

HACCP Standard for Non-Federally Registered Food Processors

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Ontario's HACCP Strategy

- Ontario is updating its food safety system.
- HACCP for non-federally registered food processors is a key component.
- Proposed HACCP system must be suitable for small-to-medium sized enterprises (SMEs)

Project Background

- Foundation for OMAF's HACCP strategy is an approach that must:
 - effectively reduce or eliminate the risk of food safety hazards
 - be based on the Codex Alimentarius HACCP principles
 - be practical and feasible for industry to implement
 - be accepted by stakeholders
 - be compatible with existing regulatory requirements, where applicable
- Ideally, the approach will be deemed equivalent to FSEP/QMP with respect to food safety outcomes.

Proposed HACCP Approach (the 'HACCP Advantage')

- **Target audience:**
 - non-federally registered food processors, largely SMEs
- **General principles to foster practicality:**
 - universality
 - user-friendly format
 - straightforward language
 - provision of rationales for requirements
 - non-prescriptive, outcome based guidelines
 - thorough/efficient, but not intensive documentation

The 'HACCP Advantage' - Prerequisite Programs

- 4 groups divided into manageable sections
 - *Written Control Programs*: focus on written control programs and procedures
 - *Written Training Programs*: focus on written training programs
 - *Control of Operations*: outline means of executing operational controls
 - *Control of Environment*: delineate controls of facility and surrounding
- Additional voluntary program addressing biosecurity considerations being investigated ⁵

Regulatory Action Points (RAPs)

- The 'HACCP Advantage' also makes reference to regulatory requirements where needed.
- Where there are specific regulatory requirements beyond the universal prerequisite program standards, such as for meat or dairy programs, a reference to the regulatory requirement is made within the standard.

Figure 1. Draft Layout of Guidelines for OMAF's Draft HACCP Approach Prerequisite Programs

Prerequisite Group #. Group title.

Section # and title

Bullet / Element

Sub-bullet / Sub-element

Standard: *What is required*

Regulatory Action Points Refer To: *Applicable Regulations*

Meat and Poultry: Standards of Compliance, the National Meat & Poultry Regulations and Code

Dairy: Dairy Act and Regulations (Ontario)

Associated Risk – Biological, Chemical & Physical: *Explanation of standard; what the associated risk(s) are and why they must be controlled.*

Suggestions to meet the standard – How:

Suggested Monitoring – What & How

Food Security Control Program Standard: *What is required*

Suggestions to meet the standard – How:

Suggested Monitoring – What & How

The 'HACCP Advantage' - HACCP Plan Component

- Includes all Codex HACCP principles
- HACCP plan is product, process and site specific
- Similar to FSEP
- References must be made to:
 - restricted ingredients, as defined under the *Food and Drugs Act*
 - allergens
 - consumer packaging and labelling issues
- 8 streamlined documentation forms

Objectives of the *Proof of Concept* Project

- Collection of scientific evidence demonstrating food safety outcomes of OMAF's HACCP Approach
- Demonstration of practicality for SMEs
- Demonstration of economic feasibility
- Demonstration of compatibility with regulatory requirements

Overview of *Proof of Concept* Project

- Participation of a medium-sized poultry plant
- Microbial pre-testing/baseline study
- 3 methods to determine biological CCPs
 - microbiological analysis
 - mathematical modeling using *RiskOutLook*TM
 - expert opinion(Consultant and HACCP Team)
- Gap analysis
- Implementation of the '*HACCP Advantage*'
- Microbial post-testing – products & processing environment

Overview of *Proof of Concept* Project - continued

- Tracking of costs incurred for HACCP and new MIR implementation.
- Economic assessment
 - cost recording by HACCP Consultant
 - cost recording by Plant's HACCP Team
 - formal economic analysis study
 - development of cost/benefit tool
- Concurrent compliance with potential new Meat Inspection Regulation (MIR) based on the National Meat and Poultry Regulation and Code

Overview of *Proof of Concept* Project - continued

- HACCP system audits:
 - in accordance with proposed Ontario standards
 - in accordance with FSEP standards (possibly)
 - in accordance with Buyer(s) standards (possibly)
- Audit against MIR standards of compliance
- Potential video recording by *Town and Country*
- External review by the OIMP
- Final debriefing/review meeting.
- Preparation of Final Report.

Outcomes / Products

- HACCP standards - tested, reviewed and finalized
- Audit reports
- Development of audit criteria - CGSB participation
- MIR standards of compliance and MIR implementation report
- Assessment reports from:
 - HACCP Consultant; Participating Plant; External review; Microbiological study; *RiskOutLook* model; and Economic analysis (cost/benefit assessment tool).
- Implementation guidebook draft including record keeping forms
- Final Report, including conclusions
- Direction for further action

Proposed “Roll-out”

- Target date: March 2004
- Purpose: provide stakeholders with training and information regarding the HACCP approach
- Conducted with partners such as the OIMP and OFPA
- Distribute HACCP standards and guidebook
- Explain proposed recognition system through Canadian General Standards Board
- Outline proposed HACCP pilot plant project

HACCP Recognition

- Necessity has been conveyed to OMAF by stakeholders.
- Without recognition
 - a facility has no assurance their system meets standards and is capable of controlling food safety hazards
 - customers have no assurance regarding the facility's system

“Ideal situation” for HACCP recognition

- Accessible to all food processors
- Government oversight, at minimum
- Consistent delivery
- Consistent with National Approach
- Acceptable cost to OMAF
- Acceptable cost to industry
- Acceptance to buyers and other jurisdictions
- Acceptable time-frame to set-up
- Mechanism for delivery of on-going audits

Recommended Recognition Mechanism: Standards Council of Canada (SCC)

- Consistent with a national approach, may facilitate inter-provincial trade
- Consistent access available to all food processors in Ontario and Canada
- Most cost effective option for OMAF
- Interest has already been shown by the SCC through the Canadian General Standards Board (CGSB)
- SCC is internationally recognized, therefore buyers acceptance achieved

Recognition Process

- SCC recognizes programs that meet national standards
- No national HACCP standard yet exists
- CGSB will recognize the 'HACCP Advantage' on an interim basis until:
 - A national standard is agreed upon, or
 - The 'HACCP Advantage' is recognized as the national standard
- CGSB is participating extensively in the Proof of Concept project
 - development of audit criteria and audit procedures
 - performing audit of implemented program

National Approach

- OMAF will continue to provide support and leadership in the development of a National HACCP approach.
- OMAF will continue to facilitate having the Ontario standard adopted as the National standard.
- The Ontario-developed standard has been proposed by HACCP Recognition committee as a national standard and is currently being reviewed by CFISIG

Planned Pilot Plants

- Following the 'Roll-out' and publication of the HACCP standards a number of pilot plant projects are being planned.
- Pilot plants will be selected on a variety of criteria and will be implemented in facilities processing different commodities
- Pilot plants will be required to give guided tours of their facilities and HACCP plans
- Pilot plant selection is anticipated to begin in summer 2004.

Summary

- The 'HACCP Advantage' will
 - Increase food safety
 - Increase market access
 - Be national in scope
 - Meet stakeholder demands