



## FOOD SAFETY PROGRAM

BCRFSP2020.1

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*Food for pets, safely.*



## Production Guidelines – Worker Health and Training Program

This section provides direction regarding the personnel of a production facility that processes Big Country Raw products. These production directives address two major areas: worker health and hygiene, and personnel training program.

### Workers - Disease Control

Big Country Raw instructs that workers with direct and indirect access to the raw pet food production areas follow good hygiene practices. Following good hygiene practices will help protect the food from contamination. Direct access includes processing, storing, and transporting products. Indirect access includes operating equipment, buying materials, and pest control operators.

Big Country Raw requires:

- Workers to report any active case of illness to supervisors before commencing work.
- Shift Supervisors to identify typical indications and symptoms of infectious disease including vomiting, nausea, diarrhea and abdominal cramps.

Workers with symptoms of infectious disease are transferred to work assignments that do not involve direct or indirect contact with products processing equipment or tools. Any worker diagnosed with an infectious disease will only be allowed to return to direct and indirect access on the recommendation of a physician or local health authority.

Infected wounds on the worker's arms, wrists, or forearms are to be covered with a dry, tight fitting, waterproof bandage that is covered with an outer covering. Workers with a wound that cannot be covered are not to have contact with products, processing equipment, or tools until the wound has healed.

### Workers – Hand washing

BCR requires that employees follow food protection practices to prevent products, processing equipment or tools from becoming contaminated. This includes frequent hand washing.

BCR requires workers to wash their hands in the following instances:

- Prior to commencement of work
- Prior to putting on a new pair of disposable or non-disposable gloves
- After removing disposable or non-disposable gloves
- After touching anything other than food and food contact surfaces including human body parts or anything else
- After using the toilet
- After coughing, sneezing, using a handkerchief or tissue
- After using tobacco/vaping, eating, or drinking
- After engaging in any activity that may contaminate their hands, such as taking out the garbage, handling cleaning chemicals, handling unwashed incoming produce
- After caring for or touching animals
- Before returning to a workstation

### Hand Washing Facilities

BCR requires the following practices:

- Appropriate hand washing facilities include a sink, hot and cold adequate quality water, effective hand cleaning preparations (e.g., liquid soap), sanitary hand drying devices (such as disposable paper towels), and a waste container
- Installation of water control devices (such as knee, foot, or elbow faucet controls)
- Posting signs that show proper hand washing instructions
- Hand washing signs shall be posted near the facility entrance, in restrooms, near all hand washing stations and wherever employees may handle produce, food packaging materials, or food-contact surfaces.

**Personal Attire and Protective Gear**

BCR requires workers wear clean clothes and protective outer gear (e.g., hairnets and beard covers, lab coats, aprons) that helps protect food products from contamination during processing.

Workers must not engage in certain activities where food may be exposed, or utensils are washed. These activities include eating, using tobacco, chewing gum or spitting while on the production floor.

**Worker - Training**

Every employee will be trained on the GMP's and preventive controls and how they will help to eliminate or minimize contamination of food products.

Training includes:

- GMPs for production, maintenance, quality assurance, and quality control
- worker health and hygiene
- worker roles and responsibilities and
- sanitation principles and sanitary practices.

**Production Guidelines – Building and Equipment**

This section provides direction regarding the production facility and equipment that processes Big Country Raw products. These directives address two areas; building structure and maintenance and equipment cleaning and maintenance.

**Facility**

BCR Requires that buildings, fixtures, and equipment be maintained in a condition that will protect the food products from contamination. Facilities and staging areas are designed to facilitate maintenance and good sanitation practices throughout receiving, processing, packing, storage and shipping operations.

Direct contamination and cross-contamination of produce can be minimized by:

- proper physical design,
- proper product flow,
- use of appropriate construction materials,
- proper management of facility traffic,
- proper airflow.

BCR Requires that:

- Processing facility and structures (such as walls, ceilings, floors, windows, doors, vents, and drains) are designed for easy cleaning and maintenance.
- Food contact surfaces should be smooth, nonabsorbent, smoothly bonded, sealed and without niches.

**Building**

BCR Requires:

- limited access to production facility and processing areas,
- adequate space for operations,
- adequate drainage of processing and wash water,
- food contact surfaces that are easy to clean and maintain, and
- areas and structures designed to protect food products and equipment from contamination.

BCR requires the following practices:

- Adequately screened windows, vents, fans, and similar features to prevent entry of insects, birds, rodents, reptile and other pests,
- Close all exterior doors and entrances when not in use

- Ensure doors and windows form an adequate seal when closed
- Maintenance of walls, ceilings, windows, doors, floors and overheads in good condition (e.g., no cracks, rust, breakage, missing parts, or dips allowing puddles to form) to inhibit pests and/or pathogens
- Properly sloping floors to drains (¼ inch per foot) to prevent the accumulation of water in or around drains,
- Sealed floors and maintaining them in good repair to ensure adequate drainage
- Ensure floor drains that are accessible for cleaning
- Fit floor drains with seals and grates capable of preventing insect and rodent entry
- Design collection areas for waste stream water to prevent product and equipment contamination
- Using protective guards for light fixtures to prevent broken glass from falling into food product

### Facility Layout

Adequate food safety controls, operating practices and facility design can reduce the potential for contamination.

BCR requires that the facilities:

- Are designed to ensure that incoming raw materials never cross paths with or are mixed with finished food products.
- Maintain separate raw materials and finished product areas (including separate microbiology laboratories, maintenance, fabrication shop, waste areas, chemical storage, and toilet facilities)
- Store of in-process and raw materials in different locations
- Have dedicated freezers for raw materials and finished products
- Have footbaths and foot mats containing disinfectant located at all entrances and exits to all processing and finished product storage areas.

BCR requires the following practices:

- Short direct routes for both product and personnel flow
- One direction flow of worker traffic, product, and air flow
- Minimize the number of entrances and exits to the processing areas
- Restricts the movement of lift trucks, bins, totes, maintenance tools, cleaning implements, clothing, and people from receiving and storage areas to processing and packaging areas.

### Equipment design, Construction, and Maintenance

Big Country Raw requires all equipment to be designed to food grade standards ensuring we have the safest equipment.

### Cleaning

BCR Requires the following to facilitate cleaning:

- Use smooth, non-absorbent, sealed, and easily cleanable food contact surfaces that are made of durable, non-corrosive nontoxic materials
- Food contact surfaces are sloped to drain freely
- Food contact surfaces must be free of pits, folds, cracks, crevices, open seams, cotter pins, exposed threads and piano hinges.)
- Where two food contact surfaces meet, a cover should be used over the juncture to prevent food debris from collecting and creating an area that is difficult to clean.
- Elevate food-contact surfaces sufficiently above the floor (with accessibility for cleaning) to prevent contamination from floor splashes  
cautious use of hollow structures, such as catwalk framework, table legs, conveyor rollers and racks, as they may collect water and debris

Food contact surfaces include the following:

knives	conveyors
belts	chutes
product totes	gloves
tools including shovels and racks	cutting boards
tables	packing scales

### **Equipment Maintenance**

Establishing a preventive maintenance program helps ensure that all equipment functions as intended. Preventive maintenance includes periodic examination and maintenance of equipment such as: grinder, packaging machine, conveyors, screens, filters, and freezers.

BCR requires the following practices:

- Appropriately trained workers perform maintenance and calibration of equipment.
- Maintenance workers that work in the processing or packaging areas must comply with the hygiene requirements for production workers.
- Installation, calibration and maintenance of temperature measuring or recording devices
- Frequent knife sharpening, new blades for retractable knives
- Disinfecting knives before each use
- Damaged knives or knives that cannot be maintained in a sanitary condition should be discarded
- Inspection of processing equipment for damage, product residue build-up, or cleaning needs during processing operations
- Equipment blades should be removed and cleaned separately
- Remaining equipment parts should be disassembled (if possible) and cleaned on a regular basis.
- Procedures be in place to minimize the possibility that metal ends up in finished product packages.
- Using metal detectors, in accordance with the manufacturer's instructions, to ensure effective detection of metal and removal of affected product.

### **Sanitation Operations**

Pathogenic microorganisms may be found on floors, in drains, and on surfaces of sorting, grading, processing, and packaging equipment. Appropriate sanitation practices will mitigate contamination.

#### **Sanitation Program**

BCR Requires the use of a comprehensive sanitation program. This program is developed by Production Manager certified with a food safety, HACCP and with knowledge of pathogenic microorganisms.

BCR implements the following practices for our sanitation program:

- Establish sanitation standard operating procedures (SSOPs),
- The SSOP includes a cleaning procedure and schedule for all equipment, storage areas, raw material and food processing areas
- Developing regular cleaning and sanitizing schedules

If visual inspection or environmental monitoring results reveal dirt, food residues, or other debris, BCR Requires more frequent cleaning and sanitizing than in the schedule.

## Routine Cleaning and Sanitizing Schedule

### Food Processing Areas

#### 1) Food contact surfaces

### Cleaning Frequency

Sufficient to remove product residue. Usually after each equipment or utensil use and at the end of each shift.

#### 2) Non-food contact surfaces/areas

a) Surfaces with a potential for contamination (e.g., a potential for moisture or residue build-up, where employees contact equipment during operation)	Daily
b) Drains and floors (including refrigerator drains)	Daily cleaning. Weekly flush of the drains with bacteria eating enzymes and sanitizer.
c) Non-wood pallets	Daily
d) Waste containers	Daily
e) Coolers/Refrigerators	Daily
f) Cleaning tools (e.g., brooms, brushes)	Daily
g) Bathrooms and break rooms	Daily (more frequently, if needed)
h) Overhead piping, outside surfaces of enclosed processing systems and light fixtures	Monthly
i) Ceiling, walls, windows and doors	Monthly (unless they meet conditions in 2a, then daily)
j) Fans (fan guards)	Weekly

### Premise Areas

a) Loading dock	Daily: sweep and scrub floors Weekly: scrub walls and surrounding areas
b) Parking lot, curbs, sidewalks, landscaping	Daily: pick up trash Weekly: scrub entrance to facility
c) Dumpster and trash areas	Daily

BCR keeps the following information in the procedure's manual:

- name of worker qualified and responsible,
- equipment to be cleaned
- instructions to disassemble equipment,
- cleaning frequency,
- cleaning procedures (including type and concentration of cleaning compound and sanitizer),
- time and temperature requirements, and name of an employee/supervisor responsible for verifying the program

BCR requires consideration of the following in the cleaning and sanitizing schedule:

- Keeping cold storage as dry as possible
- Subsequent to cleaning and sanitizing, visual inspection for product residue,
- Routine microbiological tests (conventional or rapid microbiological methods, such as total count or bioluminescence) to verify effectiveness of cleaning and sanitizing program
- When reassembling sanitized equipment parts should be placed on an elevated work surface (not on the floor)
- All food contact surfaces, processing equipment and processing facility must be cleaned and sanitized after maintenance work and prior to use in processing
- Processing equipment and food-contact surfaces shall be cleaned and sanitized between the processing of different commodities
- Clean and sanitize processing equipment during processing operations, as needed, to prevent contamination (e.g., if there is residue build up on the equipment)
- Use floor drain brushes smaller than the drain opening diameter or a splash guard to help prevent splashing during cleaning
- Use dedicated colour coded utensils that are only used by certain departments and for different tasks.
- Floor drains should not be cleaned during processing operations
- Workers that cleaned drains must not clean food contact surfaces without changing gloves and washing and sanitizing hands.
- Regular inspection of cutting, slicing, and shredding tools for damage that could impair cleaning and sanitizing
- If a tool cannot be fixed for adequate cleaning it should be replaced and documented.

### Cleaning and Sanitizing Chemicals

Cleaning and sanitizing chemicals may be toxic and should be properly stored in dry areas away from facility traffic and processing operations and traffic. These chemicals should be only be handled by trained workers.

BCR requires the following practices for use of cleaning and sanitizing chemicals:

- Use adequate quality water at appropriate temperatures for cleaning and sanitizing
- Use toxic chemicals for cleaning operations in accordance with the manufacturer's instructions and in accordance with relevant CFIA regulations
- Clearly label toxic chemicals
- Store toxic chemicals and pesticides in a manner that protects against contamination of food, food-contact surfaces and food-packaging materials
- Store toxic chemicals in accordance with relevant regulations
- Monitor effectiveness of cleaning and sanitizing chemicals by visual inspection and environmental testing (especially grooves and niches)

### Pest Control Program

BCR implements a Pest Control Program throughout the entire processing facility. The program will eliminate pests, such as rodents, birds, reptiles, and insects that may harbour or be a vector for a variety of pathogens. As part of the production facility's pest control program frequent monitoring of affected and treated areas is undertaken to assess accurately the program's effectiveness.

BCR Requires the following as part of the Pest Control Program:

- Use window screens, screen doors, weather stripping for all doors, and air fans at all doorways

- Keep doors closed when not in use
- Remove and store waste products in a location outside the facility
- Remove old, unused equipment from the facility
- Maintain exterior facility grounds in good condition
- Proper storage of raw materials, finished product, and packaging
- Clean up spills and produce debris in a timely manner
- Use pesticides, traps, bait, and chemicals that are acceptable for use in a food processing facility and will not contaminate raw materials, finished products, or food packaging
- Chemical controls should only be applied by a licensed pest control operator.

### Water Supply

Water that becomes a component of the raw pet food includes water that contacts components, raw materials, or any contact surface.

Water can be a carrier of microorganisms including pathogens. Adequate quality water is critical in a pet food processing facility due to the absence of a step lethal to pathogens (kill step), the high degree of handling, damage to the product during cutting or mashing, and potential for temperature abuse in processing and storage.

BCR requires that:

- water supply in a food processing facility is sufficient for intended operations including product processing, cleaning and sanitizing.
- water is derived from an adequate source
- water is safe and sanitary, at suitable temperatures, and under pressure as needed for all uses.

Big Country Raw follows water quality guidelines issued by Health Canada on Guidelines for Canadian Drinking Water Quality.

### Environmental Monitoring

BCR Requires an environmental monitoring program that includes sampling for pathogens to detect areas of harborage and to verify the effectiveness of cleaning and sanitizing programs.

BCR implements the following practices:

- Environmental sampling for pathogens or indicator organisms both during production and immediately after cleaning and sanitizing equipment (but before equipment is reassembled)
- Environmental sampling to be completed on both food contact and non-food contact surfaces.
- Salmonella, E coli 0157, and Listeria are the most dangerous / prevalent that need to be tested for with regular sampling
- Focusing environmental monitoring on an indicator organism on our equipment and in the production facility, such as Listeria, Salmonella, E coli spp.
- Establish a plan for action in the event that a microbiological test indicates the presence of a target pathogen or indicator organism  
Document corrective actions and follow-up for all positive microbial test results

### Production and Process Controls

To minimize the potential for the growth of microorganisms and for the contamination of our product, BCR Requires that control measures be in place to prepare, process, package, and store the finished product.

### Product Specifications

BCR developed specifications and controls for all ingredients and components that are necessary for production of safe finished product. The ingredients and component include raw meat, fresh fruits and vegetables, other ingredients, and packaging materials. Specifications provide standards by which BCR can assess the acceptability of ingredients and components and minimize Biological, Chemical, and Physical hazards. BCR strives to know as much as possible about the safety of their production practices and conditions for their incoming product.



### Receipt and Inspection of Ingredients

To ensure the quality of incoming fresh produce, BCR Requires that the processor carefully inspect the produce upon receipt at the processing facility.

Contamination of fresh produce can occur from the field to the processing facility. Loading, transporting, and unloading produce may introduce contaminants. Damaged produce, soil, debris, and pests may arrive with the produce when it is delivered to the facility.

BCR requires the following practices:

- Inspect vehicles that deliver raw materials and other components of the finished product for cleanliness
- Visually inspect incoming raw materials for damage, filth, and infestation according to a predetermined sampling plan
- Reject products that do not meet established specifications
- Reject all damaged, moldy, decomposed product and extraneous matter (such as metal or other foreign material) to a designated area
- Retain information about incoming ingredients. Information that should be retained includes the identity of the grower or supplier, date of harvest, the field
- Ensure information on the incoming product be linked with the operation's lot numbering system for finished product

### Specific Processing Steps

#### Preparation for Processing

Appropriate preprocessing of incoming produce can help minimize microbial, chemical, and physical hazards.

BCR requires the following:

##### a) Ingredient items

- Evaluate ingredient items to ensure they meet the processing facility-established purchase specifications
- Ingredient items shall be provincially or the federally inspected (CFIA or OMAFRA)
- Trucks, containers and carriers of raw materials shall be evaluated upon receipt to ensure that the conditions meet processing facility requirements for transporting meat. (e.g. temperature check)
- All incoming ingredients shall be coded/identified for production facility use and for the in-production facility tracking system.

##### b) Non- ingredient items

- BCR must ensure that all packaging products need meet the production facility-established specifications.
- After acceptance of the non-ingredient items, they should be stored, handled and used in a manner that will maintain their integrity.

### Storage of Raw Materials

Proper storage of raw materials reduces the overall potential for microbial contamination.

BCR requires that:

- All raw materials be used on a First-In/First-Out (FIFO) basis or according to a production facility specified product rotation/inventory control schedule, such as the oldest bone date.
- Raw materials should be stored at temperatures that maintain proper product condition.
- Frozen raw materials should be kept frozen, unless tempering or thawing is required prior to use.
- Vegetable and fruits should be stored separately from with meat products to avoid contamination till processing.
- The package/pallet integrity must be maintained throughout during the storage period to maintain the condition of the material.
- Product identity in storage should allow for the in-production facility tracking system.

### Tempering/Thawing of Frozen Materials

Proper tempering/thawing of frozen materials reduces the overall potential for microbial contamination.

BCR requires:

- If tempering or thawing is of raw material required prior to use, then it shall be done in a time and temperature-controlled manner and method.
- The time and temperature-controlled method, which is adequately monitored and documented.

- The product package integrity is important during this process. The product's raw material traceability should be maintained throughout the tempering/thawing process.

## Processing or Grinding

Proper processing techniques ensures a safe and quality raw pet food.

BCR requires the following practices:

- A visual evaluation of raw materials prior to commencing production.
- Throughout these steps the temperature of the product should be maintained and documented.
- Food handling step precautions are taken to prevent products cross- contamination.
- Finished products are labeled properly labeling to maintain end finished product identity.
- A visual evaluation of the raw material ingredients is completed prior to the batch.
- A tracking mechanism allowing for batch identification.
- Raw materials are visually inspected for foreign objects.
- All operations have a system for detecting and controlling metal and other foreign materials.
- The equipment is checked to ensure that no parts are missing every time it is cleaned and assembled.
- Visually checking the raw materials and products for characteristics that appear different, if noticed they are to call the supervisor
- Final product packaging includes production date and time relating to the in- production facility tracking system.
- All finished products must be labeled with the statement: "Keep Frozen - Thaw Prior to Feeding, Raw Pet Food - Not for Human Consumption"

## Packaging

Anything that touches the raw pet food has the potential to contaminate anything with which it comes in contact. This includes the materials used in packaging the product.

BCR requires the following practices:

- Maintaining an effective system to prevent the use of contaminated, damaged, or defective cartons and totes in order to prevent microbial contamination of the pet food during packing operations
- Establishing specifications standards for all product packaging materials
- Overseeing and inspect incoming packaging materials used to confirm that they meet those specifications standards
- Rejecting damaged or contaminated packaging materials that are damaged or contaminated
- Using containers and cartons only for their intended purpose only
- Storing packaging materials and other containers and other packaging materials in a manner so as to protect them from contamination, such as pests, dirt, cleaning chemicals, and water condensation from overhead equipment and structures
- FIFO use of an appropriate inventory system to ensure FIFO use of packaging materials and other containers and other packaging materials
- To help achieve proper rotation of inventory, all pallets are dated upon receipt.
- Maintaining a program to identify and correct situations where of packaging damage may potentially occur
- Labeling all finished pet food products with recommended storage instructions (e.g., " Keep Frozen - Thaw Prior To Feeding ")

## Transportation and Storage

### Storage of Raw Pet Food

Proper storage of finished product reduces the overall potential for microbial contamination.

BCR requires the following practices:

- Finished products shall be handled in a method that provides separation of stored raw materials.
- Finished products shall be stored at production facility-designated time and temperatures to maintain product shelf life.
- Frozen products should be kept frozen.
- Finished product must be FIFO with a production specified product rotation. Inventory control schedule should be maintained for finished products.

- The package/pallet integrity shall be maintained throughout the storage period to maintain the condition of the finished product.
- Product identity in storage or product batch identification will allow for the in-production facility tracking system to be used for product recall and/or market withdrawal purposes.

### Transport of Raw Pet Food

BCR requires the following practices:

- Finished product be transported under conditions suitable that will protect the food against physical damage or chemical, and microbiological contamination.
- Finished product be transported in clean, sanitary vehicles, either our own- or third-party vehicles
- Finished products transported at the maximum of -8°C during transportation refrigerated transportation vehicles and storage rooms must be equipped with accurate temperature measuring devices
- Finished products are shipped on a FIFO basis to minimize storage time and chances for the product to degrade over time
- Delivery vehicles and containers are inspected for debris, soil, and off-odors prior to loading
- Finished product is loaded and unloaded in a manner that minimizes damage and microbial contamination
- Finished product it to be displayed for sale in suitable conditions to minimize the potential for growth of microbial pathogens by our resellers

### Documentation and Records

BCR require adequate records are kept to sufficiently reflect important product information and practices.

Records will include:

- Employee training records
- Temperature control records
- Equipment monitoring and maintenance records
- Calibration records
- Sanitation records
- Product processing batch records
- Corrective action records
- Pest control records
- Distribution records
- Microbial test records

All records will be kept for 18 months

All records will include the business name, business address, business telephone number, name of person in charge of production and name of person responsible for quality control,

A location is designated for all files and records in respect of quality control program

Records will include the date, time and name of person(s) who completed the record.

### Trace back and Recall

Trace back is the process of tracking food items, such as raw materials, back to their source. The ability to identify the source of a product can serve as an important component of a food safety program.

BCR requires:

- Written contingency plan to initiate and implement a recall.
- Recall contingency plan will include:
  - name of contact persons coordinating recall,
  - role and responsibility of the contact person,
  - methods to identify, locate, and control recalled products,
  - requirements to investigate other possibly affected products, and
  - procedures for monitoring the effectiveness of the recall.