rodents, birds, beetles, etc.)
  - ☐ Schedule/frequency (monthly inspection at minimum, pre-season and during season or while product is stored)
  - ☐ Device map, signed and dated
  - ☐ Copy of insurance
  - ☐ Copy of pesticide applicators certificate
  - ☐ Service reports, including pesticide usage, concentration and trending
  - ☐ Safety Data Sheets for pesticides
  - ☐ Contractor training
  - ☐ Recommendations and corrective action reports
  - ☐ Records must be kept
  - ☐ Contractor reports findings to operator after inspection is completed. Operator must sign off and complete any corrective actions

FOR BOTH

- ☐ DO NOT allow animals, either wild or domestic (including pets), or pests (i.e., birds, rodents) into buildings or storages (i.e., sea cans).
- ☐ 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. If required, it's only used when no operation is taking place or when storages are empty. To prevent pests from spreading bait, avoid using bait in pellets, powder or granular forms. Avoid bait containing allergens (i.e., cheese, peanut butter)
- ☐ Fly control (lights or strips) are not used directly over top/in close proximity of product, packaging or food handling areas
- ☐ Old traps, bait, glue boards and pests that are disposed of are done so in a sealed container and placed in the garbage
- ☐ All pest control devices are clearly numbered/labelled/identified on the trap and the wall above the trap location (this helps keep the trap in the proper location in case it gets moved).
- ☐ Pest control products are registered for use in Canada and are used according to label instructions

NON-FOOD AGENTS – SANITIZERS AND NON-FOOD CHEMICAL AGENTS

REQUIREMENTS: Any sanitizer 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 food contact 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.
- Provide the necessary training of staff.

Checklist:

- ☐ Non-Food Agents Policy
  - ☐ Master list of approved chemicals, approval letters
  - ☐ Safety Data Sheets (SDS)
  - ☐ Specification/Technical Data Sheets
  - ☐ Proper labelling (clearly labelled, identified with product name, its active ingredients, PCP#, concentration, manufacturer's instructions for use and identification of chemicals)
  - ☐ Concentrations
  - ☐ Designate storage area - separation of food-grade vs. non-food grade; stored separately, correctly labelled, secure from food products, packaging and equipment
- ☐ Receipts are on file and signed
- ☐ Pesticide Applicator License on file (if applying commercial and restricted class pesticides), formally trained if applicable (i.e., online, self-study, examinable course)
- ☐ Master List of Approved Chemicals (can be added to your Non-Food Agents Policy)
- ☐ **Sanitation and or Maintenance Record(s) (wherever application of chemicals is recorded)**
- ☐ Employee training

SUBDIVISION C: CONVEYANCES AND EQUIPMENT

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 minimizes 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 minimizes risks. Devices that require calibration must be accurate to ensure they are functioning as intended (i.e., delivering the 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, galvanized metal or lead, 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, allowing 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 and gauges on equipment are shatter proof or protected from breakage
  - ☐ No temporary repairs (i.e., string, cardboard, wire, tape), missing nuts, screws, bolts, or cracks in surfaces.
  - ☐ Knives are single-blade (not the breakaway kind), intact/no chips or missing pieces and rust-free.
  - ☐ Maintenance schedule
  - ☐ Maintenance program and equipment list
  - ☐ Equipment inspections
- ☐ **Maintenance & Calibration Record**, service reports from outside contractors, if applicable
- ☐ Calibration Program (may be combined with the Maintenance and Preventive Maintenance Program above):
  - ☐ List of devices to be calibrated (may include but not limited to scales, thermometers, pH meters)
  - ☐ Calibration schedule
  - ☐ Calibration procedures, **Calibration Record** (see above)
- ☐ Employee training

SUBDIVISION D: CONDITIONS RESPECTING ESTABLISHMENT

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

The location of a facility can lead to food contamination. For example, a waste or auto salvage facility located beside a food facility could cause issues such as run off or attraction of pests. Well-constructed and maintained facilities reduce the risk of contamination to food, ingredients and packaging materials (i.e., free of debris, refuse, pooling water and pest harbourage).

Interpretation

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

Checklist

- ☐ Facility and Premises Inspection Procedure
- ☐ Site Assessment:
  - ☐ Previous use (i.e., industrial activities)
  - ☐ In the migratory path or experiencing high levels of bird or animal activity that may cause issues with outside storage or the facility itself
  - ☐ Flood zone, incompatible neighbouring properties and runoff into water sources
- ☐ **Exterior building inspection checklist** (Monthly while in operation or when product or packaging is stored)
  - ☐ 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 or stored close to 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 deter animals and pest entrance. Compost and cull piles, if applicable, are situated away from buildings to prevent attracting pests
  - ☐ Exterior of building does not have evidence of nesting birds or areas for wildlife to make a den close to the buildings. 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
  - **iii.** the size and layout are adequate to accommodate the activity being conducted and the equipment used in the activity,
  - **iv.** the entry of insects, rodents and other vermin is prevented,
  - **v.** 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
  - **vi.** 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 facility shall be constructed and maintained to reduce risk of contamination.

Checklist

- ☐ Interior Inspection Checklist (Monthly while in operation or when product or packaging is stored)
  - ☐ 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, and junctions are smoothly sealed and designed to allow maintenance, cleaning and sanitizing
  - ☐ Windows are screened and shatter proofed if located in or near food handling and storage areas
  - ☐ Lighting is shatter proofed if located in or near food handling and storage areas
  - ☐ The area is free from pests and animals (wild or domestic)
  - ☐ Product, packaging and food contact items are kept off the floor and covered to stay dry and clean where required
  - ☐ Sound construction and good condition
  - ☐ Air intakes and vents are screened
  - ☐ Drains are accessible for cleaning and maintenance
  - ☐ Floors are sloped to drain, with 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 work rooms, 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 (raw/incoming, in process, rework, finished)
- Waste/compost
- Ingredients
- Packaging
- Chemicals
- Allergens

Checklist

- ☐ Operational flows do not pose a risk of cross-contamination or cross-contact. Identify points where they overlap and pose a potential source for cross-contamination (i.e., finished product and chemicals)
- ☐ Operational flows are identified on plant schematic
- ☐ Cross-contamination points are identified on facility/building/storage schematic
- ☐ Handwashing sinks, employee welfare rooms (lunchroom, washrooms, change rooms), storages, chemical storages and 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 where applicable
- ☐ **Visitor's Log** 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

a. anything that presents a risk of contamination of the food;

b. any food that does not meet the requirements of the Act or these Regulations; and

c. 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 or cross-contact.

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
- Returned/suspect product
- Multi-use facilities where different types of activities are performed by different companies (i.e., commercial kitchens) 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-contact)
  - ☐ Designate allergen storage areas (where applicable)
  - ☐ Allergen-free clean up and inspections (where applicable)
  - ☐ Food-grade lubricants used do not contain allergens
  - ☐ Employee training
  - ☐ Correct labelling and verifications
- ☐ 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 product's colour 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., inspection, grading). Lighting intensity guidelines are as follows: Storages 110 LUX, General Production Areas 220 LUX, Inspection Areas 540 LUX.

Checklist

- ☐ **Interior Inspection Checklist**
  - ☐ Adequate lighting is provided (as per the 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 stored at -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
  - ☐ Ensure condensation is not an issue in pack areas or storage
  - ☐ System is equipped with devices to control and 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)

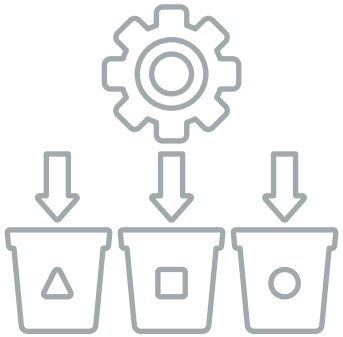
FREQUENCY AND MANNER
Contaminated materials and waste must be removed and disposed of at a frequency that is sufficient to prevent contamination of a food and in a manner that does not present a risk of contamination of a food. 66(2)

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) and covered
  - ☐ 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 and have no cross-connections
- ☐ 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 lavatory 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 (i.e., do not create lineups, meet applicable OH&S regulations). Washrooms are provided at the site or within a short walk, or transportation is provided 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., they should not be located with a direct opening into production 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 and contain the following:
- ☐ Handwashing signage posted with clear steps for proper handwashing
- ☐ Approved (intended for use in a food processing environment) single-use soap is available
- ☐ Single-use paper towel is available
- ☐ Warm potable water (some customers and standards require hands-free)
- ☐ Waste receptacle
- ☐ Approved hand sanitizer, if applicable
- ☐ Cleaning stations and washrooms (lavatories) are on the sanitation schedule (Sanitation program and **Sanitation record**)

WATER – CONTACT WITH FOOD

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 – contact with food
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 – CROSS-CONNECTIONS
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.
- Intended use: handwashing, equipment washing, product washing (if recirculated, must be kept potable and monitored), and final rinse, making ice.
- Water storage tanks (clean before use or if seasonal 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., for cleaning)
- 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, and 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 (where applicable)
- ☐ Accredited lab used for testing, certificate of accreditation and scope of accreditation for the lab
- ☐ 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).

SUBDIVISION E: UNLOADING, LOADING AND STORING

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 (shipping), unloading (receiving), 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:

LOADING

- Product to be loaded should remain at proper storage temperatures until ready to load, should be neatly stacked and securely wrapped
- Product should not be placed directly on the transport vehicle floor
- Temperature requirements must be maintained during shipping
- Inspect the carrier for temperature, cleanliness and physical conditions before loading
- Ensure the carrier is not carrying any hazardous or incompatible materials - food products and packaging must be transported separately from incompatible food products and items (i.e., meat, fish, chemicals). It should be completed in a manner to avoid contamination of the product.

UNLOADING

- Inspect the carrier for temperature, cleanliness and physical conditions before unloading
- Ensure the carrier is not carrying any hazardous or incompatible materials – food products and packaging must be transported separately from incompatible food products and items (i.e., meat, fish, chemicals)
- Ensure materials received are from an approved supplier/source and that required information, such as specifications, letter of guarantee and/or certificates of analysis, are on file to ensure any incoming materials do not pose a risk of contamination to your product
- Inspect the product to ensure temperature requirements were met and that there is no evidence of spoilage, damage, foreign material, off-odours and best before date is adequate
- Ensure unloading occurs in a timely manner and in an appropriate area which avoids unloading product, ingredients and packaging material under inadequate conditions which could pose a risk to the product (i.e., rain)

STORAGE

- Product, ingredients and packaging material should be protected from cross-contamination/contact and damage during storage.
- Food product and 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.
- Practice First In, First Out (FIFO) stock rotation to ensure older product, product close to its shelf-life, is used first.
- Production site equipment must be stored separately from product, ingredients and packaging material.
- Chemicals storages must be kept clean, locked and labelled in a location where there is no cross-contamination risk to products, ingredients and packaging. Access should be restricted to only personnel who have been trained on the proper handling of chemicals.
- Chemicals must be stored separately from product and packaging in a dry, well-ventilated area.
- Raw/ingredients (inputs) are stored separated from finished product.

Checklist

- ☐ Loading, Unloading and Storage Procedures
  - ☐ Approved supplier/source
  - ☐ Non-conforming items SOP in place to address any product, ingredient, packaging and equipment that does not meet the requirements
  - ☐ Product inspections
  - ☐ Food carrier inspections
  - ☐ Food carrier temperature inspections (where applicable)
  - ☐ Loading/unloading is performed in a manner to prevent the risk of contamination
  - ☐ First In, First Out stock rotation is followed
  - ☐ Where and how product, packaging and chemicals are stored
- ☐ **Receiving Reports**
- ☐ **Shipping Reports**/Invoices/Shipping Logbook
- ☐ **Temperature Logs**

SUBDIVISION F: COMPETENCY

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.

Personnel must be adequately trained on food hazards, food hygiene, clean/sanitary conditions, general hygienic practices and complete technical training such as how to use equipment and monitoring devices to properly monitor critical control points (CCPs). Training is ongoing and must be effective and documented. Visitors and contractors will also require training on your hygienic practices if entering production and storage areas.

Training should occur at the start of the season for returning employees and with each new hire prior to starting work. For non-seasonal operations, training or re-fresher 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 (BUT IS NOT LIMITED TO):

Grading, if applicable

Preventative maintenance and calibration

Pest Control/Pest Sightings

Production, packaging, receiving, storage and transport activities

Sanitation and chemical handling

How to fill out records

Good manufacturing practices

Personnel Hygiene

Allergens

Visitor policy

SUBDIVISION G: HYGIENE

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 ACTS

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 – RISK OF CONTAMINATION

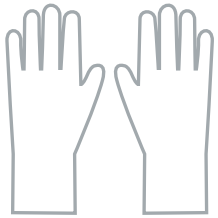
Any person who enters or is in an area where a food is manufactured, prepared, stored, packaged or labelled must refrain from wearing or using any object or substance that presents a risk of contamination of the food. 79

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 – RISK OF CONTAMINATION

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. Visitors and contractors can also be a source of contamination and must be properly trained on food hazards, food hygiene, clean/sanitary conditions and general hygienic practices to prevent the risk of contamination or the spread of diseases.

Interpretation

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

- Showering/bathing regularly and wearing clean clothes/workwear and footwear.
- Clean, short fingernails (i.e., no fingernail polish or artificial nails).
- No lash extensions or false eyelashes.
- Long hair should be tied back, and 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 re-used. Gloves must be removed during breaks and stored away from break areas in a clean location.
- No food, drink, chewing gum, candy, spitting, sampling of product, using tobacco, or vape products are to be done in the production/pack/storage locations. Where water is permitted due to temperatures or a dry environment, a beverage station should be set up away from production and pack areas with access to handwashing after water is consumed.
- Handwashing is the single most important thing that people can do to prevent the contamination of food. Hands must be washed at the following times: at the start of a shift, after breaks, each time an employee enters the production area, after touching floor contact surfaces, after touching your face or hair, after eating or drinking, after coughing/sneezing, after using tissues and after using the washroom.
    - Handwashing sinks should not be used to clean food equipment and vice versa.
    - If your handwashing station is not hands-free, please use a paper towel to turn off the taps when you finish.
    - Proper handwashing procedures can be found under the Quality & Food Safety resource tab of the Perennia website (**www.perennia.ca**).
- Persons in production areas should not wear jewellery of any kind that is visible (medical jewelry and plain wedding bands, religious apparel may be permitted), including pins or buttons. If they cannot be removed, piercings may be permitted depending on the results of a risk assessment. However, if they are permitted, they need to be covered.
- Medicine that must 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. Employees should only return to work 48 hours after their last symptom has subsided. Open wounds or exposed areas of the skin must be covered with a brightly coloured, waterproof dressing prior to working with food.
- Employees should be trained to sneeze or cough into their elbow or turn their head into their shoulder, stepping away from the processing and packing area to avoid contaminating the product and/or equipment.
- Employees should be trained on and follow proper traffic flow throughout the facility in order to prevent risk of cross-contamination or cross-contact.
- Doors must be kept closed at all times, including any applicable refrigerator and freezer doors.
- Waste bins must be kept clean, in good condition and emptied whenever full.
- Employees should be trained on how to manage blood and bodily fluid spills, glass breakage, spilled product, product that has fallen on the floor or has been exposed to dripping condensation.
- Product packaging should only be used for the product, not for things such as equipment parts, temporary stands, tools or garbage.

Checklist

- ☐ Personnel Training Program
    - ☐ Personnel GMP and Hygiene Policy:
    - ☐ Personnel protective equipment - clothing and footwear
    - ☐ Personal cleanliness – handwashing and sanitizing, where applicable
    - ☐ Personal conduct – no food, drinks, smoking, vaping or spitting in production areas. 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 must be followed after handling.
    - ☐ Personal objects – jewellery and personal effects. Personal effects must be stored away from the production areas.
    - ☐ Reporting of health conditions
    - ☐ Communicable disease and lesions
    - ☐ **Daily GMP Checks**
    - ☐ Proof of training effectiveness checks
- ☐ **Personnel Training Records**
- ☐ **Visitor's Log**

PREVENTIVE CONTROLS, PART 4 OF THE SFCR

—

Division 5: Investigation, Notification, Complaints and Recall

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)

RECALL PROCEDURE
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
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.

Complaints from any source are important indicators of possible deficiencies in the system or the possible presence of a contaminant, pest, or disease. When the complaint handling system itself is deficient, it could result in failure to identify, control, and mitigate risks.

Interpretation

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

Mock Recalls are used to test your program to ensure it continues to be effective in tracing all materials coming in and products going out within a reasonable amount of time. Testing your recall plan is just as important as having one.

Mock recalls must be completed at least once every 12 months, and your finished product must be traceable to the customer (one step forward), You must also show traceability through to the ingredient/primary input supplier (one step back). To do this, the date of receipt, as well as the use of incoming materials, food contact packaging or other processing inputs where reasonable, will need to be recorded.

Use the recall forms created that would be used in the event of an actual recall situation to document the exercise. Walk through your recall 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 information, DO NOT tell them you are conducting a mock recall as this may accidentally trigger a recall with that customer)
- Remember to include reworked products, product samples that were sent out, product samples that were sent for testing, or product taken for staff or personal use

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 produced 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
- Keep copies of all documentation used for the exercise for two years or the duration of the product's shelf life plus one year unless otherwise required.

Complaints can vary from quality issues to food safety concerns or even legality issues (misrepresentation). A documented complaint plan enables a food business to quickly access and investigate the complaint to determine its severity. Complaints related to food safety, pests and product misrepresentation must be investigated to determine the root cause and corrective actions. Complaint files allow a company to track the number and type of complaints and, therefore, can be used as a form of continuous improvement. Complaints must be assessed, investigated and resolved in a timely manner. Should processes or procedures require changes based on the results of the assessment and investigation, ensure that changes are made and appropriate personnel are notified.

Checklist:

- ☐ Customer/Consumer Complaint Procedure
  - ☐ Who records the complaint?
  - ☐ Who investigates and categorizes the complaint (must be a qualified individual)?
  - ☐ 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: Recall Procedure: A guide for food businesses
  - ☐ CFIA contact information
- ☐ Traceability Program
  - ☐ Product coding (lot code/identifier)
  - ☐ Product labelling
- ☐ **Customer/Consumer Complaint Records**
- ☐ **Recall Management Records**
- ☐ **Mock Recall/Recall Simulation Records** (test your recall program at least once per year)
- ☐ Employee training

PREVENTIVE CONTROLS, PART 4 OF THE SFCR

Division 6: Preventive Control Plan

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)

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)

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 manufacturing practices, including traceability and the HACCP plan.

The Preventive Control Plan is documented through a hazard analysis process. For each different product/process type at your facility, there needs to be a Preventive Control Plan. Hazards will be identified for incoming materials and ingredients, cross-contamination points, and process steps. Appropriate controls for each will be implemented to reduce the risk or eliminate the hazard. Those control measures need to be monitored to ensure they effectively control the hazard. The control measures can include your preventive controls or critical control point(s). If one of those control measures fails, then corrective actions need to be taken and a corrective action/deviation report documented. The root cause of the incident needs to be determined and addressed to prevent reoccurrence.

There are 12 steps when implementing a HACCP Plan.

These steps can be divided into the five preliminary steps and the seven basic principles of HACCP.

FIVE PRELIMINARY STEPS

1. Assemble a Preventive Control Plan Team/HACCP Team
2. Describe the product
3. Identify its intended use
4. Construct a process flow diagram and a plant schematic
5. On-site verification of the process flow diagram and plant schematic

SEVEN BASIC PRINCIPLES OF HACCP

6. List all potential hazards associated with each step, conduct a hazard analysis, and identify control measures
7. Determine critical control point(s) (CCPs)
8. Establish validated critical limits
9. Establish a system to monitor control of the critical control points
10. Establish corrective actions to be taken when monitoring indicates a deviation of the critical limit at a critical control point
11. Validate the HACCP plan and then establish verification procedures to confirm the HACCP system is working as intended
12. Establish record keeping

When implementing a Preventive Control Plan/HACCP Plan, the first step is deciding who should be on the Preventive Control Plan/HACCP. Secondly, determine how many HACCP Plans are needed. In other words, how many different products/processes? For example, a fruit processor that processes and packages frozen fruit, as well as fruit juice, will have two HACCP plans.

A Preventive Control Plan/HACCP Team can consist of senior management and production employees from various disciplines, such as:

- CEO, Owner, Operator
- Quality Assurance, HACCP Coordinator, PCP Manager
- Receiver/Shipper
- Production Supervisor/Manager
- Sanitation
- Maintenance
- Purchasing and/or Sales
- Product Development

A smaller company may only have two or three people that fill these roles. The person that oversees product safety and quality will have the proper food safety training and will be the one that leads the Preventive Control Plan/HACCP Team. A cross-functional team is important because food safety and quality is everyone's responsibility, and one person cannot successfully do it alone. The rest of the HACCP steps will correspond with forms and are discussed in further detail in the following section.

THE FORMS

A HACCP Plan generally consists of 11 forms that are best completed in the following order:

- **Form 1:** Product Description
- **Form 2:** List of Product Ingredients and Incoming Materials
- **Form 3:** Process Flow Diagram
- **Form 4:** Facility Schematic
- **Form 5:** Biological Hazard Identification*
- **Form 6:** Chemical Hazard Identification*
- **Form 7:** Physical Hazard Identification*
- **Form 8:** CCP Determination and Other Control Measures (Decision Tree) *
- **Form 9:** Hazards Not Controlled by the Facility
- **Form 10:** Critical Control Point(s) (CCP)
- **Form 11:** Process Controls (PC)

*Forms 5 to 8 can be combined into a Hazard Identification and CCP Determination form.

Each form is in place to help guide the team through the hazard analysis process in order to eliminate or reduce the food safety risk in the products.

Form 1's basic purpose is to record the products produced, their specific requirements and special characteristics that need to be considered when completing a HACCP plan. Form 1 should include the product name, important product characteristics, how the product will be used (including who the product may be consumed by), packaging used, shelf-life of the product, where it will be sold, important labelling instructions and special distribution controls. With regard to the intended use of the product, be very clear in the documentation and on the labels as to the intended final use of the product; for example, include a 'Ready to eat' statement.

The purpose of **Form 2** is to help identify all ingredients, processing aids, other inputs and packaging materials used to produce the products that were recorded in Form 1.

Form 3 is documented to show the process steps for the products listed in Form 1. The process flow diagram gives you a snapshot of the process and helps determine what potential hazards could be present at each step in the process. It is important to include everything (inputs and outputs), including rework, store sales and waste where applicable. Each step in the process will be numbered, and a hazard category will be assigned to each (biological, chemical, and/or physical). This information will be used in the hazard analysis in Form 5-8.

The purpose of **Form 4** is to document the facility and how ingredients, product, rework, allergens, chemicals, personnel and waste move through it. This form is for all products that are made in the facility. It is important to include all processes in order to identify any cross-contamination and cross-contact points. Examples of cross-contamination or cross-contact are waste with finished product or raw ingredients, chemicals with product, people with product, and allergens with non-allergens. Draw a picture of the facility as if you were looking down onto it, and make sure all equipment and rooms are included and labelled. To show the movement of ingredients, product, rework, allergens, chemicals, personnel and waste, use different colours or different types of lines. Where the different lines cross are the potential cross-contamination points.

The cross-contamination points identified here will be inputted into Form 5-8. Pest control trap numbers (bait stations, tin cats and fly traps) can also be included on this schematic, or you can create a separate map as part of the pest control program.

Forms 5, 6, 7 and 8 can be combined to make it easier to complete the hazard analysis. This form pulls the information gathered in Forms 1-4 together and then looks at the process, hazards and risk in detail. This form asks five questions to help guide you through the hazard analysis process and determine if the hazards identified are controlled under the documented preventive controls/prerequisite programs or if they will need to be controlled as a process control (PC) or a critical control point (CCP) and what their risk is. Note that you cannot have a PC without a CCP, but you may have a CCP without a PC. To assist with Hazard Analysis, CFIA has an online tool called the Reference Database for Hazard Identification (RDHI). CFIA periodically updates the online tool. However, if you produce an innovative item, it may not be listed in this reference tool.

REFERENCE DATABASE FOR HAZARD IDENTIFICATION - INTRODUCTION (INSPECTION.GC.CA)

Sometimes hazards are beyond the control of the facility. In those instances, **Form 9** comes into play. On this form, you record the hazard, what part of the process this affects (before or after receipt), and how the outside source will control it. For example, if using water from a municipal source as an ingredient, the supplier of the service is responsible for ensuring a safe supply, not the processor.

If it is determined that critical control points (CCPs) are required to control a hazard, then **Form 10** is used to describe the details of the CCP, who will monitor it, when and how it will be monitored, any critical limits that need to be adhered to and what records and standard operating procedures (SOPs) are used. Other details that need to be considered are how to verify that the hazard is being controlled properly and what happens if the critical limit(s) are not met.

The process controls (PC) determined through the hazard analysis are recorded on **Form 11**. Much like Form 10, you document the details and refer to the CCP to which the process control is linked.

Examples of HACCP Forms 1-11 are available in the CFIA Archive for "**HACCP Generic Models and Commodity – Specific Food Safety Guidance Documents**", and fillable templates are available in the Downloadable Forms section of this guide.

Verify the system is effective. Is the final product completely safe, or was something missed? Records should be simple and nonredundant. Feedback from employees on their usability will be beneficial as employees will be more likely to fill them out if they are easy to use. Records must be legible and filled out at the actual time the check was performed. They must be signed by the person who monitors the task and by the person who verifies that the record is complete and the task was performed properly. Records must be kept for at least two years or for the duration of the product's shelf life plus one year unless otherwise requested.

RECORD KEEPING/DOCUMENT CONTROL

Keeping track of the HACCP records and documentation of your quality and food safety system is critical. Records will demonstrate the application of the HACCP plan. Documents are an important tool for training existing and new employees as well as ensuring procedures are followed consistently by all. Documents demonstrate the effective implementation of your quality and food safety management program and allow for continuous improvement. They are most often a condition of registration, licensing, or certification and are evidence of due diligence on your company's behalf. Creating a basic template for documents such as procedures and work instructions will allow you to keep records organized, up-to-date, legible, accurate and readily accessible.

Note that it is important to use appropriate languages in your documents.

- ☐ Preventive Control Plan Team/HACCP Team
- ☐ Product Description:
  - ☐ Product name(s)
  - ☐ Source of raw material
  - ☐ Important final characteristics
  - ☐ Ingredients & inputs
  - ☐ Product packaging
  - ☐ How the end product is to be used (intended use and include who the product may be consumed by)
  - ☐ Shelf life
  - ☐ Where the product will be sold
  - ☐ Special labelling instructions
  - ☐ Special distribution controls
- ☐ Incoming Ingredients and Materials:
  - ☐ Raw ingredients
  - ☐ Added ingredients
  - ☐ Packaging materials (primary packaging, secondary packaging, tertiary packaging)
  - ☐ Other inputs: water, steam and ice
  - ☐ Allergens
- ☐ Process Flow:
  - ☐ Inputs, process steps and outputs (i.e., waste, compost, rework, returns, rejects, etc.)
  - ☐ List of biological, chemical and physical hazards
  - ☐ Identification of critical control point(s), if applicable
- ☐ Plant Schematics:
  - ☐ Traffic flows
  - ☐ Cross Contamination Points
  - ☐ Water supply lines
  - ☐ Sewage and drain lines
  - ☐ Waste flow
  - ☐ Pest Control Devices
  - ☐ Hand wash stations
  - ☐ Chemical storage areas
  - ☐ Equipment
- ☐ Hazard Identification and Critical Control Point(s) determination:
  - ☐ Incoming Materials
  - ☐ Cross Contamination Points
  - ☐ Process Steps (Inputs)
  - ☐ Outputs (i.e., waste, compost, rework, returns, rejects, etc.)
  - ☐ Preventive Controls controlling hazards
  - ☐ Critical Control Point(s), if applicable
  - ☐ Risk assessment of the hazards
- ☐ Hazards not controlled by the Operator/Company
- ☐ Critical Control Point Form (if applicable, see above):
  - ☐ Process Step
  - ☐ Hazard Description and control measure
  - ☐ Critical limit
  - ☐ Monitoring Procedure
  - ☐ Deviation Procedure
  - ☐ Verification Procedure
  - ☐ Record Keeping
- ☐ Process Control Form, if applicable:
  - ☐ Process Control number and associated Critical Control Point
  - ☐ Hazard description
  - ☐ Standards
  - ☐ Monitoring Procedure
  - ☐ Deviation Procedure
  - ☐ Verification Procedure
  - ☐ Record Keeping
- ☐ Document Control Procedure
  - ☐ Retention of documents
  - ☐ Electronic or hard copies
- ☐ Maintenance and Reassessment Procedures
- ☐ Corrective and Preventive Action Plan
- ☐ **Corrective and Preventive Action Report**

TRACEABILITY, PART 5 OF THE SFCR

DOCUMENTS

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. 90(1)

DOCUMENTS — RETAIL SALE

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). 90(2)

RETENTION PERIOD OF DOCUMENTS

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. 90(3)

PRODUCTION OF DOCUMENTS

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. 91 (1)

DEFINITION OF PLAIN TEXT

In paragraph (1)(b), plain text means data that is not encrypted and whose semantic content is available. 91(2)

Rationale

Effective traceability programs allow companies to trace their product quickly and efficiently recall products that are suspect or identified as unsafe to protect the general public from preventable risks. Traceability documents and 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 (to the supplier) and one step forward (to the 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 or for the duration of the product's shelf life plus one year unless otherwise required. 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., individual unit (bag, bottle, box) or 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;
- A lot code or unique identifier (lot code for consumer packaged and either a lot code or unique identifier for prepackaged products other than consumer prepackaged such as a shipping container)
- Declaration of net quantity in metric units

Refer to CFIA's Labelling Requirements – Labelling, Part 11 of the SFCR for more information and Division 3 – Specific Requirements for Certain Foods (Dairy Products, Eggs, Processed Egg Products, Processed Fruit or Vegetable Products, Honey).

- CFIA also has an **Industry Labelling Tool** that may be useful.

Keep in mind that all mandatory information must be in both official languages on consumer prepackaged, with the exception of the name and principal place of business. There are also requirements on the legibility, location and type/size fonts. It is recommended to have an expert review your label to ensure compliance.

For consumer prepackaged products, situations that are exempt from the traceability requirements are listed below (i.e., having a label attached, applied, or accompanying the product).

- Individually sold one-bite confections; however, if more than one individual one-bite confection is sold together in the same package, it is not considered to be a one-bite confection. Regardless of size, lollipops are not considered to be one-bite confection because the stick allows the lollipop to be eaten in several bites.

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

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. 92(1)

CONSUMER PREPACKAGED FOOD

- 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. 92(2)

EXCEPTION

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

a. a food at the time of its export;

b. a food, other than a consumer prepackaged food, at the time of its sale at retail; or

c. a prepackaged food described in paragraphs 213(a) to (c) at the time of its sale at retail. 92(3)

EXCEPTION — FOODS DESCRIBED IN PARAGRAPHS 219(1)(A) AND (B)

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. 92(4)

EXCEPTION — FOODS DESCRIBED IN SECTION 220

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. 92(5)

Rationale

Labelling and/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 production records as well as shipping records/invoices. Lot codes of ingredients, raw materials and direct food contact packaging materials should also be recorded on your receiving and production/packing records for traceability.

A lot size is determined based on whether it is manufactured, prepared, produced, stored, graded, packaged or labelled under the same condition(s). For example, if you select a week as your production lot, then if there is an issue with a product in that week, then all of the product produced that week would be affected, which in actuality may not be the case. If you select a day, shift, or even production line, it narrows the window and possibly lowers the chance of business disruption and economic loss due to unaffected product being included in the traceability/recall situation.

Lot codes may be alphabetic, numeric, alphanumeric or any other code that can be used for traceability. You need to be able to clearly explain what your lot code means should you be asked or if a food safety investigation occurs.

Examples of allowable lot coding options:

- Production/pack date
- Best before date (if applicable)
- Establishment number in combination with a unique identifier
- SFC license number in combination with a unique identifier
- Or any other unique code that can be used for traceability

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
- ☐ Production/Packaging Records
- ☐ **Shipping Reports**/Invoices/Shipping Logbook
- ☐ **Receiving Reports**/Invoices

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

PACKAGING, PART 10 OF THE SFCR

DIVISION 1: GENERAL

Requirements for packages

A prepackaged food that is sent or conveyed from one province to another or that is imported or exported must meet the following requirements:

- **a.** its package
  - **i.** must be suitable for its intended use and appropriate for the food,
  - **ii.** must be capable of protecting the food against moisture, loss, damage, contamination and deterioration during normal handling, storing and conveying,
  - **iii.** must be clean and in a sanitary condition,
  - **iv.** must be of sound construction,
  - **v.** must be free from odours that might affect the food,
  - **vi.** must not impart any undesirable substance to the food,
  - **vii.** must not have a design or mark, or be of a colour, that enhances the appearance of the food with respect to its quality or composition, and
  - **viii.** must be new, in the case of
    - **A.** liner that is used in connection with a processed egg product,
    - **B.** a package of a processed egg product, if the package is made of corrugated fibreboard,
    - **C.** an egg carton of eggs that are graded in accordance with these Regulations, and
    - **D.** a tray of eggs that are graded Canada A or Canada B that is made of molded pulp;
- **b.** in the case of a processed egg product, its package must, if it has previously been used and is not constructed of corrosion-resistant material, be lined with a sanitary plastic or equivalent liner;
- **c.** in the case of eggs that are graded in accordance with these Regulations, its package must, if it is a plastic tray that has previously been used, be sanitized and dry before reuse; and
- **d.** in the case of eggs that are graded Canada A or Canada B, its package must not have previously been used to package ungraded eggs or eggs that are graded Canada Nest Run. 186

Rationale

Packaging must be appropriate and not contaminate or permit contamination of the product.

Interpretation

Ensure food packaging is suitable for its intended use, does not pose a risk of contamination to the product, and that your product is packaged correctly. The following checklist will help you confirm these requirements are met.

Checklist:

- ☐ Written specifications are on file for food-contact packaging
- ☐ Packaging material meets regulatory requirements
- ☐ Packing procedure should detail the following:
  - ☐ Damaged or defective packaging material is not used during the packing process
  - ☐ Packaging material is protected from risks of contamination during receiving, storage, and packing
- ☐ **Employee training records**
- ☐ Production/Packaging Records

COMMODITY-SPECIFIC REQUIREMENTS, PART 6 OF THE SFCR

SEE THE COMMODITY SPECIFIC GUIDANCE DOCUMENTS FOR:

- Dairy Products
- Eggs and Processed Egg Products
- Honey
- Icewine
- Manufactured Food (all other food)
- Processed Fruit and Vegetable Products
- Unprocessed Food used as grain, oil, pulse, sugar or beverage

PERENNIA HAS DEVELOPED SEPARATE GUIDES FOR:

- Fish and Seafood
- Fresh Fruits and Vegetables
- A Guide to Meeting the Nova Scotia Food Safety Guidelines for Meat Processors
- Maple

Please see the Perennia website for these guides.

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, the issue/revision date, the date of the previous version, who approved or documented the policy and page numbers. The 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 will check to ensure 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

5. 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.
6. The inspector will make notes either manually or electronically.
7. The inspector will determine if the operation meets regulatory requirements and completes the report.

POST-INSPECTION

8. The inspector will meet with you to review the results and give you the report.
9. 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.
10. 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 and Preventive 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.

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, the 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 preventive control(s) or standard operating procedure(s) title 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 Manufacturing 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 Manufacturing 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 Report 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, temperature records, and/or lot codes shipped.

- Letter of Commitment
- Maintenance and Reassessment Record
- Change Log
- Sanitation Record
- Corrective and Preventive Action Report
- Pest Control Record
- Maintenance & Calibration Record
- Exterior Building Inspection Checklist
- Interior Inspection Checklist
- Visitor's Log
- Glass and Brittle Plastic Checklist
- Temperature Log
- Receiving Report
- Shipping Report
- Personnel Training Record
- Daily GMP Checks
- Customer/Consumer Complaint Record
- Recall Management Record
- Mock Recall/Recall Simulation Record

Resources

Our Quality and Food Safety Team have created a variety of resources which can be found on our website at www.perennia.ca. We offer coaching, assessments and online or public training courses covering a variety of topics. Most recently, we have added a resources page, which includes Perennia's publications and fact sheets, recommended resources, videos and a link to sign up for our monthly newsletter. If you have any questions, please do not hesitate to contact one of our Quality and Food Safety Team members. We are here to help.

Perennia's Quality and Food Safety Team

Elaine Grant, Shelly MacDonald, Cheryl Andrews, Amanda Cameron

CANADIAN AGRICULTURAL PARTNERSHIP
Innovate. Grow. Prosper.

OFFICE LOCATIONS

28 Aberdeen Street, Unit 6
Kentville, Nova Scotia
B4N 2N1

Phone: 902-678-7722
Fax: 902-678-7266
Email: info@perennia.ca

PERENNIA FOOD AND BEVERAGE INNOVATION CENTRE

173 Dr. Bernie MacDonald Drive,
Bible Hill, Nova Scotia
B6L 2H5

Phone: 902-896-8782
Fax: 902-896-8781
Email: innovation@perennia.ca

WWW.PERENNIA.CA

@nsperennia

perennia ideas • innovation • success

NOVA SCOTIA

Canada