Traceability Regulations & Implementation

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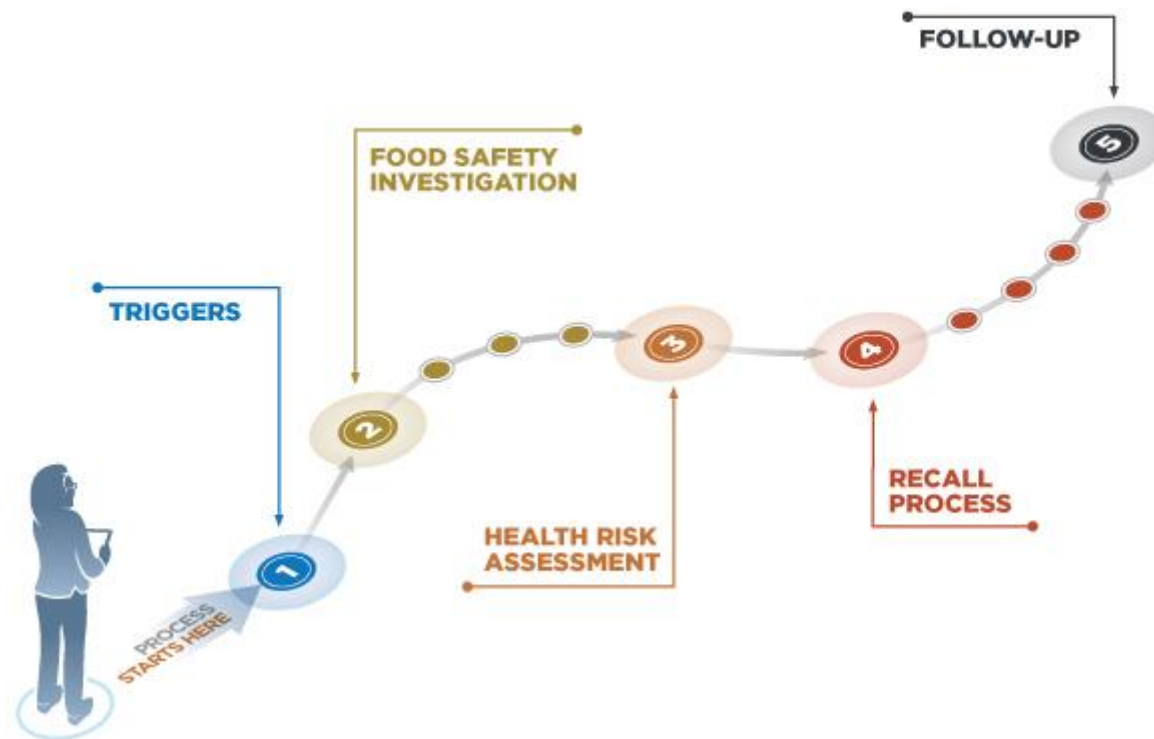V.P. Policy & Issue Management, CPMA

February 11, 2015

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CFIA Food Safety Investigation and Recall Process

CFIA – *Guide to Food Safety*

- All food operators are responsible under Canadian law for the safety of the food they produce and distribute.

- Currently CFIA's *Guide to Food Safety* outlines steps to ensure that "potentially unsafe food products are identified rapidly and removed efficiently from the marketplace".

- Steps include:
    - Assigning product coding/lot numbers
    - Tracking incoming materials and outgoing product
    - Records of processing, inventory and distribution for each lot
    - Implementing a written recall program (recall plans are available for distributors, importers, manufacturers and retailers).

CFIA – Safe Food for Canadians Act (SFCA)

- The *Safe Food for Canadians Act* consolidates and modernizes existing laws and makes them simpler and more consistent.

- Proposed regulations include specifics around traceability although the aim of all new regulations is to be more outcome based.

- CPMA, CHC, and CanadaGAP have been regular participants in the CFIA consultations to determine regulatory language.

- Specific to traceability regulations all three, along with others participated in a meeting with regulators to explain the logical parameters of traceability within regulations.

CFIA –SFCA & Proposed Regulations

62. (1) Any person who sends food from one province to another — or imports or exports it — and any licence holder who processes, treats, preserves, grades, manufactures, packages or labels food that is to be exported or to be sent or conveyed from one province to another must prepare, keep and maintain documents that identify

(a) if that food was received from another person, that food, the date on which it was received, the address at which it was received and the name and address of the person who sent it;

(b) if the person or licence holder received a food commodity that is incorporated into that food or from which that food is derived, that food commodity, the date on which it was received, the address at which it was received and the name and address of the person who sent it;

(c) if the food is sent to any other location, that food, the date on which it was sent, the name and address of the person who conveys it, the name of the person to whom it was sent and the address of the location to which it was sent; and

(d) the name of a contact person for each of the addresses referred to in paragraphs (a) to (c).

CFIA – SFCA & Proposed Regulations - Traceability

- Anyone who imports, exports or prepares food commodities for interprovincial trade will be required to maintain traceability records

- Documents must be provided on request in a format which can be imported and manipulated for recall purposes by standard commercial software, or if in paper form, legible without external aids

- It is not required that this information be kept in Canada but that it is accessible and can be provided upon request through a desktop audit

CFIA – SFCA & Proposed Regulations - Traceability

Areas of concern:

- Traceability documents must be provided within 24 hour of the time of the request or within any shorter time limit specified.

- Food must be labelled to enable its traceability using a lot identifier, bar code, universal product code or other similar identification.

- Requirements for maintaining records "One step forward, one step backwards" (Codex standard), to every stage of food supply chain under federal jurisdiction and must be kept for three years

- Hopeful that meeting with CFIA will ensure these concerns are addressed in the regulations published in *Canada Gazette I*

CanadaGAP Labelling of Packaging Materials

Market Ready Secondary Packaging Materials

- Labelled (unless the secondary container is transparent e.g., a large clear plastic bag holding smaller labelled bags of carrots)] with the correct identifying information (i.e., name and address) of:
  - ❒ The operation that produced the product, **OR**
  - ❒ The operation that packaged the product, **OR**
  - ❒ The company for whom it was produced/packaged

- Labelled with Pack ID
  - ❒ Who produced the product **AND**
 - ❒ When the product is packed/repacked

CanadaGAP Labelling of Packaging Materials

If there is NO market ready primary OR secondary packaging materials used, the person responsible labels the pallet/skid with:

- The correct identifying information (i.e., name and address) of:
    - ❐ The operation that produced the product, **OR**
    - ❐ The operation that packaged the product, **OR**
    - ❐ The company for whom it was produced/packaged

- The Pack ID
    - ❐ Who produced the product **AND**
    - ❐ When the product is packed/repacked
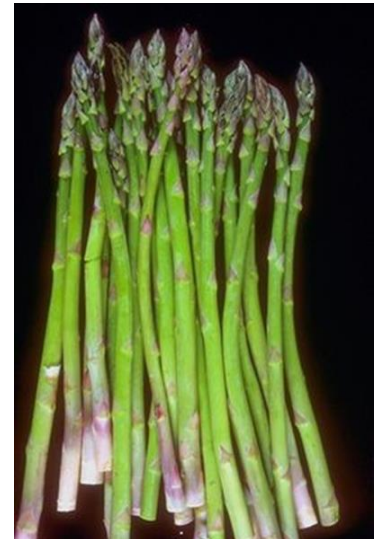
CanadaGAP Traceability Requirements

Requirement: A traceability system that allows all product to be traced in the event of a recall must be in place.

- *For complete traceability, a Lot ID is to be assigned to all market product, if not directly on packaging materials then on Form (Q)*

- Harvesting/Outbound:
    - Keep track of harvested product (e.g. harvest dates or date received) through the use of pallet/bin tags or some other form of identification
    - Record field/block/pallet/bin tag for harvested product

- Putting Product Into Packaging which is Market Ready:
    - Identify all market product with a Pack ID (who produced the product and when the product was packed/repacked) on the primary or secondary market ready packaging materials or, if no packaging material is used, then on the pallet/skid (e.g., bunched product directly on a lined pallet)
    - Record Pack ID and Lot ID for market product

CanadaGAP Traceability Requirements

- Inbound (including brokerage):
  - Record incoming information (e.g. Field/block#/pallet/bin tag/pack ID/lot ID, etc.)

- Outgoing Product (including brokerage):
  - Records outgoing information (e.g., Field/Block #/Pallet/ Bin Tag/Pack ID/Lot ID, etc.) for product

Records Retention:
- Forms, receipts, letter of assurance and certificates must be kept for a minimum of two years for audit, recall or other purposes.
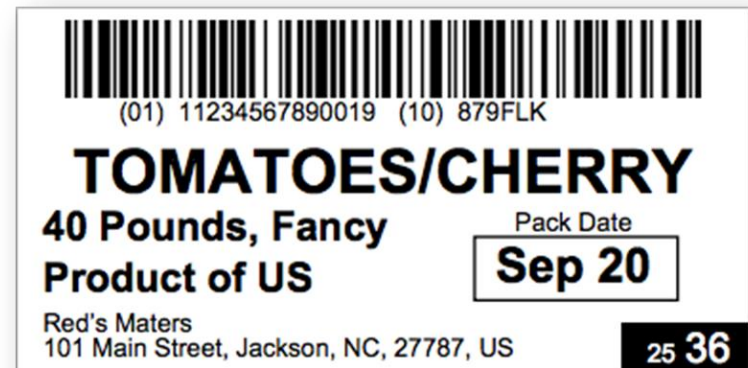
Alignment Between CanadaGAP & Draft CFIA Traceability Regulations

- Record Keeping
  - CanadaGAP – 2 years; CFIA – 3 years (industry have requested 2 years)

- One step forward, one step backwards record maintenance
  - Required in both

- Lot Code
  - Required in both: CanadaGAP:
    - For harvested product (e.g. bin tags)
    - For market ready, Pack ID must be on the packaging, Lot ID must be in the records

  - R**emember** – if you re-pack product (i.e. co-mingle), the new lot and Pack ID should include (be linked to in your internal records), all the original lot numbers and Pack IDs from the items which went into the new pack.

Produce Traceability Initiative (PTI)

- U.S.-based initiative based on global standards for product identification and traceability – How to implement in a standard way.

- Alignment with other fresh traceability initiatives
  - Key Data Elements
    - GTIN
    - Lot Number
  - GS1 Global Standards
  - Critical Tracking Events

(01) 11234567890019 (10) 879FLK

TOMATOES/CHERRY

40 Pounds, Fancy
Product of US

Pack Date
Sep 20

Red's Maters
101 Main Street, Jackson, NC, 27787, US

25 36

- Includes standardized case labeling

Produce Traceability Initiative (PTI)

- Many U.S. retailers now have implementation guidelines for vendors/shippers.

- 28 Best Practices support implementation (e.g. assigning GTINs, data attributes, FAQs, repacking/commingling, formatting case labels, etc.)

- Increasingly retailers are asking for Pack Date on the case label.

- Label developed and required by:
    - Safeway, Kroger, Wal-Mart U.S.
    - Loblaw (although no Canadian retailer has planned implementation of PTI to date)

- www.producetraceability.org

Questions?

www.cpma.ca