



# CMC Panel Discussion

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# Challenges To Food Safety:

- Senior Management Commitment
  - Commitment to placing Food Safety ahead of production
  - To providing the resources needed to ensure Food Safety
    - Enough sanitation people to clean properly
    - Mntc time to dismantle and reassemble
    - QA resources to monitor programs including sanitation
    - Adequate time to clean, ahead of OT.
  - Possible delay or hold of product until checks are done or results are in. Potential to short customers, possible charges
    - Ship out of code rotation due to waiting for results



## Discussion Topics: *Food Safety*

- Increased awareness of Customers and the Consumer.
  - But not a complete understanding, can make assumptions with only some details or some of the facts
  - Demand complete food safety – no risk for the same price
  - At the same time expect longer shelf life
  - And we are to bear the cost and liability when we are no longer in control of our own product anymore.
  - Still want cleaner ingredient lists and lower salt as well



## Discussion Topics: (CFIA & Health Canada)

- Listeria Policy (Feb 2009):
  - It was and still is needed
  - Lots of details needed to be cleared up.
  - In our company it means Hold & Release.
    - Very costly
      - New QA
      - 800 more pallet spaces purchased
      - New program for monitoring held and released product
    - Customers needed to be educated and often did not understand
      - Receiving product out of code rotation
      - Reducing shelf life, sometimes to the point where guaranteed days remaining can not be made when shipping across Canada.
  - Some guidelines still not science based and leans to much on chemical intervention rather than process science and efficacy.

# Discussion Topics: (CFIA & Health Canada)

- Consistency:
  - We understand the difficulty in training CFIA inspectors, supervisors etc to interpret the policies consistently.
  - But it needs to be done
    - Many inspectors seem to not understand the Listeria Policy and contact regional or Ottawa for decisions
    - There can be inconsistencies at the supervisor / area manager level
    - Inevitably decisions are referred to Ottawa.
  - New Allergen – Mustard:
    - This new policy coming out on Mustard is really going to impact our business.
      - We wonder about the need for Mustard as an allergen.
      - As well there will be significant costs associated in reformulating most of our products and then trying to schedule production around a new allergen.



## Discussion Topics: Risk Based testing

- A good plan, we support it.
  - still lots of room for error and potential swabbing that can give a false negative.
  - Need some flexibility in criteria for alternative testing
    - Science based studies should be considered for Est # approval
    - Difficult to cover all variations and still be fair
      - Needs to be solved due to cost and company risk
  - Fallout from a presumptive or confirmed L.SPP positive
    - OFSR wild card. What will they do? Will they do a risk assessment and go test product in the stores? Can they issue a recall? Need criteria for their decision making process.
    - We want to test environmentally to be pro-active.



## Discussion Topics: Back to the Basics

- Focus on Food Safety and increased testing have forced most to go back to the basics.
  - Back to proper GMP's
  - Make the RTE off limits to all that do not work there
  - Proper sanitation practices on all shifts
  - More monitoring
  - Having QA more involved in the decision making and gaining priority over productivity
- Starting to push back to;
  - Equipment manufacturers to make their product easier to clean and harbor bacteria less
    - Make them easier to disassemble
    - Start listening to the industry on what design changes need to be made



## Discussion Topics: Back to the Basics

- Starting to look at the RAW side of the process.
  - Not only focusing on the RTE. The cleaner the raw side the less dependency on the cooking step to reduce the risk
  - The Raw side can be the micro hot spot that feeds the rest of the plant
  - Clean and handle equipment on the raw side the same way you do on the RTE side
  - Do the same GMP and cross-contamination control training for the raw side as the RTE side gets.



## Discussion Topics: Suppliers – Raw Materials

- The industry processors need to expect more from their raw material suppliers.
  - More monitoring of kill and cut plants
  - Their food safety, GMP and sanitation programs should start to approach that of the RTE product producers.
  - More testing and letters of guarantee are being required by many sources.