



Food safety: How do Canada's new regulations affect you?

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By Therese Kehler

Next time you grab a frozen pizza, take a moment to think about food safety.

With upwards of 35 ingredients sourced from 60 countries on five continents, each slice represents dozens of opportunities for contamination to creep in from pests, unclean facilities or careless work practices.



Government of Canada

In January 2019, the Canadian government launched its new food-safety guidelines. Known as the Safe Food for Canadians Regulations (SFCR), the new rules streamlined 14 sets of regulations affecting the meat, fish and agricultural industries.

“All those were commodities-specific regulations,” says [Tammy Switucha](#), senior director with the [Canadian Food Inspection Agency \(CFIA\)](#). “Now the requirements are consistent for all foods.”

For some divisions of the Canadian food industry, including the plant-protein sector, this is the first time these types of federal regulations will affect them.

And for some companies, compliance could carry implications that are bigger than they expect, from making facility improvements to implementing and staffing for new quality-assurance measures, says [Khalid Hansraj](#), a senior client partner at [BDC Advisory Services](#).

“Their biggest challenge is a lack of knowledge and familiarity and expertise to be able to become compliant by the deadline,” says Hansraj.

“You don’t want any surprises when you go to CFIA to request licensing and you’re short one or two or three documents.”

The regulations, which are being phased in over **three years**, will extend to **fresh fruit and vegetables** in January. Six months later, in July, they will expand again to include **unprocessed foods** used as grains, oils, pulses, sugars or beverages.

News rules, in a nutshell



Government of Canada

Consumers are increasingly seeking out convenient foods created with ingredients from around the world. Most of Canada’s main trading partners, including Europe, Australia and the U.S., have food-safety regulations and Canada now meets those international standards, Switucha says.

“The pizza example is excellent,” she says, “because it demonstrates the complexity of food being produced today.

The guidelines create consistent expectations in three areas: licensing, preventive controls and traceability. Most conscientious companies have some

practices in place for the latter two categories but the regulations formalize the process plus add new requirements for documentation.

“The primary focus was to put in place a preventive approach to food safety,” Switucha says. As a result, the regulations prioritize safe practices — from pest control and employee hygiene to food storage and clean equipment — “to make our food-safety system even safer.”

What’s in, what’s out: Where it gets confusing



Danni Kneeland

The food industry is a complex landscape that stretches from growers to manufacturers to consumer sales, with a host of “activities” taking place in between. During stakeholder consultations, the government heard that a one-size-fits-all set of rules would be unworkable. As a result, the SFCR includes a variety of exemptions based on a company’s size and what it does.

Understanding those exemptions, however, have some businesses struggling to understand exactly what they need to do, says **Danni Kneeland**, director of Calgary-based **Food Safety Solutions**.

“They don’t want to overburden the amount of records that they’re keeping,” Kneeland says. “But they don’t want to do too little — to not control the risks to food safety and then also not meet their regulatory requirements. So it’s a bit of a fine line.”

Here are some thoughts from Switucha, Hansraj and Kneeland about navigating the new regulations.

Licences and ‘Schedule 1’



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Getting a **licence** should be the easy part, says Kneeland. You fill out an application, pay a fee and end up listed in a federal government food-safety database.

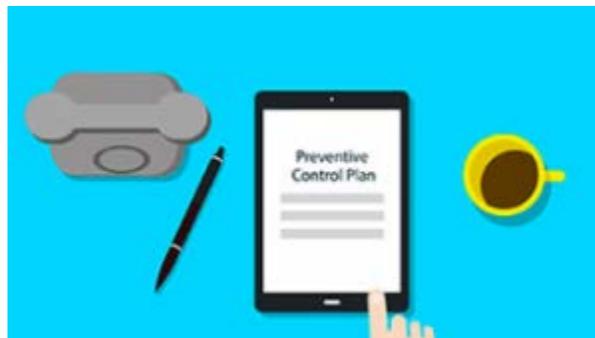
But not everyone needs a licence. And figuring out whether you do depends on a host of variables ranging from the type of food you handle, where you are selling it (intraprovincial, interprovincial or international), how you package or

label it, and what kind of processing you've done, from basting or blanching to waxing or whipping.

The ins and outs can seem arbitrary and confusing, Kneeland says. "You do need a licence for things like cracking and crushing and cutting and things like that. But if you're just blending or cleaning or drying or fumigating, then you don't."

Switucha notes that businesses in the plant-protein sector should pay attention to the list of "Schedule 1" foods — grains, pulses, oils, sugars and beverages that aren't normally eaten in a raw state. These are exempt from licensing for companies that are doing only the most basic measures of processing. (See factbox below.)

Preventive controls



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For most businesses, preventive controls — such as sanitation and pest measures, equipment maintenance and operation, food storage or employee competence — are already part of standard operations.

What's new is that all companies with gross annual food revenues over \$100,000 will also need what's called a **Preventive Control Plan (PCP)**, which is

regularly updated documentation that incorporates the plan and monitoring efforts.

“A lot of companies will be doing things, like pest control and cleaning the equipment. But they won’t necessarily have written procedures that tell how to do it, they won’t necessarily be keeping records of the proof,” says Kneeland. “And they almost certainly will not be doing any verification activities, like swabbing their equipment to make sure it’s clean.”

Companies with a HACCP (Hazard Analysis and Critical Control Point) plan in place will need to integrate those measures into a PCP.

The federal government offers templates and other tools to understand what they need to do, while organizations like Food Safety Solutions or the offer consulting or training programs to help businesses figure it out.

“They don’t have to get somebody to write all their programs for them,” Kneeland says, “but often just reaching out and getting clarification where they fall short and what sort of programs that they need can be really helpful to them.”

Traceability



Government of Canada

The theory is that proper preventive controls will reduce food recalls. But should a problem occur, new measures of **traceability** will ensure every business knows exactly where their food product came from, what they did with it and where it went next. Those measures will increase safety for consumers but also ensure that businesses are only recalling tainted goods.

“We call that ‘one back’ and ‘one forward’,” says Kneeland. “I would say most companies have the ‘one forward’ — the where they’re shipping it to — because that’s their business.”

But most are likely lacking detailed information, such as tracking specific lot codes and shipment dates, she says. “If they’re not tracking it to that level, then they have to recall everything.”

Places to get help



Khalid Hansraj

Doing your homework is something Hansraj can't stress enough. A bank devoted exclusively to entrepreneurs, BDC also offers business advisory services — including specialists in food and beverage regulatory compliance — that can be accessed by non-banking clients.

A business may require help understanding operational changes that are needed to comply with the new preventive control and traceability measures. “The subsequent requirements as a result of becoming licensed will be to ensure that your building is appropriate to accommodate and support the licensing for the long term,” he says.

“In some extreme cases, a business might have to pay over \$100,000 for compliance.”

Here are some places to get started:

- [CFIA](#) has published extensive amounts of information online. These include:
 - : interactive [tookits](#)
 - : an [SFCR handbook](#)
 - : plain-language [webpages](#) describing the new legislation
 - : the [full text](#) of the regulations.
- CFIA welcomes questions by phone or email. Details available at [Ask CFIA](#)
- [PPAA](#) members may find value in an [FAQ](#) developed with the Canadian Grain Commission dealing with the new regulations and grain-handling facilities.
- The [Alberta Food Processors Association](#) offers consulting and gap assessments for food safety. They offer public courses or can provide customized training for your company. See their [website](#) for course information and registration.
- [BDC Advisers](#) can provide guidance and answer questions. As well, a BDC webinar offers a broad overview of the food and beverage industry in Canada as well as some specific information about the SFCR. See their website to register for the [Nov. 28 webinar](#) or to view the presentation afterward.

Factbox:

Foods listed in Schedule 1 of the SFCR for use as grain, oil, pulse, sugar or beverage are:

Amaranth, barley, buckwheat, camelina, canola, chickpeas, cocoa beans, coffee beans, dry beans, dry faba beans, dry peas, flaxseed, hemp, hops, lentils, maize (corn), millet, mustard seeds, oats, quinoa, rapeseed, rice, rye, safflower seeds, sorghum, soybeans, sugar beets, sugar cane, sunflower seeds, tea leaves, triticale, wheat, wild rice.

(Source: Food business activities that require a licence under the *Safe Food for Canadians Regulations*)

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