OVERVIEW

- The new Safe Food for Canadians Regulations (SFCR) came into force in January 2019 and replaced 14 different Canadian Food Regulations. The objective of the consolidation is to align food safety requirements for all types of food and activities under a universal set of regulations. The SFCR is outcome-based and allows for flexibility and innovation in meeting food safety requirements.

- Food types and processing technologies are becoming more complex and the SFCR outlines requirements for food businesses to increase consumer protection by implementing robust Food Fraud and Defense Plans, Supply Chain Verification, Allergen Management and Packaging and Labelling Controls.

- The CFIA has provided food manufacturers, processors, packagers, labellers, importers, and exporters until 2020 and 2021 to achieve compliance to the new SFCR requirements. These requirements depend on business activity and size.

- Three of the key new requirements of the SFCR are 1) activity specific licensing, 2) Food Safety Preventive Control Plan (PCP) and 3) improved traceability.

- This Quick Note focuses on the SFCR regulations and provides guidance on licensing, developing a written PCP, and traceability measures.

WHO DOES THIS APPLY TO?

- The SFCR is applicable to food businesses based on activity. To determine if a food business must comply to the new SFCR, there is an interactive tool available on the CFIA website. In general, SFCR applies to:
  - Food for human consumption (including ingredients) that is imported, exported, or interprovincially traded
  - Food animals from which meat products to be exported or interprovincially traded may be derived
• Specific sections of the SFCR (traceability, labeling and advertising) may apply to intra-provincially traded food

WHO DOES THIS NOT APPLY TO?

• Food businesses that manufacture food for pets
• Food intended for research or exhibitions, weighing 100 kg or less
• Food intended for transportation such as airlines, trains, ships, etc.

KEY POINTS

• The Food and Drugs Act (FDA) and its Regulations still apply to all food sold in Canada.
• SFCR replaces outdated regulations that have been in place for decades and no longer apply to current food technology and more complex supply chains.
• The CFIA ensures plant and animal safety and enforces compliance to food regulations.
• The new SFCR aligns with the Codex Alimentarius, a globally recognized collection of food safety standards.
• Fundamental new elements of the SFCR are:
  o Licensing to reflect the activities conducted by food businesses, based on commodity.
  o Preventive controls that focus on compliance to GMPs, food safety standards and market fairness.
  o Traceability of ingredients, materials and products which will aide in faster recalls. This means traceability one step forward and one step backwards.

REQUIREMENTS

• Licences under the previous CFIA structure will no longer be valid therefore, food businesses must apply for a SFCR licence applicable to the food activity.
• Preventive control is demonstrated by developing, implementing, and maintaining a PCP which demonstrates how food products are manufactured safely by eliminating or
minimizing hazards that pose a risk of contamination to products and potential harm to consumers.

- The requirement and timeline for implementation of a PCP varies by food commodity, the site’s activity, and the size of the establishment. For example, fresh fruit and vegetable growers do not require a PCP if the business generates less than $100,000.

**Authoring a Preventive Control Plan**

- A PCP is a document that highlights the **hazards** present in a process. Hazards are classified according to the following categories:
  - **Biological:** Microorganisms such as bacteria, fungus, and parasites.
  - **Chemical:** chemical concerns present along the process, such as pesticides, cleaning agents, and lubricants.
  - **Physical:** debris and/or foreign material such as stones and metal, or even rodents and other pests.

- These hazards are then evaluated for their risk, and those with significant risk must be controlled for through **Critical Control Points (CCPs)** and **Critical Limits**.

- **Steps to develop a PCP:**
  1) Assemble PCP team: consisting of Subject Matter Experts (SMEs) such as Plant Manager, Quality Assurance, Supply Chain, Quality Control, Engineering
  2) Ensure establishment is Operated and Maintained as required
  3) Perform Hazard analysis and implement monitoring procedures:
     a. Hazard Analysis
     b. Control Measures
     c. Critical Control Points
     d. Verification
  4) Establish measures for consumer protection
5) Assemble documents

- **PCP must be implemented into daily operations** by training personnel on PCP requirements, following procedures identified in the PCP, keeping records, and verifying compliance to the PCP and SFCR.

- **The PCP must be maintained** by reassessing periodically for any changes that potentially impact the PCP as written or potential new hazards that impact food safety, or if multiple non-conformances, complaints or recalls reveal a problem with the PCP.

**WHAT DO I NEED TO DO?**

- Understand the new SFCR requirements
- Assess whether your food business requires licensing, a PCP or traceability.
- Prepare for CFIA inspection

**ACRONYMS**

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>CCP</td>
<td>Critical Control Points</td>
</tr>
<tr>
<td>CFIA</td>
<td>Canadian Food Inspection Agency</td>
</tr>
<tr>
<td>PCP</td>
<td>Preventive Control Plan</td>
</tr>
<tr>
<td>SFCR</td>
<td>Safe Food for Canadian Regulations</td>
</tr>
<tr>
<td>SME</td>
<td>Subject Matter Expert</td>
</tr>
</tbody>
</table>

**RELATED DOCUMENTS**

- [CFIA - Reference Database for Hazard Identification](#)
- [Safe Food for Canadians Regulations, (SOR/2018-108)](#)
- [Codex Alimentarius, International Food Safety Standards](#)
FAQ

1. **If I was licensed prior to SFCR, do I need to obtain a new licence?**

   To determine if an SFCR licence is applicable to your food business, visit the interactive tool on the CFIA website. You will most likely require a licence if you manufacture, process, package, label, import or export food.

2. **How do I know if my business requires a written PCP?**

   To determine if a PCP is applicable to your business, the interactive tool on the CFIA website will provide guidance.

3. **How much does a new SFCR licence cost and how long is it valid?**

   The licence costs $250 and is valid for two years.

4. **Do I need a PCP for each product type?**

   Preventative control plan should be developed to identify and control hazards for all products within the scope of PCP requirement.

5. **How many licences does my business need?**

  Licenses are issued based on business activities. You may choose to apply for one licence that covers all of your establishments, activities and types of food, or multiple licences that cover unique combinations of establishments, activities and types of food.

6. **Is my PCP recognized globally?**

   Preventive control measures are internationally accepted approach based on Codex Alimentarius Hazard Analysis Critical Control Point (HACCP) process. *Note: consumer protection requirements components of the PCP (eg labeling) may differ among countries.*

7. **What is the difference between a PCP and a HACCP Plan?**

   HACCP Plan outlines specific hazards to product categories and control measures to eliminate and reduce food safety hazards.

   In addition to food safety hazard analysis and control measures, PCP outlines consumer protection and market fairness requirements (labeling, compositional standards, grades).
Do you need more information?

If you need help navigating the requirements that must be met in order to sell and distribute these new classes of cannabis products,

contact us today!

1-877-877-5152 ext. 271
or visit

www.QualityAndCompliance.com