

# Food Safety Regulations Modernization

## Project Overview

### Information Presented

Overview and rationale of the regulatory structure being considered for Agri-food processors that are part of the supply chain.

Considered regulatory structure:

The Public Health Act

Food Processing and Abattoir Regulation

1. General Provisions applicable to Food Processing and Abattoirs
2. Food Processing Provisions
3. Abattoir Provisions

## Engagement Overview

### Engagement Objectives

- To inform stakeholders with balanced and objective information to assist them in understanding considered regulatory provisions that will modernize food safety regulations.
- To consult and engage with stakeholders to seek feedback on considered regulatory provisions.

### Invited Participants

- Food Industry Associations and Selected Members
  - Food and Beverage Manitoba
  - Direct Farm Manitoba
- Educational Professionals
- Livestock Producer Associations
- Manitoba Agriculture (Inspection and other branches with food responsibility)
- Manitoba Health
- Provincial Abattoirs

## Engagement Approaches

- EngageMB Survey
- In-Person Sessions
- On-line Sessions
- Video Recorded Session

## Engagement Timeframe

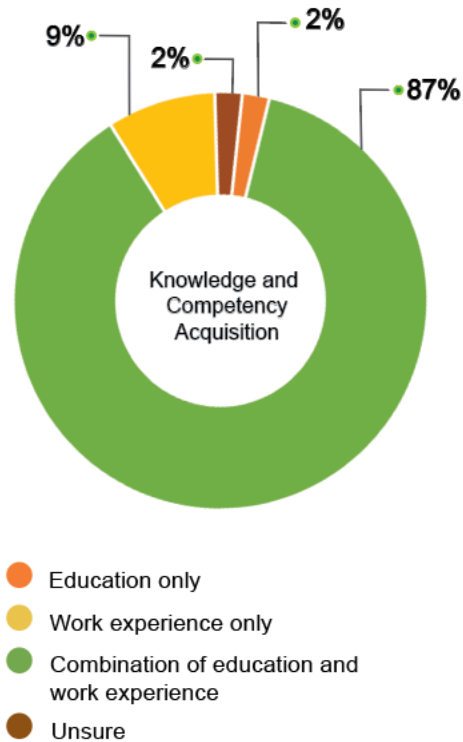
June – November 2022

## What We Heard

### General Considered Food Safety Requirements

#### Required Level of Competencies or Knowledge

- Dependent on the actual job, should include knowledge in the process and product made.
- Consider a combination of job experience, training and education.
- Requirement should be on an appropriate scale and recognize industry knowledge and experience.
- Facilities face staffing challenges that may pose limitations:
  - young employees and students joining the workforce
  - hard to find employees
  - minimal access to advanced education in rural areas
  - high turnover
- Basic food safety training to help create an educational baseline identified as an industry need.
- Difficulty to assess compliance by inspectors. Inspection could assess education and knowledge by observing practices at a facility.
- Guidebook needed for operators and inspectors that includes examples of acceptable education and knowledge.
- Facility-led training and job shadowing can help fill knowledge gaps, especially where there is a high employee turnover.
- Financial resources needed to develop custom training.
- Create a consolidated list of educational resources on a dedicated user-friendly web page.



### Written Sanitation Standard Operating Procedures and List of Cleaning Agents

- Could be a burden for small facilities with 2-3 employees. Large-size companies already in compliance as per customers' requirements.
- Consider an outcome-based approach, based on facility size and type of operation, to minimize burden.
- Useful for new staff to have something for reference; important when training as a procedure reminder.
- Sets a standardized approach for consistent and effective sanitation.
- Documented practices help support inspection activities.
- Help is required to support business owners to implement requirements, especially for those processors scaling up.
- Resources, including templates and examples, to share with new and existing facilities will be needed. Materials should be specific to the business venture and product-based.
- Fundamental for achieving food safety.
- Helps standardize the process if there is a high staff turnover.
- Ensures companies are using the proper chemicals, as they vary depending on the industry.

### Records of Pest Control Monitoring

- Pest control maps can be useful to help inspectors evaluate proper device placement, especially in a large facility.

- Require regular monitoring of pest control devices, as staff at some facilities forget to check them.
- Consider making the use of pest control devices mandatory. Some level of prescription is needed to facilitate enforcement.
- Records are useful to help determine if facilities have done anything to fix issues.
- Operators may require resources (e.g., education and financial) to keep documentation.
- Reasonable requirement to ensure food safety.
- Demonstrates a proactive approach to fix a problem.
- Helps track preventative or corrective measures used.
- Include a section in the guidebook about pest control monitoring frequency, based on facility size and recommended time to keep pest control records.

### **Sampling and Testing Procedures**

- It could be a burden to the operator, depending on the facility size. Develop a program to support operators to meet the requirements. Financial resources would be beneficial to support achievement.
- There should be a link to work with different stakeholders (e.g., academia) in helping validate processes.
- Guidebook should provide clarity on frequency of sampling and testing, depending on the product.
- Include a list of accredited laboratories or publish resources on a web page.
- Inspector standardization and protocols to interpret and apply this requirement are needed.
- Existing scientific evidence to be considered when validating new technologies or processes that are to be implemented in Manitoba when coming from other jurisdictions.
- Testing should be based on the need for evidence that will help prevent food safety risk, especially with high-risk foods.
- Testing and sampling should be required for high-risk products only. Concern expressed that leaving the decision to the discretion of the director could be perceived as too much authority.

## **Food Processing Considered Requirements**

### **Written Record of Food Allergens**

- Having a list of allergens will be useful for:
  - inspectors to conduct a more effective inspection, as the list will help them assess allergen control
  - operators to increase awareness of the allergens at their facility
- In the guidebook, include a list of allergens, and provide training and resources for operators.
- If no allergens are present at a facility, have a statement indicating so.
- Help identify possible sources of contamination.

## **Food Allergen Control Procedures**

- There are different control procedures that could be used, depending on the facility size (e.g., storing ingredients on different shelves, different colours of utensils for different products, swabbing after to test for cross-contamination, washing hands before handling another product).
- Include procedures for allergen validation in the guidebook.
- Provide access to a consultant and subsidies for allergen testing. Have trained personnel who can go on site with processors and provide advice.
- Helpful in minimizing recalls.

## **Process Controls for Hazardous Foods**

- Recommended to validate the process at product development, not relying on end product testing to confirm food safety.
- Important to define what a process control is, to which type of food does it apply and if there is a need to draw a line when a process control may not be needed. Include detailed information in the guidebook.
- Establishing process controls, and having records showing how a process is making safe food, increases trust from consumers.
- Have a list of calibration companies and calibration resources on website.
- Educate processors on controls that make the product safe (e.g., pH, water activity).
- Technical and financial support for processors is required for equipment calibration.

## **Food Traceability Requirements**

- Large facilities may be able to comply, but small operators may have challenges.
- Facilities with large range of products may have challenges.
- Products intended for retail should have traceability in place.
- Adoption of record keeping will require changing habits to implement new practices (e.g., filing invoices).
- Outcome-based will provide options on how these requirements are met.
- Beneficial when dealing with a recall.
- Provide clear information in the guidebook.
- Allocate financial resources for technology to support traceability.

## **Food Prepared and Advertised for Sale Online**

- Need to consider high-risk vs. low-risk foods and enforcement approach.
- Clear regulations that will apply to online businesses.
- All food businesses should comply with same regulations, regardless of the distribution channel.
- No impact on farmers' markets, because they have a system in place that is working effectively
- Work in collaboration with Manitoba Health.

## **Training**

- Consider an approach similar to the current food handling training. Have at least one employee with a training certificate on-site at all times.
- Design training in collaboration with educational institutions on key subject areas for processors and abattoirs.
- Have available supporting educational materials.
- Training requirements should be outcome-based, allowing for participants to select applicable courses from different sources.
- Consider a transition period.
- Trained employees support public trust.
- Small businesses do not have time to train new employees. Large companies have high turnaround, which makes achieving training needs a challenge.
- Provide training in different languages.
- Consider training that can be equivalent across Canada, so employees moving from other jurisdictions could enter the job force without delay.
- Specialized food safety training is key for those making high-risk products.
- Guidebook materials should contain training examples and expectations.

## **Trained Employees and Phased-in Approach for Training Requirement**

- Facilities need a trained employee in a leadership position to be on-site at all times.
- The number of trained employees should depend on the facility size.
- Staging phase-in approach requirement at different time frames:
  - high risk products one year
  - low risk products two years
- Consider the training that some facilities may already have in place.
- Phase-in approach may require accommodation based on ability to meet industry demand.
- Training options that require hands-on approach may require more time for completion.

## **Abattoirs Considered Requirements**

### **Record of Food Animal Purchased/Received/Slaughtered**

- Some facilities are already filling the ante-mortem forms and lading slips provided by each producer. Creating a new record is not supported, but rather streamline one document to be used by all parties rather than different ones.

## Reporting of Animals Found Dead

- Some operators are recording animals found dead on the anti-mortem cards. There is no benefit to creating another record for this data.
- Requirement will be useful to ensure appropriate reporting, either by documentation or verbally.

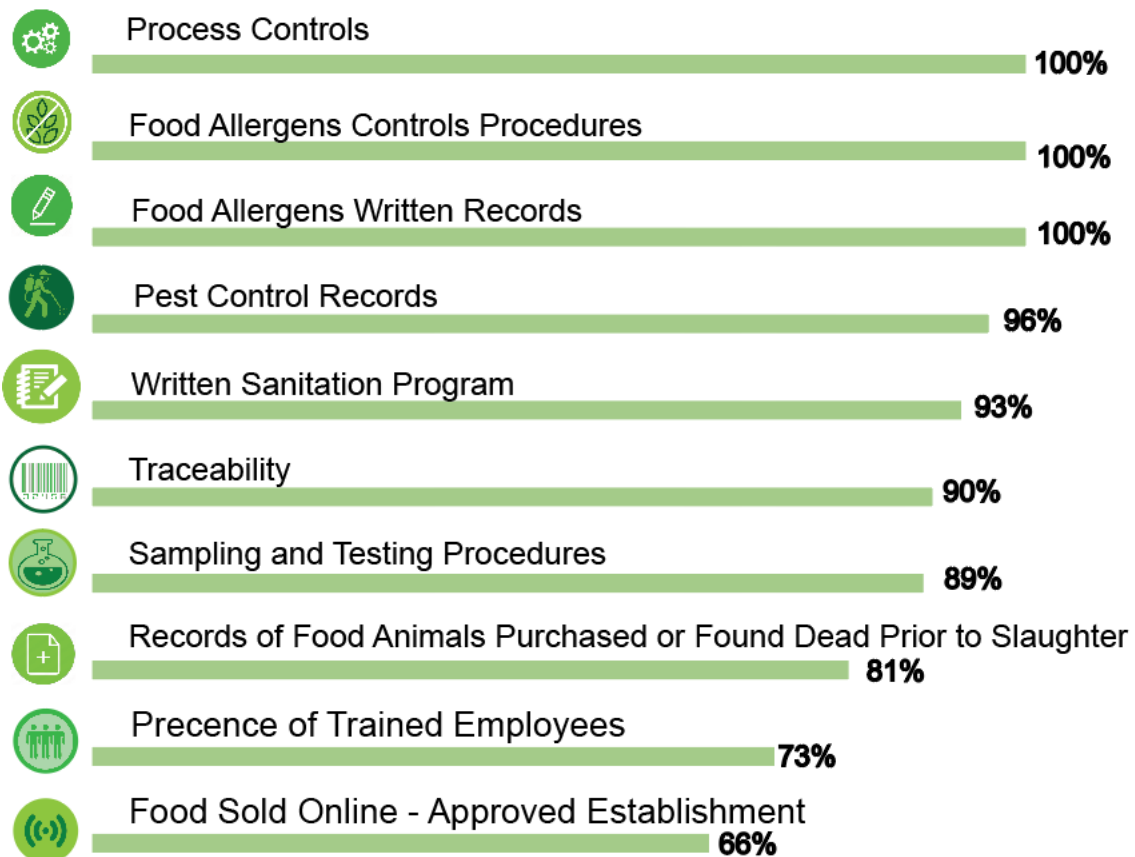
## Record Retention Period

- One to two years.

## Other

- Recommendation to have a process for disputed inspection results.
- Desire to have provincial regulations that will enable interprovincial trade.
- A balance of outcome and prescriptive requirements would be beneficial for the operator and regulator.
- Regulations will allow for flexibility, so processors can use new technologies.

## Stakeholders Support



### **Greatest Benefits**

Trust and consumer confidence.  
Alignment with other regulatory jurisdictions.  
Enter new markets.

### **Greatest Challenge**

Resources: human, financial and time.

## Next Steps

### **Timeline**

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- ✓ Engagement
- ✓ Review and Analyze Information
- ✓ What We Heard Report
- Draft Regulation
- 45-day Consultation
- Finalize Regulation
- Regulation Registration

### **Active Offer Statement**

This information is available in an alternate format on request. Please contact [foodsafety@gov.mb.ca](mailto:foodsafety@gov.mb.ca).

### **Questions?**

Email: [foodsafety@gov.mb.ca](mailto:foodsafety@gov.mb.ca) for questions or comments.