

New food rules coming

*Does your business sell food outside Alberta,
import food into Canada or export food to another country?*

If you do, or may in the future, read on.

Strong, flexible regulations that focus on prevention will go a long way in helping businesses uphold their reputation, keep customers healthy and loyal, and avoid costly recalls.

The CFIA recently launched a 90-day consultation on the proposed Safe Food for Canadians Regulations (SFCR) to better protect the health of Canadians.

What would change?

If you import food or prepare food to be exported or sold across provinces, including at B.C. and Saskatchewan farmers' markets, you would be required to have preventive controls in place and you may need to write them down in a plan. Preventive controls would allow you to identify and manage food safety risks before products are sold to consumers. Strong preventive systems, such as traceability and food safety controls, could boost your competitiveness here in Canada and abroad.

You may also need to obtain a licence and meet certain traceability requirements. Learn more about the key elements of the proposed Regulations in this [video](#).

Learn

Regulations can sometimes be difficult to understand and apply. The CFIA website is home to resources to help you

determine how the proposed requirements would apply to your business.

Find out if you would need a licence, a written Preventive Control Plan or what your traceability requirements would be under the proposed new rules by answering a few questions using these [interactive tools](#).

Participate

Get involved and stay connected on this important initiative:

- Visit inspection.gc.ca/safefood to register for a webinar or in-person information session near you.
- [Follow us](#) on Twitter, LinkedIn and Facebook or sign up to receive email updates.
- Join the food safety conversation online using #SafeFoodCan.
- Have a question? Call 1-800-442-2342 or send it to inspection.gc.ca/contactus.

Have your say

Once you've learned about the proposed Regulations, let us know what you think. Go to inspection.gc.ca/safefood and submit your feedback before the consultation closes on April 21, 2017.



Read more on the proposed regulations inside.

Questions and Answers about the Proposal

About the Proposal

1. How would foods prepared and sold within the same province be impacted?

The proposed regulations generally would not apply to foods sold within a province (intra-provincial trade). However, certain traceability, labelling and advertising requirements would apply to businesses selling within a province, such as net quantity declarations and bilingual labelling requirements. If businesses supply food products to Alberta retailers, they would be asked by the retailer to have traceability requirements in place.

The Food and Drugs Act and regulatory requirements that apply to foods sold within the same province are not impacted by the proposed SFCR.

Businesses can find out if they would need a licence, Preventive Control Plan and/or have traceability requirements by using interactive tools at inspection.gc.ca/safefood.

2. How would the proposed regulations impact imported foods and importers?

Those importing food, including ingredients used in food sold in Alberta, would be required to meet the same requirements as domestic producers selling food in another province, where applicable, such as obtaining a licence to import food into Canada. In addition, they would

be required to work with their foreign suppliers to control any potential risks to the food they import. Importers would be required to have preventive controls in place; they would need to know their food, know their foreign supplier, and clearly articulate in a written plan the steps they take to control potential risks to food. This means being aware of any hazards that pose a risk of contamination to the food, ensuring that their suppliers are using safe conditions to prepare, store and transport their products and keeping this information in a written plan, known as the Preventive Control Plan. Importers would also have to keep traceability records identifying who they purchased food from and who they sold food to, similar to domestic producers.

3. When would the proposed regulations become law?

The outcome of this public consultation will affect the timing of final publication in Canada Gazette, Part II (CGII) and the corresponding coming into force.

Traceability

The CFIA has developed the [What would your traceability requirements be? tool](#) to help you determine what information needs to be included in your traceability system.

4. I sell food at retail; would I need to trace the food I sell?

Retailers (excluding restaurants or other similar businesses that sell

food as meals or snacks) would be responsible for tracking the incoming food that they sell (one step back). However, they are not required to track the sale of the food to the consumer (one step forward).

5. What is a lot code?

A lot code is a unique identifier for your food that allows it to be traced. You are responsible to determine what it represents and how it is represented. An explanation of how to read the lot code should be included in your traceability system.

6. When would I need to keep traceability documents?

Once the SFCR comes into force, the following timelines would apply: a person would be required to keep traceability documents immediately for meat, fish, eggs, processed eggs, dairy, processed fruit or vegetable products, honey, maple, and fresh fruit or vegetable products. Fresh fruit or vegetable growers and harvesters would have an additional year. A staged implementation approach for coming into force for all other foods would provide an additional two years.

Organic Products

The proposed organic provisions cover: food for human consumption; plant and animals, or any of their parts from which food is derived; animal feed; aquaculture animal feed, and seed.

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7. Would there be any new regulatory requirements for the organic sector?

Yes. The following new requirements have been proposed: organic aquaculture standards related to aquaculture animals, seaweed and aquatic plants, and a person who is manufacturing, processing, treating, handling, slaughtering, producing, storing, packaging, labelling and conveying an organic product would need to obtain certification for that activity, unless they already hold an organic certification for that organic product.

8. My product is organic; do the provisions in Part 14 prevail over other food provisions?

No, one does not prevail over the other; they both apply. If you wish to label your food as organic, it needs to meet the provisions in Part 14 in addition to all of

the other applicable parts of the proposed SFCR.

9. What is the difference between an inspection mark and an inspection legend?

The Safe Food for Canadians Act defines “inspection mark” as a prescribed mark, stamp, seal, product legend, work, design, or any combination of these things. This definition means that an inspection mark is the broader term that includes both the inspection legend and the Canada Organic logo.

Support for Businesses

10. Will the proposed regulations place too much burden on importers and small businesses that are not familiar with the CFIA and/or have limited knowledge of preventive controls?

As part of its proposal, the CFIA has addressed small business concerns by providing an

exemption from the requirement to maintain a written Preventive Control Plan for businesses in some sectors with gross annual sales of food under \$30,000. Small businesses will also be given additional time to comply with the regulations with staggered coming into force dates. Plain language guidance material and digital tools will continue to be developed to help food businesses in meeting the new requirements.

11. Will food businesses have enough time to prepare and implement a Preventive Control Plan?

Yes. The CFIA recognizes the challenges that some small businesses may have in meeting the administrative and compliance requirements related to the proposed regulations. To help address this, a staged implementation approach for coming into force for small businesses to comply with the proposed preventive control requirements has been proposed; refer to Table 1.

Table 1: Proposed staggered implementation approach for Part 4 requirements.

	Meat, Fish, Eggs, Processed Eggs, Dairy, Processed Fruit or Vegetable Products, Honey, Maple	Fresh Fruits and Vegetables	All Other Foods >\$30,000 and >5 employees	All Other Foods >\$30,000 and <5 employees	All Other Foods <\$30,000
Preventive control measures	Immediately upon coming into force	+1 year	+2 years	+3 years	+3 years
Written Preventive Control Plan	Immediately upon coming into force	+1 year	+2 years	+3 years	Not required ¹

¹In addition to all other foods, honey, maple, and fresh fruit or vegetable products would not need a written Preventive Control Plan if they have gross annual sales of food that is <\$30,000.

To request an export certificate, you must meet all requirements immediately upon coming into force.

Additional Questions

12. Where should stakeholders direct their questions?

Stakeholders can refer to the main consultation page on the CFIA’s website to learn more about the proposed regulations – inspection.gc.ca/safefood.

Further questions should be forwarded by phone to 1-800-442-2342 or by email via inspection.gc.ca/contactus. ●

Free online market access tool

Are you a processor or producer entering a new market? Not sure if you can meet your customer or regulatory requirements? There is a new resource that can help get you on your way.



Meeting Customer Requirements is a free, online resource developed by

Meeting Customer Requirements

agriculture.alberta.ca/customer-requirements

Alberta Agriculture and Forestry to guide producers and processors through the necessary steps to consistently meet market, standards and regulatory requirements.

This tool helps producers and food processors to evaluate their current ability to meet new requirements; create an action plan to address gaps; maintain their system through an

internal audit; and prove they are meeting requirements through an external audit.

Meeting Customer Requirements started as a tool to help producers understand the terms of their contracts, and has expanded to prepare processors to meet the requirements of regulations, contracts, and customer requirements.

Meeting Customer Requirements will be free and easy to use on your computer or tablet.

For more information email kellie.jackson@gov.ab.ca or phone 403.948.8538. ●

Upcoming Events

WORKSHOP SERIES

TROUBLESHOOTING SHELF LIFE

Tue, Apr. 11, Airdrie

\$25 incl. gst, lunch, refreshments

One of the challenges of producing your own processed food product is knowing how long the product is good for. This workshop will help small scale food processors understand the process of determining shelf life. **To register call 1-800-387-6030.**

FOOD LABELLING FOR LOCAL MARKETS

**Tue, Apr. 12, Airdrie, Apr. 13, Leduc
9am-11:30am, Free, lunch is on your own**

Learn how to meet regulations while promoting your products; protect your

business and your customers from undeclared food allergens; demystify food labelling information

Following the interactive half-day workshop, Explore Local will offer one-on-one food label coaching. Sign up when you register or at the workshop. Bring your existing or proposed food label to be reviewed.

To register or for more information, contact Delores at (780) 427-4611 or delores.serafin@gov.ab.ca. To connect toll-free please call 310-0000 first.

MARKETING ESSENTIALS: INTRO TO MARKETING

Wed, Apr. 12, Airdrie

\$25 incl. gst, lunch, refreshments

This one-day workshop will focus on

practical information and tools to help you develop and implement an effective marketing strategy for your business. **To register call 1-800-387-6030.**

MARKETING ESSENTIALS: TELLING YOUR STORY

Wed, Apr. 19, Airdrie

\$25 incl. gst, lunch, refreshments

Interesting stories about you and your business are effective sales tools. They build customer commitment and loyalty. **To register call 1-800-387-6030.**

EVENTS



For more information on any of these, or future events, [click here](#) or call **1-800-387-6030.**

Field Notes is published up to four times per year and is available online at explorelocal.ca. For further information about anything you've read here, or to be included on our email list, please contact Donna Skorworodko at donna.skoworodko@gov.ab.ca.