2019/20 EDITION

SAFE 4 MARKET

A QUALITY AND FOOD SAFETY GUIDE FOR PRIMARY PRODUCERS, PROCESSORS AND STORAGE FACILITIES PART II

Supporting access to new markets by enhancing the food safety knowledge and skills of agriculture producers and agri-food or beverage processors in Nova Scotia.

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MARCH 2020

INTRODUCTION

We hope you enjoyed the first guide in this series. The 2018/19 issue covered the importance of food safety, food safety hazards, and the basics of prerequisite programs including premises, equipment, sanitation, recall and traceability, transportation and storage, purchasing/receiving/shipping, personnel, pest control, allergens and food additives. It also introduced the concept of Hazard Analysis and Critical Control Points (HACCP) and how to develop a HACCP plan. If you have not yet read the first issue, we strongly encourage you to do so before beginning this guide. To obtain a copy of the first issue, please contact one of Perennia's Quality and Food Safety Specialists.

Our Quality and Food Safety team is pleased to present the 2019/20 second issue which expands and builds on topics mentioned in the previous issue while exploring new and important topics. In this issue, we will take a more in-depth look at the Safe Food for Canadians Act and Regulations that were introduced in 2019 and are being enforced for most businesses in 2020. We will expand on previous topics such as pest prevention, transportation and storage and dive into new topics such as Canadian food labelling, food safety culture, food fraud and food defence, approved supplier programs, basic importing and exporting requirements, and third-party food safety certification.

We hope readers appreciate this issue and enhance their knowledge of food safety. The resources mentioned throughout this issue can be found on Perennia's website under Quality & Food Safety/Food Safety Resources/Recommended Resources. If there is a topic you would like to see covered in the third and final 2020/21 edition, please contact a member of the team and let us know. As always, if you have any questions feel free to contact us, we are here to help.

Perennia's Quality and Food Safety Team
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SAFE FOOD
FOR CANADIANS

FOOD SAFETY IN CANADA

Food safety affects all Canadians. Each year, one in eight Canadians become ill from a foodborne illness. Food safety is a concern for all food businesses, regardless of size. It is the responsibility of the food business to ensure they are always producing safe food. One way of making sure you are meeting regulatory requirements and producing safe food is to become familiar with the Safe Food for Canadians Act (SFCA) and Regulations (SFCR). For a better understanding of the SFCR, see the **Handbook for Food Businesses (SFCR)** link on our website.

NEW REGULATIONS

Consumers want to know their food is safe. The SFCR supports this with mandatory preventive controls, traceability, and better controls for imported foods, to name a few.

In 2019 the SFCR consolidated 14 sets of food regulations into one. The intent is to improve consistency between all food businesses and types of food, reduce administrative burden, and enable outcome-based provisions. However, it is important to understand that many commodities have food-specific requirements that must also be met. It is your responsibility to be familiar with your products' specific requirements. See the **food-specific requirements** link on our website.

The SFCA and SFCR came into effect on January 15, 2019; however, timelines for compliance vary based on food commodity, activities conducted, and business size. Visit the **SFCR timelines** link on our website to determine which requirements apply to you and when you must be in compliance.

To learn more about SFCR see the **SFCR homepage** link on our website.

LICENCES

Many food businesses will be required to have a licence to carry out activities related to food. If you import, export or interprovincially trade food, chances are your business requires a licence. A licence costs $250 and is valid for two years. See **CFIA's licencing interactive tool** link on our website to determine the licence requirement for activities conducted at your facility.

Before your food business can apply for a licence you must create a client profile and assign contacts. See the **Before you sign up for My CFIA** link on our website.

Once you have created your client profile you are ready to apply for a licence. It is recommended you watch the video on requesting a licence as it clearly explains the process. See the **Requesting a SFC licence video** link on our website.

The licence application requires attestation (proof) of a Preventive Control Plan (PCP). There are many models of PCPs in use (e.g. FSEP, QMP, CanadaGAP, SQF, BRCGS, etc.), but it is your responsibility to ensure you meet all the SFCR requirements. CFIA provides a checklist (gap assessment) template that is useful for determining which sections of your current PCP comply. See the **SFCR maintenance and operation of establishment checklist** on our website.

If you are already using another PCP model (e.g. FSEP or QMP), CFIA provides guidance on approaching a PCP using your current Food Safety Enhancement Program or Quality Management Program. See The **Food Safety Enhancement Program (FSEP) approach to a preventive control plan** and The **Quality Management Program approach to a preventive control plan** links on our website.

CANADIAN PROCESSORS

As a processor, you are responsible for determining which SFCR requirements apply to your food business. You can determine this by reviewing the SFCR timelines specific to your commodity.

You may be required to meet one or more of the SFCR requirements - Licence, Preventive Control Plan, Preventive Controls and/or Traceability. These are dependent on the activities (e.g. grow, harvest, package, label, intraprovincial or interprovincial trade, etc.) being conducted at your facility.

You may also be required to validate your food safety program and critical limits and complete verification records. Record-keeping may be a new activity for some food operators since records by exception were allowed for QMP in the past. Appropriate record keeping proves that you are doing what you say you are doing.

CANADIAN IMPORTERS

Regulations regarding food commodities imported into Canada have been improved and strengthened to reduce the risk of unsafe food commodities entering the Canadian market.

As a Canadian importer, you must meet similar requirements as Canadian processors plus ensure you have a licence to import your product. You must have records to prove where your product is being produced and that the foreign supplier is manufacturing, preparing, storing, packaging and labelling food under the same conditions as food prepared in Canada.

You must also maintain procedures for handling and investigating complaints and recalls and keep clear records for traceability, this means being able to trace back to where the food came from (supplier) and to whom it was sold (buyer). For more information, see the Importing and Exporting Basics section of this booklet and the **Food Imports** link on our website.

The three key principles for Canadian importers are:

1. **Know your foreign supplier** – food is prepared under conditions to meet Canadian regulations;
2. **Know your food** – understand the potential hazards associated with the imported product; and
3. **Have a Food Safety Plan** – demonstrate how you and the imported food meet regulations.

CANADIAN EXPORTERS

Regulations regarding food commodities being exported have also been strengthened to help maintain and grow Canada's market access.

Canadian exporters need to ensure that their food is manufactured, prepared, stored, packaged, labelled, or slaughtered by a licence holder under sanitary conditions. Not only are exporters required to meet Canadian requirements but they must also meet foreign country requirements. Clear and complete records are required for traceability.

See the SFCR timelines to determine which requirements apply to your food business. Depending on the activity conducted at your facility you may not need an SFC licence but are required to have Preventive Controls and Traceability. If you need an export certificate or export permission you will need a licence and a PCP.

It is your responsibility to ensure you are meeting the SFCR requirements. See the Importing and Exporting Basics section of this booklet and the **Food Exports** link on our website.

The three key principles for Canadian exporters are:

1. **Know your foreign market** – foreign country requirements (i.e. eligibility list);
2. **Know your food** – potential hazards associated with the exported product; and
3. **Have a Food Safety Plan** – food safety controls in place during storage and shipment.

As a Canadian exporter, it is recommended that you review the checklist for food exporters to ensure you have met all the regulatory requirements. See the **Checklist for food exporters** link on our website.

PREVENTIVE CONTROLS

Preventive Controls are a combination of measures used to achieve compliance with the SFCR. Preventive controls form a system focused on preventing food safety hazards during food handling and reduce the likelihood of contaminated food entering the marketplace. Commonly known as Prerequisite Programs, Preventive Controls are used to control hazards associated with the environment in which the product is processed (e.g. Sanitation, Pest Control, Hygiene, etc.).

In addition to food handling, preventive controls establish the outcomes for preventing or eliminating avoidable suffering, injury, or death other than by slaughter or humane killing of the food animal.

The SFCR Preventive Controls are outcome-based. This does not mean that industry regulates itself. It means that the onus is on industry and it is up to industry to demonstrate how they effectively control food safety hazards. In the past, CFIA's food safety programs used a prescriptive approach to controlling food safety hazards.

Processors using FSEP, QMP or GFSI Certification such as CanadaGAP meet the basic SFCR requirements. The food safety programs mentioned are based on Codex Principles of Food Hygiene. However, this is going to be completely NEW for companies that are unfamiliar with CFIA and Food Safety Programs. See the **Preventive Controls** link on our website.

SFCR Preventive Controls Include:

- **Division 2** Biological, Chemical and Physical Hazards
- **Division 3** Treatments and Processes
- **Division 4** Maintenance and Operation of Establishment
  - **a.** Responsibility of Operator
  - **b.** Sanitation, Pest Control and Non-Food Agents
  - **c.** Conveyances and Equipment
  - **d.** Conditions Respecting the Establishment
  - **e.** Unloading, Loading and Storing
  - **f.** Competency
  - **g.** Hygiene
- **Division 5** Investigation, Notification, Complaints and Recall
- **Division 6** Preventive Control Plan

For guidance with developing Preventive Controls (Prerequisite Programs) see Part I of this guide located on our website. If using this guide, it is important that you also include preventive controls for preventing or eliminating avoidable suffering, injury, or death other than by slaughter or humane killing of the food animal.

PREVENTIVE CONTROL PLAN (PCP)

A Preventive Control Plan (PCP) is a written document prepared, kept, maintained and implemented by a food business. It describes how hazards to food are controlled as well as how the requirements for the humane treatment of food animals during slaughter activities and the requirements related to consumer protection (such as labelling, packaging, and grading) are met.

A HACCP plan, Food Safety Plan and a PCP all include a hazard analysis and a description of the control measures applied by a food business operator to ensure food safety. However, a PCP also includes a description of the measures applied to meet requirements related to the humane treatment of food animals and requirements related to consumer protection. If you already have a HACCP plan in place there is no need to develop an additional PCP. However, you will need to add the requirements related to the humane treatment of food animals and consumer protection (e.g. labelling, packaging, grading). You should make sure the terminology you are using is the same as the CFIA. This can be done by creating a reference table until you are familiar and confident with your PCP. To determine if and when you need a PCP, see the **CFIA's preventive control plan interactive tool** link on our website. For more information regarding PCPs, see the **Preventive Control Plan (PCP)** link on our website for more information.

TRACEABILITY

Food businesses are now required to track the movement of their food in the supply chain. This includes one step forward to the immediate customer and one step back to the immediate supplier.

- Processors must be able to trace ingredients back to the original supplier and trace all finished products to the first level of distribution.
- Importers must be able to trace imported products back to the foreign supplier and trace products to the first level of distribution.
- Exporters must be able to trace products back to the supplier and trace products to the buyer.
- Retailers must be able to trace product back to the supplier.

All food commodities must meet traceability requirements. To determine which traceability requirements you need, see the **CFIA's traceability interactive tool** link on our website.

For more information regarding traceability requirements, see the **CFIA's Traceability Requirements** and **CFIA's Fact sheet: Traceability (SFCR)** links on our website.

Clear and complete records must be available for two years. A food business must be able to provide CFIA with traceability documents within 24 hours of request.

FOOD-SPECIFIC REQUIREMENTS

Each commodity has requirements that need to be met. These programs were already in place and are not new for the SFCR. Some other examples of requirements that need to be met are regulatory requirements specific to your food, Canadian Standards of Identity, Canadian Grade Compendium, Grade Names for Imported Food, Food-specific export requirements, etc. See the **Food-specific requirements and guidance** link on our website.

PACKAGING, LABELLING & GRADE AND GRADE NAMES

Buyers, sellers, and consumers rely on food labels as one of the most important and direct means of determining what is being purchased. It is your responsibility to ensure you are labelling your product correctly and meeting regulations. See the **Food labelling for industry** link on our website.

Deliberate and intentional misrepresentation and mislabelling are seen as food fraud. You are responsible for ensuring your product is labelled and graded correctly. See the **Labelling, standards of identity and grades** link on our website. In Canada, it is prohibited to sell food that is unsafe or falsely labelled.

For assistance with labelling requirements refer to the next section of this guide and consult the **Labelling Requirements Checklist** link on our website. For guidance on grade and identity see the **Documents incorporated by reference – Safe Food for Canadians Regulations (Canadian Grade Compendium, Canadian Standards of Identity, etc.)** link on our website.

We hope this step by step guide will assist you in navigating the SFCR path. Below is a checklist you can use to ensure you don't miss a step when working toward becoming SFCR compliant.

SFCR CHECKLIST FOR PROCESSORS, IMPORTERS, AND EXPORTERS

GENERAL REQUIREMENTS		YES	NO	N/A
I have reviewed the SFCR and am familiar with the new regulations				
I am aware of the SFCR timelines and have determined which regulations apply to my food business				
I have created a client profile (if applicable)				
I have watched the licence video and am confident with the licensing process (if applicable)				
I applied for an SFC licence (if applicable)				
I have traceability procedures in place to trace one step back and one step forward (if applicable)				
I have all the required documents for my product(s)				
PREVENTIVE CONTROLS & PREVENTIVE CONTROL PLAN		**YES**	**NO**	**N/A**
I have preventive controls in place (if applicable). I have the following preventive controls in place:				
Division 2 – Biological, Chemical and Physical Hazards				
Division 3 – Treatments and Processes (if applicable)				
Division 4 – Maintenance and Operation of the Establishment	**Subdivision A.** Responsibility of Operator			
	Subdivision B. Sanitation, Pest Control and Non-Food Agents			
	Subdivision C. Conveyances and Equipment			
	Subdivision D. Conditions Respecting the Establishment			
	Subdivision E. Unloading, Loading and Storing			
	Subdivision F. Competency			
	Subdivision G. Hygiene			
Division 5 – Investigation, Notification, Complaints and Recall				
Division 6 – Preventive Control Plan (PCP) (if applicable) I have the following controls in place:				
A PCP team has been established				

PREVENTIVE CONTROLS & PREVENTIVE CONTROL PLAN (CONT)		**YES**	**NO**	**N/A**
The establishment is operated and maintained as required				
I have performed a hazard analysis and established procedures which include: inputs, outputs, processing steps and traffic flow				
Critical control points (CCP) have the following:	Established control measures			
	Established critical limits			
	Established monitoring procedures			
	Established verification procedures			
	Record keeping associated with CCPs			
	Established corrective action procedures			
I have reviewed the gap assessment template to ensure all preventive controls are in place (if applicable)				

FOOD-SPECIFIC REQUIREMENTS	**YES**	**NO**	**N/A**
I have reviewed and am familiar with the food-specific requirements associated with my product(s)			
I have reviewed and am familiar with the labelling requirements for my product(s)			
I have reviewed and am familiar with the packaging requirements for my product(s)			
I have reviewed and am familiar with the grade and grade name requirements for my product(s) (if applicable)			

IMPORTERS	**YES**	**NO**	**N/A**
I know my food product(s) and what risks may be associated with the product(s)			
I am familiar with the Canadian requirements for importing food			
I know my supplier and what risks may be associated with the product(s)			
I have developed and implemented a PCP			
I have developed recall and complaint procedures			
I am familiar with applying for a licence to import from the CFIA			
I have all the documents required to provide CFIA when importing my product(s)			
I have traceability procedures and records (one step back and one step forward)			

EXPORTERS	**YES**	**NO**	**N/A**
I meet all the requirements for exporting my product(s)			
My product has been manufactured or prepared in accordance with Canadian regulations			
I have obtained export certification			
I have developed and implemented a PCP (if applicable)			
I have traceability procedures in place and records (one step back and one step forward)			
I have all the documents required to provide CFIA when exporting my product(s)			
I am familiar with the foreign country requirements (CFIA exports, foreign authority, my importer, market access secretariat, trade commissioner)			
I have reviewed and am familiar with the food-specific requirements associated with my product(s)			
I am familiar with export certification requirements (export certificate, attestations and statements, CFIA export inspections)			
I am familiar with the validation/verification requirements (facility inspection/ audits by the foreign buyer, corrective actions above the scope of Canadian regulatory requirements)			
I am familiar with the shipping foods for export requirements (control of certificates and certificate numbers, stamps, stickers and seals and transportation methods)			
I am aware of the checklist for food export and have reviewed the list			

CANADIAN FOOD LABELLING

REQUIREMENTS

Labels are a critical part of any product. Labels serve several functions such as providing buyers and consumers with basic product information as well as health, safety, and nutritional information. They are also a means to market and promote products in the competitive food industry. The most important consideration when creating a label is to ensure that all information provided is truthful and not misleading. The majority of food labelling requirements are outlined in the **Food and Drug Regulations (FDR)** and the **Safe Food for Canadians Regulations (SFCR)**, however there are other regulations, such as the **Weight and Measures Regulations** that need to be taken into consideration. Links to these regulations can be found on our website. It is the manufacturer's responsibility for determining which regulations apply to them and those from which they are exempt.

While there are general labelling requirements that apply to most food products, there are also food-specific requirements under the SFCR for commodities such as meat and poultry; dairy; fish; honey products; maple products; egg and processed eggs; processed fruit and vegetables; fresh fruit and vegetables; and organic products.

Before jumping into the core food labelling requirements, several terms need to be defined. Readers need to understand the difference between a 'prepackaged food' and a 'consumer prepackaged food.' Consumer prepackaged foods are considered prepackaged foods; however they are sold solely to individuals in their final packaging and not repackaged. Alternatively, prepackaged foods are sold to an individual or an organization for further manufacturing or food service and can be repackaged. This includes foods packaged in shipping or other bulk containers that are sold only at levels of trade other than retail. This is important to note as some labelling requirements apply to 'all prepackaged food' whereas other requirements may only apply to 'consumer prepackaged' or 'prepackaged other than consumer prepackaged.'

Next, readers need to become familiar with the following terms: principal display surface (PDS), principal display panel (PDP) and available display surface (ADS). The definition for PDS and PDP varies depending on the package. A **link** to these definitions is found on our website. The **ADS** includes the total surface area of a package excluding the bottom if the contents of the package leak out or are damaged when the package is turned over. ADS also excludes any area of a package where a label cannot be physically applied or where information cannot be legibly set out and easily viewed by the consumer at the time of purchase. It excludes any part of the package that will be destroyed upon opening (not applicable to packages that are intended to be consumed by one person at a single eating occasion) or the area occupied by the Universal Product Code.

Below is a list of core food labelling requirements and is current as of January 2020. Please note that this list does not include all specifics for each requirement. Some foods are exempt from one or more of the following requirements, while other foods have additional labelling requirements. The best way to determine which requirements you must comply with is to consult the regulations directly. For each of the requirements below, the CFIA has developed content which outlines the requirements, exceptions, exemptions and helpful guidance. Links to further detail on each requirement can be found on our website.

COMMON NAME

The common name can be the:

- Standard name for the food as prescribed in boldface type, but not italics, in the FDR (e.g. tomato paste) or the name prescribed in boldface type, but not italics, in the Canadian Standards of Identity document or the Common Names for Prepackaged Fish document incorporated by reference in the SFCR (e.g. condensed milk); and
- Name by which the food is commonly known or that identifies its function if a standard name is not prescribed (e.g. chocolate chip cookie).

NET QUANTITY

- The net quantity is the weight or volume of the food in a package excluding the weight or volume of any packaging material. It is declared in metric units in the appropriate unit of measure (volume, weight, count).
- The appropriate unit of measurement is prescribed for some foods in CFIA's document **units of measurement for the net quantity declaration of certain foods**. A link to this document can be found on our website. Typically, weight is used for solid foods and volume is used for liquid foods.

LIST OF INGREDIENTS AND ALLERGEN LABELLING

- All prepackaged products with more than one ingredient must declare their ingredients and components in a list of ingredients (unless they are exempt). Ingredients must be listed in descending order of proportion by weight and using the appropriate common or collective name. The mandatory common and collective names of ingredients and components can be found in sections **B.01.010 (3)(a) and (3)(b) of the FDR**. A link to this section can be found on our website.
- The following ingredients may be shown at the end of the ingredient list in any order: spices, seasonings and herbs (except salt); natural and artificial flavours; flavour enhancers; food additives except ingredients of food additive preparations or mixtures of substances for use as a food additive; vitamins and their salts or derivatives; and mineral nutrients and their salts or derivatives.
- The components of ingredients (second generation ingredients) must be declared after the ingredient in parentheses in descending order of proportion by weight or broken out and declared in the ingredient list without parentheses in descending order of proportion by weight.

Note: Some ingredients do not require component declaration and these can be found in **sections B.01.009 (1) and (2) of the FDR**. There are also components of preparations and food that must always be declared. These can be found in sections **B.01.009 (3) and (4) of the FDR**. A link to these sections is on our website.

- Sugar-based ingredients must be grouped after the term "Sugars" in parentheses and descending order of proportion by weight separated by a comma. Examples of sugar-based ingredients that require grouping and those that do not can be found in **CFIA's Annex 1: Examples of Sugars-based ingredients that require grouping** and **Annex 2: Examples of ingredients for which grouping with sugars is not required,** respectively. Links to these pages are on our website.
- Priority allergens, gluten, and added sulphites must be declared using the appropriate common name either explicitly in the list of ingredients or in a "contains statement" directly below the ingredient list. Priority allergens in Canada include eggs, milk, mustard, peanuts, crustaceans and molluscs, fish, sesame seeds, soy, sulphites, tree nuts, and wheat and triticale. The common name for allergens, gluten and sulphites is found in section **B.01.010.1 and B.01.010.2 of the FDR**. A link to this section is on our website.
- When artificial flavour is added to a food, whether alone or with natural flavouring agents, the word "artificial" or "imitation" must be included as part of the flavouring preparation name.
- A food additive is any chemical substance that is added to food for the purpose of achieving a technical effect that becomes a part of the food or affects its characteristics. Food additives must be declared by their common name and may be listed at the end of the ingredient list in any order. Similar food additives may be declared using a collective/class name rather than listing each ingredient individually. When food additives are used in preparations or mixtures and have a function or effect on the food, they must be declared in the list of ingredients as if they were ingredients. A link to **CFIA's Food Additives Labelling Guidance** can be found on our website.
- Processing aids are used for a technical effect in food processing and do not affect the intrinsic characteristics of the food and result in no or negligible residues of the substance or its by-product in the food. They are not considered ingredients and do not need to be declared. Health Canada defines processing aids and lists substances that do not need to be declared in the ingredient list as they are considered processing aids. A **link** to this page can be found on our website.
- Food colours must be declared by their common name (e.g. Allura Red). The use of the term "colour" is no longer allowed. Food colours can be listed at the end of the list in any order. This also applies to food colours that are components of ingredients that are not exempt from component declaration. A **link** to a list of permitted food colouring agents and their common names can be found on our website.

DOMICILE STATEMENT

- The domicile statement is the complete name and principal place of business of a company.
- A link to the proper manner of declaring for domestic products, imported products and retail specific products can be found on our website.

DATE MARKINGS

- A "Best Before" date is required on prepackaged products that have a durable life of 90 days or less. Durable life date refers to the anticipated amount of time that an unopened food product, when stored under appropriate conditions, will retain its freshness, taste, nutritional value or any other qualities claimed by the manufacturer.
  - » The Best Before Date must appear on the label as "best before/meilleur avant" and in the order of year, month, day using the bilingual symbol for the month e.g. MA 26 Note: The year is only required for clarity (i.e. when the durable life date goes into the next year).
- "Expiration Dates" are required only on foods for special dietary use (i.e. food that has been specially processed or formulated to meet the particular requirements of a person). Examples include infant formula, formulated liquid diets, meal replacements, nutritional supplements and food represented for use in a very low-energy diet.
  - » The date generally appears on the label as "Exp.". The date format is the same as above.
- A **link** with more information on "Packaged On" dates, "Use By" dates, and other date markings can be found on our website.

STORAGE INSTRUCTIONS

- Storage instructions are mandatory on foods that require a "best before" date and if the storage conditions differ from normal room temperatures. Examples include "Keep Refrigerated", "Keep Frozen", and "Store in a cool, dry place". A **link** with more information on storage instructions is on our website.

NUTRITION LABELLING

- The Nutrition Fact Table (NFT) is located on the ADS and the correct NFT format to use is based on the size of the ADS. You must use the largest NFT format that fits into 15% of the calculated ADS unless the ADS is less than 15 cm^2 (product is exempt from carrying an NFT) or 100 cm^2 (product has a small package). All the formats can be found on **Health Canada's Directory of Nutrition Facts Table Formats** found on our website. For help with selecting the correct format, refer to **CFIA's Steps for Choosing a Nutrition Facts Table** on our website.
- The NFT must include a serving size and the amount of calories, fat, saturated fat, Trans fat, the sum of saturated and Trans fat, cholesterol, sodium, carbohydrates, fibre, sugars, protein, calcium, iron, and potassium per serving size.

Recent changes to the NFT templates include:

  - » Serving sizes are more consistent to allow consumers to easily compare similar foods;
  - » An emphasis on Calories (larger font and bold line below);
  - » Daily value for Carbohydrates no longer required;
  - » Percent daily values for total Sugars required;
  - » Potassium is now required while Vitamin A and C are optional;
  - » In addition to the daily value, the quantity of vitamins (optional) and minerals must be shown in the appropriate units;
  - » Triggered nutrients must be declared; and
  - » New footnote stating "5% or less is a little, 15% or more is a lot."

- Serving sizes can be determined using the **Health Canada's Table of Reference Amounts for Food** link on our website. It is expressed in grams if the net quantity is declared in weight or by count and in millilitres when the net quantity is declared in volume. They must be expressed using a household measure first followed by the equivalent metric measure in parentheses (e.g. Per 1 cup (250mL)).
- Percent daily values can be calculated by dividing the amount present in the serving size by the recommended daily intake in **Health Canada's Table of Daily Values** and multiplying that number by 100. A link to this page is on our website.
- Nutrient claims must follow the prescribed requirements. See the **CFIA's specific nutrient content claim requirements** link on our website.
- Rounding rules are in CFIA's Rounding and Manner of Expression for NFT Core Information table and Rounding and Manner of Expression for Additional Nutrition Information table. A **link** to these tables are on our website.

BILINGUAL REQUIREMENTS

- All mandatory information must be in English and French for consumer prepackaged foods however the domicile may be in English or French unless an exemption exists. English and French main panels can be on separate but equally prominent panels.
- Note there are some exemptions regarding shipping containers, speciality foods, local foods, and test market foods. For a complete list of exemptions, please visit **CFIA's bilingual labelling requirements**. A link to this page is on our website.

SWEETENERS

- Some sweeteners trigger specific mandatory labelling requirements such as an amount declaration on the PDP or in the ingredient list or NFT. These sweeteners include aspartame, sucralose, acesulfame-potassium, neotame, polydextrose and sugar alcohols (e.g. sorbitol). To find out more about these specific mandatory labelling requirements visit **CFIA's mandatory labelling of sweeteners** page. A link to this page is on our website.

COUNTRY OF ORIGIN

- All prepackaged food products sold in Canada are required to have the domicile. When a product is wholly manufactured outside Canada, the label must show the product is imported by having either:
  - » The name and principal place of business of the foreign manufacturer;
  - » The statement "imported by" / "importé par" or "imported for" / "importé pour" followed by the name and principal place of business of the Canadian company; or
  - » The name and principal place of business of the Canadian company with the country of origin of the product.
- Some foods with unique requirements include: wine and brandy; dairy products; honey; fish and fish products; fresh fruit or vegetables; shell egg and processed egg products; meat and poultry products; maple products; and processed fruit or vegetable products. For more information, visit the **CFIA's Country of origin labelling** page. A link to this page is on our website.

GRADES

- Grades are mandatory or voluntary depending on the food commodity. For more information on grade labelling, see **CFIA's Grade labelling guidance** and the **Canadian Grade Compendium** incorporated by reference in the SFCR on our website.

IRRADIATION

- Irradiated foods must have the written statement such as "irradiated" or "treated with radiation" or "treated by irradiation" and have the international symbol.
- Irradiated ingredients that constitute more than 10% of the final food must be identified in the list of ingredients as irradiated.

EXAMPLE OF A MOCK LABEL

Note: This example is of a single ingredient product. Multiple ingredients products require an ingredient list and NFT.

Wild Blueberries
Canada No. 1
500g

Package on: 19DE03
Lot Code: 19DE03

ABC Blueberries Inc.
123 Prospect Way, Halifax, NS, B3Z 1T6

Keep Refrigerated
Product of Canada

Common Name
Grade (if applicable)
Net quantity

Date Marking – BBD or Packaged On
Lot Code

Name and Location of Business

Storage Instructions
Country of Origin

FOOD SAFETY CULTURE

WHAT IS FOOD SAFETY CULTURE? WHY IS IT IMPORTANT?

Food safety culture can be described as how an organization approaches food safety through its values, beliefs, behaviours, and attitudes. A positive food safety culture exists when an organization is deeply influenced and driven by producing safe food and is always striving to improve. A positive food safety culture is important for several reasons including: fewer customer complaints and recalls; maintaining customer loyalty and brand reputation; continued sales and profitability; and most often it is a requirement of third-party certified food safety programs.

HOW DO YOU DEVELOP AND IMPLEMENT POSITIVE FOOD SAFETY CULTURE?

Food safety culture begins with assessing the organization's current approach to food safety. This can be achieved through staff surveys or interviews. An example of a questionnaire to assess the food safety culture at your facility can be found at the end of this section.

Commitment from senior management is the foundation of a positive food safety culture – an organization's commitment to food safety will only be as strong as its leaders. Behaviours within an organization are largely influenced by top management and as such, they need to lead by example. Proper food safety behaviours and attitudes consistently demonstrated by top management will become reinforced within and across the organization. Commitment from top management can further be exhibited by supplying staff with adequate resources such as equipment, handwashing stations, standard operating procedures, etc., needed to produce a safe product.

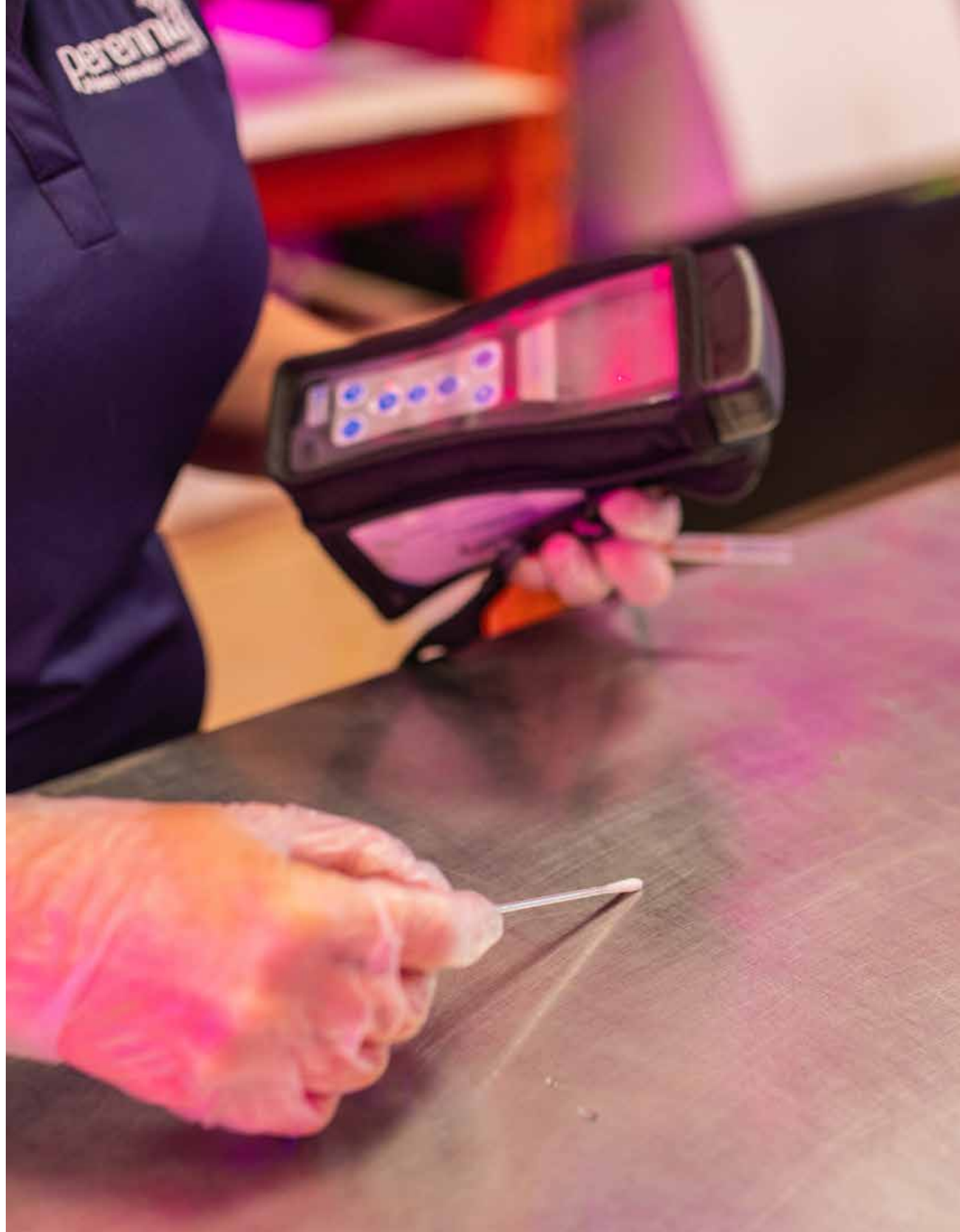
A good start for food safety culture is training and communication. All employees (including temporary, volunteers, visitors, and contractors) should understand the importance of food safety. Food safety expectations should be defined by leaders and all staff should understand how food safety applies to their role and how their activities affect food safety. Training should be relevant, engaging, on-going, and available in the appropriate language(s). Staff should be periodically evaluated to determine whether training is effective. Food safety values, policies, and objectives should be at the forefront of conversations and highlighted in employee orientation, training, weekly team or toolbox meetings, and posted throughout the facility (e.g. in the office and lunchroom). One way to encourage communication is to implement a confidential reporting system that allows employees to communicate to upper management when they observe unsafe food practices without fear of negative consequences.

Recognition and appreciation will help to encourage positive food safety behaviours. Employees are more likely to demonstrate behaviours when they are motivated to do so. It is important to continuously celebrate food safety successes and recognize both small and large contributions. This can be as simple as acknowledging an employee for doing a good job and sharing feedback.

FOOD SAFETY CULTURE QUESTIONNAIRE EXAMPLE

To what extent do you agree with the following statements regarding food safety culture at this company? Please select one answer per statement.

	STRONGLY AGREE	DISAGREE	NEUTRAL	AGREE	STRONGLY AGREE
Food safety is important to you.					
Food safety is important to the company.					
Senior management provides you with adequate resources to produce safe food (e.g. training, cleaning tools and procedures, etc.).					
I am aware of the company's food safety objectives.					
I have received training on food safety and understand how my role and responsibilities impact product safety.					
I have received training on and follow programs, policies, and procedures that ensure product safety.					
My co-workers follow programs, policies, and procedures that ensure product safety.					
I prevent products that could cause a consumer to become ill from leaving the facility.					
I would consume the company's products without any concern.					
I would serve the company's product to family, friends, or pets without any concern.					



FOOD FRAUD AND FOOD DEFENCE

WHAT IS THE DIFFERENCE BETWEEN FOOD FRAUD AND FOOD DEFENCE?

Food fraud refers to intentional fraudulent acts to food, food ingredients, food packaging or food labelling for economic gain. Food defence is the effort to protect the food supply against intentional adulteration that is committed with the intent to cause harm to the consumer.

WHY IS FOOD FRAUD IMPORTANT TO THE FOOD SAFETY MANAGEMENT SYSTEM?

While the intention of food fraud is not to harm consumers, the substances used to adulterate food may negatively impact consumer health. For example, in 2008, a chemical compound called melamine which is approved for use in plastics, countertops, dishware, and whiteboards was added to milk and infant formula diluted with water to enhance the apparent protein content. Because melamine is high in nitrogen, its addition to food products artificially increases the apparent protein content as measured with standard tests – which is how it went undetected. As a result, infants experienced kidney damage and deaths were reported.

WHAT TYPES OF FOOD FRAUD MECHANISMS ARE THERE?

1. **Dilution:** Mixing an authentic high-value product with a product of lower value e.g. adding corn syrup to honey.
2. **Substitution:** Replacing an authentic high-value product with a product of lower value e.g. substituting extra virgin olive oil with regular olive oil.
3. **Counterfeit:** Intellectual Property Rights infringement e.g. copies of popular foods produced with unapproved ingredients.
4. **Unapproved enhancement:** Quality enhancement using illegal, unapproved and/or undeclared substances e.g. melamine to enhance protein content in milk diluted with water.
5. **Concealment:** Hiding the low quality (e.g. disease or defect) of a product, such as poultry treated with antibiotics to reduce bacterial load.
6. **Mislabelling:** Making false claims or statements on labels, such as providing false information regarding net quantity, expiration dates, nutritional value, grades, organic certification, country of origin, etc.
7. **Grey Market Production, Theft or Diversion:** Legitimate product or product destined for disposal is stolen and sold/distributed outside of intended markets (i.e. selling product that has tested positive for pathogens and covering up the unacceptable results).

WHICH FOODS ARE MOST OFTEN TARGETS OF FOOD FRAUD?

1. **Olive Oil** – Olive oil is often diluted with another type of oil such as sunflower.
2. **Honey and Maple Syrup** – Honey and maple syrup are often diluted with other liquids such as corn syrup.
3. **Dry Spices** – Dry spices, in particular, Saffron, are often diluted with fillers.
4. **Fish** – High-quality fish species are often substituted with lower quality fish species.
5. **Organic Food Products** – Products are often mislabelled as organic when they are not certified or come from an uncertified source.

HOW TO PROTECT PRODUCTS AGAINST FOOD FRAUD?

VULNERABILITY ASSESSMENT CRITICAL CONTROL POINT

Also known as a food fraud vulnerability assessment, Vulnerability Assessment Critical Control Point (VACCP) is a systematic approach to prevent potential adulteration of food by identifying vulnerability points in the raw material supply chain and implementing mitigation strategies and monitoring, corrective action, and verifications procedures.

Each raw material, ingredient, packaging, food, and supplier should be assessed based on the risk factors listed below and assigned a risk score. Mitigation strategies for each risk should be identified and assigned a score. The overall risk score can be calculated by subtracting the mitigation score from the risk score (product risk and supplier risk). Depending on the score, the raw material, ingredient, packaging or food may be considered a low, medium or high risk. Based on the risk, a company may require additional controls in place. Please see the end of this section for an example.

WHAT RISK FACTORS TO CONSIDER?

- Nature of the food or food ingredient – Is the product easy to adulterate? Liquid and powdered materials are easier to dilute/substitute than solid material.
- Fraud history and emerging concerns associated with the food or food ingredient – Is the product a frequent target of food fraud (i.e. in the top five listed above)?
- The length and complexity of the supply chain – Is the supply chain short and simple or long and complex allowing for more opportunities for adulteration?
- Ease of access to raw materials – Are raw materials readily accessible or are they kept secure?
- Supplier relationship – Are they a first-time supplier or a long-time, trusted supplier?
- Supplier history – Do they have a history of regulatory, quality, or safety issues?
- What is the likelihood of detecting the adulterant in the material? This depends on the ability of quality assurance methods and specifications to detect the adulterant and the testing frequency.
- Geographic origin – Is the material originating from an area where there is a low level of food safety regulations and enforcement and high level of corruption and organized crime?
- Economic factors – Is there an economic motive to adulterate (e.g. cheap vs. high-value product)?

EXAMPLES OF MITIGATION FACTORS

- Approved supplier program (request proof of a food safety program or GFSI certification, review GFSI site certification directories, audit results, etc.).
- Raw material acceptance specifications and certificates (e.g. certificates of analysis).
- Raw material and final product testing.
- Mass balance checks.
- Tamper-evident packaging techniques.
- Employee integrity screening.
- Employee training on food fraud.
- Whistleblowing guidelines and protection (i.e. confidential reporting system).

FOOD FRAUD VULNERABILITY ASSESSMENT EXAMPLE

RAW MATERIAL, INGREDIENT, PACKING OR FOOD	SUPPLIER	SUPPLIER LOCATION	PRODUCT RISK SCORE (A)	SUPPLIER RISK SCORE (B)	MITIGATION SCORE (D)	OVERALL RISK (A+B) – (D)	RISK LEVEL*	ADDITIONAL MITIGATION REQUIRED? (Y/N)	MITIGATION MEASURE
Unpasteurized Liquid Honey	XYZ Honey	Nova Scotia, Canada	19	5	10	14	low	No	N/A

*Risk Level: Very Low (1-10) / Low (11-20) / Medium (21-30) / High (31-40) / Very High (41-50)

PRODUCT RISK SCORE BASED ON:

RISK FACTOR	SCORING	RISK SCORE	REASONING
Nature of raw material, ingredient, packaging, or food	1 – Solid (difficult to adulterate) 5 – Liquid or powder (easy to adulterate)	5	Honey is liquid and easy to dilute/substitute.
History of adulteration	1 – Rare (not often a target of adulteration) 5 – Frequent (very often a target of adulteration)	5	Honey is one of the top foods targeted for adulteration.
Ease of access to material	1 – Limited access 5 – Readily accessible	1	Honey is securely stored with tamper-proof seals. Drums are accurately labelled.
Likelihood of detection	1 – Highly detectable 5 – Low detection rate	3	Difficult to detect common adulterants such as corn syrup in honey without sending samples for product testing.
Economic factors	1 – No incentive (cheap commodity) 5 – High incentive (high value)	5	Honey is a high-value product that is easily adulterated and the adulterant is difficult to detect making the economic motivation high.
	TOTAL RISK SCORE (A)	**19**	

SUPPLIER RISK SCORE BASED ON:

RISK FACTOR	SCORING	RISK SCORE	REASONING
Supplier relationship	1 – Long-time, trusted supplier 5 – New supplier	1	Honey XYZ is a long-time, trusted supplier.
Supplier history	1 – Rarely involved in regulatory, quality or safety issues 5 – Frequently involved in regulatory, quality or safety issues	1	Honey XYZ is never involved in regulatory, quality or safety issues.
Material availability	1 – Honey is a readily available product 5 – Honey is a rare product	1	Honey is readily available in Nova Scotia, Canada.
Length and complexity of the supply chain	1 – Short and simple supply chain (very little opportunity to adulterate) 5 – Long and complex supply chain (several opportunities to adulterate)	1	Honey comes directly from XYZ Honey in Nova Scotia. The supply chain is short and simple.
Geographic origin	1 – Regions where reports are rare, levels of organized crime/corruption are low and food safety regulations/ enforcement is high 5 – Regions where reports are common, levels of organized crime/corruption are high and food safety regulations/ enforcement is low	1	Honey comes from Nova Scotia, Canada. Reports of fraudulent activities are low, organized crime is low and food safety regulations and enforcement are well established.
TOTAL RISK SCORE (B)		**5**	

MITIGATION SCORE BASED ON:

MITIGATION FACTOR	SCORING	RISK SCORE	REASONING
Approved supplier program	0 – Supplier is not an approved supplier 2 – Supplier is approved through the approved supplier program	2	Honey XYZ is an approved supplier and has an SFC licence, preventive controls, a PCP, and a traceability and recall program. Product Certificate of Analysis (COA) is provided upon receipt and audit results provided upon request.
Raw material acceptance criteria	0 – No specifications established or certificates required 2 – Specifications established and certificates required	2	Specifications for incoming honey have been established. COA's are required upon receipt.
Raw material and final product testing	0 – No testing 2 – Testing on raw material and final products conducted often	2	Raw material is not tested as COA's are required upon receipt from Honey XYZ. Final product testing performed occasionally.
Mass balance checks	0 – Not performed 2 – Performed often	0	Mass balance checks not performed at the facility.
Tamper-evident packaging	0 – Not present 1 – Present	1	Tamper-evident packaging is present.
Employee training	0 – Employees are trained 1 – Employees are not trained	1	All employees are trained on food fraud.
Employee integrity screening	0 – Not conducted 1 – Conducted upon hire	1	Employee integrity screening conducted upon hire.
Confidential reporting system	0 – Not implemented 1 – Implemented	1	A confidential reporting system is developed and implemented.
TOTAL SCORE		**10**	

HOW TO PROTECT AGAINST INTENTIONAL ADULTERATION?

THREAT ASSESSMENT CRITICAL CONTROL POINT

A food defence plan begins with a risk evaluation. Threat Assessment Critical Control Point (TACCP) is a systematic approach to prevent potential adulteration of food by identifying threats in the supply chain and manufacturing process and implementing mitigation strategies and monitoring, corrective action, and verification procedures. TACCP should assess ingredients, packaging, finished products, suppliers and the supply chain, the physical facility and premises, and the manufacturing process. TACCP should take into consideration the risk factors mentioned above, as well as, visitors and contractors.

EXAMPLES OF MITIGATION FACTORS

- Security cameras (proper CCTV signage).
- Adequate lighting surrounding premises, particularly around entrances and shipping/receiving areas.
- Controlled access to the facility and off-site storages (e.g. key fob system, security fencing).
- Protection of ingredients, air, gas and water supplies.
- Protection of sensitive data systems and the data (e.g. labels, specifications, formulations).
- Control visitors (including contractors) through a visitor policy and sign in sheet:
  - » Sign in and out – record name, present ID, the purpose of visit, time in and out; and
  - » Visitors are escorted at all times by a staff member when possible.
- Shipping/Transportation controls:
  - » Vehicles inspected for evidence of tampering;
  - » Incoming and outgoing vehicles to be locked or sealed; and
  - » Match seal number to shipping documents at receiving.
- Tamper evident packaging.
- Approved supplier program.
- Raw material and final product testing.
- Employee integrity screening.
- Employee training on food defence.
- Whistleblowing guidelines and protection.

HOW DO YOU CHALLENGE YOUR FOOD DEFENCE PLAN?

- Regular security inspections (check lighting, security cameras footage, controlled access, etc.). See an example of an inspection checklist below.
- Penetration test – have an outside visitor attempt to enter the facility without following the proper protocol (e.g. read visitor policy, sign in, show ID, be escorted) to determine how employees react to an unfamiliar person or situation.
- Ensure that all employees are trained and training is documented.

Use the following checklist as an inspection tool to ensure your facility is protected against intentional adulteration and there are no new threats or concerns. Note that based on your risk evaluation, some of these mitigation measures may not be applicable to your operation.

FOOD DEFENCE INSPECTION CHECKLIST

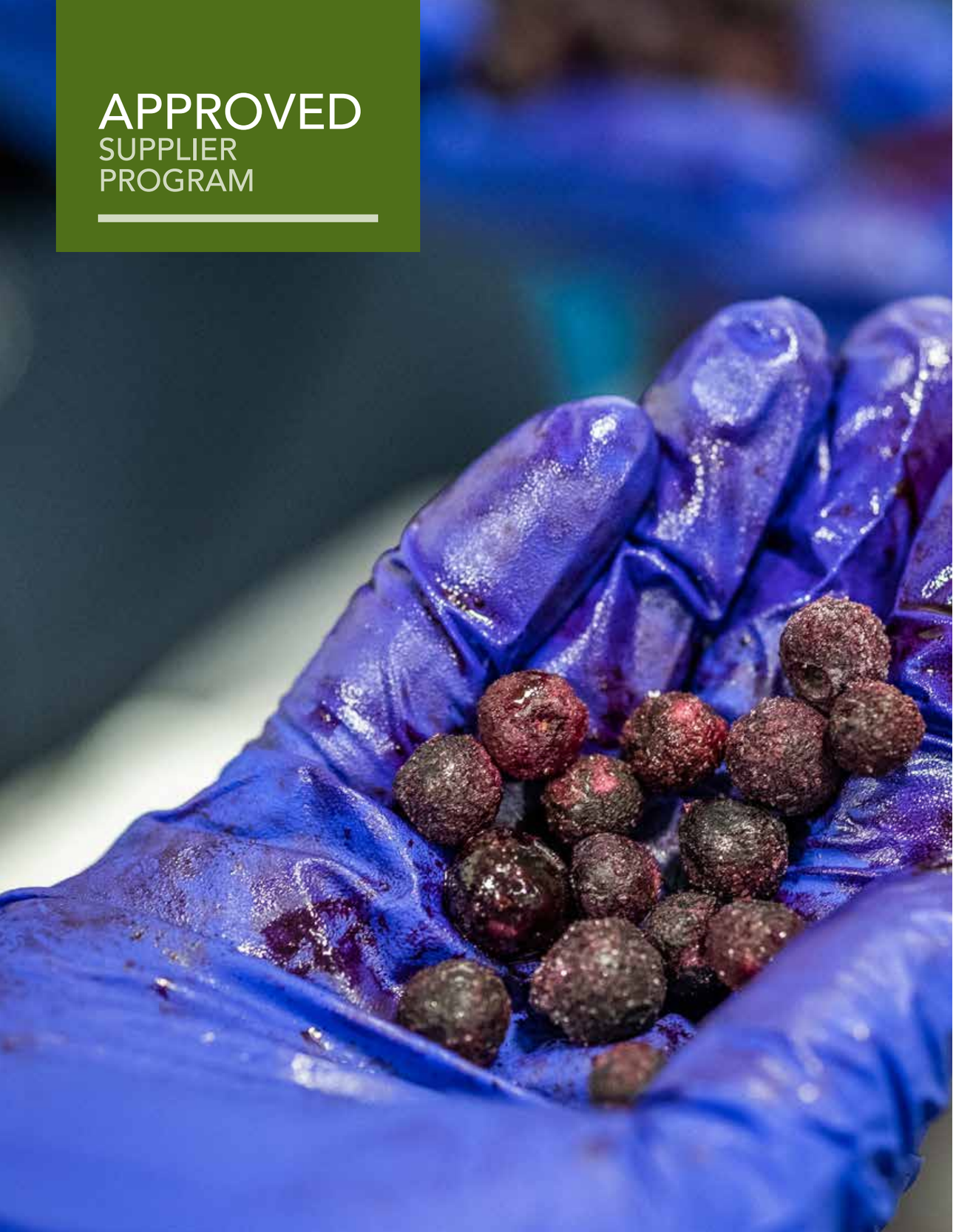
ITEM TO INSPECT	YES	NO	N/A
PREMISES AND FACILITY SECURITY			
There is adequate lighting around the facility, particularly around entrances and shipping/receiving areas.			
All outside doors, windows, roof openings/hatches, vent openings, etc. to the facility, off-site storages are closed and locked.			
All ingredients and air/gas/water supplies are stored securely and access is limited to authorized personnel.			
All chemicals are stored securely with limited access and handled only by authorized personnel.			
Security cameras are installed and monitored regularly.			
Sensitive data systems and data (e.g. labels, specifications, and formulations) are protected and access is limited to authorized personnel.			
SHIPPING/RECEIVING			
An approved supplier program is developed and implemented.			
Shipping and receiving vehicles are inspected for evidence of tampering.			
Incoming and outgoing vehicles are locked and have seals.			
VISITORS/PERSONNEL			
A visitor's policy controlling the access of visitors and contractors is developed and implemented.			
All employees have completed integrity screening upon hire.			
All employees are trained in food defence.			
Employees are able to report a suspicion anonymously without fear of negative consequences using a confidential reporting system.			

HOW ARE GOVERNMENT AND INDUSTRY ADDRESSING FOOD FRAUD AND FOOD DEFENCE?

As food fraud becomes more common, government and industry are addressing the issue through regulations and enforcement. The Safe Food for Canadians Regulations have requirements regarding licensing, packaging, labelling, grading and grade names, and organic products aimed to prevent food fraud. The Global Food Safety Initiative (GFSI) developed a document outlining three food fraud requirements for all GFSI-benchmarked schemes (e.g. BRCGS, SQF, CanadaGAP, IFS, and FSSC 22000). These include:

- A Food Fraud Vulnerability Assessment to identify potential vulnerabilities and prioritize food fraud mitigation measures;
- A Food Fraud Mitigation Plan that specifies what measures the organization has implemented to mitigate the public health risks from identified food fraud vulnerabilities; and
- A Food Fraud Mitigation Plan that is supported by the organization's Food Safety Management System.

GFSI-benchmarked schemes also have requirements for site security and food defence, which includes undertaking a documented risk/threat assessment and implementing controls to mitigate these risks. They also require controlled visitor policies and training for all employees on site security and food defence.



APPROVED SUPPLIER PROGRAM

An approved supplier program is an important prerequisite to ensure that all incoming raw materials, ingredients, packaging materials, and processing aids are safe and will not pose any risk of contamination to your product. Approved supplier programs are most often a requirement of third-party certification, provincial or federal regulations, or a customer. A common misconception is that chemicals (cleaning, sanitizing, pest control, maintenance) do not have to come from approved suppliers but they should as these chemicals have the potential to come in contact with your food product and if they are not approved for use in a food facility, they could pose a serious safety risk. Approved supplier programs should also take into consideration service providers. Some examples of service providers that could have an impact of product safety are pest control, laundry services, cleaning, maintenance, transport and distribution, storage or packing, laboratory testing, catering services, and waste management. Contracts or formal agreements with these service providers should clearly define expectations regarding product safety.

The approved supplier program should include a written procedure for how suppliers are evaluated and initially approved. It should include the frequency and method of monitoring and reviewing approved suppliers and a written procedure for removing a supplier from the list. The program should also outline the procedure to follow when materials arrive from a non-approved supplier (e.g. risk assessment, product testing).

For approving suppliers, a questionnaire is the easiest method of obtaining information about their food safety program. The questionnaire should address the supplier's product safety, traceability, HACCP and Good Manufacturing Practices (GMPs). An example of a supplier questionnaire can be found at the end of this section. The best way to evaluate a supplier is to conduct a supplier audit. These can be conducted by you, a second-party or a third-party. The audit scope should include product safety, traceability, HACCP and GMPs.

Approved supplier programs should first begin by compiling a list of all suppliers of raw materials, ingredients, packaging materials, processing aids, chemicals, and service providers. Each supplier and service provider should be subject to a risk assessment. The risk assessment should take into consideration different criteria regarding the product and the provider. Criteria can include:

- Inherent characteristics of the raw material, ingredient, packaging material, processing aid, chemical, etc. – Determine if the product a low-risk or high-risk product in terms of allergens, biological, chemical or physical hazards, cross-contamination, fraud, etc.;
- Country of origin – This is important as some countries have a lower level of food safety regulations/enforcement and a higher level of corruption and organized crime which may impact the safety of the product;
- History of the supplier – Have they had a large number of recalls/alerts recently or in the past? Check if they have been involved in any food fraud incidents recently or in the past;
- Relationship with supplier – Determine whether they are a long-time trusted supplier that you have built a good relationship with or a new supplier; and
- Food Safety Program – Do they have a third-party certified food safety program? Do they have a HACCP/PCP plan? Do they have prerequisite programs/ preventive controls? Do they undergo annual audits or inspections? What food safety controls (e.g. CCPs) do they have in place?

Based on the risk assessment, you will identify which suppliers are low-risk and high-risk. Depending on the level of risk, you may need to request that the supplier have certain controls in place. This can include a food safety plan/program, product testing, etc. Obtaining evidence of these controls from the supplier is most often in the form of documents, records, etc. Examples of this include:

- A copy of their food safety plan (e.g. HACCP/PCP);
- A copy of their third-party food safety program certification (this can also be found and verified through online directories) or an SFC license;
- Certificate of Analysis (COA) or Certificate of Conformity (COC)/letter of Guarantee (LOG) or Letter of Analysis (LOA) outlining the results and the accredited lab and methods used; and
- A copy of their second-party or third-party audit or inspection results.

Create a supplier matrix and record the following:

- Name and location of the supplier;
- Product or service provided;
- Primary contact information;
- Description of how the supplier is assessed (e.g. risk assessment, questionnaires, audit);
- Results of risk assessment (e.g. high or low risk);
- Monitoring requirements (e.g. risk assessment, questionnaires, audits, product testing results, etc.);
- Responsibility and frequency for monitoring;
- Outcome; and
- Date performed and next due date.

APPROVED SUPPLIER QUESTIONNAIRE EXAMPLE

SECTION 1. SUPPLIER INFORMATION		
Company name		
Company address		
Contact person, name and title		
Mailing address		
Email address		
Phone number		
Fax number		
Raw material, ingredients, packaging, processing aids, chemical or service supplied to (insert Company Name)		
SECTION 2. FOOD SAFETY PROGRAM		
Does your company have a food safety program in place? Circle one.	**YES**	**NO**
If, yes, please indicate the food safety program and attach your latest audit certificate.		
Is the food safety program GFSI recognized? Circle one.	**YES**	**NO**
Are you inspected or certified by a provincial, federal, 2nd or 3rd party? Provide details.		

Is your facility approved by the appropriate authority (e.g. CFIA, FDA, Provincial, etc.)? Provide details.		
Do you have an Allergen Control Program? Please complete the additional Allergen Checklist for each product supplied.		
SECTION 3. COMPLETE THIS SECTION ONLY IF NOT GFSI-CERTIFIED		
Do you have an employee hygiene policy/GMPs, etc., in place? Circle one. If yes, please attach a copy of your policy.	**YES**	**NO**
Do you have a Pest Control Program in place?	**YES**	**NO**
	Name of pest control provider	
	Frequency of service	
Please indicate the source of water for your facility (e.g. well, municipal).		
If well water, do you conduct routine water testing?	**YES**	**NO**
Frequency of testing:		
Do you have a documented Sanitation Program in place? Please provide details on sanitation at your facility.	**YES**	**NO**
Details:		
Please describe your Traceability Program.		
Do you have a HACCP Plan?	**YES**	**NO**
SECTION 4. PRODUCT TESTING/CERTIFICATES OF ANALYSIS		
Are your products tested before shipped to customers?		
Is a Certificate of Analysis provided for each lot / batch of production?		

ALLERGEN CHECKLIST FOR SUPPLIERS AND MANUFACTURERS

(BASED ON CFIA'S G.1 ALLERGEN CHECKLIST FOR FOOD SUPPLIERS OR MANUFACTURERS)

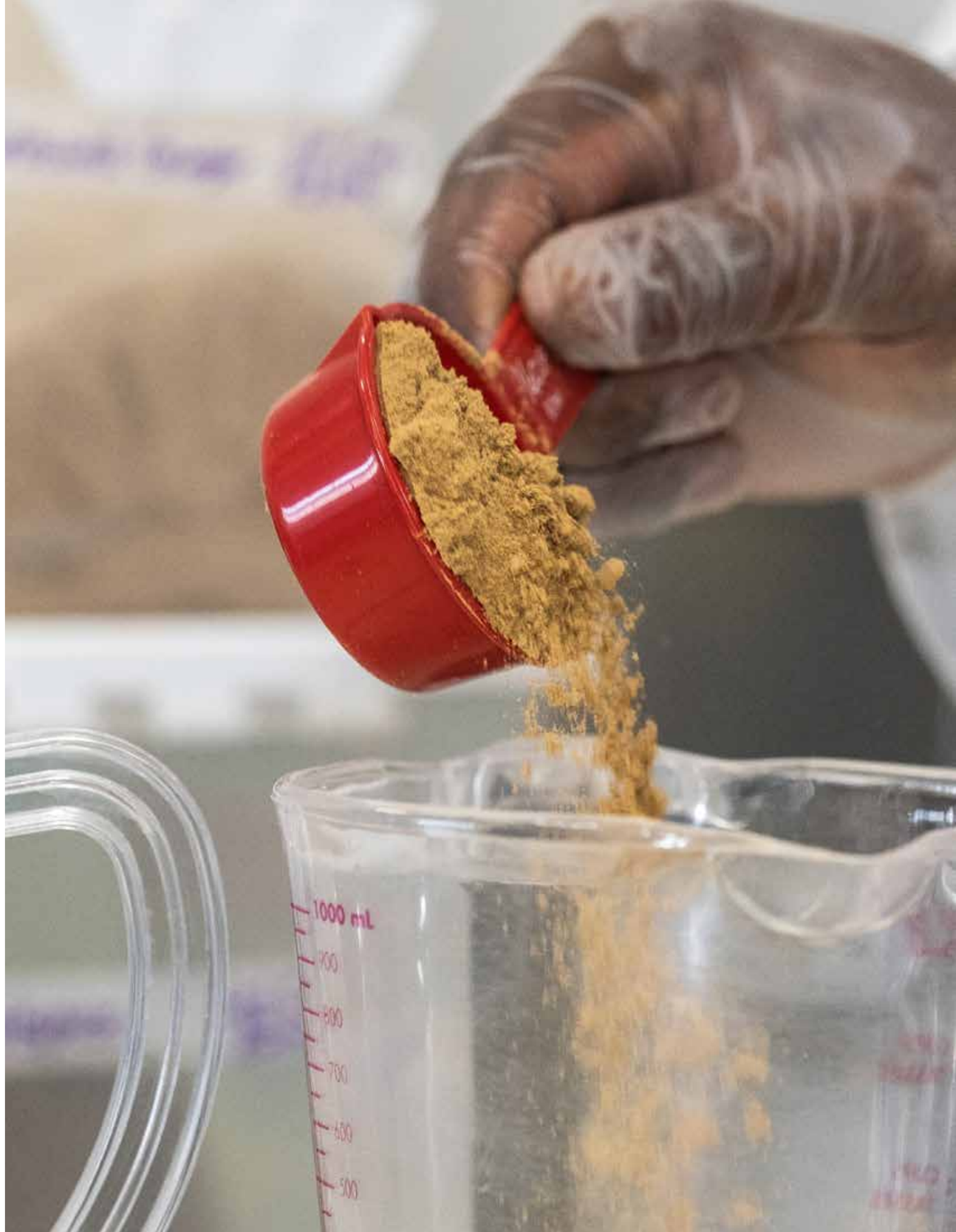
Please complete the following table for each product supplied. The first column describes the product component. The second indicates the allergens that may be found in the product, from addition or cross-contamination. The third indicates the allergens present in other products that are run on the same equipment but at a different time. The fourth column indicates whether any allergens are present in your plant.

Please fill in each cell of the table with a **YES** or **NO** and, when applicable, include the name of the ingredient. Do not leave any empty cells.

COMPONENT	PRESENT IN THE PRODUCT	PRESENT IN OTHER PRODUCTS MANUFACTURED ON THE SAME LINE	PRESENT IN THE SAME MANUFACTURING PLANT
Peanut or its derivatives e.g. peanut-pieces, oil, butter, flour, and mandelona nuts (an almond flavoured peanut product), etc. Peanut may also be known as ground nut.			
Tree nuts e.g. almonds, Brazil nuts, cashews, hazelnuts (filberts), macadamia nuts, pecans, pine nuts (pinyon, pinon), pistachios and walnuts or their derivatives, e.g., nut butters and oils, etc.			
Sesame or its derivatives e.g. paste and oil, etc.			
Milk or its derivatives e.g. milk caseinate, whey, and yogurt powder, etc.			
Eggs or its derivatives e.g. frozen yolk, egg white powder, and egg protein isolates.			
Fish or its derivatives e.g. fish protein and extracts, etc.			
Crustaceans (including crab, crayfish, lobster, prawn and shrimp) and Shellfish (including snails, clams, mussels, oysters, cockle and scallops) or their derivatives, e.g. extracts, etc.			
Soy or its derivatives e.g. lecithin, oil, tofu and protein isolates, etc.			
Wheat/Gluten or its derivatives (triticale) e.g. flour, starches, and brans, etc.			
Sulphites e.g. sulphur dioxide and sodium metabisulphites, etc.			
Mustard or its derivatives			
Others (as considered necessary)			

Do you have procedures to avoid cross-contamination of the product with the allergens not present in the product but noted in the third or fourth columns? **YES** **NO**

Please attach a finished product label to this form for each product. If for any reason there are any modifications in this product, you are responsible for updating your records including labels and specifications, and for notifying us immediately.



GUIDANCE FOR EXTERNAL TRANSPORT AND STORAGE OPTIONS

Whether you are a small business that offers storage and/or transport options for food or food packaging businesses or you are a business looking to hire a company to store and/or transport your product, it is important to know what to offer and look for to ensure food products are handled correctly.

The best practice is to visit the business that will store or transport your product to conduct a supplier audit. Below are some things to think about when you visit the business.

PREMISES

First impressions are everything. If the area surrounding the facility is well maintained and the building and trucks are in good condition that is typically a good sign. If there is old equipment, damaged doors or bumpers, pooling water in the loading area, and tall grass and weeds, then they may have issues that can negatively impact food safety.

Take a tour of the interior to check for:

- Adequate well-stocked hand washing station(s), lunchrooms, and washrooms for employees;
- Walls, ceilings, floors, and racking are maintained in good condition;
- Lighting is adequate (110 LUX for basic storage areas) and shatterproof;
- The area is clean and dry, cooling units are draining properly (no condensation or drips) to the outside or plumbed to a drain; and
- Any waste is removed and kept separate from product or if it is accumulating.

It will be important for the company to answer the following questions and provide proof of claims/documentation if needed:

SANITATION

- Does the company have a sanitation program?
- How often does the company clean its transport vehicles (reefers, trailers, trucks, etc.) and storage areas?
- For cold storage, how often does the company defrost and perform deep cleans?
- How often are the floors, drains, walls, doors, shelving units and ceilings cleaned?
- How often are heat exchange fans, air vents, and dehumidifiers cleaned? Are these items on a schedule?
- Does the company have detailed procedures directing staff which chemicals to use and at which concentration?
- Does the company describe how cleaning is to be performed?
- Does the company use different cleaning tools for allergen vs non-allergen areas?
- How does the company validate its cleaning to ensure that the procedures in place, as well as the frequencies, are effective?
- Does the company have a foreign matter control program (i.e. a procedure detailing how to properly clean up spilled or damage product)?

PERSONNEL

- Does the company have an employee hygiene policy in place? Does the policy include details regarding personal hygiene, food hygiene, illness and injury, procedures to follow in the event of a blood or bodily fluid accident, GMPs, etc.?
- Does the company have a training program?
- Does the company have a visitor's policy?

PEST CONTROL

- Does the company have a pest control program?
- Is the pest control in-house or outsourced?
- Is the person responsible knowledgeable and properly trained?
- Does the company meet all the requirements discussed in the pest prevention section of this booklet (e.g. proof of insurance, applicators certificate, maintain records of their visits, etc.)?

UNLOADING/LOADING PRACTICES

- Do personnel demonstrate proper unloading and loading practices?
- When shipping, do personnel properly wrap and stack product to protect it from damage and contamination?
- Do personnel transport or store product with compatible items and not potential contaminants such as chemicals, allergens, etc.?
- When unloading and loading, do personnel check and monitor the temperature and humidity to ensure it is appropriate for product?
- Do personnel unload and load as quickly as possible to avoid having product sit at the temperature danger zone (4°C to 65°C) if the product is temperature-sensitive?
- Have personnel been given a procedure to follow outlining the appropriate inspections performed when product is received and before product is shipped?
- Do personnel handle product with care and prevent cross-contamination?
- Upon receipt, do personnel inspect the trailer to ensure it is in good condition, clean and sanitary, free from excess dirt and dust, there are no off odours, pests or incompatible items, and that seals are intact? Do they check temperature data loggers (if applicable) and the condition of the product before accepting it (e.g. correct product, quantity, dates, odour, appearance, no signs of pest activity or tampering, etc.)?

Note: If the transport company is carrying Less than Load (LTL), make sure you are aware of what else they are transporting with your product. LTL is the transportation of relatively small freight. Transport companies may transport your product with a potentially incompatible item to make a trip worthwhile.

TRANSPORTATION AND STORAGE

It should be common practice for a storage company to separate incompatible products. All allergen-containing material should be stored separately from all non-allergen containing material. As previously noted, product should not be transported with incompatible items such as chemicals including non-food grade lubricants, paint, etc. This also applies to storage – products should be stored separately from these items in storage facilities. If physical separation is not possible, non-allergen containing material should be stored above or over allergen-containing material.

Transport companies should have measures in place to ensure food is kept secure and protected from any form of tampering during transportation. The company should also have procedures and measures in place to protect and maintain the quality and safety of product if the truck and/or reefer breaks down.

Storage companies should also implement a tracking system such as First-In-First-Out (FIFO) or First-Expired-First-Out (FEFO). This ensures that product is used before the best before or expiration date which maximizes the safety, quality and freshness of the product while minimizing waste.

Again, transportation and storage companies should continuously monitor temperature and humidity in areas where product is stored. Validation studies should be conducted on their storage areas by the storage companies themselves to identify any hot or cold spots and ensure that all product will reach and be maintained at the appropriate temperature. Electronic data loggers, thermometers, etc., should be on a preventative maintenance schedule to ensure they are calibrated, and readings are accurate. If product requires any other special transportation and storage requirements (e.g. product is light sensitive), the company must be made aware of these requirements and meet them accordingly.

FOOD SAFETY STANDARDS

Lastly, when using an outside source for transportation or storage, you need to ensure that you communicate the requirements of your food safety standards to the company and collect evidence that it is meeting these requirements. The requirements should be written in contracts and evidence may include third-party certification, inspection/audit results, written food safety plan (e.g. HACCP/PCP), allergen statements, etc.

Here is a sample checklist to use when you visit or talk to a potential transport or storage company.

EXTERNAL TRANSPORT AND STORAGE OPTIONS CHECKLIST	YES	NO	N/A
PREMISES			
Are the premises neat, tidy and maintained in good condition (no pooling water, debris, overgrown grass, etc.)?			
Is the exterior of the building in good shape (no holes, damage where pests could enter)?			
Is there a sufficient number of adequately stocked hand wash stations, lunchrooms, and washrooms for employees?			
Are walls, ceilings, racking and floors maintained in good condition?			
Is there adequate lighting (110 LUX for basic storage areas) and is lighting shatterproof?			
Are storage areas clean and dry and cooling units properly draining (no condensation or drips)?			
Is waste accumulating or is it removed and kept separate from product?			
SANITATION			
Does the company have an effective sanitation program in place?			
PEST CONTROL			
Does the company have an effective pest control program in place (either in-house or outsourced)?			
UNLOADING/LOADING PRACTICES			
When shipping, is product properly wrapped and stacked to protect from damage and contamination?			
Are personnel transporting the product with incompatible items?			
Are personnel unloading and loading as quickly as possible to avoid having product sit at temperature danger zone?			
Do personnel conduct inspections of transport vehicles and the product upon receipt and before shipping?			
Are personnel handling products with care to avoid cross-contamination and damage?			

EXTERNAL TRANSPORT AND STORAGE OPTIONS CHECKLIST	YES	NO	N/A
TRANSPORTATION AND STORAGE			
Are food items and non-food items that may cause contamination kept well separated?			
Is there an Allergen Management Program in place to control the potential cross-contamination of allergenic products?			
Are there measures and/or procedures to keep food safe and protected from tampering during transport?			
Are there measures and/or procedures to maintain the quality and safety of your product in the event the transport vehicle/reefer breaks down?			
Is FIFO or FEFO in place and is it followed?			
Are transport and storage temperatures monitored and at what frequency? Are records maintained?			
Can the company meet any other special storage requirements (if applicable)?			
Are data loggers and thermometers on a preventative maintenance schedule and calibrated regularly?			
FOOD SAFETY STANDARDS			
Have you communicated the food safety standard requirements that apply to your products?			

PEST PREVENTION

WHAT TO INCLUDE IN YOUR PEST PREVENTION PROGRAM

Properly managed pest prevention programs are critical for preventing pests from contaminating raw materials, ingredients, packaging, equipment, etc. Pest prevention programs can be developed, implemented and maintained in-house or by an outside service provider. In each case, there are several requirements to consider.

If you choose to maintain the pest prevention program in-house, the program must include:

- A person responsible for maintaining the program who is competent, qualified, and properly trained. This person must have a pesticide applicator certificate, pesticide/chemical handling training, and adequate knowledge of common pests including how to identify them and the appropriate pest control chemicals and proofing methods to use;
- A procedure for employees to follow when a pest is sighted and what to do if they come in contact with bait stations. Employees should be properly trained on these procedures;
- Methods used to prevent pests and specific elimination and removal methods used including the type, number, and location of devices/bait stations;
- A schedule of how often inspections and checks of devices are conducted;
- An up-to-date site map (interior and exterior) which includes the type, number, and location of devices/bait stations. Devices and bait stations must be labelled with a corresponding label on the wall;
- A list of pesticides to be used. Pesticides must be approved and Safety Data Sheets (SDS's) available. They should be clearly labelled and securely stored with proper signage, adequate ventilation, spill kit and a first aid kit. A complete chemical inventory and instructions for proper use should be available. Chemicals should only be used by those who have received proper training. Chemicals should be disposed of properly and empty containers should be segregated until removed – they should not be reused;
- Records of inspections, findings, applications, follow up/corrective actions, and trends; and
- An annual reassessment of the program to ensure it is effective.
    - » This assessment can be outlined in a Standard Operating Procedure (SOP) and supporting record to determine if the types of pests, the number, type and location of devices/bait stations, the monitoring frequency, and the pesticide applications are still relevant and/or effective.

WHAT TO EXPECT FROM YOUR PEST CONTROL PROVIDER

If you choose to hire an outside service provider, here are five things to expect from your pest control provider to ensure you are receiving the best service.

1. **Contract** – Once you have selected a reliable and trustworthy provider, a written contract including a full description and scope of the service should be provided. As well, training requirements of contracted personnel should be established and signed by both parties. The contract should outline the methods, frequency, and responsibility for the maintenance of the pest control program and any requirements of the food safety standard you follow. It should also specify any good agricultural/manufacturing/hygiene practices that contracted personnel must follow when they enter your farm, pack house or facility.

2. **Certificates and Insurance** – Pest control providers in Nova Scotia must hold a valid Business Operator Certificate from Nova Scotia Environment. Employees applying pesticides must be competent, knowledgeable and hold a valid Applicators Certificate from Nova Scotia Environment. Providers should also have insurance coverage and comply with all applicable regulations.

3. **Site Map** – Pest control providers must supply an up-to-date site map (interior and exterior) that indicates the type, number, and location of all bait stations/devices in use. Bait stations/devices should be physically labelled with a corresponding label on the wall. The location of bait stations/devices should not cause a risk to product safety. Bait should never be used in a building where food and food packaging are stored or used, enclosed devices should be used wherever possible. The map must be reviewed at least annually and updated whenever changes are made. Maps must be initialled and dated by the pest control provider and the appropriate employee.

4. **Approved Chemical Use** – Pest control providers must use chemicals that are approved by the relevant authority. Providers should supply you with a list of chemicals they use and corresponding SDSs. Providers must use, store, and dispose of chemicals in accordance with applicable regulations. If chemicals are stored on-site, they must be clearly labelled and stored in a locked cabinet in a room with controlled access, adequate ventilation, spill kit, first aid kit, chemical usage log, and the SDSs.

5. **Reports & Trend Analysis** – Providers should report to authorized personnel when they have arrived and after they have completed their visit. Although pest control may be contracted out, it is still your responsibility to verify effectiveness. The best practice is to periodically accompany the technician. This provides you with the opportunity to build a relationship with the technician and learn new methods to prevent pests. Once finished, providers should supply you with a written report of their findings and treatments applied. These reports may be hard copies or electronic. If catches were reported, be sure to follow up to determine if the problem has been controlled or escalated. Each year you should receive a trend report and review the pest control program with your provider to ensure it is effective or if new pests have been identified or specific areas need to be targeted. If this is not included in your contract you can do this on your own through something as simple as an excel spreadsheet.

Following these key practices will define responsibilities for both parties and ensure you have the best possible pest prevention program in place.

PEST PREVENTION CHECKLIST	YES	NO	N/A
PEST PREVENTION PROGRAM REQUIREMENTS			
If using an outside service provider, there is a written contract detailing the scope and frequency of the service to be provided, training requirements of contract personnel and good agricultural/ manufacturing/hygiene practices to follow when on site.			
The person responsible for maintaining the program is competent, qualified, properly trained and holds the appropriate applicable licences/certificates (e.g. pesticide applicator certificate, business operator certificate) and insurance.			
Staff are trained on procedures to follow when pests are sighted and what to do if they come in contact with bait stations.			
The program outlines the methods used to prevent target pests and specific pest elimination methods (i.e. type and number of devices/bait stations).			
The program outlines how often inspections are conducted and devices are checked.			
There is an up-to-date site map (interior and exterior) detailing the type, number, and location of pest control devices. There is corresponding signage on the walls.			
There is an up-to-date inventory of pesticides that are used and proper usage instructions. SDSs are available.			
Chemicals are clearly labelled and securely stored with proper signage, adequate ventilation, a spill kit and a first aid kit. A chemical usage log is available and current.			
Chemicals are properly disposed of and empty containers are segregated and never reused.			
Records of inspections, findings, applications, follow up/corrective actions, and trends are maintained.			
The program is assessed annually to ensure it is effective.			

IMPORTING AND EXPORTING BASICS

There are four types of movement of food products: importing, exporting and inter-/intra-provincial trade. Importing is when food products are shipped to Canada from a foreign country whereas exporting is when food products are shipped from Canada to a foreign country. Inter-provincial trade refers to the movement of product across provincial and territorial borders within Canada whereas intra-provincial trade refers to the movement of product within a province or territory. For each type of product movement, there are specific requirements from several government departments that must be met by both the importer and exporter. These departments include the Canada Revenue Agency (CRA), Canada Border Service Agency (CBSA) and the Canadian Food Inspection Agency (CFIA).

This section provides three checklists which aim to outline key questions and requirements that importers, exporters and those shipping products within Canada should consider and be in compliance with. When shipping only within the province (intraprovincial) please check the Nova Scotia Food Safety Regulations and the CFIA timelines specific to your product.

IMPORTING CHECKLIST	YES	NO	N/A
CANADA REVENUE AGENCY REQUIREMENTS			
Do you have a Business Number or an import-export program account? *This is free of charge and can be obtained through CRA's online registration.*			
Are you maintaining appropriate records to uphold the account?			
CANADA BORDER SERVICE AGENCY REQUIREMENTS			
Have you determined the classification of the product you wish to import? *This includes a description, product composition information, and if possible, product samples.*			
Have you determined the country of origin of the product? *The exporting country may not be the country of origin.*			
Have you determined if the product is permitted into Canada?			
Have you determined if the product falls into the controlled products lists?			
Have you determined if the product requires any certifications, permits, or inspections?			
Have you determined the tariff classification? *Most trading countries, including Canada, use the Harmonized System (HS).*			
Have you determined the tariff treatment?			
Have you determined the applicable duties and taxes?			
Have you identified the method of shipping and reported the shipment to CBSA?			
Are you maintaining appropriate documents for the release of the product?			
Are you maintaining records pertaining to the import for six years?			
CANADIAN FOOD INSPECTION AGENCY REQUIREMENTS			
Have you obtained an SFC licence to import? *Note there are some exemptions.*			
Have you become familiar with the Automated Import Reference System (AIRS)? *AIRS is a tool for importers and brokers to identify HS codes, import requirements, and restrictions for CFIA regulated commodities.*			
Have you classified the product to determine the applicable requirements?			
Have you determined if the specific food commodity is permitted in Canada?			
Have you created, implemented, and maintained a Preventive Control Plan (PCP) *(if applicable)*?			
Have you obtained information from the supplier to allow for the identification of all food safety hazards and controls to eliminate these hazards?			
Have you determined that the food meets general food safety requirements and is prepared under similar conditions as food prepared in Canada?			
Do you understand the supply chain(s) of the product?			
Have you determined the end use of the product (e.g. for further processing, consumer sales, etc.)?			
Have you developed recall and customer complaint procedures? Have you developed and maintained a traceability program? *Must be able to trace one step back to the immediate supplier and one step forward to the immediate customer.*			
Have you determined if the product meets all product identity standards or grades?			

IMPORTING CHECKLIST	YES	NO	N/A
CANADIAN FOOD INSPECTION AGENCY REQUIREMENTS (CONTINUED)			
Have you determined if the product meets all applicable food labelling requirements?			
Have you determined if food-specific import requirements are met? *Food-specific import requirements exist for dairy products, egg and processed egg, fish and seafood, fresh fruit and vegetable, honey, maple and maple products, meat, and processed fruit and vegetables.*			
Have you determined if a phytosanitary certification is required? *Note: This depends upon the plant-based product.*			
Have you determined if there are any applicable animal health requirements and that they are met?			
Have you determined if the exporting foreign supplier falls under one of Canada's frameworks for recognizing foreign food safety systems? *1. Foreign food safety systems recognition (FFSSR)* *2. Commodity specific recognition* *3. Recognition of systems of inspection as pre-requisite to trade*			
Have you determined if the exporting foreign supplier is part of an internationally recognized third-party certification program and that the food to be imported is subject to this program?			
For exporting foreign suppliers that are not subject to one of Canada's frameworks and do not have an internationally recognized third-party certification program, have you determined that there are appropriate preventive controls in place and written confirmation that these controls are implemented effectively?			
Have you maintained records and obtained COA's for potential hazards (e.g. mycotoxins, contaminants, micro standards)? *Refer to Health Canada, CFIA or Codex Alimentarius for micro and contaminant standards for food.*			
Have you notified CFIA of the shipment and provided them with all appropriate information?			

EXPORTING CHECKLIST	YES	NO	N/A
CANADA REVENUE AGENCY REQUIREMENTS			
Do you have a Business Number or an import-export program account? *This is free of charge and can be obtained through the CRA's online registration.*			
Are you maintaining appropriate records to uphold the account?			
CANADA BORDER SERVICE AGENCY REQUIREMENTS			
Have you identified the product you wish to export?			
Have you determined the country of origin of the product?			
Have you determined if the product is permitted to be exported from Canada?			
Have you determined if the product is allowed entry into the destination country?			
Have you determined if the product requires any certifications, permits or inspections?			
Have you determined if an Export Declaration is required?			
Have you determined the classification of the product? *Canadian Export Classification number or Tariff Classification number.*			

EXPORTING CHECKLIST	YES	NO	N/A
Have you determined the method of shipping and timeline for export declaration?			
Have you determined where to report your product? (Non-Restricted Goods vs Restricted Goods)			
If required, have you submitted an export declaration and presented proof of export?			
Have you provided a Certification of Origin to the receiver of food, if requested?			
Have you maintained all pertinent records for six years?			
CANADIAN FOOD INSPECTION AGENCY REQUIREMENTS			
Have you obtained an SFC licence to export? *Note there are some exemptions.*			
Have you classified the product to determine the applicable requirements?			
Have you created, implemented, and maintained a Preventive Control Plan (PCP) *(if applicable)*?			
Have you developed recall and customer complaint procedures?			
Have you developed and maintained a traceability program? *Must be able to trace one step back to the immediate supplier and one step forward to the immediate customer.*			
Have you determined if the product meets all product identity standards or grades?			
Have you determined if the product meets food-specific requirements?			
Have you determined if the product meets all applicable food labelling requirements?			
Have you determined if the product meets foreign country requirements?			
Have you determined if there is a country eligibility export list for the commodity?			
Have you obtained export certification from CFIA (if required)? *If the food is exempt from Canadian food safety requirements by the importing country, you may require an exemption or permit from CFIA.*			
Have you obtained validation or verification from the foreign country?			
Have you maintained all pertinent records *(including shipping and storage temperatures, certificates and certificate numbers related to use and control of stamps, stickers, and seals for your shipment)?*			
LOGISTICS			
Have you determined the appropriate method of transport?			
Have you determined if the product will require refrigeration or freezing during transport or is it shelf stable?			
Will you hire a broker to handle the logistics? Do you have the appropriate paperwork?			

INTERPROVINCIAL TRADE CHECKLIST	YES	NO	N/A
CANADA REVENUE AGENCY REQUIREMENTS			
Do you have a Business Number or an import-export program account? *This is free of charge and can be obtained through the CRA's online registration.*			
Are you maintaining appropriate records to uphold the account?			
CANADIAN FOOD INSPECTION AGENCY REQUIREMENTS			
Have you obtained an SFC licence to trade interprovincially? *Note there are some exemptions.*			
Have you classified the product to determine the applicable requirements?			
Have you created, implemented, and maintained a Preventive Control Plan (PCP) *(if applicable)*?			
Have you developed recall and customer complaint procedures?			
Have you determined if the product meets food-specific requirements?			
Have you developed and maintained a traceability program? *Must be able to trace one step back to the immediate supplier and one step forward to the immediate customer.*			
Have you determined if the product meets all product identity standards or grades?			
Have you determined if the product meets all applicable food labelling requirements?			
Have you determined if a phytosanitary certification is required? *Note: This depends upon the plant-based product.*			

Please visit our resource page for links to more information on the following:

- **Canada Revenue Agency – Business Number**
- **Canada Border Services Agency's Guide to Importing Commercial Goods into Canada/ Guide to Exporting Commercial Goods from Canada**
- **Automated Import Reference System (AIRS)** and **AIRS tutorial**
- Canadian Food Inspection Agency's **Food Imports/Food Exports**

THIRD-PARTY FOOD SAFETY CERTIFICATION

INTRODUCTION TO THIRD-PARTY FOOD SAFETY CERTIFICATION

Are your customers requesting third-party food safety certification? A GFSI program? HACCP? More and more customers are asking their suppliers for evidence that the incoming raw materials, ingredients, packaging materials, etc. that they supply are safe. This section aims to clarify what your suppliers are asking of you.

WHAT IS A THIRD-PARTY FOOD SAFETY CERTIFICATION?

A third-party food safety certification means that your company has a food safety program developed and implemented, and you undergo third-party audits. Third-party audits are independent of the customer, free of any conflict of interest, and are carried out by an audit organization or a certification body. The auditor will supply you with an audit report and after any deviations or non-conformances have been corrected and closed out, you will receive your certification. This is most often performed annually.

WHAT IS A CERTIFICATION BODY?

A certification body is an organization accredited by a recognized accrediting body for its competence to audit and issue certification confirming that an organization meets the requirements of a standard. Certification bodies are impartial and objective, are members of the International Accreditation Forum (IAF) and consist of trained and competent auditors capable of assessing an operation's conformance to a standard.

WHO SHOULD I CHOOSE AS A CERTIFICATION BODY?

There are several certification bodies to choose from. The choice often depends on which food safety standard or set of regulations you are trying to meet. The most common food safety standards are the GFSI-recognized standards and the most common certification bodies for these standards in the Maritimes are NSF Canada, SGS and SAI Global.

WHAT DOES GFSI-RECOGNIZED MEAN?

GFSI stands for Global Food Safety Initiative. The GFSI was created in 2000 to help ensure safe global food supply and build consumer trust in the food they buy. The GFSI is a global multi-stakeholder movement that is composed of the world's leading food safety experts from retail, manufacturing, and food service companies, as well as international organizations, governments, academia and service providers to the food industry. These experts develop benchmarking requirements based on internationally recognized standards such as ISO and Codex Alimentarius. Food safety standards that have been GFSI-benchmarked are considered robust and are recognized and accepted worldwide.

WHAT ARE SOME GFSI-RECOGNIZED STANDARDS?

Some GFSI-recognized programs that we often assist clients with are listed below. A link to each standard can be found on our website.

CanadaGAP – A food safety program for companies that produce, pack, repack, store, handle and broker fruits and vegetables to promote Good Agricultural Practices (GAP) and Good Manufacturing Practices (GMP).

SQF (Safe Quality Food) – This standard encompasses the whole food supply chain, from primary production to ingredient manufacturing, product packaging, and distribution. SQF has a food safety and optional quality component.

BRCGS (Brand Reputation through Compliance Global Standards) – This standard applies to all food processing facilities where products are handled, processed or packed including fresh produce, slaughter facilities, processing plants and ready to eat products. BRCGS also has a packaging standard and storage and distribution standard.

IFS (International Featured Standard) – Food standards that ensure companies produce a product or provide a service that complies with customer specifications, while continually working on process improvements.

FSSC (Food Safety System Certification) 22000 – This standard is based on standards such as ISO/TS 22002-1 (food processors and manufacturers), PAS 223 (food packaging manufacturers), and PAS 222 (animal feed producers). This is a food safety add-on for companies who are already ISO certified.

WHAT ARE THE BENEFITS OF THIRD-PARTY CERTIFICATION?

- GFSI-schemes are globally recognized and are comprehensive in scope covering product safety, quality, legality, and product integrity.
- Allows for the production of safe products, which contributes to brand confidence, reassured customers, enhanced market image, improved traceability and reduced waste, product withdrawal and recall.
- Provides a report and certification that can be accepted by customers in place of their own audits (e.g. reduces time and cost).
- Addresses part of the legislative requirements of the food manufacturer and their customers.
- Enables companies to ensure their suppliers are following ethical and good food safety management practices.
- Requires completion of corrective actions on any non-conformities to a standard and root cause analysis to identify preventive controls before certification.
- Certification status is made publicly available.

HOW DOES MY COMPANY BECOME THIRD-PARTY CERTIFIED?

1. Get the most current version of the audit standard of your choice.
2. Become familiar with the standard and/or attend a training session.
3. Register with a certification body - there are several different options. To save travel costs, ask if they have local auditors in the Maritimes.
4. Conduct your own self-assessment to the audit standard or have a gap analysis, pre-assessment or pre-audit done by a reputable food safety consultant such as Perennia.
5. Close the gaps and correct any deficiencies identified in your assessment (such as premises, equipment, written program, etc.) before the audit. If you need help with program development, implementation or training, contact a qualified food safety consultant.
6. Undergo an initial certification audit (may be both an on-site and off-site document review audit depending on the standard).
7. Review and correct non-conformities within a given time period. Send supporting documents to the auditor or certification body or have them come back on site again (depends on the standard chosen).
8. Receive a final decision from the certification body regarding certification status.

Note: Some standards have different auditing strategies with regard to frequency, whether they are announced or unannounced and the audit result format.

WHAT ARE THE COSTS ASSOCIATED WITH THIRD-PARTY CERTIFICATION?

There are several costs associated with third-party certification and they vary depending on which standard you chose. Some costs that apply across the board include an annual fee, audit and certification fee and of course the costs associated with developing, implementing, and maintaining the program.

NOT READY FOR GFSI?

Some businesses aren't quite ready for the big leap of becoming GFSI certified. If that is the case, there are other options out there. Ask your customer to clarify what requirements you must meet in order be one of their suppliers. Would they accept proof of being federally registered, a second-party audit (conducted by an independent qualified auditor), and/or proof of a food safety program? There are other options available from certification bodies such as NSF Canada that are robust but not globally recognized such as but not limited to Supplier Verification, GMP and HACCP certification. A link to **NSF's certification options** is on our website.

WHAT DOES HACCP CERTIFIED MEAN? HOW DO I BECOME HACCP CERTIFIED?

HACCP certified means you have developed and implemented prerequisite programs (preventive controls) and a HACCP (PCP) plan and you undergo an annual third-party audit by an accredited certification body. NSF Canada offers HACCP certification and there are five steps to achieve initial certification, which is valid for three years. To begin, an NSF auditor will complete an on-site supplier assurance or GMP audit followed by an off-site HACCP documentation review. Once these are complete, the auditor will come back on site to evaluate the effectiveness of the HACCP plan implementation. After successful closure of any corrective actions, the auditor will make a final certification decision. Annually thereafter, the NSF auditor will conduct surveillance audits (which may be unannounced) and every three years, they will conduct a re-certification audit.

WHAT FOOD SAFETY OPTION IS RIGHT FOR ME?

This depends on your product, process, and customer requests, as well as how committed company management is to establishing or strengthening the current food safety program. The resources and support of management are necessary to create and maintain a successful food safety program. Before you begin to develop and implement a scheme make sure that it will be accepted by your primary retailers/customers (although all GFSI standards are fundamentally the same and should be accepted worldwide).

NOTES

RESOURCES

Our Quality and Food Safety Team offer a variety of resources on our website at **www.perennia.ca**. We offer coaching, assessments, e-Learning, in-house customized and public training options covering a variety of topics. Our website has many publications, fact sheets, resource links, and videos. If you have any questions, please do not hesitate to contact one of our Quality and Food Safety Specialists, we are here to help you with your quality and food safety journey.

PERENNIA'S QUALITY AND FOOD SAFETY TEAM

2019/20 EDITION

SAFE 4 MARKET

Visit **perennia.ca/acceleratorprogram** to find out how to access funds to correct a technical issue that is preventing your Nova Scotian agri-based product from entering a new market or from achieving market success.

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