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THE 2016 GLUTEN-FREE STAKEHOLDER UPDATE & PLANNING SESSION PRESENTED IN COOPERATION WITH:



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# INTEGRATION OF FOOD SAFETY MANAGEMENT SYSTEMS – “DOING MORE WITH LESS”

Gordon Hayburn, VP Food Safety & Quality. Trophy Foods Inc.  
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# CONTENT

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- The Evolution of Food Safety Management Systems
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- Comparison and Integration
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# TROPHY FOODS – AN INTRODUCTION

- Established in 1967, now operating from 3 facilities
- “Trophy” is an established brand in Canada
- Trade as “Redland Food Corp.” in the USA
- Primarily manufacture and pack retailer private label for all major Canadian retailers and some USA based companies
- All sites have common processes and “unique” processes
- Manufacturing scope covers BRC Categories – 5, 15, 16, 17
- Buffalo, USA - most recent location (May 2015)

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# FOOD SAFETY EVOLUTION

- **HACCP/FSEP Recognition** **2005-2008**  
(Canadian Food Inspection Agency - Food Safety Enhancement Program)
- **HACCP Accreditation** **2008-2010**
- **GFSI-BRC Certification** **2011- present:**
  - Calgary **AA+**
  - Mississauga **A+**
  - Buffalo **A**

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# AUDITS AND AUDITING – CHALLENGES

- **3 main issues:**
- Time
- Knowledge
- Money

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# CURRENT CERTIFICATIONS

- BRC Global Standard for Food Safety
- GFCP (Gluten Free Certification Program)
- Kashruth Council of Canada Certification Program (Kosher)
- COR Canada's Organic Regulation
- DVUP (Direct Verifiable User Program)
- NON GMO Certified
- GPFHCL (General Principles of Food Hygiene , Composition and labeling)

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# SITE AUDITS

Standard/ Program	Certification/ Inspection Body	Frequency
BRC	SAI Global	Annual (unannounced)
COR	Pro-Cert Organic	Annual
GFCP	SAI Global	Annual
DV	ABC Approved Auditor	Annual
Kosher	Kashruth Council of Canada	Quarterly
Non GMO	SCS Global Services	Annual
GPFHCL	CFIA	Annual

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# THE INTEGRATION JOURNEY

- The FSQMS had to be suitable for the Company
- Key and common elements within standards
- Determine the backbone
- Identity how they integrate
- Confirm which standard was most demanding
- Confirm the default requirement

**THIS TAKES TIME**

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Area (List based on BRC issue 7)	Organic	Water	GDP	FSD	DV	Non-GMO
Senior Management Commitment						
Management Commitment			2.1	2.1		MS Doc R
Organizational Structure				2.1 - FSD Manual NA		
The Food Safety Plan/ HACCP			2.2 to 2.7 & 3.1 to 3.5	2.2 to 2.7 & 3.1 to 3.5	X	SWB
HACCP				2.2-2.7 + 3.1-3.5 - FSD Manual		
PRPs			3.1 to 3.17	3.1 to 3.17 3.14 - FSD Manual	X	
Food Safety and Quality Management System						
Food Safety & Quality Manual						SWA
Document Control				3.1 - FSD Manual		
Record Completion & Maintenance	4.4	2.6h	3.14	3.14 (PRP) + 3.17 (SDP) + 3.18 (PC) - FSD Manual	X	
Internal Audit			4.2.3	4.2.3 7.6-8.23 - FSD Manual		
Supplier Approval			3.8.1	8.21 to 8.23 + 8.6 to 8.14 8.21 + 8.23 + 8.6 to 8.14	X	
Specifications		4	8.21 to 8.23.1	8.21 to 8.23.1 8.21 + 8.24 + 8.12		SP & SWA
Corrective Actions			3.13	3.13 3.13 (PRP) + 3.17 (SDP) + 3.18 (PC) - FSD Manual	X	SWC
Control of Nonconforming Product			3.13	3.13	X	SWC
Traceability	4.4	2a	F.1.1	F.1.1 8.21 + 8.23 + 8.11 + 8.21 + 8.16	X	AD (S) & SWA
Complaint handling				F.1.1		
Incidents/Recalls/Withdrawal		10	3.1.6	3.1.6	X	
Customer Focus				F.1.1		
Site Standards				NA		
External Standards			A.1.1	A.1.1		
Security			A.2.1	A.2.1		
Layout, Product Flow & Segregation	8.3 & 10	2&3	A.2.1	A.2.1	X	AD (S) & SWB
Building Fabric			A.3.1 & A.3.2	A.3.1 & A.3.2		
Utilities - Water & Air			A.4.1	A.4.1	X	
Equipment	5		C.1.1	C.1.1 C.1.1 + A.1 + G.1.2	X	
Maintenance			C.1.1	C.1.1		
Staff Hygiene			A.1	A.1		
Chemical and Physical Controls				A.3.1 + A.3.2 + A.3.1 + A.3.2		
Chemical				8.21 + 8.23 + 8.11 + G.1.3		
Metal			D.1.1	D.1.1		
Glass				G.2.1		
Wood				G.2.1		
Foam/Body Detection				G.2.1		
Housekeeping & Hygiene	8.18	5.11 & 5.4	G.1.1	G.1.1 A.2 + C.1.1 + G.1.10	X	SWB
Waste/Water Disposal			A.4	A.4		
Management of Sensitive Food/Animal Feed				NA		
Pest Control	8.4		G.1	G.1		
Storage Facilities		3.1.2	H.2	H.2		
Dispatch & Transport	8.5		H.1	H.1 H.1 + H.1.2		
Product Control						
Product Design & Development	8			G.1.1		
Product Labelling	10/11		F.1.2	F.1.2 F.2.1 + G.1.1 + G.1.14 + G.1.7		AD (S) R
Management of Allergens	10.14		G.1	G.1		
Product Authenticity, Claims, Chain of Custody				NA		X
Product Packaging	3.8		H.2.1	H.2.1 H.2.1 + H.2.2		AD (S) & SW
Product Inspection & Laboratory Testing				A.1.1 + H.2.1 + H.2.2 + H.2.3 + F.1.1 + F.1.1 + G.1.10 + G.1.2 + G.1.3 + G.2.1 + 3.17.2 (SDP) - FSD Manual		
Product Release				H.2.1		
Process Control			3.8	3.8		
Control of Operations				C.1.2 + G.1.1 + G.1.2 + G.1.3 + 3.2 (SDP) + 3.8 (PC) - FSD Manual		
Labelling and Pack Control			F.2.2	F.2.2		SWB
Quality Control			C.1.2	C.1.2 C.1.2 + G.1.1	X	
Calibration				C.1.2	X	
Personnel			G.1.1 & H.2.1.1	G.1.1 & H.2.1.1		SWA
Training				G.1.1		
Personal Hygiene			D.1.1	D.1.1		
Medical Screening			D.1.1	D.1.1		
Protective Clothing			D.2.1	D.2.1		
Additional Comments						DV does not prescribe a standard but complies with 7.2.8 Part 9.1. We have used an "X" mark to indicate the areas audited. All DV requirements were satisfied with current BRC procedures.

# COMPARISON AND INTEGRATION

BRC	FSEP
Management Commitment	2.2.1
Organisational Structure	2.2.1 - FSEP Manual
HACCP	2.2.2 to 2.2.7 & 3.2 to 3.5
	2.2.2 - 2.2.7 • 3.2 - 3.5 - FSEP Manual
PRP's	3.1.1.1 to 3.1.1.7
	3.1.1 - FSEP Manual

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# COMPARISON AND INTEGRATION

Record Completion & Maintenance	3.1.4 • 3.2.7.5 • 3.2.8.4	<b>Non GMO</b>
Supplier Approval	B.2.1.1 • B.2.1.3 • G.1.1.2 • G.1.1.4	S V E & VII A
Specifications	B.2.1.1 • B.2.1.4 • G.1.1.2	S VIII C
Corrective Actions	3.1.3	
Control of Nonconforming Product	3.1.3 • 3.2.7.3 • 3.2.8.2	S VIII C
	F.1.1.1	
Traceability	B.2.1.1 • B.2.1.3 • F.1.1.1 • F.1.2.1 • G.1.1.6	A2 (pg 3) & S IV A

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# BENEFITS AND DRAWBACKS

## *Pro's*

**Single system-All sites**

**Confidence**

**Easy to manage**

**Makes training more effective**

**Allows for future acquisition and integration**

## *Con's*

**Technically demanding**

**Time demanding**

**Requires regular review/update**

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# GFCP– CHALLENGES

- **3 main issues:**
- Knowledge! - Supplier Understanding
- Knowledge! - Raw Material Sourcing
- Knowledge! - Customers, Regulators, Consumers

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# ONGOING DEVELOPMENTS

- **USA:**  
**Food Safety Modernisation Act -  
Food Safety Preventative Controls**
- **Canada:**  
**Safe Food For Canadians Act**

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# SUMMARY

- Commit to the program (Integration and GFCP)
- Plan the work - everyone needs to be involved
- Execute and stay with it - It will take time
- Review the program - make sure it works for you
- Evolve in line with business, customer, standards and regulatory requirements

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- Thank you
- Questions?
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