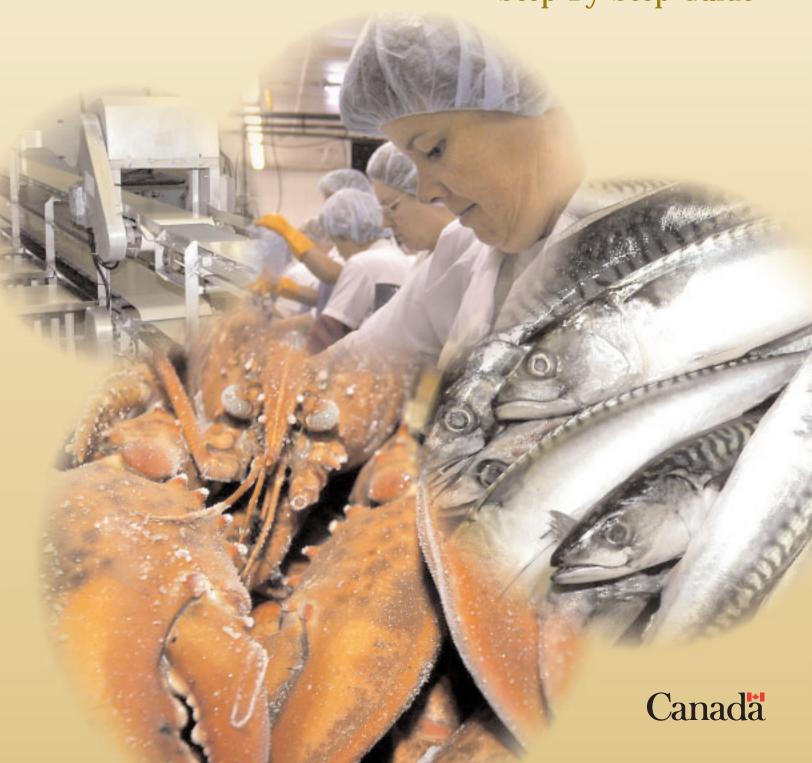


DEVELOPING A QUALITY MANAGEMENT PROGRAM PLAN:

A Fish and Seafood Processor's Step-By-Step Guide



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introduction

	INTRODUCTION	
	DEFINITIONS	
	THE STEP-BY-STEP APPROACH TO DEVELOPING YOUR QMP 11	
	DEVELOPING YOUR QMP IS A TEAM EFFORT	
	AN OVERVIEW OF THE QMP PLAN	
	REGISTRATION PROCESS	
step-	by-step guide	
	ELEMENT 1: MANAGEMENT ROLES AND RESPONSIBILITIES 23	
	ELEMENT 2: BACKGROUND PRODUCT AND PROCESS INFORMATION 27	
	ELEMENT 3: THE PREREQUISITE PLAN	
	ELEMENT 4: THE REGULATORY ACTION POINT (RAP) PLAN 43	
	ELEMENT 5: THE HACCP PLAN	
	ELEMENT 6: VERIFICATION AND MAINTENANCE OF THE QMP PLAN 65	
	ELEMENT 7: RECORD KEEPING	
	CONCLUSION	
appeı	ndices	
	APPENDIX A: APPLICATION FOR REGISTRATION OF FISH PROCESSING ESTABLISHMENT	
	APPENDIX B: BLANK FORMS	<u>D</u>

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introduction

INTRODUCTION 7
DEFINITIONS 8
THE STEP-BY-STEP APPROACH TO DEVELOPING YOUR QMP 11
DEVELOPING YOUR QMP IS A TEAM EFFORT 12
AN OVERVIEW OF THE QMP PLAN 13
REGISTRATION PROCESS17

Canada's domestic and international reputation for high standards in fish product safety and quality has been well earned. It has taken the effort of every level of the food production and distribution system to achieve this success.

Canada's Quality Management Program (QMP), which began in February 1992, was the world's first mandatory food inspection program based on Hazard Analysis Critical Control Point (HACCP) principles. The QMP is recognized internationally as an effective system for controlling the production of fish products and has facilitated the export of Canadian fish products around the world.

In order to process fish products for export, Canadian processors are responsible for complying with the Fish Inspection Regulations by:

- Developing a QMP (Quality Management Program) Plan. The QMP Plan must include a Hazard Analysis Critical Control Point (HACCP) Plan.
- **Registering** the processing facility with the CFIA by properly completing an application form and paying a specified fee. A Certificate of Registration can only take place once a QMP Plan has been completed and accepted by CFIA.
- **Ensuring** the facility(s) is in **compliance** with Schedule I of the *Fish* Inspection Regulations. Facility compliance will be verified by CFIA prior to issuance of the Certificate of Registration.

The CFIA presents Developing a QMP Plan: A Fish and Seafood Processor's Stepby-Step Guide, as a tool to help fish processors develop a Quality Management Program Plan. Using this document as a guide, a processor can tailor their QMP Plan to their products, processes, plant, and specific hazard-avoidance needs.



DEFINITIONS

The following is a list of definitions and terms which relate to the Quality Management Program.

Compliance Verification	Activities carried out by CFIA Inspectors to verify that a federally registered fish processing establishment has implemented its Quality Management Program plan as designed and that it meets the requirements set out in the <i>Fish Inspection Regulations</i> and the QMP Reference Standard. This includes a combination of audit and inspection activities.
Control Measure	An action performed to maintain adherence to a standard or to eliminate a hazard or reduce it to an acceptable level. It is also known as a preventative measure .
Corrective Action	The procedure that is to be followed whenever a deviation from a critical limit in a HACCP plan occurs or whenever the results of monitoring procedures in respect of a prerequisite program plan or a regulatory action point plan show that there is non-compliance with the <i>Fish Inspection Regulations</i> .
Corrective Action Plan	A documented plan of corrective actions required, including time frames, persons responsible for implementing the plan and the processor's verification that the corrective action is working. A Corrective Action Plan is prepared in response to a compliance verification or inspection report, and must be reviewed and accepted by the CFIA.
Critical Control Point (CCP)	A point in a process operation at which control is to be applied in order to prevent or eliminate a hazard or reduce it to an acceptable level.
Critical Limit	The maximum or minimum value to which a hazard must be controlled at a critical control point.
Export	Ship from Canada to any other country or from any province to any other province.
Hazard	A biological, chemical or physical agent or factor that has the potential to cause illness or injury to humans in the absence of its control.

QMP

introduction

Restricted Access Zone	That part of a processing area where personnel movements are restricted and employee hygiene and sanitation procedures are in place to control potential contamination or cross-contamination, but which does not meet the specific requirements of a Sanitary Zone.
Sanitary Zone	That part of a processing area, for sensitive processing steps or high risk products, for which a set of controls, meeting specified criteria, have been established to control all vectors of potential contamination or cross contamination including air movement, employee hygiene and sanitation procedures.
Standard Operating Procedures (SOPs)	A detailed set of instructions which describes how to carry out a task, function or product formulation.
Systems Verification	An evaluation of a federally registered fish processing establishment's documented Quality Management Program plan against the QMP Reference Standard to verify that it contains all the necessary components and has the necessary controls to ensure compliance with the <i>Fish Inspection Regulations</i> .
Validation	Supportive evidence or documentation to confirm that the values of the critical limits for each Critical Control Point (CCP) are sufficient to prevent, eliminate or reduce to an acceptable level, food safety hazards in the final product.
Verification	A review of a control system or its records performed on a regular basis to determine whether the controls are working as intended and are functioning effectively to control the relevant hazards. Verification activities may include conducting records checks, reviewing procedures, conducting operational simulations (such as mock recalls), internal audits, tests or measurements (independent of monitoring controls), and product sampling (including microbiological & chemical).

This guide provides you with a step-by-step approach to developing your QMP Plan. The major steps of the process are as follows:

- 1. The first and most critical step is to get senior company management commitment to the QMP Plan. This is vital to the successful development, implementation, and maintenance of the QMP Plan.
- 2. Once you have management commitment, management must assign the task of developing the QMP Plan to an individual or a team. Either approach is acceptable, and should depend on the size of you company and plant. In either case, the input of other plant employees will be necessary to develop the best possible QMP Plan.
- **3.** The individual responsible for developing the QMP Plan must then set out a plan identifying the major tasks and target dates on which they will be completed.
- 4. The training institutions in the area should be contacted to determine whether any QMP Plan development workshops are being held that relate to your products and processes. Participation in a workshop is strongly recommended. If possible, companies should have more than one member attend a workshop. If there are no workshops available, schedule a workshop by contacting local training institutions or the National Seafood Sector Council.
- **5.** The next step is to begin developing your QMP Plan by using the step-by-step process described in this guide.
- **6.** Once you have developed your QMP Plan, verify the written plan to ensure that you have addressed all components of the plan.
- **7.** When you are satisfied with your QMP Plan, submit the self-verification checklist, with the appropriate information, to the local CFIA office; the regulatory verification process will then begin.
- 8. The CFIA will review the self-verification package and notify you of any further work that is required. Once the QMP plan is found to be acceptable, and the establishment is determined to meet requirements, the CFIA will issue a certificate of registration advise you to begin operating under your QMP Plan. The CFIA will schedule a compliance verification to assess the program.

The development of your QMP Plan needs a team approach. Although there may be only one individual designated to develop the QMP Plan, he or she should involve as many of the plant staff as possible. Throughout the development of the plan, bring in the individuals that are responsible for the subject you are working on. For example, if you are documenting the plant sanitation and clean-up procedures, get input from the clean-up crew, the individual responsible for verifying that the clean-up was performed properly, and any other staff involved in this area. Discuss the procedures and controls, and try to find better and simpler ways to meet the goal of achieving a clean and sanitary plant.

The team approach is helpful because when only one person develops the QMP Plan, some key points can be missed or misunderstood. The team approach minimizes the risk that key points will be missed. It also encourages ownership of the plan and builds company involvement.

In small companies, it may be difficult to take a team approach. In these cases, the team approach can be met by attending one of the QMP Plan development training courses offered by local training institutions. Working with a group of processors in a workshop environment can be very beneficial and helpful.



Management Commitment

Managers are part of the team effort. Management participation will set a good example, promote quality management, and foster employee cooperation. It is strongly recommended that senior management demonstrate their commitment to the QMP Plan in writing. Managers can also demonstrate their commitment by taking on responsibilities under the QMP Plan, supporting training, and encouraging and motivating personnel.

A QMP Plan is a document describing controls applied in a fish processing establishment to meet requirements under the *Fish Inspection Regulations*. Each federally registered fish processing establishment must develop, document and apply a specific QMP Plan for the products and processes carried out in their plant.

Let's begin with the QMP Reference Standard.

The QMP Reference Standard is the blueprint for the development of the QMP Plan. It sets out the requirements for the documentation and application of a fish processing establishment's Quality Management Program Plan. CFIA personnel use the Reference Standard during their systems verification and compliance activities. The complete QMP Reference Standard and compliance guidelines can be found at www.inspection.gc.ca.

The QMP Reference Standard consists of the following seven elements:

- ELEMENT 1: MANAGEMENT ROLES AND RESPONSIBILITIES
- ELEMENT 2: BACKGROUND PRODUCT AND PROCESS INFORMATION
- ELEMENT 3: THE PREREQUISITE PLAN
- ELEMENT 4: THE REGULATORY ACTION POINTS (RAP) PLAN
- ELEMENT 5: THE HAZARD ANALYSIS CRITICAL CONTROL POINT (HACCP) PLAN
- ELEMENT 6: VERIFICATION AND MAINTENANCE OF THE QMP PLAN
- ELEMENT 7: RECORD KEEPING

An overview of the requirements for each of the seven elements will be covered in this section followed by detailed guidance in the step-by-step section. The appendices of this guide contain additional information invaluable to the development of a proper and complete QMP plan.

ELEMENT 1: MANAGEMENT ROLES AND RESPONSIBILITIES

Element 1 (Management Roles and Responsibilities) identifies the position responsible for the QMP Plan. It may also describe how the QMP was developed and how it will be implemented.

ELEMENT 2: BACKGROUND PRODUCT AND PROCESS INFORMATION

Element 2 (Background Product and Process Information) identifies product and process information in the form of a Product Description, Process Flow Diagram, and where applicable, and Establishment Floor Plan.

ELEMENT 3: THE PREREQUISITE PLAN

Element 3 (The Prerequisite Plan) requires an Establishment Environment Program and a Lot Accountability and Notification Program.

Under the Establishment Environment Program processors need to identify:

- The establishment standard that is applied in the facility;
- The actions that are taken by the processor to ensure the standard is met;
- the record keeping system to record corrective actions when problems are identified:
- The corrective action system in place to address deficiencies when they are identified.

Under Lot Accountability and Notification Program, the processors need to identify:

- A Product identification and distribution system that allows for the rapid identification of the first shipping destination (for the purposes of carrying out a product recall);
- Procedures to notify the CFIA of any valid health and safety complaints.

ELEMENT 4: THE RAP PLAN

Element 4 (The RAP Plan) must describe the controls designed to ensure that:

- Fish is handled properly during processing and results in a final product that is not tainted, decomposed or unwholesome and meets all the applicable sections of the Fish Inspection Regulations;
- Any ingredients added to the fish product or packaging material used are acceptable for food and meet all regulatory requirements as specified in the Fish Inspection Regulations and the Food and Drugs Act and Regulations;
- Labelling and coding of all fish products meet the requirements of the *Fish Inspection Regulations* and is not false, misleading or deceptive.

The processor must identify:

- The fish product standard(s) and the ingredient and packaging requirements to which they must comply;
- The controls that are implemented in production to ensure the standards and requirements are met;
- The record keeping system to record corrective actions when problems are identified.

ELEMENT 5: THE HACCP PLAN

Element 5 (The HACCP Plan) requires processors to develop, document, and implement a HACCP Plan to control any health and safety hazards related to the product or process. The processor must apply the seven principles of HACCP to identify any significant hazards. For those significant hazards identified, the processor must develop a HACCP Plan to prevent, eliminate or reduce the hazard to an acceptable level.

The HACCP System consists of the following seven principles:

- Principle 1: Conduct a hazard analysis.
- Principle 2: Determine the Critical Control Points (CCPs).
- Principle 3: Establish the critical limit(s).
- Principle 4: Establish a system to monitor control of the CCP.
- Principle 5: Establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control.
- Principle 6: Establish procedures for verification to confirm that the HACCP system is working effectively.
- Principle 7: Establish documentation concerning all procedures and records appropriate to these principles and their application.

See *Figure 1* for a summary of the three main control elements of a QMP Plan (Elements 3, 4 and 5)

ELEMENT 6: VERIFICATION AND MAINTENANCE OF THE QMP PLAN

Element 6 (Verification and Maintenance of the QMP Plan) requires processors to perform verification activities to ensure that their QMP Plan is functioning correctly.

Before implementation the processor is required to:

- Validate the critical limits of CCPs;
- Review the QMP Plan to ensure that all of the necessary controls are in place and that it meets the requirements of the Reference Standard.

Once the QMP Plan is implemented the processor is required to:

- Perform routine verification of the HACCP Plan to ensure it is functioning effectively;
- Verify or validate any changes to the QMP Plan or to critical limits that may occur in the ongoing development of the QMP Plan;
- Review the QMP Plan at least once a year;
- Maintain a list of amendments of any changes to their QMP Plan.

ELEMENT 7: RECORD KEEPING

Element 7 (Record Keeping) requires that records must be kept for the QMP Plan as follows:

- For all Prerequisite and RAP Plans, record keeping may be "by exception" (only deficiencies need to be noted);
- For the HACCP Plan, record keeping is mandatory for all testing, measurements, and monitoring at CCPs and for corrective actions when the critical limits are exceeded;
- For all verification activities and results, record keeping is mandatory;
- For amendments or changes to the QMP Plan, a record must be maintained.

Figure 1: Main QMP Plan control elements

PREREQUISITE PLAN	REGULATORY ACTION POINT PLAN	HACCP PLAN	
 Establishment environment Lot accountability 	 Minimum fish product standards Input materials Labelling 	Hazard Analysis CCPs	

Once the QMP Plan is properly completed, a processing plant may apply to the CFIA for a Certificate of Registration.

To register, complete an application form and submit the specified fee. See Appendix A of this guide for a sample form. Forms can be requested from the CFIA by telephone, or downloaded from the CFIA website.

The form must be signed by an authorized officer of the processing plant. The application must include a self-verification of the QMP Plan in the form of a letter signed by the applicant confirming the Critical Control Points (CCPs). It must also validate the critical limits of the CCPs, and verify that the QMP Plan meets the requirements of the Reference Standard.

The diagram of the processing plant that is included for a new Certificate of Registration must include the measurements of the processing area.

Full payment of the fees for the Certificate of Registration should be included with the application form, and should be sent directly to the designated CFIA office in your region.

CERTIFICATE OF REGISTRATION OF A FISH PROCESSING ESTABLISHMENT OUN ÉTABLISSEMENT DU POISSON DU POISSON	Registration No. / N° d'agrément	Region / Région
Name of Establishment / Nom de l'établissement	Issue Date / Date d'émission Y/A M D/J	Expiry Date / Date d'expiration Y / A M D / J
Mailing Address / Adresse postale Location of Establishment / Lieu de l'établissement Sample /	Type(s) of Process Operation / Type(s) Spécim	
Signature REGIONAL DIRECTOR DIRECTEUR RÉGIONAL		
This certificate is issued in accordance with the Fish Inspection Regulations.	Le présent certificat est délivré en vertu de	Règlement sur l'Inspection du poisson.

Note:

A food production facility may be subject to a wide range of applicable legislation at the municipal, provincial and federal level. Quality system controls respecting acts, regulations and/or standards and various other regulatory requirements, other than those identified within this document, are not required to be addressed in the QMP Plan. Processors should ensure that all processing operations and products meet other applicable legislation and market requirements.



step-by-step guide

ELEMENT 1:	
MANAGEMENT ROLES AND	
RESPONSIBILITIES	23
ELEMENT 2:	
BACKGROUND PRODUCT AND	
PROCESS INFORMATION	97
PROCESS INFORMATION	21
ELEMENT 3:	
THE PREREQUISITE PLAN	33
·	
ELEMENT 4:	
THE REGULATORY ACTION	
POINTS (RAP) PLAN	43
ELEMENTE F.	
ELEMENT 5:	
THE HAZARD ANALYSIS	
CRITICAL CONTROL POINT	
(HACCP) PLAN	53
ELEMENT 6:	
VERIFICATION AND MAINTENAN	CE
OF THE QMP PLAN	~~
OF THE QWIP PLAN	03
ELEMENT 7:	
RECORD KEEPING	71
CONCLUSION	73



The processor must identify the position responsible for the QMP Plan. As well, it is recommended that the processor describe how the QMP Plan was developed, and how it will be implemented. This element is important because management commitment is critical to the successful development, implementation and maintenance of the QMP Plan.

The requirements of this element must be met by:

- **1.** Providing the name, business address, business telephone number and the title of the person responsible for the QMP Plan.
- 2. It is not mandatory, but is strongly recommended that senior management demonstrate their commitment to the QMP Plan in writing. This can be done by producing:
 - an organization chart;
 - a written description of each manager's accountability;
 - a written description of company dispute-resolution processes, ie., between production staff and quality management staff;
 - a vision statement or mission statement that emphasizes quality management;
 - a QMP Plan internal audit schedule, with management roles indicated;
 - documentation of management's role in corrective and preventive actions;
 - a written statement of commitment signed by all management staff;
 - Prerequisite Plan, RAP Plan and HACCP Plan procedure manuals; and/or
 - a signed statement of management commitment to quality management training, accompanied by a list of training opportunities for employees, broken down by job requirements.

In addition to a written commitment, managers can **demonstrate** their commitment by taking on responsibilities under the QMP Plan, supporting training activities, and motivating employees in the development, implementation and maintenance of the QMP Plan.

Managers can **participate** in the development of the QMP Plan by explaining it to employees, assigning quality management duties, or allocating equipment, materials, staff and space to QMP Plan activities, such as training.

Training is an effective way of involving employees in the process of developing a QMP Plan. Investment in training establishes management commitment. In addition, it is a valuable tool for the development and maintenance of a successful QMP Plan.

Contact local training schools and companies to find out whether any QMP courses are being held in the area. Try to have more than one employee from the QMP team go to the training course. If there are no courses available, a course can be scheduled by contacting the training schools or the National Seafood Sector Council (NSSC). The NSSC is a valuable source of information and training tools.



MINIMUM REQUIREMENTS

Processors are required to identify product and process information in the form of a product description for each type of product, a process flow diagram, and where necessary, a plant floor plan.

The product description must identify those product attributes and characteristics that are important in ensuring a safe and acceptable fish product.

The process flow diagram must outline all of the production steps and assists in identifying those steps that are important in processing a safe fish product meeting all regulatory requirements.

The plant floor plan is obligatory for plants with sanitary zones and restricted-access zones.

PRODUCT DESCRIPTION

A QMP Plan must include the necessary controls specific to the operations in place and the products produced. Therefore, before a QMP Plan can be written, information must be gathered about the attributes and characteristics of the products and processes that influence product safety and quality.

Step 1

Prepare a list of all products processed by the facility.

Step 2

For each product, record all relevant characteristics such as:

- product name;
- source of raw material;
- important characteristics of the final product;
- all ingredients;
- product packaging;
- end product use;
- product shelf life;
- market destination;
- labelling instructions for safe product storage (where applicable);
- special distribution controls or instructions (where applicable).

Figure 2 shows an example of a product description form that can be used to organize this information.

Step 3

Group the products according to their attributes and the controls they need.

Figure 2: Product Description Form

1. PRODUCT NAME(S)	Identify the species and method of processing; e.g. "Frozen sole fillets."
2. SOURCE OF RAW MATERIAL	State where it came from ; e.g., "Locally caught" or "Imported from China."
3. IMPORTANT FINAL PRODUCT CHARACTERISTICS	List characteristics that affect product safety, especially those that influence pathogens, such as pH level or salt concentration.
4. INGREDIENTS	List every substance added during processing; e.g., water, salt. Also list all ingredients of sauces and batter or crumb coatings.
5. PACKAGING	List all packaging materials; e.g., waxed cardboard, polyethylene wrapping. Only approved materials may be used.
6. HOW THE END PRODUCT IS BEING USED	State how the final product is to be prepared for serving, especially whether it is ready to eat.
7. SHELF LIFE (IF APPLICABLE)	State the date when the product can be expected to begin to deteriorate if stored according to instructions; e.g., "Use within 21 days of shipping."
8. WHERE THE PRODUCT WILL BE SOLD	If the product is for export only – that is, it contains an ingredient or labelling not permitted in Canada – include this information so that the product goes only to a market where all its ingredients are permitted and the labelling is acceptable.
9. SPECIAL LABELLING INSTRUCTIONS	List all instructions for safe storage and preparation; e.g., "Keep refrigerated."
10. SPECIAL DISTRIBUTION CONTROL	List all instructions for safe product distribution; e.g., "Keep refrigerated."

Note: A blank version of this form can be found in Appendix B

4. Receiving head-on, gutted fish **RAP CONTROL**

5. Holding head-on, gutted fish

6. Washing

7. Heading

8. Filleting

9. Skinning

PROCESS FLOW DIAGRAM

The purpose of the process flow diagram is to clarify and document the process and, eventually, to help the processor pick out the process steps where control measures and monitoring procedures would be most effective. Therefore, the process flow diagram should include all process steps and highlight the specific steps that are significant to product safety.

Step 1

Develop a process flow diagram for each of the products or groups of products that are produced at the facility. A plain block schematic, like the sample in *Figure 3* for a fresh and frozen groundfish plant, is adequate.

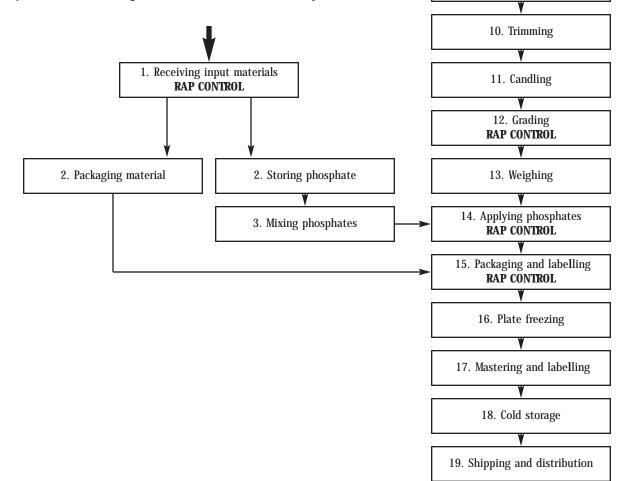
Step 2

When the process flow diagram is finished, walk through the plant with it and verify that it is complete and accurate.

Step 3

When the QMP Plan is complete, indicate the RAPs and CCPs on the process flow diagram.

Figure 3: Sample Process Flow Diagram - Fresh and Frozen Groundfish Plant



PLANT FLOOR DIAGRAM

If, during the development of a HACCP Plan, hazards are identified that can be controlled by using sanitary zones or restricted areas (for example, in cooked or canned fish products), the QMP Plan must show where these areas will be. This can be achieved with a schematic indicating the flow of materials, traffic and product that outlines the sanitary zones and restricted access areas. An example of a floor plan for a hot pack cooked lobster operation is shown in *Figure 4*.

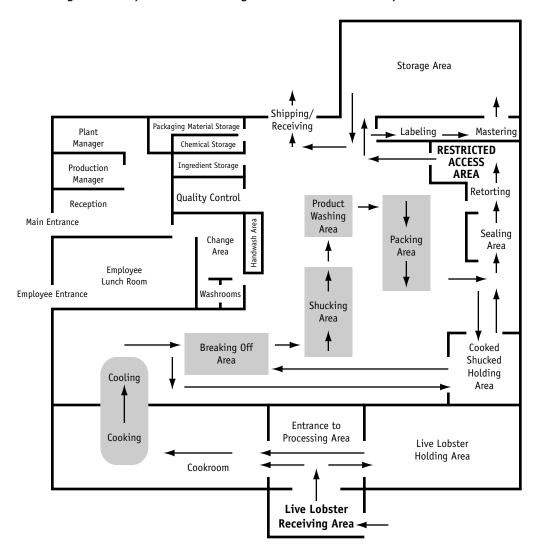
Step 1

If the application of sanitary zones or restricted access areas have been identified as a control measure in the development of the HACCP Plan, develop a plant floor diagram outlining these areas.

Step 2

When the plant floor diagram is finished, walk through the plant with the diagram and check that it is complete and accurate.

Figure 4: Sample Plant Floor Diagram - Hot Pack Lobster Operation





MINIMUM REQUIREMENTS

Processors are required to identify controls on establishment design, construction and maintenance in order to provide assurance:

- that the food will be produced under sanitary conditions;
- of control of all potential sources of significant contamination;
- that product can be rapidly recalled from first shipping destinations.

THE PREREQUISITE PLAN IS DIVIDED INTO TWO PROGRAMS:

1. Establishment Environment Program

As part of the Establishment Environment Program processors are required to identify:

- the establishment environment standard that is applied in the facility (as a minimum the standard must meet the requirements of the Fish Inspection Regulations);
- the actions that are taken by the processor to ensure the standard is met;
- the record keeping system to record corrective actions when problems are identified;
- the corrective action system in place to address deficiencies when they are identified.

2. Lot Accountability and Notification Program

- for purposes of carrying out a product recall, processors are required to have a product identification and distribution system that allows for the rapid identification of the first shipping destination.
- the processor is also required to have procedures to notify the CFIA of any valid health and safety complaints.

Note:

Under the Prerequisite Program, processors are not required to record the results of monitoring unless a problem is identified. In these cases, the processor must record the problem and the corrective action that was initiated.

DEVELOPING A PREREQUISITE PLAN

Every fish processing operation must have a Prerequisite Plan, which covers the plant environment (facilities, sanitation and hygiene) and accountability and notification (removing from the market product that may be unsafe). A Prerequisite Plan should be specific to each individual operation.

This plan is called "Prerequisite" because it includes aspects of plant operations that are essential to the production of safe, healthy food that must be in place before processing begins.

3.1 Establishment Environment Program

The Establishment Environment Program is divided into two parts: Construction and Equipment and Sanitation and Personnel Hygiene. To aid in the development of an Establishment Environment Program, a worksheet is provided in the Appendices as an example. The Establishment Environment Program Worksheet is an effective tool because it relates standards to control measures and monitoring procedures to corrective actions. The worksheet summarizes in one document why the control measures are being applied and what to do when a problem arises. Figure 5 shows a sample of a completed Establishment Environment Program Worksheet for a cooked shrimp operation.

3.1.1 Plant Construction and Equipment

The Establishment Environment Program must include a documented program to ensure that plant facilities and equipment are:

- · suitably designed and built; and
- maintained in a state appropriate for safe food processing.

To develop the plant construction and equipment component of the Establishment Environment Program , follow these steps:

Step 1 – Know the standard.

- 1. Become familiar with the construction and equipment standard applied at the processing facility. Most companies apply the construction and equipment requirements set out in Schedule 1 of the *Fish Inspection Regulations*. These requirements are set out in Chapters 5 and 6 of the CFIA Facility Inspection Manual.
- 2. A copy of the standard must be included in the QMP Plan. The standards are the foundation of the QMP Plan. Without a standard, control measures will not be focused on a fixed target and it will not be known if the objectives are being met. The inclusion of standards is a demonstration to any party that audits your QMP Plan that it is based on clear, defined standards.
- 3. Upon becoming familiar with the construction and equipment standard, document the control measures, monitoring procedures and corrective action system (as illustrated in the sample Establishment Environment Program in *Figure 5*) that will ensure the processing facility is maintained in compliance with the standard.

Step 2 – Document control measures and monitoring procedures.

- 1. The control measures and monitoring procedures can be developed together.
- 2. This step offers another opportunity to work in a team environment. Involve the personnel that are currently responsible for the inspection and maintenance of the plant.
- 3. Review the present control measures and monitoring procedures, and discuss ways they can be improved and simplified.
- 4. Refer to *Figure 5* for an example of a Establishment Environment Program .
- 5. Control measures are the actions that a company takes to maintain the processing facilities in compliance with the regulations. They can include:
 - training production personnel on the standard so that they can identify deficiencies when they occur;
 - routine inspection of the processing facility; or
 - · scheduled plan maintenance.

All of the above actions are effective control measures for ensuring the plant construction and equipment are maintained in a suitable condition for food processing.

- 6. Monitoring procedures describe how the control measures are applied and verify that the standard is being met. The monitoring procedures describe how the inspections are carried out, the frequency of the inspections and who is responsible for the inspections.
- 7. Record the control measures and monitoring procedures in the QMP Plan. The Establishment Environment Worksheet, found in Appendix B is one way of recording this information.

Step 3 – Document the corrective action system.

- Once the control measures and the monitoring procedures have been developed, the team can focus on writing the corrective action systems.
- 2. Corrective actions are actions that are taken when monitoring identifies a deviation from the standard.
- 3. Corrective actions must be recorded.
- Corrective actions include two different kinds of activities: fixing the immediate problem and preventing the problem from happening again.
- 5. Fixing the immediate problem includes:
 - correcting the deficiency that gave rise to the problem;
 - identifying and segregating the affected product;
 - sampling and inspecting the affected product to find out whether it is safe; and
 - reworking or destroying the defective product.

Note:

The Corrective Action Record for correcting deficiencies should include the following information:

- a description of the deficiency;
- identification of which part of the standard is not being complied with;
- a description of the corrective action;
- who is responsible for taking the corrective action;
- the date the corrective action was verified as effective;
- the name and signature of the person who verified the corrective action; and
- the long-term preventative steps (if any) that were implemented to ensure that the problem does not recur.

- 6. Preventing the problem from happening again includes:
 - investigating the development of the problem;
 - determining the method most likely to eliminate the source of the problem (such as a new control measure, procedure, standard or critical limit);
 - writing or rewriting control measures or monitoring procedures, setting a new standard, or revising an established one; and
 - giving both processing and Quality Management staff training that specifically covers the source of the original problem.
- 7. With the team, develop a corrective action system that captures these concepts and includes a record-keeping system.
- 8. Document the general steps of the Corrective Action System in the QMP Plan. The Establishment Environment Program Worksheet, found in Appendix B is one way of recording this information.

3.1.2 Plant Sanitation and Personnel Hygiene

The Plan Environment Program must include a plant sanitation and personnel hygiene component that covers:

- clean-up that is, ensuring that the plant is cleaned and sanitized in accordance with health and safety standards, using only materials approved for use in food processing areas;
- · hygiene procedures for all staff; and
- · pest control measures and procedures.

To develop the plant sanitation and personnel hygiene of the Establishment Environment Program , use the same process as that for developing the construction and equipment component.

Step 1 – Know the standard.

- 1. Become familiar with the plant sanitation and personnel hygiene standard applied at the processing facility. Once again, most companies follow the requirements set out in Schedule II of the *Fish Inspection Regulations*. These requirements are set out in Chapters 5 and 6 of the CFIA Facilities Inspection Manual.
- 2. A copy of the standard must be included in the QMP Plan.
- 3. Upon becoming familiar with the plant sanitation and personnel hygiene standard, document the control measures, monitoring procedures and corrective actions that will ensure the processing facility is maintained in compliance with the standard.

Note:

The CFIA Reference Listing of Approved Construction Materials and Non-food Chemicals identifies acceptable materials. It can be found at:

http://www.inspection.gc.ca /english/ppc/reference /cone.shtml

Step 2 – Document control measures and monitoring procedures.

- 1. The control measures and monitoring procedures can be developed together.
- 2. Once again, the team approach is recommended. Involve the personnel that are currently responsible for performing plant clean-up and sanitation, and those that inspect the processing facility to ensure it is kept clean and sanitary.
- 3. Also include those responsible for supervising on-line employees. Discuss the overall hygiene practices of personnel in the plant, and compare these practices with the standard.
- 4. Review the present control measures and monitoring procedures, and discuss ways that they could be improved and simplified.
- 5. Review the training (if any), direction, instructions and supervision that all company personnel receive, and determine if they are effective and whether improvements can be made.
- 6. Refer to *Figure 5* for a partial example of a Establishment Environment Program .
- 7. Refer to the appropriate example QMP Plans to get an idea of different control measures and monitoring procedures that can be applied.
- 8. Control measures are the actions a company takes ensure that the processing environment is maintained in a clean and sanitary condition appropriate for processing food. They include the training and instruction provided to all company employees on proper hygienic practices and behaviour in a food processing facility, and the implementation of a daily plant sanitation regime.
- 9. In developing the control measures, provide a written description of:
 - plant sanitation and clean-up procedures;
 - facility pest control program; and
 - standard operating procedures for personnel hygiene.
- 10. Monitoring procedures describe how the control measures are applied and verify that the standard is being met. For example, if you choose to provide instruction to on-line employees on specific hygiene rules, the monitoring procedure could be to observe the personnel, hygiene practices periodically and correct poor practices. The control measure performing a daily plant sanitation and clean-up can be monitored by inspection before the plant starts up.
- 11. Record the agreed-on control measures and monitoring procedures in your QMP Plan. One way of recording this data is with a Establishment Environment Program worksheet, which can be found in Appendix B.

Note:

Example QMP plans are meant to be used as a guide only and should not be interpreted as adequate for your processing facility or products. They can be found at:

http://www.inspection.gc.ca /english/anima/fispoi/qmp /files/planse.html

Figure 5: Establishment Environment Program Worksheet

Sample Controls Construction and Equipment – Cooked Shrimp Operation

	CONTROL MEASURE					
STANDARD		What	How	Frequency	Who	CORRECTIVE ACTION
FIR Sch. I - Plant Construction and Equipment	1. Inspection of construction and equipment.	1. Construction and equipment of the plant	1. Inspect	1. Pre-season	1. QMP Supervisor	Record all deficiencies on corrective action report when the deficiency is identified.
FIR Sch. II - Plant Sanitation and Hygiene	2. Continuous monitoring of plant environment by trained personnel on FIR requirements.	2. Overall plant conditions	2. Monitoring	2. Ongoing	2. Production Manager	QMP Supervisor will sign and date the corrective action report.
	3. Inspection of construction and equipment.	3. Construction and equipment of the plant	3. Inspect	3. Monthly	3. QMP Supervisor	The plant manager will verify that the appropriate corrective action was taken.
Standard that will be met	Controls to meet the standard	Specifies how being meet	to monitor or	verify that the	standard is	Specifies the corrective action to be taken

Step 3 – Document the corrective action system.

The corrective action system that has been developed for the plant construction and equipment component can also be applied to the plant sanitation and personnel hygiene component.

3.1.3 Documentation and Records for the Establishment Environment Program

The Establishment Environment Program must include sufficient documentation to explain how the program is delivered. The following documents are recommended to be part of the Establishment Environment Program :

- the Prerequisite Program linking standards, control measures, monitoring procedures and corrective actions;
- the standards (as set out in the *Fish Inspection Regulations*);
- standard operating procedures (SOPs);
- manufacturers' literature on any purchased materials that come into contact with processing equipment and product, such as cleaning agents and sanitizers; and
- examples of documents used to record corrective actions.

The Establishment Environment Program must also include examples of the written records of:

- corrective action taken when a system failure is found; and
- preventive action taken against recurrence of a system failure.

3.2 Lot Accountability and Notification Program

Processors must provide a written description of the system used to trace fish to their first shipping destination. For each shipment of fish, this program must outline how the following information will be recorded:

- the name and address of the person to whom each shipment was sent;
- the type of fish;
- the quantity of fish;
- the method of transportation, including manifest and container numbers or other information that is sufficient to identify or trace the location of the fish;
- the date on which the fish was shipped, and;
- the date on which the fish was processed.

Processors should establish specific procedures to address the requirement for notification of CFIA, within 24 hours, in the event of any valid health and safety complaints.

For health and safety complaints, the following records must be kept:

- the date and time when the processor received information questioning the safety of fish processed or exported by the registered establishment, and a description of the information;
- in cases where the complaint is confirmed:
 - the date and time it was confirmed;
 - the name, address and telephone number of the informant;
 - the method of investigation and the results obtained;
 - the corrective actions taken; and
 - the date and time when the CFIA was notified.



MINIMUM REQUIREMENTS

Processors are required to establish, document and apply controls that ensure the final product meets the requirements of the *Fish Inspection Regulations*.

The Regulatory Action Points* (RAP) Plan must describe the controls to ensure that:

- fish is handled properly during processing and results in a final product that is not tainted, decomposed, or unwholesome, and meets all regulatory requirements as specified in the Fish Inspection Regulations;
- any ingredient added to the fish product or packaging material are acceptable for food and meet all regulatory requirements as specified in the Fish Inspection Regulations and the Food and Drugs Act and Regulations; and
- labelling and coding of all fish products meet the requirements of the Fish
 Inspection Regulations and the Food and Drug Regulations and is not
 false, misleading or deceptive.

As part of the RAP Plan the processor must identify:

- the fish product standard(s) and the ingredient and packaging requirements to which they must comply;
- the controls that are implemented in production to ensure the standards and requirements are met;
- the record keeping system to record corrective actions when problems are identified; and
- the corrective action system in place to address deficiencies when they are identified.

* Under RAP, processors are not required to record the results of monitoring unless a problem is identified. In these cases, the processor must record the problem and the corrective action that was initiated.

Relevant Regulations

PROCESSING ELEMENT	REGULATIONS
Minimum acceptable	Paragraph 6. (1) (a) Fish Inspection Regulations.
Product quality	Sets a minimum standard that fish shall not be tainted, decomposed or unwholesome. This regulation is interpreted through fish product standards for many common species.
Input materials	Paragraph 6. (1) (a) and Section 7, Fish Inspection Regulations; Food and Drug Act and Regulations. All packaging material must be new, sound and clean, and all packaging material and ingredients must be acceptable for food use.
Labelling	Fish Inspection Regulations, including all sections on specific fish species. Labels must be accurate, legible, and not misleading or deceptive.

DEVELOPING A RAP PLAN

Regulatory Action Points (RAPs) are the processing steps where control measures are applied to ensure that the product complies with the Fish *Inspection Regulations*. The RAP Plan addresses three areas:

- minimum acceptable product quality;
- input materials; and
- labelling.

The minimum standard is set in the Fish Inspection Regulations; however, processors are encouraged to adopt standards above the minimum.

Processors are responsible for developing and applying control measures, monitoring procedures and corrective actions for each RAP.

As with the Establishment Environment Program, a RAP Plan worksheet is provided in Appendix B as a sample. The worksheet is an effective tool because it relates regulations to control measures, to monitoring procedures, to corrective actions. It summarizes in one document why the control measures are being applied and what to do when a problem arises. Figure 6 shows a sample of a RAP Plan worksheet for a cooked shrimp operation. Note that the layout of the RAP Plan worksheet is similar to that of the Plant Environment Plan worksheet for ease of comparison. This worksheet gives an example of one way to format this information.

4.1 Minimum Acceptable Product Quality

To develop the minimum acceptable product quality component, follow these steps:

Step 1 – Identify the fish products the company produces.

Refer to the product description documents and ensure that this information is done for each of the products that will be covered under the QMP Plan.

Step 2 – Know the standards.

- 1. Find and get copies of the standards for each of the fish products. It may be the company's specific standard, or the minimum government standards set out in the CFIA Fish Products Standards Manual.
- 2. This provides another opportunity to work in a team environment. Involve the individuals responsible for ensuring that the final fish products meet your standards and your customer's expectations. Review the standards to ensure they are valid.
- 3. In most cases, a company may wish to identify Paragraph 6.(1) (a) of the Fish Inspection Regulations as the minimum standard for acceptability Refer to Figure 6 for a sample RAP Plan Worksheet. Using this worksheet to format the information is optional.

- 4. A copy of the product standards must be included in the QMP Plan. As mentioned previously, the standards are the foundation of the QMP Plan. Without a standard, control measures will not be focused on a fixed target, and it will not be known if objectives are being met.
- 5. Once the product standards have been identified, document the control measures, monitoring procedures, and corrective action systems that are in place to ensure the products meet the standards.

Step 3 – Document your control measures and monitoring procedures.

- 1. The control measures and monitoring procedures can be developed together.
- 2. Using the team approach, review the process flow diagram and identify the best point in the process to apply control measures to ensure that the product meets the company standard.
- 3. Refer to *Figure 6* (sample RAP Plan) to get an idea of different control measures and monitoring procedures that can be applied.
- 4. Indicate on the process flow diagram where these control measures or RAPs are located. Number the RAPs 1,2,3, etc.
- 5. Control measures are the actions that a company takes to ensure that the final product meets the company standards. These could include inspecting the product according to raw fish standards when it is landed, or training on-line personnel to recognize and remove sub-standard fish.
- 6. **Monitoring procedures** describe how the control measures are applied, and ensure that the standard is being met. Develop and document the monitoring procedures used to ensure that control measures are correctly and consistently applied. If inspecting incoming fish will be a control measure, then the monitoring procedures will describe how this is carried out.
- 7. Monitoring procedures should specify:
 - what will be monitored;
 - how monitoring will be done;
 - how often (or when) monitoring will be done; and
 - who will do the monitoring.
- 8. Identify the RAPs in the RAP Plan and then describe the control measures and monitoring procedures for each. Again, refer to *Figure* 6 for a sample RAP Plan worksheet. This is just one way of formatting the required information.

Step 4 – Document a corrective action system.

- 1. The corrective action system for the RAP Plan can be developed and documented in the same way as the corrective action system for the Prerequisite Plan.
- 2. The corrective actions related to product require not only that the problem be rectified, but also that any potentially affected product be inspected to ensure that it is in compliance.

- 3. Any portion of the product that does not meet the standard must be reworked or disposed of. The corrective action record must indicate the status of the deficient product.
- 4. With the team, develop a corrective action system that includes these concepts and a record-keeping system.
- 5. Document the general steps of the corrective action system in the RAP Plan and provide a copy of the document used to record Corrective Actions.

4.2 Input Materials

Follow these steps to develop the input material component of your RAP Plan:

Step 1 – Identify all of the input materials for each product.

Referring to the product description, identify all of the input materials, including packaging material and product ingredients such as salt, pickling spices and food additives.

Step 2 – Know the standards.

The minimum standard is defined in the *Fish Inspection Regulations* and states that "all packaging material must be new, sound and clean, and all packaging material and ingredients must be acceptable for food use". The acceptability of food additives used in fish products is defined in the *Food and Drug Regulations*.

Step 3 – Document control measures and monitoring procedures.

- 1. Using the team approach, review the process flow diagram and identify the best point in the process to apply control measures to ensure that the input materials meet the standard. Involve the people who purchase packaging materials and ingredients, and those who are responsible for mixing and applying the ingredients. Review the input materials and confirm that they meet the standard.
- 2. Develop and document the control measures to be applied to ensure that the input materials are acceptable for food. Ask the question, "What control measures can be implemented to ensure compliance with the standard?"
- 3. Refer to *Figure 6* and the appropriate example of QMP Plans to get an idea of different control measures and monitoring procedures that can be applied.
- 4. Indicate on the process flow diagram where these control measures or RAPs are located. Number the RAPs 1, 2, 3, etc.
- 5. Identify the RAPs in the RAP Plan and describe the control measures and monitoring procedures for each. Refer to *Figure 6* for ideas.

Step 4 – Document the corrective action system.

- Identify the corrective action system that will be taken when monitoring indicates that the ingredients or packaging materials do not meet the standard.
- Document the general steps of the Corrective Action System in the RAP Plan and provide a copy of the document used to record the Corrective Actions.

4.3 Labelling

To develop the labelling component of a RAP Plan, follow these steps:

Step 1 – Know the regulatory requirements.

The regulatory requirements covering fish products are found in the:

- Fish Inspection Regulations;
- Food and Drug Regulations;
- Consumer Packaging and Labelling Regulations; and
- Weights and Measures Regulations.

The processor is required to implement controls to ensure that the regulatory requirements of the *Fish Inspection Regulations* are met. These include the species specific requirements found in the body of the regulations, and the requirements set out in *Part II - Labelling* of the regulations. In general, these sections require that product labelling is accurate, legible and not misleading. Review and understand these regulations.

Step 2 – Document control measures and monitoring procedures.

- 1. Once the regulatory requirements are understood, document the control measures and monitoring procedures to ensure that the labels meet the applicable regulatory requirements.
- 2. Review the existing controls with the staff responsible for label development and printing.
- The controls should ensure that no label is sent to printing until it meets the regulatory requirements, that the printed labels have been inspected before being accepted, and that all labels are doublechecked before they are applied.
- 4. Refer to *Figure 6* to get an idea of different control measures and monitoring procedures that can be applied.
- 5. Indicate on the process flow diagram where these labelling control measures or RAPs are located. Number the RAPs 1, 2, 3, etc.
- Identify the RAPs in the RAP Plan, then describe the labelling control
 measures and monitoring procedures for each RAP. Refer to Figure 6
 for ideas.

Step 3 – Document the corrective action system.

- 1. Identify the corrective action that will be taken when monitoring indicates that a label does meet the regulatory requirements.
- 2. Document the general steps of the Corrective Action System in the RAP Plan and provide a copy of the document used to record the Corrective Actions.

4.4 Documentation and Records for the RAP Plan

The RAP Plan must include sufficient documentation to explain how the controls are delivered. The following documents are recommended to be part of the RAP Plan:

- the RAP Plan linking standards, control measures, monitoring procedures and the corrective action system;
- the fish product standards;
- the ingredient and packaging standards (as set out in the Fish Inspection Regulations);
- SOPs, such as ingredient mixing instructions; and
- proof that ingredients and packaging material are acceptable for food use (this may include manufacturers' literature).

The RAP Plan must also include examples of documents used to record corrective actions.

In many cases, the Corrective Action Records developed for the Prerequisite Plan can be used in the RAP Plan.

Figure 6: RAP Plan Worksheet - Cooked Shrimp Operation

REGULATORY	DECLII ATODV	CONTROL		MONITORING	CODDECTIVE		
ACTION POINT (RAP)			WHAT	HOW	FREQUENCY	WНО	CORRECTIVE ACTION
	M	INIMUM	I QUAL	ITYS	TANDA	R D S	
RAP 1 Receiving of shrimp and production of final product	The production of shrimp that is not tainted, decomposed or unwholesome and meets all other regulatory requirements. FIR Section 6(1).	1. Do not accept shrimp that will result in a tainted, decomposed or unwholesome final product 2. Train production personnel to immediately recognize shrimp that are tainted, decomposed or unwholesome. 3. SOP time / temperature for on-line production of shrimp.	1. Incoming fish 2. Final product	Inspect incoming fish. Conduct on-line inspection. Inspect and grade final product. Use receiving records to reflect inspections and necessary actions.	Each lot	QC personnel QC personnel	 If the lot sampled does not meet company specifications, then refuse receipt and record cull and record in Corrective Action Log Book. The QC manager determines the type and time frame of the corrective action Record the corrective action taken with signature and date. QC manager to verify that the corrective action was taken. Determine the source of the problem and take action to prevent recurrence. Retrain employees if necessary.
Specifies where in the process the control is to be applied.	Specifies the standard that will be meet.	Specifies the control measures that will be used to meet the standard.	Specifies how to monitor or verify that the standard is being meet.				Specifies the corrective action to be taken



MINIMUM REQUIREMENTS

Processors must develop, document and implement a HACCP Plan to control any health and safety hazards related to the product or process. The processor must apply the seven principles of HACCP to identify any significant hazards and for those significant hazards identified, develop a HACCP Plan to prevent, eliminate, or reduce the hazard to an acceptable level.

The HACCP System consists of the following seven principles:

- **Principle 1:** Conduct a hazard analysis.
- **Principle 2:** Determine the Critical Control Points (CCPs).
- **Principle 3:** Establish the critical limit(s).
- Principle 4: Establish a system to monitor control of the CCP.
- **Principle 5:** Establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control.
- **Principle 6:** Establish procedures for verification to confirm that the HACCP system is working effectively.
- **Principle 7:** Establish documentation concerning all procedures and records appropriate to these principles and their application.

The application of the HACCP principles must be consistent with the *Recommended International Code of Practice – General Principles of Food Hygiene*, CAC/RCP 1-1969, Rev.4-2003. (and as amended from time to time)

Every fish processor must analyze their products to determine what, if any, health and safety hazards are present. If any hazards are identified, appropriate controls must be put in place. HACCP is based on seven internationally recognized principles that will lead a processor through conducting a hazard analysis and developing controls as Critical Control Points for any significant hazards identified.

There are many approaches to hazard analysis and the development of a HACCP Plan. The following approach is presented as a guide and is not meant to be considered complete, as the exact method will vary depending on the product and process.

GETTING STARTED

Step 1 – Form your HACCP team.

Processors must take a team approach when developing their HACCP Plan. The development of the HACCP Plan can involve many technical issues and, therefore, at least one member of the team must understand the HACCP principles through formal education and work experience.

Note: It is a good idea to assemble a HACCP planning team, especially in larger companies, to cover expertise in a every aspect of operations, including administration as well as production and maintenance.

Step 2 – Gather information.

- 1. Refer to the product descriptions completed for Element 2.
- 2. Refer to the process flow diagram developed for Element 2.
- Review material such as consumer complaint data, and epidemiological and technical literature on your product and similar products.

DEVELOPING YOUR HACCP PLAN

Principle 1 - Conducting a Hazard Analysis

This identifies process steps where a significant hazard may be introduced, or increase to unacceptable levels. There are two steps involved in conducting a Hazard Analysis.

Step 1 – Identify potential hazards.

Processors must demonstrate that they have considered all process steps in conducting their hazard analysis and show their reasoning when a disagreement occurs. A hazard analysis worksheet can be used to organize and document the hazard analysis process followed by the HACCP team. A suggested format for a Hazard Analysis Worksheet is given in Appendix B.

- 1. For each product type, fill in the processing steps on a hazard analysis worksheet according to the process flow diagram.
- 2. At each step of the process, identify potential biological, chemical or physical hazards.

Step 2 – Analyze hazards.

The HACCP component of the QMP Plan focuses solely on significant hazards that are reasonably likely to occur and likely to result in an unacceptable health risk. It is important to maintain this focus, since if the HACCP Plan tries to control too many things, the hazards that are genuinely significant will not receive the attention they require, and the plant will lose control of the process.

1. Analyze each identified hazard by considering its severity and the risk or likelihood of occurrence, which determines its significance.

Biological hazards:

- pathogenic microorganisms (bacteria, viruses)
- parasites
- decomposition (related to safety only, e.g., bacteriological formation of histamine)

Chemical hazards:

- natural toxins
- chemical contaminants, cleaning agent residues
- pesticides
- drug residues
- unapproved food additives

Physical hazards:

metal, glass, shell fragments, etc.

Analyze hazards in the context of existing programs, such as the Prerequisite Plan and the RAP Plan. Some hazards can be controlled by improving plant design and sanitation or personnel hygiene, and are therefore not considered significant.

- 2. Indicate on the hazard analysis worksheet whether each identified hazard is significant, and the reason for your decision.
- 3. Identify measures that can be used to prevent or eliminate the significant hazards, and record them on the hazard analysis worksheet.

Figure 7 gives an example of a hazard analysis for a processing step from a cooked shrimp operation.

Figure 7. Hazard Analysis Worksheet - Cooked Shrimp Operation

diagram

INGREDIENT / PROCESSING STEP	POTENTIAL HAZARD INTRODUCED OR CONTROLLED	IS THE POTENTIAL HAZARD SIGNIFICANT?	JUSTIFICATION FOR INCLUSION OR EXCLUSION AS A SIGNIFICANT HAZARD	PREVENTATIVE MEASURES OF THE SIGNIFICANT HAZARDS
8. Cooking (Steam)	Biological Pathogen survival (Listeria)	YES	Processing time and temperature may not be sufficient to kill vegetative pathogens.	1. Cooking 2. Employee training
	Chemical Industrial chemicals	NO	Controlled by prerequisite program (SOP plant clean-up and sanitation).	
	Physical None identified	n/a		
1. Processing Step corresponding to process flow	2. Potential hazards identified	3. Significance of	each identified hazard is determined	4. Preventive measures are identified to control hazards

Principle 2 – Determine the Critical Control Points (CCPs)

For each significant hazard identified in *Step 2 - Analyse hazards*, there is an appropriate preventative measure in place to prevent or eliminate the hazard, or reduce it to an acceptable level. This principle determines where in the process these controls should be located to control the hazard effectively. The process step where hazard is controlled is known as the Critical Control Point (CCP).

Step 1 – Determine CCPs.

- 1. Record each processing step where a significant hazard was identified on the CCP Determination worksheet (Appendix B).
- 2. For each processing step, ask the following questions and record your answers on the worksheet. See *Figure 8* for a sample CCP Determination worksheet.

Figure 8. CCP Determination Worksheet - Cooked Shrimp Operation

PROCESS STEP	HAZARD	QUESTION 1	QUESTION 2	QUESTION 3	QUESTION 4	CCP: YES OR NO
		Do control preventive measures exist? No - Not a CCP (However, if preventive measures are required to ensure safety, then modify the step, product or process.) Yes - to Q. 2	Is the step specifically designed to eliminate or reduce the likelihood of occurrence of the hazard to an acceptable level? No - to Q. 3 Yes - CCP	Could contamination with identified hazards occur in excess of acceptable levels or could these increase to unacceptable levels? No - Not a CCP Yes - to Q. 4	Will a subsequent step eliminate identified hazards or reduce the likelihood of occurrence to an acceptable level? No - CCP Yes - Not a CCP	Yes or No?
8. Cooking	Pathogen survival (Listeria)	Yes	Yes			Yes

^{1.} Processing step and the identified hazard from the hazard analysis worksheet.

^{2.} Answer each question in sequence.

^{3.} Determine if processing step is a CCP.

Question 1. Do control measure(s) exist?

If your answer is yes, ask Question 2.

If you cannot identify a preventative measure in the process that controls the hazard, answer no. Then ask:

Is control at this step necessary for safety?

If the answer to this question is also no, then this step is not a CCP and you can move on to the next identified hazard in the process. If yes is the answer, then a significant hazard has been identified that is not being controlled. In this case, the step, process or product must be modified to control the hazard.

Question 2. Is the step specifically designed to eliminate or reduce the likelihood of occurrence of a hazard to an acceptable level?

To answer this question, ask whether this step is the best step at which to control the hazard. If the answer is yes, then the step is a CCP; move to the next significant hazard. If the answer is no, ask question 3.

Question 3. Could contamination with identified hazard(s) occur in excess of acceptable level(s), or could it increase to unacceptable levels?

This question refers to contamination that exists, occurs or increases at this step. If the answer is no, then the step is not a CCP for that hazard. Move to the next hazard at that step, or the next step with a significant hazard.

Question 4. Will a subsequent step eliminate the identified hazard(s) or reduce its likelihood of occurrence to an acceptable level?

If the answer is no, then this step is a CCP. If you answer yes, then this step is not a CCP for this hazard. In this case, be sure that the hazard is controlled by a subsequent processing step.

Step 2 – Record the CCPs on the process flow diagram.

Indicate the CCPs on the process flow diagram developed for Element 2.

Step 3 – Record on HACCP Plan table.

If there were any CCPs identified, then a HACCP Plan must be developed. For an example of a HACCP Plan table, see Appendix B.

- 1. Record each of the identified CCPs for the product on this table, or in the format chosen.
- 2. Record the preventative measure to be used to control the hazard.

Principle 3. Establish Critical Limits

Critical limits must be established for each CCP identified in Principle 2. A critical limit represents the values that are used to separate acceptable product from unacceptable product. The critical limit is measured during the monitoring procedures; and if anyone deviates from these procedures, the appropriate corrective action must be taken.

Step 1 – Determine critical limits.

1. Determine critical limits for each identified CCP.

In many cases, the appropriate critical limit may not be readily apparent. Tests may need to be conducted or information gathered from scientific publications, regulatory guidelines, experts or experimental studies. One example of critical limits are the critical factors determined by a recognized process authority for a canned product.

2. Validate the critical limits by providing the scientific or regulatory reference.

Principle 4. Establish a System to Monitor Control of the CCP

The processor must establish procedures to monitor each CCP, determining its operation within the critical limits. To design a proper monitoring system, the HACCP team determines:

- what will be monitored;
- how the critical limits and preventative measures will be monitored;
- how frequently monitoring will be performed; and
- who will perform the monitoring.

Step 1 – Establish monitoring procedures.

- 1. Determine what will be monitored and record it in the HACCP Plan table. This is usually a measurement or observation, such as:
 - measurement of cold-storage temperature;
 - measurement of processing line speed; or
 - verification that the harvest area listed on a container of raw molluscan shellfish is in approved waters.
- 2. Determine how the critical limits and preventative measures will be monitored, and record this information in the HACCP Plan table. These are usually physical or chemical measurements, or observations that must be designed to provide rapid (real time) results. Lengthy analytical testing is not appropriate, as the product will be distributed before the results are received.

- 3. Determine the frequency of the monitoring and record this information in the HACCP Plan table. The frequency must be appropriate to the CCP and the critical limits being monitored, and can be continuous or intermittent. Continuous monitoring can include:
 - recording the time and temperature of a batch sterilization process on a temperature recording chart; and
 - using a metal detector.

If continuous monitoring is conducted, then the equipment used must be checked periodically to make sure it is operating correctly. This should be addressed in the verification section of the HACCP Plan.

If continuous monitoring is not possible, then intermittent measurements must be made at appropriate intervals. The frequency of measuring depends on how much the process varies, how close the measured values are to the critical limits, and how much risk the processor is prepared to take. Examples of intermittent monitoring include:

- temperature checks of the core temperature of a pasteurized product;
- can seam integrity checks for canned products; and
- belt speed checks for a continuous cooker.
- 4. Determine who will be responsible for monitoring a CCP. Record this information in the HACCP Plan table. Examples include line personnel, equipment operators or quality control personnel. The person responsible for monitoring must:
 - be trained to perform the specific monitoring activity;
 - fully understand the importance of CCP monitoring;
 - have ready access to the monitoring activity;
 - accurately report each monitoring activity; and
 - immediately report any deviations so that the appropriate corrective action can be taken.

Note:

FIR 14.2 No person shall, unless they have the job experience or qualifications that meet the applicable sections of the Facilities Inspection Manual, (a) perform or supervise a product preservation process.

Principle 5. Establish a Corrective Action System

Corrective action must be taken whenever monitoring indicates that the process is operating outside the defined critical limits. There are two activities associated with corrective action: the first is to determine the immediate, short-term action that must be taken to deal with the product that may have been affected, and the second is to determine the long-term action that should be taken to prevent recurrence. The corrective action system developed in the Establishment Environment Program or the Regulatory Action Point Plan may also be applicable here.

The immediate action to be taken when a process deviation is found can be predetermined or decided on a case-by-case basis. For example, if the critical limits for a cooking operation are not met then the predetermined corrective action may be to immediately re-cook the product. If there is no predetermined corrective action, then there must be procedures in place to isolate any potentially affected product until it can be assessed to determine its appropriate disposition.

1. Establish a corrective action system for each CCP, and record it in the HACCP Plan table.

Figure 9. HACCP Plan Table - Cooked Shrimp Operation

CRITICAL				MONITORING PROCEDURE					CORRECTIVE	
CONTROL POINT (CCP)	SIGNIFICANT HAZARD	CONTROL / PREVENTIVE MEASURE		WHAT	HOW	FREQUENCY	wно	RECORDS	ACTION (CA) AND RECORDS	VERIFICATION
CCP 1 8. Cooking	Survival of Listeria	Heat Process 5D Listeria Reduction	2 min @ 100°C will provide internal product temp. of 80°C for 1 second	Conveyer belt speed Temperature of cooker Recorder chart	Conveyor speed with stopwatch Recorder thermo- meter Visual check	After each break Continuous Hourly	QC staff Automatic QC staff	Conveyor belt monitoring record Recorder chart QC initial the recorder chart	1. Isolate affected product and evaluate for safety. 2. Record in non-conformity CA log book. 3. Sign and date the CA taken. 4. Determine the source of the problem and take measures to prevent reoccurrence. 5. Retrain employees if necessary.	1. Have the QC Manager verify the CA daily. 2. QC to review cook log. 3. QC manager to observe cooking process and compare data with that obtained by the cooker operator. 4. Verify the heat process. 5. Calibrate the temperature recorder.

Principle 6. Establish Verification Procedures

For each monitoring activity, tests must be performed to ensure that the HACCP system is working as designed. Tests are done on a schedule, less frequently than monitoring procedures. Verification can include:

- a review of monitoring records generated as a result of monitoring;
- calibrating monitoring equipment; and
- · additional testing, such as microbiological tests.

These activities are limited to the monitoring procedures for the CCPs and are to be done by someone other than the person responsible for monitoring the CCP. Other verification requirements for the QMP Plan are discussed in the following section.

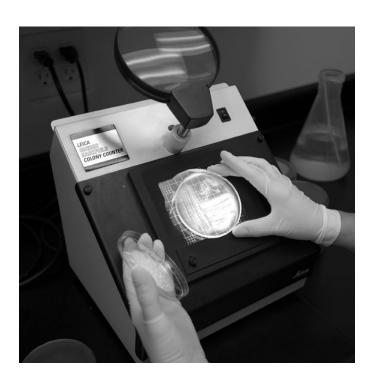
1. Establish verification procedures for each monitoring activity, and record them in the HACCP Plan table.

Principle 7. Establish Documentation and Record-keeping Requirements.

Accurate documentation and record-keeping is an essential part of the HACCP program. Documentation is the physical record of the procedures or activities that are to be followed (HACCP Plans, SOPs, etc.); records are generated by the procedures or activities performed, or if any corrective actions are taken. Maintaining records is mandatory for all CCP monitoring and verification activities. Records should include all pertinent information and be signed and dated by the person in charge of monitoring and reviewing the HACCP process.

The maintenance of documents is covered in Element 6 of this guide.

- 1. Decide where records will be collected.
- 2. Design documents to record all pertinent information.
- Identify the documents needed for the HACCP Plan, and include a copy of each one with the plan.



MINIMUM REQUIREMENTS

Processors are required to perform the following verification activities to ensure that their QMP Plan is functioning correctly:

- 1. Before implementation the processor will be required to:
 - validate the critical limits of CCPs, where appropriate; and
 - verify the QMP Plan to ensure that all the necessary controls are in place and that it meets the requirements of the QMP Standard.
- 2. Once the QMP Plan is implemented, the processor is required to:
 - perform routine verification of the HACCP Plan to ensure it is functioning effectively (e.g. Record reviews, Corrective Action reviews, review of calibration of equipment);
 - verify or validate any changes to QMP controls or CCP critical limits that may occur in the ongoing development of the QMP Plan; and
 - verify the QMP Plan at least once per year.

To ensure that the QMP Plan is accurately documented, processors are required to maintain records of any changes to their QMP Plan.

There are five main activities involved in verifying a QMP Plan. The first two must take place before the implementation of the QMP Plan. These activities are the validation of the critical limits at the CCPs (covered in Element 5) and the initial verification. These activities happen once only.

The next three verification activities are performed once the QMP Plan is implemented and include: the routine verification of the CCPs (covered in Element 5), the verification or validation of changes to the QMP Plan to ensure that it is still adequate, and verification of the QMP Plan at least once per year.

Changes to a QMP Plan must be documented in the form of an amendment log to ensure that the written QMP Plan reflects the controls that are being applied in the processing operation.

6. 1 INITIAL QMP PLAN VERIFICATION

Once the QMP Plan is completed, it must be verified. That is, reviewed to ensure that it complies with the QMP Reference Standard. Once it has been verified that the plan meets all the requirements of the standard, it and the other information required will be submitted to the CFIA for review.

Verifying Your Initial QMP Plan

Step 1 – Perform verification using a checklist.

Step 2 – Prepare the submission.

Prepare a QMP submission package with the completed QMP Plan including:

- background information on the plant;
- the date the company wishes to begin processing;
- the operations the company is requesting registration for; and
- the products the company intends to process.

Step 3 – Submit the QMP submission package to the local CFIA inspector.

Step 4 (Performed by CFIA staff)

Once the QMP submission package has been received, CFIA inspection staff will:

- review the QMP submission;
- ask the processor to explain anything in the QMP submission that is unclear;
- tell the processor whether the QMP Plan must be amended or expanded; and
- inform the processor when the QMP Plan has been accepted.

6.2 ANNUAL QMP PLAN VERIFICATION

The processor must verify their QMP Plan once each year. The processor must ensure that the QMP Plan is still effective and that it is still being correctly applied by the staff. This annual verification must be documented, and the records must be available for the inspector to review.

For the annual verification, check that:

- all CCPs are still being controlled;
- the controls implemented for each CCP are adequate;
- · any amendments made to the processing line have been documented; and
- the QMP Plan, including the Prerequisite and RAP Plans are complete and functioning effectively.

6.3 MAINTAINING THE RECORD OF AMENDMENTS TO A QMP PLAN

When amending a QMP Plan, or any QMP documentation, record the changes and when they were made. The most efficient way to do this is to include an amendment record in all permanent QMP documentation (see *Figure 10*)

This documentation must also be made available to the inspector.

Figure 10: Sample Amendment Record

DATE	PAGE	AMENDMENT MADE	SIGNATURE



As with the HACCP Plan, there are two types of records kept as components of the QMP Plan – "documents" and "records". Documents are kept as a record of the development of a QMP Plan. Records are taken as a result of the implementation of the QMP Plan.

It is important to balance the volume of record keeping with the true needs of the organization, and the resources available to deliver the system. Records are developed, used and maintained to provide sufficient evidence that the system was developed properly. Records also prove that the plan is being implemented as written, and that it can demonstrate trends to identify a problem. Record keeping for all verification activities and results is **mandatory**. As well, records of amendments or changes to the QMP Plan **must** be maintained.

Record keeping for Prerequisite and RAP Plans may be performed "by exception", meaning records are only required when a deficiency is identified during monitoring procedures. For the HACCP Plan, however, record keeping is mandatory for all testing, measurements, and monitoring at CCPs, and for corrective actions when the critical limits are exceeded.

It is recommended the processor ensures that personnel understand why they are taking records, when, and how to complete them accurately. The processor should also review records periodically to confirm accuracy and relevance. These steps will increase the effectiveness of the establishment's record keeping.

Records must remain current, legible, readily identifiable, and retrievable. The location of all QMP Plan files and records must be identified. Records must be retained for at least 36 months, and should be retained for a longer period of time if relevant to the product shelf life, such as for canned fish.





In order to export fish and seafood, processors must obtain a Certificate of Registration from the CFIA. Developing a QMP Plan is a condition of registration. It is important to note that it is the processor's responsibility to comply with the regulatory requirements. The processor is responsible for the safety and quality of the products they produce by ensuring their QMP Plan is properly developed, effectively implemented, and meets all requirements. The CFIA is mandated to ensure all fish processing plants are in compliance with the *Fish Inspection Regulations*. As such, the CFIA has developed this guide as a comprehensive tool to help new fish processors understand the Quality Management Program, and develop an acceptable QMP Plan of their own.

Your QMP Plan is a living document which should be kept up-to-date and reflective of your operation. From time to time revisions and amendments to the QMP Program are implemented by CFIA in consultation with industry and in response to emerging issues, market requirements and new technology. You are encouraged to visit the CFIA website regularly to remain informed of any updates.

If you require any additional information while developing or maintaining your QMP Plan visit the CFIA website at www.inspection.gc.ca.

You may also obtain further information by contacting your regional CFIA office.





appendices

APPENDIX A: APPLICATION FOR REGISTRATION OF FISH PROCESSING ESTABLISHMENT . 79

APPENDIX B: BLANK FORMS . . 81

46.	Canadian Food
37. 3. 3.	Increation Agen

Agence canadienne tion Agency d'inspection des aliments

☐ Amendment / Modification	☐ Renewal / Renouvellement
□ New / Nouveau	□ Other / Autres

APPLICATION FOR REGISTRATION OF FISH PROCESSING ESTABLISHMENTS DEMANDE D'AGRÉMENT POUR LES ÉTABLISSEMENTS DE TRANSFORMATION DU POISSON

Section A BASIC INFORMATION OF APPLIC	ANT / INFORMAT	ION DE BASE DU DEI	MANDEUR
LEGAL NAME OF COMPANY OR ESTABLISHMENT / NOM LÉGAL DE LA COMPAGNIE OU DE L'ÉTABLISSEMENT	TELEPHONE / TÉ	LÉPHONE:	
	FACSIMILE / TÉLE	ÉCOPIEUR:	
MAILING ADDRESS / ADRESSE POSTALE			
Section B FEE / TAR	IF		
FACILITY REGISTRATION NO. / N° D'AGRÉMENT DE L'ÉTABLISSEMENT	FACILITY LOCATI L'ÉTABLISSEMEN	ON/PORT / ENDROIT DI IT/PORT	E
PHYSICAL ADDRESS / ADRESSE MUNICIPALE			
IF YOUR FACILITY HAS A VALID PROVINCIAL PROCESSING LICENCE VOUS POSSÉDEZ UN PERMIS PROVINCIAL DE TRANSFORMATION E PERMIS			
SIZE OF FACILITY / SUPERFICIE DE L'ÉTABLISSEMENT		More Than 300 m ² Plus de 300 m ²	300 m ² or less Au plus 300 m ²
I. BASIC FEE / DROITS DE BASE		□ \$1500	□ \$1000
PRESENTLY REGISTERED OPERATIONS	/ OPÉRATIONS P	RÉSENTEMENT AGR	ÉES
II. OPERATION FEES (Please check appropriate boxes) DROITS POUR LES OPÉRATIONS (veuillez cocher les cases	appropriées)		
Processing Fresh or Frozen or Semi-Preserves / Transforma frais, congelé ou semi-conservé	tion en poisson	□ \$500	□ N/C - S/F
Pickling, Spicing or Marinating Fish / Transformation en poiss mariné ou épicé	son saumuré,	□ \$500	□ N/C - S/F
Salting or Drying Fish / Transformation en poisson salé ou sé	èché	□ \$500	□ N/C - S/F
Canning Fish / Mise en conserve du poisson		□ \$1000	□ N/C - S/F
Processing Ready-to-Eat Fish / Transformation en poisson p	rêt-à-manger	□ \$1000	□ N/C - S/F
Processing Shellfish* / Transformation de mollusques*		□ \$1000	□ N/C - S/F
Any Other Type of Process Operation / Tout autre type d'opé transformation	ration de	□ \$1000	□ N/C - S/F
TOTAL COST / COÛT TOTAL Please pay this amount / S.V.P. remettre ce montant			
Initial Fees for Shellfish Process Operations Conducted by Depuration Droits initiaux relatifs aux opérations de transformation de mollusques par	dépuration	□ \$7500	□ \$6000
F. (17)		1.01-115-1-01-1-1-1-1-1-1	2012/1
Establishments that export shellfish** to the United States must be listed of établissements qui exportent des mollusques** aux États-Unis doivent êtr			
		atégorie : (circle applicable a efinitions below / définitions a SP RS RP	
(Note: FDA 3038 application filled out by CFIA Operations) / (Nota : La	demande FDA 3038 se	ra remplie par le bureau des	Operations de l'ACIA)
Establishments that export to the European Union must be on the EU app européenne doivent être inscrits sur la Liste des établissements agréés pa	roved establishment list ar l'UE.	/ Les établissements qui ex	portent vers l'Union
Do you wish to have your facility included on the "EU Yes Approved Establishment List"?/ Souhaitez-vous faire inscrire votre établissement sur la Liste des établissements agréés par l"UE?		atégorie : (circle applicable definitions below / définitions a PP PPa ZV	
(Note: Submission for inclusion on EU List done by CFIA Operations) / (Notes Opérations de l'ACIA)	ota: La demande d'inse		
* "shellfish" means all species of bivalve molluscs of the class <i>Bivalvia</i> and all marine, carnivorous sp	ecies of the class Gastropoda,	either shucked or in the shell, in who	le or in part, excluding the

ICSSL Category Definitions: SS - Shellfish Shipper; SP - Shucker Packer; RS - Reshipper; RP - Repacker; DP - Depuration Processor. Descriptions of the categories may be found on the CFIA Internet at: http://www.inspection.gc.ca/english/anima/fispo/imanman/cssppccsm/define.shtml / Categories de I'CSSL: SS - Expéditeur de coquillages en écailles; SP - Écailleur-emballeur; RP - Réemballeur; DP - Dépurateur. Descriptions des catégories sur le site de l'ACIA: http://www.inspection.gc.ca/francais/anima/fispo/imanman/cssppccsm/definf.shtml

EU Establishment List Definitions: PP - Processing plant; PPa - Plant processing only or partially materials derived from aquaculture (farmed products); ZV - Freezer vessel; FV - Factory vessels / Catégories d'établissements de l'UE: PP - Usine de transformation; PPa - Usine transformant seulement ou partiellement des matières issues de l'aquaculture (produits d'élevage); ZV - Navire-congélateur; FV - Navire-usine.

CFIA/ACIA 2003 (2006/04)

Page 1 of/de 2



adductor muscles of scallops and the meat of geoducks /* of Mollusque's . Les espèces de mollusque's bivalvies de la classe Bivalvia et des mollusques carnivores marinst de la classe Gas ecallés ou non, entiers ou non, o l'acculsion du muscle adducteur des pétoncles et la chair des panopes
** includes only fresh and frozen oysters, clams, mussels, whole or roe-on scallops /** includes only fresh and frozen oysters, clams, petoncles entiers ou avec corail, à l'état frais et congelé





Canadian Food Agence canadienne Inspection Agency d'inspection des aliments

The Fish Inspection Regulations require that the person renewing their certificate of registration advise the CFIA of any changes to the information below. Complete this section if any changes have been made. I Le Règlement sur l'inspection du poisson exige qu'une personne qui renouvelle le certificat d'agrément informe l'ACIA de tout changement. Compléter la section ci-dessous, en indiquant si des changements ont été faits.

Dur	ing the past year, have you changed / Pendant la dernière année, avez-vous changé :	Yes/Oui	No/Non
•	the types of operations performed in your establishment (as described in the application)? les types d'opérations de transformation que vous avez effectué dans votre établissement (comme décrit dans la demande)?		
	the types of fish products produced, stored or exported by your establishment (e.g., salmon, herring, clams)? les types de produits du poisson que vous avez produit, entreposé ou exporté à votre établissement (par exemple saumon, hareng, palourdes)?		
	the description of any fish products produced, stored or exported by your establishment (e.g., breaded fish, fish roe)? la description des produits pour chaque type de produit du poisson que vous avez produit, entreposé ou exporté à votre établissement (par exemple poissons panés, oeufs de poisson)?		
	the process flow and/or any processing steps for any fish products produced by your establishment? le diagramme de fabrication et/ou les étapes de la transformation pour les produits du poisson que vous avez produit à votre établissement?		
	the arrangement of rooms, equipment, processing lines or any other things in your establishment? l'aménagement des salles, de l'équipement, des lignes de traitement ou d'autres choses dans votre établissement?		

Section C CORPORATE OFFICER OR PROVINCIAL OWNER / ADMINISTRATEUR OU PROPRIÉTAIRE

OCCURION O CONTONA	TE OFFICER OR FRO	THEODY LE OTT.		/ Diminior in the contract in	
NAME (printed) - NOM	(imprimé)		POS	ITION TITLE - TITRE DU POSTE	
I request that the above estable requirements of Section 15 of				mande que l'établissement ci-haut soit agréé ticle 15 du <i>Règlement sur l'inspection du po</i>	
I, the undersigned, certify that the knowledge, true and correct. Furth name, address, telephone numbe establishment.	ner, I hereby consent to the disclo	sure of the	de ma d nom, l'a	ssigné, atteste que les renseignements donnés ci- connaissance, vrais et exacts. Je consens aussi à drésse, le numéro de téléphone, et le numéro d'as sement.	ce que solent divulgués, le
Signature of Authorized	Officer /Signature de l'age	ent autorisé		Date	
Signature of Authorized Make your cheque or Money of Receiver General For Canada MASTERCARD, or AMERICA information below and sign to	Order payable (Canadian Fu a. If you wish to pay with VISA N EXPRESS, provide the re	nds) to: The A,	l'ordre VISA,	Date z votre chèque ou mandat-poste (en devise du Receveur Général du Canada. Si vous v MASTERCARD, ou AMERICAN EXPRESS sous et signez pour autoriser le paiement.	oulez payer avec
Make your cheque or Money of Receiver General For Canada MASTERCARD, or AMERICA information below and sign to	Order payable (Canadian Fu a. If you wish to pay with VISA N EXPRESS, provide the re	nds) to: The A,	l'ordre VISA, ci-des	z votre chèque ou mandat-poste (en devise du Receveur Général du Canada. Si vous v MASTERCARD, ou AMERICAN EXPRESS sous et signez pour autoriser le paiement.	oulez payer avec
Make your cheque or Money of Receiver General For Canada MASTERCARD, or AMERICA information below and sign to	Order payable (Canadian Fula. If you wish to pay with VIS/N EXPRESS, provide the reauthorise payment.	nds) to: The A, quired	l'ordre VISA, ci-des AN E	z votre chèque ou mandat-poste (en devise du Receveur Général du Canada. Si vous v MASTERCARD, ou AMERICAN EXPRESS sous et signez pour autoriser le paiement.	oulez payer avec

Operators of registered processing establishments are reminded that failure to renew their certificate of registration prior to the expiry date could result in loss of access to product certification and export markets./ Rappel aux exploitants d'établissements de transformation agréés : si votre certificat d'agrément n'est pas renouvelé avant la date d'échéance, vous risquez de perdre votre privilège de certification des produits et votre accès aux marchés d'exportation.

For Agency Use only / Réservé à l'ACIA

Application and Payment Received/ Date

Paiement et demande reçu

The Information you provide on this document is collected by (for) the Canadian Food Inspection Agency under the authority of the Fish Inspection Act for the purpose of registering an establishment. Information may be accessible or protected as required under provisions of the Access to Information Act.

Les renseignements que vous fournissez dans le présent document sont recueillis par (pour) l'Agence canadienne d'inspection des aliments en vertu de la Loi sur l'inspection du poisson afin d'agréer un établissement. Les renseignements peuvent être accessibles ou protegés selon ce que prescrit la Loi sur l'accès à l'information

CFIA/ACIA 2003 (2006/04) Page 2 of/de 2



1.	PRODUCT NAME(S)	
2.	SOURCE OF RAW MATERIAL	
3.	IMPORIANT FINAL PRODUCT CHARACTERISTICS	
4.	INGREDIENTS	
5.	PACKAGING	
6.	HOW THE END PRODUCT IS TO BE USED	
7.	SHELF LIFE	
8.	WHERE THE PRODUCT WILL BE SOLD	
9.	SPECIAL LABELLING INSTRUCTIONS	
10.	SPECIAL DISTRIBUTION CONTROL	

CORRECTIVE	ACTION	
	МНО	
PROCEDURE	FREQUENCY	
MONITORING PROCEDURE	МОН	
	WHAT	
	CONTROL MEASURE	
	STANDARD	

	CORRECTIVE ACTION	
	МНО	
PROCEDURE	FREQUENCY	
MONITORING PROCEDURE	МОН	
	WHAT	
	CONTROL MEASURE	
CONFORMITY	WITH REGULATIONS	
REGULATORY	ACTION POINT (RAP)	

INGREDIENT / PROCESSING STEP	POTENTIAL HAZARD INTRODUCED OR CONTROLLED	IS THE POTENTIAL HAZARD SIGNIFICANT	JUSTIFICATIONS FOR INCLUSION OR EXCLUSION AS A SIGNIFICANT HAZARD	PREVENTIVE MEASURES FOR SIGNIFICANT HAZARD
	Biological			
	Chemical			
	Physical			
	Biological			
	<u>Chemical</u>			
	<u>Physical</u>			
	Biological			
	<u>Chemical</u>			
	<u>Physical</u>			

	T	1
CCP	YES OR NO	
0.#4	Will a subsequent step eliminate identified hazards or reduce the likely occurrence to an acceptable level? No - CCP	
0.#3	Could contamination with identified hazards occur in excess of acceptable levels or could these increase to unacceptable levels? No - Not a CCP	
0.#2	Is the step specifically designed to eliminate or reduce the likely occurrence of the hazard to an acceptable level? No - to Q.#3 Yes - CCP	
0.#1	Do control preventative measures exist? No - Not a CCP Yes - to Q.#2	
HAZARD		
PROCESS STEP		

VERIFICATION		
CORRECTIVE ACTION AND RECORDS		
	RECORDS	
	МНО	
MONITORING	FREQUENCY	
	МОН	
	WHAT	
CRITICAL LIMITS FOR EACH CONTROL MEASURE		
CONTROL		
SIGNIFICANT		
CRITICAL CONTROL POINT (CCP)		