

**Update for Manitoba
Potato Production Days Conference
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Presentation Overview

- Updating your CanadaGAP Manual for 2015
- Manitoba Potato Industry Issues & Challenges
- Main changes for 2015
 - Certification Program
 - Manuals
 - Appendices
 - Audit Checklist
- Questions & Answers



Updating your CanadaGAP Manual

- For the potato industry, the 2015 manual changes are relatively minor.
- Use the *Summary of Main Changes* handout on the CanadaGAP website to gain a quick overview of the changes.
- Determine which changes affect your operation (there may be few or none).
- It is wise to reprint the Glossary or at least print/review any changes to definitions.

Updating your manual for 2015

- On the CanadaGAP website (Manuals/ Downloads page), you can view the tracked changes version of the manual.
- This shows every revision that CanadaGAP has made to the manual.
- Reprint only the pages that contain changes that affect your operation. You can print from the PDF version if you want a clean copy without the tracking.
- You do NOT need to reprint the entire book.

Updating your manual (cont'd)

- Insert any new pages into your existing manual, showing you have completed (checked off) any new procedures relevant to your farm.
- This is part of your annual review and update to your program: go through each section of the manual, make updates as needed, and initial at the bottom to show that you have reviewed your program.
- On the title page of your manual, cross out last year's version number/date and write in "Version 6.3 2015".

Updating your CanadaGAP Forms

- Find out which record-keeping templates (CanadaGAP Forms) have changed.
- There have been very few changes to the forms in recent years.
- The 2015 version also has few changes.
- Some changes may not be applicable to your operation.
- Determine whether the changes pertain to your farm.
- Start using the new versions of the Forms.

2015 Changes to CanadaGAP Forms

- Form F: Water (for Fluming and Cleaning) Assessment
 - New columns were added
 - You must now record the commodity the water is being used for, as well as the dates when the water will be used and when the prior to use and second water tests are taken.
- All operations will need to start using the updated Form F starting on April 1st, 2015.

Record-Keeping Forms

- Minor wording changes to:
 - **Form Q:** *Packing, Repacking, Storing and Brokerage of Market Product*
 - Now covers brokers
 - **Form S:** *Allergen Information – Assessment*
 - “**If applicable**” was added to control measures.



Why do we make changes to the CanadaGAP Manuals?

- To maintain technical rigour of the program as science, industry, buyer, or government requirements change.
- To respond to user requests for changes – for example:
 - Any program user (grower, auditor, etc.) can request changes and we receive many (20 requests last year).
 - We see producer or auditor confusion about certain requirements that need to be clarified.
 - We get questions that show the wording is not clear in the manual and is being misinterpreted or misapplied.
- CanadaGAP's Stakeholder Advisory Committee reviews all proposed changes and often brings forward suggestions of their own. They meet once a year.

How often are the manuals updated?

- CanadaGAP is required to review the manuals **annually** and submit them to CFIA to show the program's technical rigour is being maintained on an ongoing basis.
- Manuals are always published in late January/early February on the website www.canadagap.ca.
- All program users, including growers, are informed by email or mail as soon as the updates become available.
- Changes take effect April 1st to give people time to update their manuals, implement changes, or retrain as needed.

How often are the manuals updated?

(cont'd)

- One year, we had to reissue the CanadaGAP Manual mid-season because a new hazard in cantaloupes was discovered as a result of an outbreak.
 - This is not typical, and did not affect most program participants.
- In future we may be able to issue new versions less frequently. However, updates give us the opportunity to be responsive to user requests to make the program clearer and more understandable, and to keep pace with scientific and technical developments in fresh produce safety.

Manitoba Potato Industry Issues



Manitoba Potato Industry Issues

- A number of specific issues/challenges specific to CanadaGAP implementation and audits have been identified:
 - Unwanted hygiene facilities in storages
 - For processing potatoes: weight given to handwashing on bulk/raw product
 - Lack of auditors
 - Lack of auditor knowledge of the processing potato industry
 - Weight of the processors in trying to access detailed grower audit information.

Unwanted Hygiene Facilities in Storages

- There was a small wording change made to the CanadaGAP Manual in 2014 that helped to clarify expectations.
- The Manual says handwashing facilities are required “**FOR** PRODUCT STORAGES”, not “**IN** PRODUCT STORAGES”.
- IF product is being handled by employees working in the storages, then handwashing facilities must be present. They need to be accessible to workers.
- Auditor discretion may be required to determine if the location is appropriate.

Handwashing Requirements

- For processing potatoes:
 - Handwashing is expected in operations where employees are handling product, whether bulk/raw or market ready potatoes.
 - The major food safety issue is VIRUSES. These can withstand freezing, blanching, etc.
 - Absence of handwashing facilities is NOT an autofail on the audit.
 - Growers will lose points on the audit. (10 points)

Options for Handwashing

- There are three acceptable options for handwashing:
 1. Soap + potable water + paper towels to dry hands
 2. Hand wipes + hand sanitizer
 3. Non-potable water + paper towels to dry hands + hand sanitizer
- To be effective, items **must** be used in the order given.
- Employees require training on how to use the handwashing option that is chosen.
- Proper technique is also important as friction is needed to remove dirt, debris, lotions, viruses, microorganisms, etc. from hands.

Source of Water for Handwashing

- If Option 1 is chosen, the water used for handwashing must be potable.
- Potability means: 0 Total Coliforms and 0 *E. coli*
- The water must be tested twice per season (once prior to use and once more during the season).
- The water must be tested from the source (e.g., well, etc.) unless it is municipal water and/or is stored, treated or re-circulated. Section 15.1 must be read carefully to ensure proper testing is conducted based on risk.

Lack of Auditors

- Currently, Manitoba has only two resident CanadaGAP auditors.
- It is difficult to attract auditors to this area because of the relatively small demand for audits.
- A significant number of Manitoba growers are enrolled in the CanadaGAP four-year audit cycle.
- Most enrolled at the same time, meaning that peak demand for auditors occurs only once every four years.

Strict Requirements for Auditors

- CanadaGAP auditors must meet stringent qualification requirements and are drawn mostly from a pool of professionals whose expertise is food safety.
- There is significant investment needed on the part of individuals and certification bodies to qualify new auditors.
- These individuals will seek work in areas where they can apply their expertise and find enough work to make a living.

Lack of Auditor Knowledge of the Processing Potato Industry

- CanadaGAP auditors must have at least one year of on-farm/produce industry related experience. Sometimes an auditor's background may be in a different area of horticulture.
- Auditors must be able to audit a wide range of fresh produce operations, and to understand the inherent food safety risks. CanadaGAP auditor training covers the full diversity of horticultural products, but experience is also a good teacher.
- What are the specific issues and challenges for the processing potato industry? What can we do to address them as part of the CanadaGAP auditor training and qualification process, and through ongoing calibration?

Auditor Availability

- If you wish to seek a different auditor:
 - Other certification bodies may be able to bundle audits in this area and assign an auditor from a neighbouring province.
 - Travel costs would be shared evenly among the growers audited.
 - This may be difficult with a larger geographic reach.
- Availability of appropriately expert and qualified auditors is an ongoing challenge for other food safety programs too.

Processor Requirements

- A final concern relayed to CanadaGAP relates to the weight of the processors in trying to access detailed grower audit information.
- CanadaGAP's influence is limited, as these requirements are usually proprietary to different processors' IT systems.
- CanadaGAP is not involved in data collection or reporting systems, nor do we endorse any particular format.
- In an ideal world, data collection and reporting systems would be streamlined and compatible.
- As we understand it, these are issues to take up collectively with customers, especially as the number of competing IT platforms and software solutions continue to grow.

Main changes to the CanadaGAP Manual for 2015

- Changes take effect for 2015 season
- Audits on or after April 1st will be based on updated requirements
- Certification Program changes
- New manuals at:
www.canadagap.ca
 - New scopes added
 - Glossary definitions
 - Sections 1-24
 - Appendices
 - Audit Checklist



Certification Program Changes

Timeframe to close out Corrective Action Requests:

- Will be tightened up on April 1st, 2015
- Program participants will have 60 days from the issue of the audit report to respond to corrective action requests, or prior to the end of the season, whichever is sooner.
- Those who have not implemented corrective actions by the deadline will either not be certified, or will have certification withdrawn, and will need another audit.
- CBs will retain some discretion to deal with exceptional cases (e.g., major capital improvements).

New Scopes added

- The following types of operations can now be CanadaGAP-certified:
 - Brokers
 - Production, packing and storage of greenhouse strawberries
 - Repacking and wholesaling of mushrooms.
- No new hazards were included in the generic HACCP models for CanadaGAP.

Key Revisions to Glossary:

Definition – “Prior to Use”

- **Prior to Use** (for water testing):
 - “Before the water is used on product, hands, equipment, packaging materials, etc. for the first time in a season. Results of water testing need to show potability before water is used. **The test will be taken as close as possible to the first use of the water, up to a maximum of 60 days before the first use.**”
 - Clarification was needed on “when” prior to use should be.

Key Revisions to Glossary:

Definition – “Controlled Access Area”

- **Controlled Access Area:**

“An area within a building that only authorized persons are allowed to enter (e.g., packing/ repacking area, storage area for **market ready** packaging materials or product).”

- “Market ready” was added as it’s these packaging materials that require controlled access.



Key Revisions to Glossary:

Definitions – “Tanks” and “Water Storage”

- Tanks used for water storage are NOT considered *production site or building equipment*.
- They have stricter requirements and thus are dealt with on their own under “Water storage”.
- Water storage includes:
 - “... water in coolers or jugs with a spigot, delivered municipal water stored in a tank, water put into backpack sprayers, a cistern/reservoir containing rainwater, water tank filled with well water, well water in a standalone handwashing tank/container, etc.”

Section 6 – Agricultural Chemicals

- A new note was added:
 - *“**Note:** PMRA considers a PHI of 1 day as 24 hours, a PHI of two days as 48 hours, etc. Therefore, if you are planning to harvest quickly record the time the application occurred in order to ensure the appropriate amount of time has elapsed.”*
- This note was added as there was confusion on when product could be harvested when a short PHI was involved.
- CanadaGAP contacted PMRA who confirmed that PHIs are seen by time rather than days.

Section 8 – Equipment Calibration

- Clarified the requirement:
“The person responsible ensures that calibration instructions are received with equipment or **are written based on expert recommendations** and made available.”
- Sometimes equipment does not come with calibration instructions, is homemade, or the instructions are lost.
- In such cases, the operation must consult with an expert to receive appropriate advice.

Section 8 – Equipment Calibration

- Requirement was changed to ensure it was clear when calibration should occur:

*“At the start of the season, when inspection results indicate a need, **when equipment is changed** and/or if tractor speeds are adjusted, the person responsible calibrates production site equipment as per calibration procedures.”*



Section 8 – Equipment Calibration

- New requirement was added regarding record keeping:

“The person responsible records detailed results of the calibration for agricultural chemical applicators (File under Tab: Calibration Instructions)”

Section 11 – Personal Hygiene Facilities

- Additional guidance was added on where to take water test samples in portable washrooms:

“Note: Hand washing water stored in permanent tanks within portable washrooms is not considered potable UNLESS:

- *the water is tested **from the tank** each time the tank is filled to confirm potability, OR...*”
- Same note was added to Section 15.2

Section 15.1 – Water Assessment

- A new note was added:
*“**Note:** Composite Samples may be an option for water testing. Refer to Appendix G: Water testing, 4. Composite Water Samples for further information.”*
- Reflects the addition to Appendix G and points users to that information.



Section 15.1 – Private Well Water

- Changed for accuracy – where to take water sample for private wells:

“The person responsible ensures the water sample is taken from the **appropriate location (e.g., equipment, tap, storage cistern/tank/container, etc.)**.”



Section 15.1 – Municipal Water

- New note was added for clarity:
*“**Note:** Municipal water is assumed to be potable; therefore, it does not need to be tested UNLESS it is stored (Section 15.2), treated (Section 15.3), recycled/recirculated or a test is required from the equipment. Testing may not be required even under those circumstances; therefore, carefully read Section 15 in its entirety.”*

Section 19.1 – Product Sourcing

- CanadaGAP requirements for sourcing product have changed. A letter of assurance from suppliers is no longer acceptable.
- Packing, repacking, wholesaling and brokerage operations will lose points on their audit if they don't comply.
- All operations supplying the certified company must have a certificate or industry recognized third party audit:
 - “The person responsible selects/purchases harvested/market product from operations that have successfully completed one of the options below and requests a copy of a current/valid certificate:
 - ❑ CanadaGAP
 - ❑ Other industry recognized third party food safety audit/certification.”

Section 22.1 – Traceability System

- **Incoming and Outgoing Product**
- Deleted requirement:
“The person responsible for incoming/outgoing product:
~~Ensures that the packaging materials are properly
labelled as per Section 17: Packaging Materials and as
stated above”~~
- It is unreasonable to expect operations to make sure that product they are receiving has the proper labelling.
- Instead they record the information they do have and ensure it goes out again properly labelled.

Section 23.3 – Crisis Management

- A requirement was added to ensure that if a recall occurs, the operation knows to contact their certification body (if certified).



Section 24

- Retitled to better reflect the purpose of this section: “*HACCP Plan and Food Safety Program Maintenance and Review.*”
- Rationale now includes the statement:
“The operation’s program needs to be maintained continuously to ensure success.”



Section 24.2 – Protocols

- Requirement now states: “*Your food safety program must be continuously maintained.*”
- New procedure:
“The person responsible maintains the operation’s food safety program on an ongoing basis.”
- This will also become a scored item on the audit checklist (worth 6 points).

Changes to Appendices

- Appendix E: Agricultural Chemical Application Equipment Calibration – An Example
 - Airblast sprayer calibration procedures have been added.
- Appendix G: Water Testing
 - Additional information on composite sampling (where and when samples may be taken)

Changes to Appendices

- Appendix S: Recall Program
- Added contacts that would need to be notified in the event of a recall:
 - CanadaGAP
 - Law enforcement
 - Certification Body
 - Broker



Changes to Audit Checklist

- New question (A4) - continuous maintenance of the program – score out of 6; however, if the program is not being maintained a re-audit will be triggered for later in the season.
- Question P1 – sourcing of product – the most an operation can score is 5/10 if any one supplier is found to not have a current/valid certificate.
- Various minor wording clarifications.

Questions?



Thank you!

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