

SFC LICENCE AND BEYOND

A guide to meeting food safety requirements for national retailer shelves.



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Introduction:

You're here because you have a food or beverage product that is getting noticed. Maybe your product is sold at farmer's markets, or perhaps it sits on local retail shelves. Either way, you're looking to understand more about Food Safety Programs, HACCP Plans and becoming Safe Food for Canadians Licenced to unlock new revenue opportunities.

Let's identify the process of building a Food Safety Program from 10,000 feet.

Step 1: Identify whether you require a Safe Food for Canadian Licence. There are a few indicators that your business has grown to the point that you will need to apply for this licence. We touch on this in Chapter 1.

Step 2: Assemble your Food Safety team. A well-developed food safety program within a food facility relies on a knowledgeable team who work together to identify food safety hazards and control them successfully.

Step 3: Develop a Preventive Control Plan (PCP) that meets CFIA regulatory requirements. This can be one of the most involved areas of your entire plan. We explain more about what is involved in Chapter 3.

Step 4: Apply for a Safe Food for Canadians Licence through the MyCFIA website. Having your plan in place and some months of records available is a critical step to being prepared for an audit by the CFIA or third-party.

A Food Safety Plan (aka Preventive Control Plan) is a system of policies, procedures and record keeping that helps you manufacture food in the absolute safest conditions. Building a Food Safety Plan and preparing to apply for a SFC Licence or HACCP Audit can take a significant number of hours. For an experienced expert, it takes about 40-50 hours. For a first timer to set up a program, it usually takes months.

Chapter 1: Do you need a Safe Food for Canadians Licence?

Okay, here's how you know if you need an SFC licence. As you read through, think about your ingredients, process, and product distribution.

You'll need a Safe Food for Canadians Licence to sell food in specific situations. Here's when you typically require a license:

Selling Outside Your Province: If you're planning to sell your yummy food products beyond your own province or territory in Canada, chances are you'll need a Safe Food for Canadians Licence. This applies when it comes to selling your goods across different provinces.

Exporting to Other Countries: If you've got dreams of sharing your delicious treats with people around the world, a Safe Food for Canadians Licence is generally necessary. This ensures that your food meets international food safety standards.

It's worth mentioning that certain activities might require a licence, regardless of whether they involve selling across provinces or exporting. For example:

Processing Meat Products: If you're in the business of processing meat products for export or interprovincial trade, you'll always need a licence.

Processing Regulated Products: Some food items like dairy products, eggs, fish, fresh fruit or vegetables, honey, maple products, meat products, processed egg products, and processed fruit or vegetable products might require additional food safety programs based on provincial regulations. To know the specific requirements, make sure to check the regulations in your province.

Retailer Requirement: The fact is, many growing food businesses implement a Food Safety or Preventive Control Plan, apply for a Safe Food for Canadians Licence any may even be HACCP or third-party audited based on a request from a National Retailer.



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Key Considerations

Interprovincial trade of products that you did not manufacture (meaning process, treat, preserve, grade, package or label) such as a distributor, does not require a licence. It is your responsibility to ensure the manufacturer does have a licence.

Interprovincial trade of food product that you did manufacture (meaning to process, treat, preserve, grade, package or label) requires a licence.

Importing food requires a SFC Licence except for food additives and alcohol which are exempt/covered under different regulations.

Exporting food requires a SFC Licence.

Tools to Help:

Government of Canada interactive tool to help food businesses determine whether or not they would require a licence.



Hot Tip: If you are hoping to get your product on any of the large retailer shelves, you will need a Safe Food for Canadians Licence. As you grow your business, your food safety program may need to be audited. A HACCP Audit is common for scaling up food businesses. Some retailers, like Costco for example, have their own audit requirements you must meet before you can stock your product on their shelves.



Chapter 2: Assembling a Food Safety Team

To get started, you will need to consider who is going to create your food safety plan. Less than 5% of food entrepreneurs create their own plans. There is a very good reason for that. Simply, it's incredibly time consuming and can be a big learning curve for entrepreneurs. To give you an idea of how much time: if it takes a consultant an average of 50 hours to build a simple food safety plan, it could take a first-time entrepreneur upwards of 250 hours. This is weeks or months of dedicated work.

When considering whether to hire a consultant you may want to also think about who will lead plan implementation, training, and provide general food safety leadership. This decision should be based upon the complexity of your product and process. Complex products will require more day-to-day management, monitoring, training, etc. Also, since your new food safety plan is being built presumably because you're scaling or meeting retailer requirements (and therefore scaling eventually) you should to consider what the new demand and production requirements are relative to the capacity of your current facility. Not only is a move disruptive, you may also have to re-write components of your food safety plan.

Adding a food safety program requires financial and personnel resources. Be ruthless in your pursuit to work with people who can help you reach your goals. This is an important step that could cost a great deal of time and resources. Remember, if food safety is something you have limited knowledge of, you will be reliant on hired team members or consultants to help make critical decisions that could have tremendously positive or negative impacts. The complexity of your product and process will dictate your hiring (external or internal) needs.

Should I hire a food safety consultant?

A food safety consultant is a great option for any food business who lacks the time or expertise to develop a food safety plan. In our opinion, hiring a consultant is the most efficient use of your time and resources. They allow you to focus on what you are great at, making your product. Consultants are a fabulous option when you're small and growing, and perhaps can't afford to hire a full-time food safety or quality assurance specialist. Check out Chapter 3 if you want to be convinced!



Hot Tip: Interview different consultants to determine that they are a good fit for your company. Understand that all consultants have specialties. For instance they may specialize in packaging & labeling, product development, process improvement, and so on. Ensure their specialty aligns with your products and your business needs.

What to look for when hiring staff

It is a good idea to hire staff who have experience in food safety. Food safety personnel should recognize practical aspects of food operations. They should understand how processes, flow, and equipment work together. Practical knowledge of microbiological, chemical and physical hazards related to the preparation of food is essential in manufacturing safe food.

If your staff is lacking in knowledge, there are food safety training programs, including HACCP certification courses, support them in understanding why and how we can set up food safety programs. Consultants who set up food safety programs may also provide necessary training as you require. Most consultants will not be able to maintain the day-to-day tasks long term, so it is important you are capable of managing food safety on an ongoing basis.

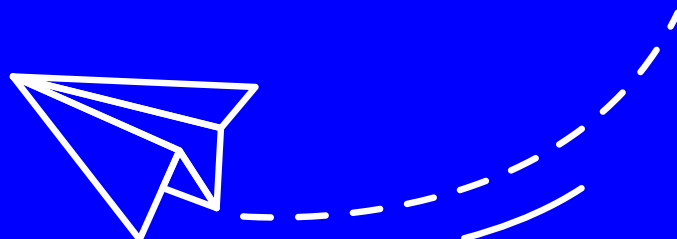
The knowledge gap within your team or complexity of your process and products will dictate how much training you need.



Hot Tip: Considering hiring your consultant to oversee your food safety talent acquisition

Developing an implementation plan

Implementing a Food Safety program and preparing for an audit should be planned thoroughly. The amount of time and effort that will be required depends on the size of your organization, complexity of products and current food safety measures already in place. Where your staff lacks technical skills, you may need to hire an outside consultant. It wouldn't be the first time a consultant has led an implementation plan. Implementation plans are vital but must not be viewed as elephants and treated with kid gloves. Take your time, be prepared to repeat things, and make lots of mistakes.



Chapter 3: Developing a Preventive Control Plan

As we've outlined in simple terms, unless you're experienced with food safety, you probably want to hire a food consultant to build your Preventive Control Plan (more on what this means below). There are training courses in GMPs, HACCP and Food Safety regulations, but they really ought to be taken in conjunction with hiring a food safety consultant, not in lieu of. It is recommended that the food safety team take introductory courses in all of these topics, whether or not you hire an outside consultant to build your food safety program. Training and competency play a major role in the success of your food safety plan.

Okay, what the heck is a Preventive Control Plan? Quite simply, it is a methodology CFIA chose to build and manage food safety plans when it developed the Safe Food for Canadians Regulations. It's the exact same thing as "food safety plan", it's just a more specific way of describing it.

On a final note, we want to share one more reason why it is a good idea to hire a food safety consultant to build your food safety plan. There are many examples of poorly built or over built and generally ineffective Food Safety programs resulting from an entrepreneur tackling this process alone. A food safety consultant is going to know how to generally optimize your plan for efficiency and safety.



Hot Tip: Consultants that build food safety plans are accustomed to guiding you through your first (verification) audit. A plan that a consultant builds ensures they're as vested in the outcome of the audit as you.

Preventive Control Plan Components

Implementing the Preventive Control Plan starts by documenting all the actions taken to meet specific requirements. This involves creating policies and standards that your facility can understand and put into practice.

Next, you need to develop standard operating procedures (SOPs) for each process required to implement a policy. For example, if your policy states that all machines must be thoroughly cleaned every day after production, the corresponding SOP would provide a step-by-step guide for you and your staff to follow during the cleaning process.

Keeping records is another crucial aspect. Whenever a process is completed, such as a sanitation clean or a pest control inspection, it's important to document it on the appropriate record form. This helps maintain a record of all the processes in place.

Monitoring is the final step. It's essential to set up a schedule for regularly checking and verifying that the required steps and verifications are being carried out. This ensures ongoing compliance with the preventive control plan.

Implementing the entire process can involve more than 100 different policies, procedures, and forms. To streamline this complex task, it is highly recommended to use digital food safety software, which can facilitate record management and monitoring. Food safety consultants often suggest utilizing such software to effectively manage the various aspects of implementing a preventive control plan.

~ Here is how involved the process is ~

Step 1: Establish your policies, procedures, and records to maintain and operate your facility.

Step 2: Development of HACCP Plans

Step 3: Preparation of Traceability Plan:

Step 4: Preparation of Complaints and Recall Plan:

Step 5: Assemble all of your food safety documents creating your Preventive Control Plan.

Step 6: Implement your PCP.

Step 1: Establish your policies, procedures, and records to maintain and operate your facility.

Once you've got your team together, the first thing you need to do is ensure that your facility's operations and maintenance align with the Safe Food for Canadians Regulations. This section outlines the fundamental practices that every food business should follow to minimize the chances of introducing hazards into the food during processing. These can sometimes be referred to as Good Manufacturing Practices. It's all about creating a safe environment for food production.

The areas of your facility that will require written policies, procedures and record keeping are:

- Sanitation
- Pest control
- Chemical Control
- Equipment maintenance
- Establishment maintenance/ housekeeping
- Shipping
- Receiving
- Handling
- Training
- Personnel Hygiene
- Visitor training and policies
- Labeling



Step 2: Development of HACCP Plans

A HACCP (Hazard Analysis and Critical Control Points) plan is like a super detailed roadmap for ensuring food safety. It's a systematic approach that helps food businesses identify potential hazards and put in place control measures to prevent or minimize those risks.

A different HACCP Plan is required for products that have different processing steps or different hazards and control measures. Your operation may have several HACCP plans.

Think of it as a step-by-step guide that covers everything from receiving ingredients to processing, packaging, and distribution. Each step is carefully analyzed to identify any possible hazards that could make the food unsafe for consumption. These hazards can include biological, chemical, or physical contaminants.

Once the hazards are identified, critical control points (CCPs) are determined. These are specific points in the process where control measures are implemented to prevent or eliminate the hazards. It could be something like monitoring temperatures, testing for pathogens, or ensuring proper sanitation practices.

The HACCP plan also establishes monitoring procedures to regularly check that the control measures are working effectively. If any deviations or issues are found, corrective actions are taken immediately to bring things back on track.

Regular record-keeping and documentation are key components of a HACCP plan. It helps demonstrate that the necessary steps were followed and provides a historical record for future reference or inspections.

In a nutshell, a HACCP plan is a detailed and proactive approach to food safety. It ensures that potential hazards are identified, controlled, and monitored throughout the entire food production process, resulting in safe and high-quality food for consumers.



Step 3: Preparation of Traceability Plan:

Businesses use traceability to keep track of their products from start to finish, allowing them to trace the journey of each item along the supply chain. Traceability is the ability to trace a material one step back to where you bought it and one step forward to where you sold your finished goods.

Imagine you're buying a product at the grocery store. A traceability plan ensures that if there's ever a problem or concern about that product, the business can quickly and accurately identify where it came from, where it went, and who was involved at each stage.

It all starts with recording key information at every step of the process. From the sourcing of raw materials to manufacturing, packaging, distribution, and even to the point of sale, data is collected and linked to each product. This information can include details like lot numbers, dates, quantities, locations, and even the names of suppliers or customers.

By having this detailed trail of information, businesses can effectively respond to any issues that may arise. For example, if there's a product recall due to contamination, the traceability plan allows the business to identify the affected batch and quickly remove it from circulation. This not only protects consumers but also helps maintain trust in the brand.

Overall, a traceability plan is like an insurance policy for the food industry. It ensures that businesses have the tools and processes in place to track their products at every stage, providing accountability, protecting consumers, and maintaining the integrity of the supply chain. The steps in traceability include;

- Developing your traceable identifiers. These are usually material names, product names, lot codes, supplier names, principal location of production and customer locations.
- Tracking received materials. Once you receive materials into your production facility, you need to keep track of the supplier's name, date, lot code and quantity received related to that product. This way, if a supplier sends out a notification of recall, you can quickly discern if you ever used the recalled material in your production.
- Tracking production. Create your own lot codes so you can trace your finished products. As you make goods, track quantities and lot codes.
- Tracking sales. Traceability requires you to track the product name, lot code, quantity, date and the name and address of the customer who purchased your products.
- Keep these records for a minimum of 2 years or longer if your shelf-life exceeds this time.

Step 4: Preparation of Complaints and Recall Plan:

A Recall Plan is a document you should have on file at your facility so that if required, your business can execute a Recall with ease and speed. Some of the details included in a Recall Plan include:

- Investigation procedure
- Notification to CFIA and mitigation of risk
- Recovery procedure for physical product

Conduct mock recalls periodically to test the effectiveness of the plan, identify areas for improvement, and ensure readiness to execute the recall plan efficiently if the need arises. By following these steps, businesses can proactively prepare for a recall and swiftly respond to protect consumers and maintain trust in their products.

Step 5: Assemble all of your food safety documents creating your Preventive Control Plan.

The plan will include all of the documents noted above including your policies, procedures and records related to the maintenance and operation of your facility, your HACCP plan, traceability plan and recall plan.

Creating a document register is a great way to manage all the moving parts.



Step 6: Implement your PCP

Here are the steps to take to start implementing your plan;

- Train your staff on all the policies and procedures outlined in your PCP. It's important to keep records of their training to meet the competency requirements set by the regulations.
- Follow the PCP in your facility. Start to do the things you have written in your policies and procedures during every production. This means following all sanitation procedures, conducting regular inspections as outlined in your plan, verifying shipments, and storing allergens properly. Essentially, your PCP tells the CFIA what you plan to do, and your actions demonstrate that you actually do it.
- Generate the records related to all policies and procedures. For every procedure that is in place to maintain or operate your business safely, there needs to be a record associated with that procedure. For example, cleaning procedures have a log that is completed every time a sanitation is done. For every pest control inspection, a pest control record is documented. Keep these documents for a minimum of two years or longer if your shelf life exceeds two years.
- Verify that your PCP has been implemented and effective by reviewing records, verify for completion and accuracy, review non-conformances.
- Maintain your preventive control plan by reviewing it annually. You may also need to make changes to your plan when regulations change or a problem in your system has been identified with an internal deviation, customer complaint or CFIA notification.
- Carry out a self-assessment (consultants can assist you) to verify that your PCP is implemented as it was written and that it is effective in meeting the intended outcomes. Conducting an internal audit of your plan is a great way to ensure you have everything covered.

Records:

Records are the documents that provide an accurate history of the food safety tasks that took place during the manufacturing process. They provide evidence that the preventive control plan is implemented and working effectively. A record permanently captures information that action was taken when it should have been according to the plan. It can be hard copy or digital.

Whether you work with a consultant or complete a review yourself it is necessary that you verify all the records in your food safety plan to allow you to confirm easily and with confidence that your preventive control plan is implemented and working effectively. Some records need to be reviewed daily, while others need to be reviewed less often depending on the task.

Upon review of recordkeeping, you might find that there are gaps in your food safety system and Preventive Control Plan. Once you know this you will be able to figure out the root cause of the issue, analyze and improve a process related to that issue or identify gaps in training.



Hot Tip: As mentioned, when you have completed your PCP, there can be over 100 documents on your register and several records to keep. When on paper, these can amount to several binders, folders or clip boards containing records that must be maintained. Digital record keeping allows for a paperless work environment. The speed of completing record keeping and verification are enhanced. Also, where documents are stored electronically, the integrity of the records is improved. Responsible personnel for each food safety event is reminded of their obligation to keep records which keep your paperwork up-to-date for any audit by CFIA or other third-party.

Chapter 4: Applying for a SFC Licence

Now that you have developed your food safety plan, it's time to walk you through the steps to applying for a Safe Food for Canadians Licence.

Step 1: Create a Contact Profile on My CFIA. Like other Canadian Government portals, you can sign in by using a sign-in partner like your online banking app or by registering for a GCKey.

Step 2: Create a Party Profile inside My CFIA. You will need to have ready:

- Your Business Number
- Legal Business Name
- Completed Proof of Authority Form
- Office Addresses
- Billing Addresses
- Physical addresses
- Billing account number with CFIA or credit card



Step 3: Assign contacts in My CFIA.

- Profile authority: the person who is responsible for all of the information on the profile.
- Profile manager: the person who is authorized to conduct business online with CFIA on behalf of the business.
- Party contacts: individuals who are designated to submit requests and communicate with the CFIA on behalf of the business.
- Emergency contact: in case there's an urgent situation that requires attention outside of regular business hours, the CFIA will reach out to the emergency contact person first.
- Regulatory contact: the CFIA will contact this person to arrange inspection activities during regular business hours.

All individuals mentioned above, except the emergency and regulatory contacts, are also required to sign up for a My CFIA account. This allows them to access the CFIA's online services and streamline their interactions with the agency.

Step 4: Log in to My CFIA and find your party profile to apply for your licence.

Step 5: Look for the "New Service Request" button and give it a click.

Step 6: In the dropdown menu, find "Safe Food for Canadians Licence Application" and click "Next Step". Don't forget to read and accept the SFC Licence Privacy Notice Statement.

Step 7: You'll see the "Safe Food for Canadians Licence Application – Application Create" page. Fill in your business and contact information accurately and click "Next".

Step 8: The "Licensable Activities" page will show up. Choose the domestic and/or international activities that apply to your business.

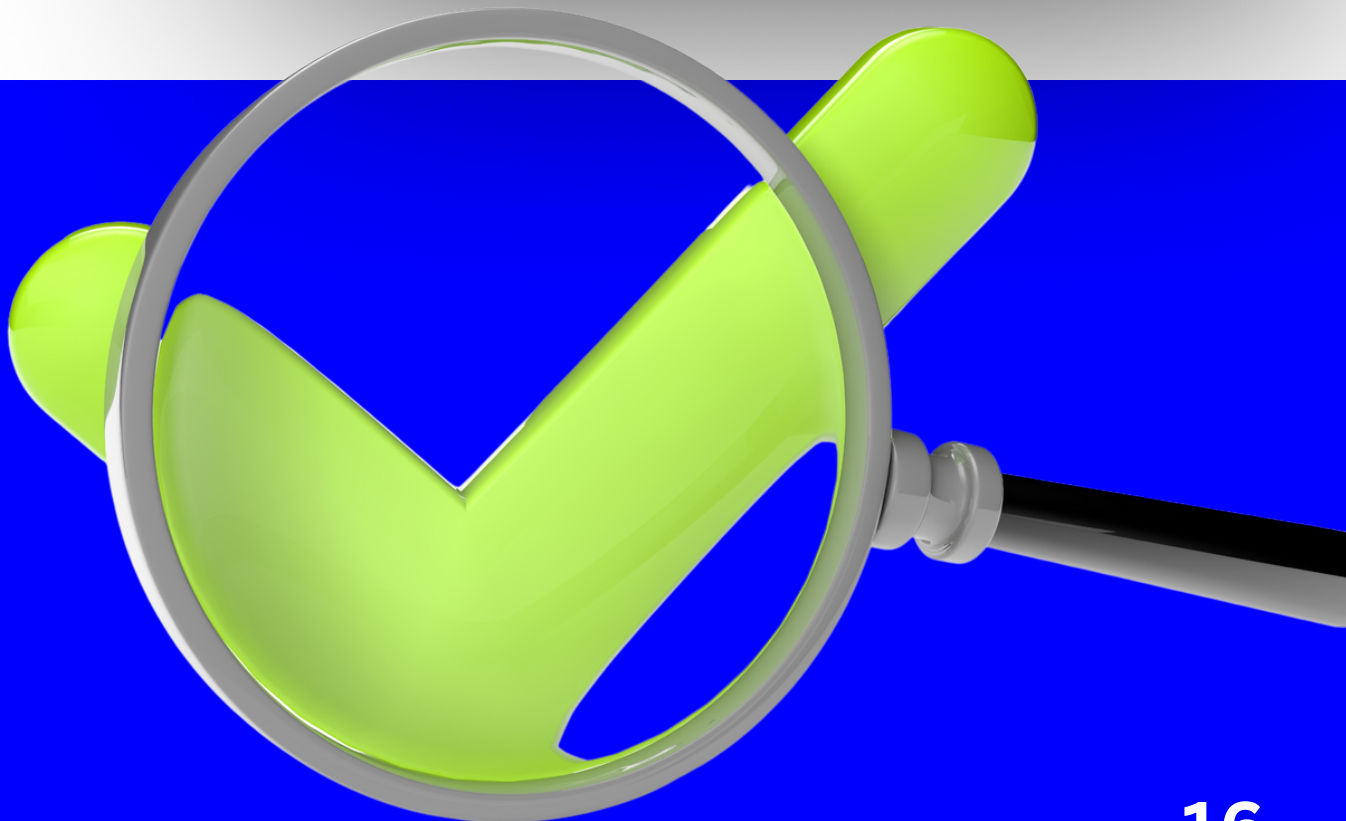
Step 9: On the "Select Establishments" page, pick the establishment you want to licence and move forward.

Step 10: Determine and select the domestic activities your establishment will be engaged in, like preparing food for interprovincial trade or preparing food for export.

Step 11: Declare that your business has the required written preventive control plans (PCPs) in place based on your licencing activities. This is an declaration that you do have a robust food safety program in place and your products are being made in a safe environment.

Step 12: Take a moment to review your application. If everything looks good, click "Submit" to proceed to the "Proceed with Payment" page.

Step 13: CFIA will schedule a review of your PCP and inspection of your establishment and processes to verify that the controls are implemented as designed and are effective. Address any non-compliances raised during the CFIA reviews as soon as possible. Once approved, the CFIA will issue you a Safe Food for Canadians Licence that will remain valid for two years.



Conclusion:

As the owner of a food manufacturing business, it's crucial to have a Food Safety Program in place to ensure the safety and quality of your products. This comprehensive plan helps you identify and address potential hazards, meet regulatory requirements, and protect consumers from foodborne illnesses.

Your Preventive Control Plan is the backbone of your operations. It establishes clear policies, procedures, and record-keeping practices for crucial areas like sanitation, pest control, allergen management, and more. By implementing this plan, you create a culture of food safety within your organization, ensuring that your employees are well-trained and consistently follow best practices. Keeping detailed records and monitoring processes allows for continuous improvement and prompt response to any deviations or issues that may arise. Ultimately, having a Preventive Control Plan showcases your commitment to delivering safe and high-quality food products while complying with industry standards.

In addition to your Food Safety Program, it's vital for a food manufacturer like yourself to apply for a Safe Food for Canadians (SFC) Licence. This licence is a legal requirement when selling your food products outside your province or exporting them to other countries. By obtaining the SFC Licence, you demonstrate your ability to meet the stringent food safety standards set by the Canadian Food Inspection Agency (CFIA). The application process evaluates your implementation of robust food safety practices, including Preventive Control Plans, proper labeling, and adherence to quality standards. Not only does the SFC Licence fulfill your legal obligations, but it also enhances your reputation as a trustworthy and responsible supplier. It opens doors to new customers and expands your market opportunities.

Now, I understand that building a food safety plan can be a daunting task due to the extensive work involved. That's where a food safety consultant can make a significant difference. Engaging the expertise of a consultant brings valuable knowledge of food safety regulations, industry best practices, and emerging trends to the table. They can assess your specific needs, identify potential risks, and guide you in implementing the necessary procedures and protocols. Working with a food safety consultant saves you time and effort by streamlining the process and ensuring that your plan aligns with regulatory requirements. This collaboration not only helps you develop a robust plan but also instills confidence in your customers, suppliers, and regulatory agencies that your operations uphold the highest standards of safety and quality.

By prioritizing your Food Safety Program, obtaining the SFC Licence, and partnering with a food safety consultant, you're taking proactive steps to safeguard your business, protect consumers, and build a strong foundation for success in the food industry.