

# Reviewing Your Food Safety and Security Strategies

## Review Checklist

**Ontario has a strong food safety system. The Ontario Ministry of Agriculture and Food is committed to working with industry stakeholders to create an even safer, more effective system. “Reviewing Your Food Safety and Security Strategies” is intended to assist food processors in reviewing food safety and security strategies to minimize risk.**

**A thorough review of your company’s strategies should consider each of the following:**

- People**
- Inputs**
- Facilities and Processes**
- Finished Product**
- Crisis Management Programs**

### FOOD SAFETY AND SECURITY - THE ISSUES

There are three main types of hazards associated with food processing and manufacturing plants: biological hazards, chemical hazards, and physical hazards.

**Biological** hazards are the most frequent sources of food safety problems. The two main ways in which food can become contaminated by biological hazards are:

1. Cross-contamination – the movement of bacteria from contaminated sources (such as raw materials, unsanitary equipment and utensils, unclean air, or employees) to previously uncontaminated items (such as cooked products or sanitized equipment and utensils).
2. Incomplete management of steps where hazards are controlled (i.e. critical control points) – To reduce or eliminate micro-organisms, and other hazards in the final product, all critical control points throughout the plant (such as cooking temperatures, incoming materials inspections) must be thoroughly examined. These points must be consistently, monitored, documented, verified, and corrective actions must be taken when problems occur.

**Chemical** and **physical** hazards can also be the source of accidental or deliberate contamination of food products. Examples of chemical hazards include unapproved equipment lubricants that may be toxic, allergens, or restricted ingredients. The vast majority of Canadian recalls are related to cross-contamination by allergens. Examples of physical hazards include metal shavings, glass, or wood. Physical hazards can present a choking hazard or can cause damage upon ingestion.

Non-food **chemical** and **physical** hazards can also be the source of accidental or deliberate contamination of food products. For example, unapproved equipment lubricants may be toxic. Metal shavings are a choking hazard that may cause serious injury. Allergens are also considered to be a chemical hazard.

**FICB**, The Food Industry Competitiveness Branch, is part of the Ontario Ministry of Agriculture and Food. Our mandate is to promote and support growth, development and investment in Ontario’s food industry.

*“Demonstrating Ontario’s Commitment to the Food Industry”*

Call toll-free 1-888-4OMAFRA (within Ontario) or (519) 826 4190 (outside Ontario)  
Visit our website: <http://www.gov.on.ca/OMAFRA/english/food/investment/services.htm>

## EVALUATING AND IMPROVING YOUR PROGRAM - 3 STEPS

1. List the hazards presented by microbiological, chemical and physical contaminants in the plant. Review how these hazards are controlled within the processing facility and by suppliers. Complete the attached checklist for your food processing operation. This tool, which is based on HACCP principles, will help you conduct a thorough evaluation of your food safety and security program.
2. Create an “Action Plan” to enhance food safety and food security at your plant.
3. Involve a team of plant management, supervisors and frontline employees to implement the plan and to ensure that everyone is well informed about the changes.

**Additional information on food safety may be found at the following web sites:**

**The Ontario Ministry of Agriculture and Food**

<http://www.gov.on.ca/OMAFRA/english/food>

**Canadian Food Inspection Agency**

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

**Guelph Food Technology Centre**

<http://www.gftc.ca/gftc.htm>

**US Department of Agriculture**

<http://www.fsis.usda.gov/oa/consedu.htm>

**DISCLAIMER**

This checklist has been prepared to assist Ontario food processors in reviewing their food safety and security strategies to minimize risk. The information in this checklist is a guideline only. It may not include all of the matters that should form the basis of a food safety and security strategy review for a particular operation, and certain measures included in the checklist may not be appropriate for all operations in all circumstances. Adherence to the checklist does not ensure compliance with all applicable laws and standards.

Processors should therefore use their own judgement in using the checklist, and seek technical expertise as required, in order to develop the most appropriate food safety and security strategies for their operations. The Ontario Ministry of Agriculture and Food and the Guelph Food Technology Centre cannot be held responsible for any claims, damages, losses or injuries resulting from the use or failure to use the information in this checklist.

## REVIEW CHECKLIST

<b>People</b>	<b>Current Status</b>			<b>Action Required</b>	
	Yes	No	Not Sure	Yes	No
1. Good Hygiene practices have been reviewed with staff recently (in the last 3 months) and refresher courses provided to long-term staff.	?	?	?	?	?
2. Employees wear uniforms with no pockets above the waist.	?	?	?	?	?
3. Personal items such as lunch containers and bags are kept away from processing areas.	?	?	?	?	?
4. Only designated employees are allowed in sensitive Critical Control Point areas or areas where the product is open to contamination.	?	?	?	?	?
5. Employee identification methods are used to ensure that only authorized personnel are in the plant at all times.	?	?	?	?	?
6. Temporary personnel are only working with packaged, coded and labelled products or in areas that do not directly affect the product.	?	?	?	?	?
 <b>Inputs</b> 					
<b>Chemical Control</b>					
1. Cleaning and sanitizing chemicals, lubricants, paints, pesticides and other non-food chemicals are stored away from food processing areas, under controlled access and with documented inventory control.	?	?	?	?	?
2. Material Data Safety sheets are readily available, up to date and accessible in case of emergency.	?	?	?	?	?
3. Chemicals used in the plant are on the Canadian Food Inspection Agency's "Reference Listing of Accepted Construction Materials, Packaging Materials and Non-Food Chemical Products"	?	?	?	?	?
4. Contractors report and control on material usage.	?	?	?	?	?

## Review Checklist

	Current Status			Action Required	
	Yes	No	Not Sure	Yes	No
<b>Ingredient Safety</b>					
1. All incoming raw materials, packaging, processing aids and chemicals are inspected for signs of tampering or other anomalies.	?	?	?	?	?
2. "Accept" and "Reject" criteria for all incoming materials are well understood by anyone signing for or receiving products, including courier packages of minor ingredients or laboratory materials.	?	?	?	?	?
3. All deliveries are checked against the orders made by the company.	?	?	?	?	?
4. All incoming materials have clear, legible lot codes for traceability.	?	?	?	?	?
5. New suppliers are thoroughly investigated for their food security programs and the food security programs of existing suppliers are known and acceptable.	?	?	?	?	?
6. Accountability programs, such as "sign-off sheets", exist for all restricted ingredients and highly restricted ingredients are handled by only trained, authorized personnel.	?	?	?	?	?
7. All lot codes for incoming ingredients, processing aids and packaging materials are identified on production records to ensure that products are traceable from inputs to finished products.	?	?	?	?	?
<b>Water Quality &amp; Safety</b>					
1. The security of well systems is reviewed monthly and samples are taken at several locations within the plant for microbiological checks. A schedule for chemical analysis and analysis for parasites has also been established and followed.	?	?	?	?	?
2. Municipally-supplied water system procedures have been reviewed and samples are taken within the plant at several locations on a regular basis to verify microbiological and chemical safety.	?	?	?	?	?

## Review Checklist

<b>Facilities and Processes</b>	<b>Current Status</b>			<b>Action Required</b>	
	<b>Yes</b>	<b>No</b>	<b>Not Sure</b>	<b>Yes</b>	<b>No</b>
<b>Controlled Access</b>					
1. A clearly, written visitor policy with “Sign-in” and “Sign-out” requirements is in place.	?	?	?	?	?
2. All visitors, especially trades people supply identification.	?	?	?	?	?
3. Visitors are accompanied by plant personnel while in the plant.	?	?	?	?	?
4. Toolboxes and other containers brought into the plant are inspected prior to entry.	?	?	?	?	?
5. Secondary doors, windows and entrances are secured to prevent unauthorized entry.	?	?	?	?	?
<b>Plant Processes</b>					
1. <i>Critical Control Points</i> in the process have been determined and specific acceptable limits identified to control the food safety hazard.	?	?	?	?	?
2. <i>Critical Control Points</i> are managed and monitored by trained, authorized personnel who keep records on their monitoring activities and on any corrective action they have taken.	?	?	?	?	?
3. Someone has been assigned to verify that <i>Critical Control Points</i> are being managed according to the requirements outlined in 1. This person is carrying out verification at least daily, or as determined by the risk management strategy.	?	?	?	?	?
<b>Laboratory Control and Safety</b>					
1. An up-to-date inventory of all hazardous laboratory chemicals and solvents is kept and such materials are securely locked.	?	?	?	?	?
2. All positive pathogen culture controls are kept locked.	?	?	?	?	?
3. Mercury thermometers are accounted for on a daily basis.	?	?	?	?	?
4. Only sample collection laboratory materials are permitted on the manufacturing floor.	?	?	?	?	?

**Review Checklist**

<b>Finished Product</b>	<b>Current Status</b>			<b>Action Required</b>	
	<b>Yes</b>	<b>No</b>	<b>Not Sure</b>	<b>Yes</b>	<b>No</b>
1. Procedures are in place for temporarily resealing ingredients, in-process products and rework in containers, bags, pails and bins and they are effective.	?	?	?	?	?
2. Individual consumer packages are “tamper evident” or “tamper proof”. Palleted product is “tamper evident” or “tamper proof”.	?	?	?	?	?
3. Bulk containers that are re-sealable and not “tamper evident” are kept in restricted storage areas.	?	?	?	?	?
4. Your transportation system or company has a written program for managing food security from pick-up to delivery.	?	?	?	?	?
5. Your central warehousing operations and/or your customer’s warehousing operations has food security protocols as they relate to Employee Practices, Controlled Access, Chemicals, Facilities and Crisis Management.	?	?	?	?	?
6. Waste packaging is controlled and destroyed effectively.	?	?	?	?	?
<b>Crisis Management</b>	<b>Yes</b>	<b>No</b>	<b>Not Sure</b>	<b>Yes</b>	<b>No</b>
1. Your organization has a written recall plan with the following key components.	?	?	?	?	?
a. A detailed listing of the recall team, including: names, contact information at home and other likely locations, roles of each of the team members and any pre-developed forms such as media releases or tracking logs that will help facilitate the team carrying out the recall.	?	?	?	?	?
b. A written explanation of the lot coding system that allows forward (to finished products) and backward traceability (to inputs and ingredients).	?	?	?	?	?

## Review Checklist

<b>Crisis Management (cont'd)</b>	<b>Current Status</b>			<b>Action Required</b>	
	Yes	No	Not Sure	Yes	No
c. Steps in the recall process, including when government, customers and media will be notified.	?	?	?	?	?
d. Procedure for conducting a mock recall every six months and how the effectiveness of the mock recall and actual recall will be tracked.	?	?	?	?	?
e. A standard due-diligence contract with all on-site contractors and service providers.	?	?	?	?	?
2. Your plant has a Crisis Management Program with the following key components.	?	?	?	?	?
a. Emergency telephone numbers (e.g. fire, police, ambulance, hospital, and regulatory agencies) made available to key management and plant personnel.	?	?	?	?	?
b. An emergency evacuation plan to get personnel out of the plant quickly and safely.	?	?	?	?	?
c. A plant plan provided in advance to the local fire department or have one in a locked, sealed container outside the plant in the event the plant cannot be accessed.	?	?	?	?	?
d. A strategy for continued production using an alternate company plant or co-packer to avoid prolonged disruption of product flow to customers.	?	?	?	?	?
e. Contacts at a qualified laboratory to help with microbiological, chemical and physical evaluation of unknown materials.	?	?	?	?	?
f. Prepared statements for the press and customers identifying the action that you have taken depending on the situation.	?	?	?	?	?
g. Designate a spokesperson to deal with media calls, and be sure that they are well-trained in media relations.	?	?	?	?	?