

# Safe Food for Canadians Regulations “The Rest of the Story”

## Roasters, Distributors & Internet Sellers

Coffee Association of Canada  
Annual Conference

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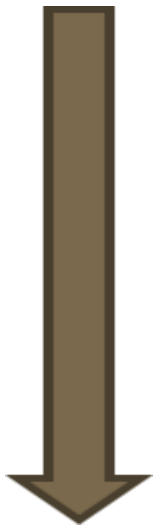
# AT A GLANCE

- ✓ Licensing
- ✓ Inter-provincial Trade
- ✓ Preventive Controls
- ✓ Preventive Control Plans
- ✓ Traceability
- ✓ Compliance Timeline: “when size matters”
- ✓ How to Obtain a License

# Safe Food for Canadians Act & Regulations

Safe Foods for  
Canadians Act (2012)

- **Licensing – importers, exporters & manufacturers**
- **Prohibitions on trade**
- *Agricultural Products Act*
- *Consumer Packaging & Labelling Act*
- *Meat Inspection Act*
- *Fish Inspection Act*



Safe Food for Canadians  
Regulation (2019)

- **Licensing**
- **Enhanced trade, food safety & compliance requirements**
- **Fresh fruit & vegetable**
  - ✓ *Consumer Packaging & Labelling Regulations*
  - ✓ *Meat Inspection Regulations*
  - ✓ *Fish Inspection Regulations*
- ✓ *Processed Products Regulations*
- ✓ *Dairy Products Regulations*
- ✓ *Egg Regulations*
- ✓ *Honey Regulations*
- ✓ *Livestock and Poultry Carcass Grading Regulations*
- ✓ *Maple Products Regulations*
- ✓ *Processed Egg Regulations*
- ✓ *Organic Products Regulations*

- ✓ **Licensing & compliance**
- ✓ **Amalgamation changes**
- ✓ **Amendments**

**License**

**Hazard  
Analysis**

**Traceability**

**Recall  
Plan**



**Preventive  
Controls**

**Preventive  
Control  
Plan**

**Investigation  
& Reporting**

**Complaint  
Management**

# License

- **Roast coffee** or conduct these activities: manufacture, process, treat, preserve, grade, package, or label food
- **Roast coffee** for sale over the internet
- **Import** roasted coffee or coffee products
- **Export** coffee [require export certificate, export to the U.S.]

## Inter-provincial Trade (distributors)

- License **NOT** required if distribution is the only activity
- Validate importer or supplier has valid CFIA license
- Must implement traceability provisions

# Preventive Controls

- **Hazard Analysis: Chemical, Biological, Physical**
- Sanitation, Pest Control & Control of Non-food Chemical Agents
- Conveyances & Equipment
- Conditions Respecting Establishments
  - Land
  - Interior of facility or conveyance
  - Design, construction and maintenance of establishment
  - Separation of food
  - Lighting
  - Ventilation systems
  - Temperature and humidity
  - Removal & disposal of contaminated materials & waste
  - Cleaning stations, lavatories
  - Water
- Unloading, Loading and Storing
- Competencies and Qualifications
- Hygiene
  - Clothing, footwear & protective coverings
  - Personal cleanliness
  - Spitting, chewing gum & other acts
  - Reporting of disease, illness, symptoms & lesions

# Preventive Control Plan

- **Describe biological, chemical & physical hazards**
- Description of control measures
- Description of critical control points
- Critical limits for each critical control point
- Procedures for monitoring the critical control points
- Corrective action for each critical control point
- Procedures for verifying implementation results in compliance to SFCR
- Documents verifying the preventive control plan was implemented

- **Measures ensuring food is packaged and labelled in compliance**



# Traceability



- Data receive from supplier
- Data maintained by coffee roaster
- Data provided to customer
- Use of lot codes or product identifiers
- Retention time for data

# Compliance Timeline

- Companies with annual sales <\$100,000 and/or 4 employees or less

| Product Category           | License to Operate | License to Import | Preventive Controls                         | Hazard Analysis                             | Preventive Control Plan   |
|----------------------------|--------------------|-------------------|---|---|---|
|                            |                    |                   | Sales < \$100,000<br>OR 4 employees or less | Sales < \$100,000<br>OR 4 employees or less | Sales > \$100,000<br>AND 4 employees or less                                |
| Coffee and coffee products | July 15, 2020      | July 15, 2020     | July 15, 2020<br><br>July 16, 2021          | July 15, 2020<br><br>July 16, 2021          | July 15, 2020<br><br>July 16, 2021<br><br>Not Required<br>Sales < \$100,000 |

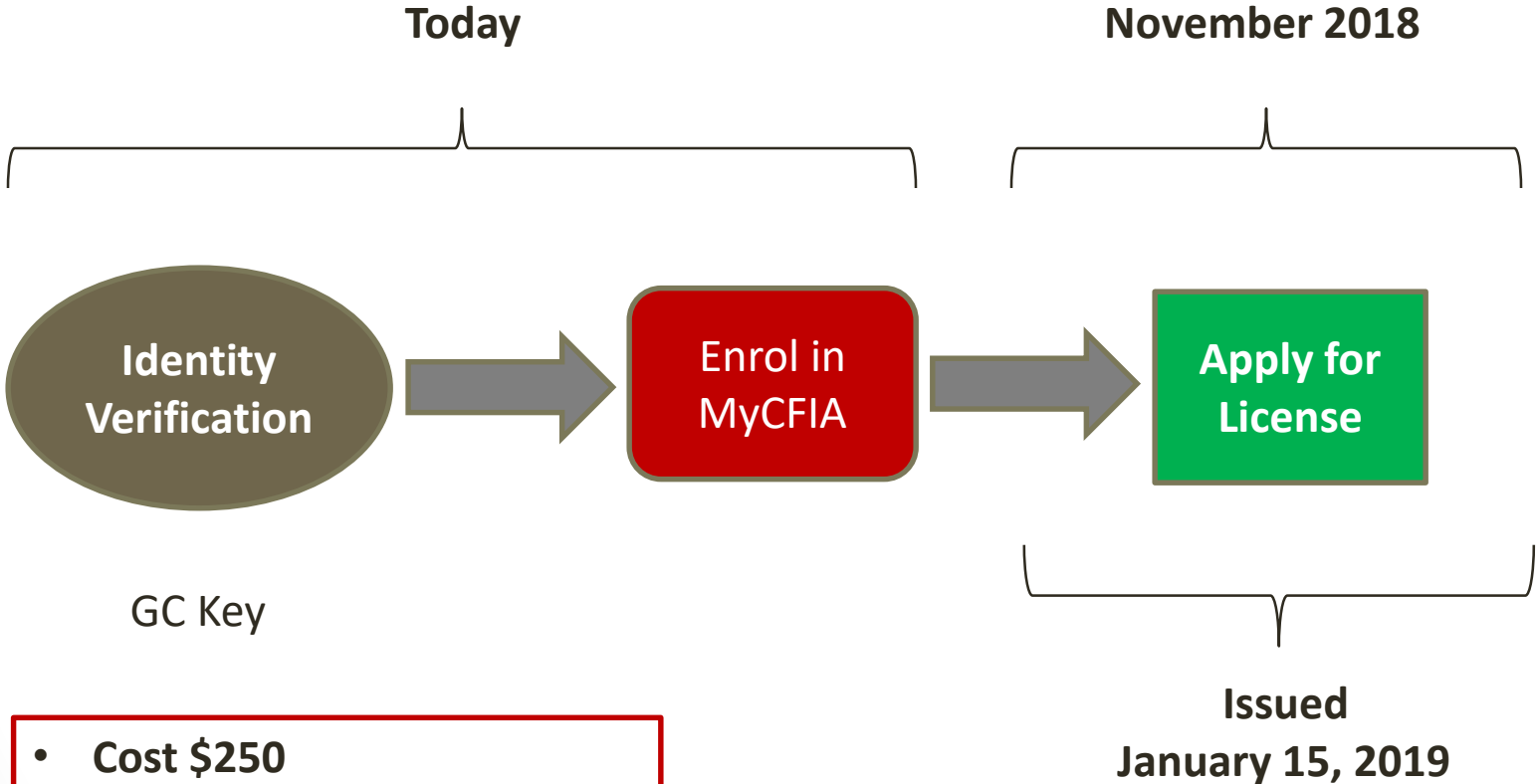
# Compliance Timeline

- Companies with annual sales <\$100,000 and/or 4 employees or less

| Product Category         | Traceability  | Recall Plan             | Complaint Management Procedures |
|--------------------------|---------------|-------------------------|---------------------------------|
| Coffee & coffee products | July 15, 2020 | <b>January 15, 2019</b> | <b>January 15, 2019</b>         |

# Getting a CFIA License

## Apply on-line at MyCFIA



# Questions ?



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# Ten Questions to Percolate On !!!

1. For traceability purposes, when **MUST** the unique product identifier be a “**lot code**” ?
2. When can a U.S. non-resident importer export roasted coffee directly from the European Union to Canada ?
3. Under what circumstances can a non-resident importer from the European Union export roasted coffee or coffee products from the European Union to Canada ?
4. Does CFIA currently charge an inspection fee for the importation of roasted coffee or coffee products into Canada?

## Ten Questions to Percolate On !!!

4. Can a U.S. non-resident importer to Canada export green coffee beans directly from Columbia to Canada ?
5. Does a coffee roaster require a CFIA license if all of party's roasted coffee is sold in the province in which the roasting establishment is located ?
6. What product information **MUST** a coffee distributor provide to their customer ?
7. Green coffee beans are being stored in a transport trailer next to the roasting facility. In this instance, is the transport trailer a conveyance or considered part of the establishment ?

## Ten Questions to Percolate On !!!

8. What two options may be used for identity authentication when enrolling in MyCFIA ?
9. Under what circumstances would a small coffee roaster require a CFIA license if they sell 100% of their coffee over the internet ?
10. Would an importer require a CFIA license to import green coffee beans if the green coffee beans are imported in a consumer pre-packaged format ?