Canadian Association of Raw Pet Food Manufacturers

MEMBERSHIP Production Guidelines

1. MISSION STATEMENT

The purpose of the *Canadian Association of Raw Pet Food Manufacturers* is to:

Provide the raw pet food industry a forum to establish industry standards and practice that will enhance the quality of products produced, while providing codes of conduct that ensure proper use and understanding of the products.

1.1 BACKGROUND

The growing trend of feeding a raw food diet to animals has been developed from mainly being practiced by zoos, mink farms, dog breeders, dog racing facilities, and other professional establishments to being increasingly performed by domesticated companion animal owners at home because of its nutritious and species appropriate characteristics. The focus of this guideline is to provide the members of the association, manufacturing advice and compliance model for the production of high quality commercial raw pet foods that are safe for pet owners use and a healthy and happy pet.

1.2 GOALS

I. To create an atmosphere of continuous improvement and growth in the raw pet food industry in Canada

II. To ensure government policies and legislation have properly addressed the interest of our members for the manufacturing of commercial raw pet food to carry on as a competitive industry

III. To establish faith in our current and potential consumers on the quality and variety of commercial raw pet food that association members offer

1.3 OBJECTIVES

I. To promote the health benefits of feeding a natural raw diet to companion animals and to encourage an industrial environment that would lead to increased competitiveness

II. To represent the standpoint of all members of the association through discussion to correspond to government agencies, other organizations as well as the general public

III. To establish and monitor an industrial standard for the manufacturing of superior commercial raw pet food (RPF) products

2. CODE OF ETHICS

Code of Ethics for the members of the Canadian Association of Raw Pet Food Manufacturers:

The members of the Association (= the Members) agree to the following fundamental values as a guide for conducting their business:

The Members will recognize their responsibility to act in accordance with the published Good Manufacturing Practices and Member Conduct Guidelines as a minimum. In doing so the group's effort will be to provide safe nutritious food for the pet populations they serve. The member products will be produced using the established level of Good Manufacturing Practices with an acceptable standard of safety for both the pet and pet owner.

Members will make every effort to inform the public of the proper use and handling of the products produced. They will include on their packaging and written material these instructions as prescribed in the association's labeling Guidelines as a minimum.

The members will treat each other with respect both inside the group and in the market place. Members will refrain from using unsubstantiated defamatory language when discussing competitive issues with customers. Any media inquiries about competitor's activities will be referred to the media contact in the association.

All members agree to use, and accept, determinations of the compliance model outlined in the Member Guidelines. They also accept responsibility to make corrective actions and statements as determined necessary by the Association.

Members in all cases shall use the association and its efforts in a respectable manner. All members have, and accept, a responsibility to their customers and competitors, to manufacture and present their products in an ethical manner following the guidelines of the association.

4 Good Manufacturing Practices Guideline

4.1 Production Guidelines

4.1.1 Personnel

This section provides recommendations regarding the personnel of a production facility that processes Raw Pet Food (RPF) products. These production guidelines address two major areas: worker health and hygiene, and personnel training program.

1) Worker Health and Hygiene

Workers can carry microbial pathogens on their skin, in their hair, on their hands, in their digestive systems or in their respiratory tracts. Basic food protection practices related to worker health and hygiene fall into two categories: disease control and cleanliness.

A Disease Control

Canadian Association of Raw Pet Food Manufacturers (CARPFM) recommends that workers with direct and indirect access to RPF production areas follow good hygiene practices. Following good hygiene practices will help protect the RPF from contamination. Direct access includes processing, storing, and transporting RPF products. Indirect access includes operating equipment, buying materials, and pest control operators.

CARPFM recommends:

- Establishing a company policy that requires workers to report any active case of illness to supervisors before commencing work.
- Training 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 RPF 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.
- An adequate supply of bandages will be maintained. Bandages must be suitable to provide protection from any wound.
- 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 RPF products, processing equipment, or tools until the wound has healed.

B Cleanliness

CARPFM recommends that employees follow food protection practices to prevent RPF products, processing equipment or tools from becoming contaminated.

a. Maintain adequate personal cleanliness

b. Wash hands frequently and effectively

CARPFM recommends workers wash their hands in the following instances:

- Prior to commencement of work, especially if the employee has direct access
- 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, 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

c. Sanitize hands as necessary.

d. Wash and sanitize non-disposable gloves before starting work, and as needed

e. Change disposable gloves whenever contamination is a possibility

f. Wear appropriate attire on the job. CARPFM recommends workers wear clean clothes and protective outer gear (e.g., hairnets and beard covers, lab coats, aprons) that helps protect RPF products from contamination during processing.

g. 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.

2) Training

Every employee will be trained on the GMPs and preventive controls and how they will help to eliminate or minimize contamination of RPF products.

CARPFM recommends that:

- education and training programs be designed to assist workers understand the expected outcomes and why they are important.
- company expectations for proper worker hygiene and food protection techniques be clearly communicated to new employees before starting employment
- Proper worker hygiene and food protection techniques are reviewed during periodic training programs.
- Signs and pictorial representations of good practices are posted in processing areas.
- Signs are multilingual.
- All training be documented to ensure there is a record of the training provided and the workers in attendance.
- Training programs be provided to temporary, seasonal and full-time employees.

Training will include:

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

A Training of Personal Health and Hygiene

CARPFM recommends that:

- workers are trained to follow good personal hygiene practices,
- use proper hand washing techniques,
- wear clean clothes and any additional outer coverings (e.g., hairnets and beard covers, disposable gloves, aprons),
- follow appropriate conduct on the job, and
- workers be informed to whom, when and how to report illness.

Figure 1 is an example of an aid that could be used to train employees on the proper technique to use in washing hands:

Figure 1.

Sample training aid on hand washing

Correct procedure for washing your hands

Use soap and warm running water

Wet hands

Apply soap

Vigorously rub hands up to elbows for 20 seconds

Turn off running water with water control device, not bare hands

Dry hands with a paper towel or air dry. Do not share towels

Soap combined with scrubbing helps dislodge and remove dirt and germs.

B Training on Employee Roles and Responsibilities

CARPFM recommends that:

- worker training is consistent with the level of complexity of their jobs
- additional training be provided as needed to ensure up-to-date knowledge of equipment and process technology.

One goal of a training program is to help workers understand how the task for which they are responsible help minimize microbial food safety hazards.

CARPFM recommend that workers:

- be trained about how to perform these tasks appropriately,

- are aware of the microbial food safety hazards associated with the tasks,
- understand procedures for monitoring conditions,
- are able to complete company required documentation
- know the actions that are necessary if the established limits are not met, and
- inform their supervisors when the established limits are not met. (such as the appropriate storage temperatures.)

CARPFM recommends that:

- maintenance workers understand that they have an impact on food safety, and
- maintenance workers be trained to understand their role in the production of safe food,
- workers must be trained to identify deficiencies that could affect product safety, take the appropriate corrective actions (e.g., in-house repairs, contract repairs).

Maintenance workers must understand how indirect cross-contamination can occur when proper equipment controls are not maintained.

C Training on Sanitation Principles and Sanitary Practices

CARPFM recommend that workers:

- understand food safety principles and methods required for effective cleaning and sanitation,
- follow guidelines for proper use of sanitizing agents (sanitizers) and foot baths,
- follow guidelines for proper cleaning and sanitizing of equipment and facility,
- follow guidelines for proper use of equipment such as hoses and tools in the production environment, and
- follow guidelines for the proper use, handling and storage of chemicals used in sanitation, and
- supervisors be trained to identify and promote good sanitary practices.

Figure 2 is an example of an aid that could be used to train employees on the proper use of sanitizers:

Figure 2.

Sample training aid on proper use of sanitizers

Use sanitizers properly

Hand sanitizing stations

- Wash hands,
- Sanitize clean hands with sanitizer solution

- Allow hands to air dry
- Wash and sanitize non-disposable gloves before wearing
- Re-sanitize hands after touching non-food contact surfaces

Foot baths and sanitizer sprays

When entering any area where RPF is present

- walk through a foot bath containing sanitizer
- spray all carts, forklifts, and other equipment entering the processing area with sanitizer

Sanitizer maintenance

- Ensure hand sanitizing units and foot baths are changed as required.

Equipment, fixtures, floors, walls, and other structures can become a source of microbial contamination when not maintained in sanitary condition. High humidity and structural niches in a RPF processing facility encourage microbial build-up. To prevent RPF products from becoming contaminated proper sanitation procedures must be followed.

Figure3 is an example that could be used to train employees on processing equipment and facilities maintenance and cleaning:

Figure 3.

Sample training aid for cleaning and sanitizing processing areas

Cleaning and sanitizing processing areas*

1. Remove debris from floor with brooms or shovels
2. Disassemble processing equipment as required
3. Wipe processing equipment with a dry cloth, if necessary
4. Pre-rinse the equipment with adequate quality water
5. Foam and scrub equipment with effective cleaner
6. Rinse equipment with adequate quality water
7. Clean debris from floor
8. Rinse floor and drains with adequate quality water using a low pressure/low volume hose

9. Use dedicated brushes to scrub floor and drains with effective cleaner, applying adequate quality water as needed
10. Thoroughly rinse floors and drains using a low pressure/low volume hose with adequate quality water
11. Remove excess water from floors
12. Sanitize equipment and floors according to manufacturer's directions.

* Cleaning and sanitizing activities must be done from top down.

Regular appropriate cleaning and sanitizing of equipment and production facility can reduce the risk of contamination of RPF products.

Proper use of a hose includes:

- Ensuring that hose nozzles do not come in contact with floors
- Only low-pressure water hoses are used to clean floors, walls and equipment in the processing and packaging areas during production,
- Only low-pressure water hoses are used to clean floors, walls and equipment in the processing and packaging areas after production equipment has been cleaned.

4.1.2 Building and Equipment

Anything that comes in contact with RPF product can cause contamination.

CARPFM recommends that:

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

1) Building

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.

CARPFM recommends that:

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

A External/Internal Structures

CARPFM recommends:

- 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 RPF products and equipment from contamination.

CARPFM recommends the following practices:

- Adequately screen open 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
- form an adequate seal when exterior doors and entrances are closed
- Properly construction of all walls, ceilings, windows, doors, floors and overheads (e.g., pipes, air vents, and lights)
- 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
- Design properly sloping floors to drains (¼ inch per foot),
- Seal floors and keeping them in good repair to ensure adequate drainage
- Design floor to prevent the accumulation of water in or around drains,
- Design 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
- plastic or stainless steel are used in processing areas
- wooden construction materials be avoided. If wooden material is used it must be in good condition and well maintained.
    - Using protective guards for light fixtures to prevent broken glass from falling into RPF product

B Facility Layout

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

CARPFM recommends that RPF processing facilities:

- be designed to ensure that incoming raw materials never cross paths with or are mixed with finished RPF products.
- maintain separate raw materials and finished product areas (including separate microbiology laboratories, maintenance, fabrication shop, waste areas, chemical storage, and toilet facilities)
- maintain separate processing areas.

CARPFM recommends the following facility design to reduce the potential for contamination:

- Rest rooms that open onto a location other than the processing area
- Outside doors open into an area other than into a processing area
- Microbiology lab that opens into an area other than into a processing area
- Storage of in-process and raw materials in different locations
- dedicated cold rooms for raw materials and finished RPF products
- Hand washing and sanitizing facilities located to promote regular and appropriate use by workers
- Footbaths and foot mats containing disinfectant located at all entrances and exits to all processing and finished product storage areas.

CARPFM recommends the following:

- Short direct routes for both product and personnel flow
- Design processing facility for one direction of worker traffic, product, and air flow
- Design processing areas so that traffic patterns separate raw materials and finished product. This can be done by using either linear product flow (raw material to finished product) or by physical partition
- Minimize the number of entrances and exits to the processing areas
- Restrict the movement of lift trucks, bins, totes, maintenance tools, cleaning implements, clothing, and people from receiving and storage areas to processing and packaging areas.

- Color code bins, totes, clothing, cleaning implements, maintenance tools and other items (e.g., blue aprons for receiving zones and red aprons for processing and packaging areas) to separate traffic flow.

2) Equipment Design, Construction, and Maintenance

CARPFM recommends that processing equipment be designed and constructed for easy cleaning and maintenance.

A Equipment Design and Construction

CARPFM recommends 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.

CARPFM recommends the following:

- Construct catwalks with open grating
- locate catwalks to ensure they do *not* pass over areas of exposed fresh or fresh-cut produce or food-contact surfaces
- Design equipment in the processing area to prevent water collection
- cautious use of hollow structures, such as catwalk framework, table legs, conveyor rollers and racks, as they may collect water and debris
- Elevate food-contact surfaces sufficiently above the floor (with accessibility for cleaning) to prevent contamination from floor splashes
- Install stationary equipment away from floor drains

Food contact surfaces include the following:

- knives,
- conveyors,
- belts,
- chutes,

- product totes,
- gloves,
- tools including shovels and racks,
- cutting boards,
- tables, and
- packing scales.
-

B Equipment Maintenance

Establishing a preventive maintenance program helps ensure that all equipment functions as intended. Equipment failure requiring maintenance activities during production may increase the risk of RPF product contamination.

Preventive maintenance includes periodic examination and maintenance of equipment such as: grinder, shredder, packaging machine, blocker unit, screens, filters, and freezers.

CARPFM recommends that a processing facility develop an appropriate plan of action in the event of major equipment malfunctions. Major equipment includes refrigeration equipment, power systems or alarm systems

CARPFM recommends 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 (including 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 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 . Metal detectors should be checked daily for proper functioning (Recommended and not required)

4.1.3 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.

1) Sanitation Program

CARPFM recommends the use of a comprehensive sanitation program. The program should be developed by a trained employee, such as a certified sanitarian.

CARPFM recommends that RPF processors consider using the following practices for their sanitation program:

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

  A sample schedule is included in Figure 4. If visual inspection or environmental monitoring results reveal dirt, food residues, or other debris, CARPFM recommends more frequent cleaning and sanitizing then in the sample schedule.

Figure4. Sample of routine cleaning and sanitizing schedule

Routine Cleaning and Sanitizing Schedule		
RPF product Processing Area		**Cleaning Frequency**
1) Food contact surfaces		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	Daily

Routine Cleaning and Sanitizing Schedule		
RPF product Processing Area		**Cleaning Frequency**
	equipment during operation)	
	b) Drains and floors (including refrigerator drains)	Daily cleaning. Weekly flush of drains with sanitizer.
	c) Non-wood pallets	Daily
	d) Waste containers	Daily
	e) 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

CARPFM recommends keeping the following information in the procedures manual:

- name of worker (or alternate) 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 responsible for verifying the program effectiveness by inspection.

CARPFM recommends consideration of the following in the procedures manual:

- Cleaning the processing unit, and hoses of refrigerators
- 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 a sanitary mat (not on the floor)
- all food contact surfaces, processing equipment and processing facility should be cleaned and sanitized after maintenance work and prior to use in processing
- processing equipment and food-contact surfaces should 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 to clean drains.
- floor drains should not be cleaned during processing operations
- workers that cleaned drains not clean food contact surfaces without changing outer garments, 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.

A 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.

CARPFM recommends 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)

B Pest Control

CARPFM recommends a pest control program be implemented 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 should be undertaken to assess accurately the program's effectiveness.

CARPFM recommends the following as part of a 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.

2) Sanitary Facilities and Controls

A Employee Changing Facilities and Toilets

CARPFM recommends that changing facilities and restrooms:

- be adequate and located in proximity to processing areas
- should not open directly into processing areas, and
- are equipped with self-closing mechanisms or have a maze-type entrance/exit.

B Hand Washing Facilities

CARPFM recommends the following:

- 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 should 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.
- Hand washing signs should be multilingual or pictorial.

C Water Supply

Water can be a carrier of microorganisms including pathogens. Adequate quality water is critical in a RPF 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.

CARPFM recommends 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.
- well water should be tested at the site of the well and at the point in the production facility most distant from the well on a regular basis to ensure compliance with regulations.

Water that becomes a component of the RPF product must comply with applicable local requirements and not contaminate the RPF product**.** Water quality guidelines issued by Health Canada on *Guidelines for Canadian Drinking Water Quality*.

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

D Environmental Monitoring

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

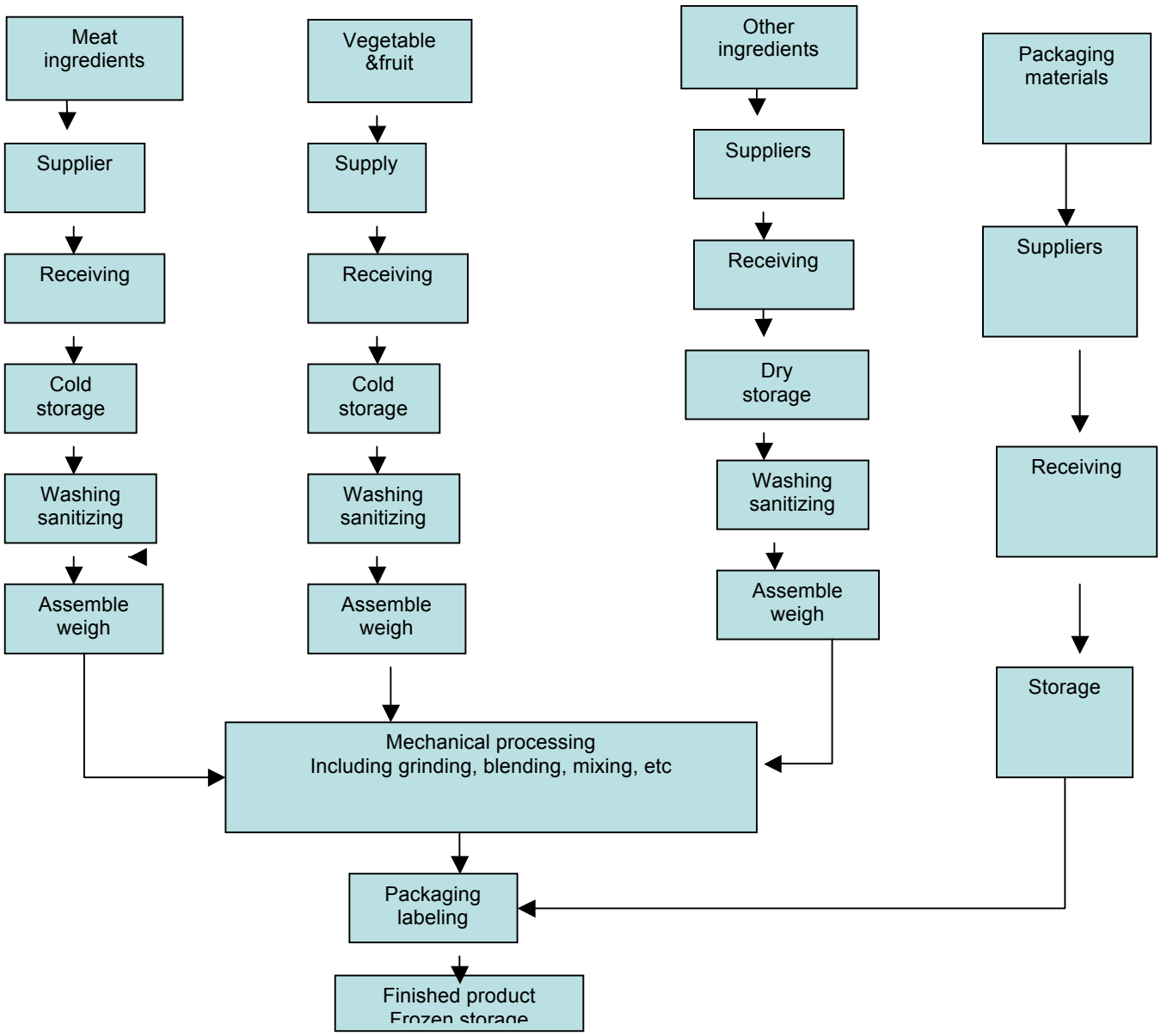
CARPFM recommends that an environmental monitoring program be part of the RPF product operations and recommend the following practices:

- Environmental sampling for pathogens or indicator organisms both during production and immediately after cleaning and sanitizing equipment (but before equipment is reassembled)
- environmental sampling should be done on both food contact and non-food contact surfaces.
- Determine the appropriate target pathogen (the most resistant microorganism of public health significance that is likely to occur in RPF product), test locations, and frequencies of sampling
- Focusing environmental monitoring on an indicator organism, 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

4.1.4 Production and Process Controls

To minimize the potential for the growth of microorganisms and for the contamination of RPF product, CARPFM recommends that control measures be in place to prepare, process, package, and store the RPF product. Figure 5 is an sample of an RPF product flow chart.

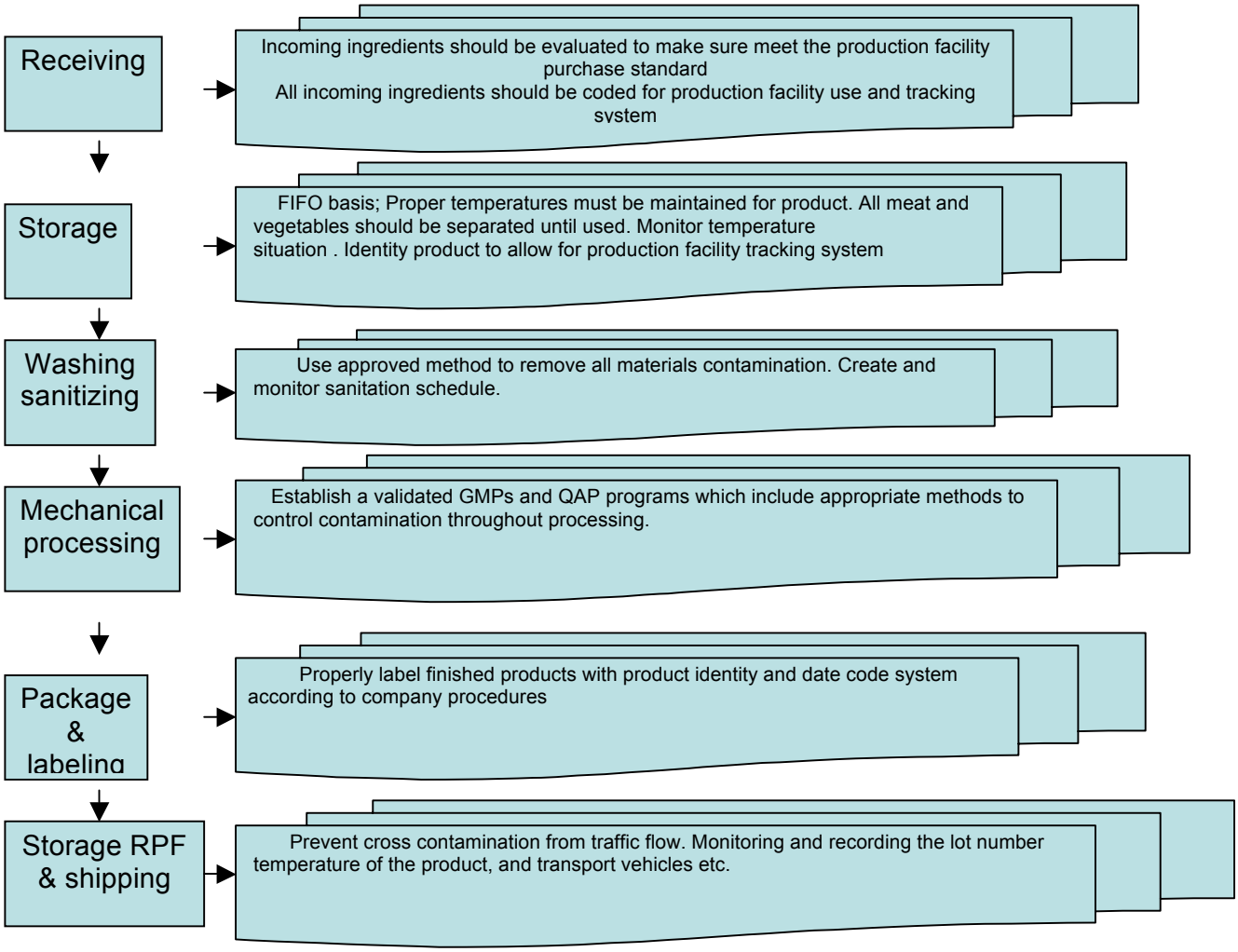
Figure 5: Sample RPF product flow chart


Meat ingredients
Supplier
Receiving
Cold storage
Washing sanitizing
Assemble weigh
Vegetable &fruit
Supply
Receiving
Cold storage
Washing sanitizing
Assemble weigh
Other ingredients
Suppliers
Receiving
Dry storage
Washing sanitizing
Assemble weigh
Packaging materials
Suppliers
Receiving
Storage
Mechanical processing
Including grinding, blending, mixing, etc
Packaging labeling
Finished product
Frozen storage

1) Product Specifications

CARPFM recommends that RPF processors develop 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 a RPF processor can assess the acceptability of ingredients and components and minimize microbial, chemical, and physical hazards. CARPFM recommends that the RPF processor know as much as possible about the production practices and conditions for their incoming product. Figure 6 is an example of how to operate an RPF production facility to manufacture high quality products.

Figure6. Flow diagram for RPF operations and recommendations:



2) Receipt and Inspection of Ingredients

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

CARPFM recommends 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
- Check for the presence of metal by use of magnets or metal detectors (recommended but not required)
- Remove 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
- information on the incoming product should be linked with the operation's lot numbering system for finished product

  This information will be useful in the event a traceback is conducted. See section X in this guide for more information.

3) Specific Processing Steps

A Preparation for Processing

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

CARPFM recommends the following:

a. Ingredient items

- evaluate ingredient items to ensure they meet the processing facility-established purchase specifications
- ingredient items should be provincially or the federally inspected
- Under no circumstances should companion animal remains be used as ingredients in any raw pet food.
- Trucks, containers and carriers of raw materials should be evaluated upon receipt to ensure that the conditions meet processing facility requirements for transporting meat.

- All incoming ingredients should be coded/identified for production facility use and for the in-production facility tracking system.

b. Non- ingredient items

- Producers of RPF products need to make sure that all non-ingredient items, such as packaging materials, supplement etc. 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.

B Storage of Raw Materials

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

CARPFM recommends:

- It is recommended that 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.

C Tempering/Thawing of Frozen Materials

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

CARPFM recommends:

- If tempering or thawing is of raw material required prior to use, then it should be done in a time/temperature controlled manner/method.
- The time/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.

D Washing the raw materials

Washing the raw materials can reduce the overall potential for microbial contamination because most microbial contamination is on the surface of the produce. If pathogens are not removed, inactivated, or otherwise controlled, they can potentially spread the contamination to additional produce during processing. However, washing, even with disinfectants, can only reduce the number of pathogens on the surface, if present. Washing has little effect on pathogens that have been internalized below the surface.

CARPFM recommends the following practices:

- Using Use a series of washes

  For some operations, a series of washes may be more effective than a single wash. An initial wash treatment may be used to remove the bulk of field soil from produce while subsequent washes followed by an additional wash or washes containing an antimicrobial chemical.

- Using Use appropriate wash methods

  Vigorous washing of produce not easily bruised or injured increases the likelihood of pathogen removal. Different methods may be used to wash different types of produce. These methods include submersion and/or, spray, or both.

- Regardless of the method used, maintaining the quality of the wash water is important in order to minimize the potential for contamination wash water quality.

- Maintaining the efficacy of wash treatments
- Using Use wash water of an appropriate temperature

E Grinding/Processing

Proper grinding/processing reduces the overall potential for microbial contamination.

CARPFM recommends:

- 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 Steps precautions should be 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 should be completed prior to the batch. Procedures are in place for ensuring proper end finished product characteristics (i.e., weights, physical characteristics, quantity, etc.)

- The production facility tracking mechanism should allow for batch identification and that may include time of batch production.
- It is recommended that all grinding Operations have a mechanism for detecting and controlling metal and other foreign materials.
- For the purpose of checking products for metal, companies may have a mechanism for detecting metal.
- Raw materials will be visually inspected for foreign objects.
- Evaluating the equipment being checked to ensure that no parts are missing.
- Visually checking the raw materials and products and other steps for controlling metal or they may utilize a metal detector. If companies are using a metal detector is used (recommend but not required) then the sensitivity level should is be sufficient for this process.
- Establishments may conduct microbiological testing may be used to monitor the process for trend analysis or because specific tests are required by individual customers.
- Final product packaging should include production date relating to the in-production facility tracking system.
- All finished products must be labeled with the statement: "Keep Frozen - Thaw Prior to Feeding"

F Packaging

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

We CARPFM recommends: 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 RPF product during packing operations
- Establishing specifications standards for all product packaging materials
- Overseeing Inspect incoming packaging materials and gases used in packaging to confirm ensure that they meet those specifications standards
- Rejecting damaged or contaminated packaging materials that are damaged or contaminated
- Determining the appropriate gas mixtures for products
- 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 away from 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, we recommend that all pallets be dated upon receipt.
- Maintaining a program to identify and correct situations where of container damage to containers may potentially occur
- Labeling all finished RPF products with recommended storage instructions (e.g., " Keep Frozen - Thaw Prior To Feeding ")

4) Transportation and Storage

A Storage of RPF Product

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

CARPFM recommends:

- Finished RPF products should be handled in a method that provides separation of stored materials.
- Finished RPF products should be stored at production facility-designated time/temperatures to maintain product shelf life.
- Frozen RPF products should be kept frozen.
- A FIFO or a production facility specified product rotation/inventory control schedule should be maintained for finished RPF products.
- The package/pallet integrity should be maintained throughout the storage period to maintain the condition of the finished product.
- Product identity in storage or RPF product batch identification should allow for the in-production facility tracking system to be used for product recall and/or market withdrawal purposes.

B Transport of RPF product

CARPFM recommends:

- We recommend that finished RPF product be transported under conditions suitable that will protect the food RPF against physical damage or chemical, and microbiological contamination.
- We recommend that finished product be transported in clean, sanitary vehicles.

We also recommend the following practices:

- Keeping finished RPF products be transported at 26 ºF during transportation, and
- Equipping refrigerated transportation vehicles and storage rooms be equipped with accurate temperature measuring devices, preferably including a recording device
- A min/max thermometer can be used as an alternative to a recording device.
- RPF products are shipped on a FIFO basis to minimize storage time
- Delivery vehicles and containers are inspected for debris, soil, and off-odors prior to loading
- RPF is loaded and unloaded in a manner that minimizes damage and microbial contamination
- RPF be displayed for sale in suitable conditions to minimize the potential for growth of microbial pathogens

4.1.5 Documentation and Records

Documents and records must be kept. This documentation is useful to the processor in several ways. Records help ensure consistency of operations and end-product quality and safety. Records are more reliable than human memory. They can assist in identifying areas where operation inconsistencies occur and where further employee training is needed. Adequate documentation and records is important if a trace back investigation is necessary.

CARPFM recommends:

- 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, President's name, 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.

4.1.6 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. Information gained from a trace back investigation can be used to limit the impact of an outbreak of food borne illness. Information from a trace back can also be used to identify and eliminate conditions that may have resulted in product contamination.

CARPFM recommends:

- RPF processors establish and maintain written trace back procedures
- RPF processors establish and maintain a 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.

A recall may extend to more than one lot of product. Therefore, processors should develop a system to identify individual production lots and their disposition.

4.2 The Labeling and Advertising of RPF Guideline

4.2.1 Labeling of RPF

1) General

Specific label requirements relating are set out in Federal and Provincial Acts and Regulations. These Acts include but are not limited to, the Consumer Packaging and Labeling Act, the Competition Act, and the Food and Drugs Act.

In accordance with the Acts, CARPFM recommends:

- A label contain sufficient legible information to provide consumers with the common name, net weight, list of ingredients, feeding instructions, storage and handling information, nutrition analysis, and nutritional adequacy.

- A label must not bear a statement of identity, a vignette or any other representation, pictorial or otherwise, that has the capacity, tendency or effect of misleading or deceiving consumers with respect to the composition, form, suitability, quality, color, flavor, performance, method of manufacture or intended use of the product or any of its ingredients.

The Consumer Packaging and Labeling Act and its regulations specify information which must appear on a label and the manner in which this information must be appear. For more detailed information on labeling requirements refer to the Guide to the Consumer Packaging and Labeling Act and Regulations which can be found on the Competition Bureau's web-site at http://www.competition.ic.gc.ca.

In general, the Consumer Packaging and Labeling Act prescribes three mandatory labeling requirements:

A Product Identity

Common or generic name of the product must appear on the principal display panel in both English and French. It must be easily legible to the consumer under normal or customary conditions of sale or use.

B Net Quantity

Net quantity must be shown on the principal display panel in metric units in both English and French. The use of a correct metric symbol meets the bilingual net quantity requirement.

C Dealer Name and Principal Place of Business

Label must specify name and principal place of business by or for whom the product was manufactured or produced for resale. Name and address should be sufficient for postal delivery. Declaration may be in either English or French and can be located anywhere on the outside surface of the package except the bottom.

Products being sold in Quebec or in any other province where provincial language legislation exist, must conform to the labeling requirements of that legislation.

2) Feeding instruction

A Directions

Feeding instructions must appear on product label unless intended for intermittent or supplemental feeding or under veterinarian direction. Information that should on the label should include, but is not limited to:

a) Serving size according to the pet's body weight, activity level and stage of life,

b) Recommendation for supplementation if the product is not intended to serve as a sole source of nutrition for the pet.

B Storage and Handling Information Statements

CARPFM recommends:

- All RPF bear a statement, "Keep Frozen", displayed in a prominent manner on the principal display panel
- RPF bear a statement for "Handling Guidelines for Safe Use" stating:

"Some raw food products may contain bacteria that could cause illness. For your protection, follow these safe-handling procedures.

· Keep frozen until ready to use.
· Thaw in refrigerator or microwave.
· Keep raw food separate from other foods.
. Wash working surfaces, utensils (including cutting boards, preparation and feeding bowls), hands, and any other items that touch or contact raw meat or poultry with hot soapy water.
· Refrigerate leftovers immediately or discard."

Where packaging size (1400g size package or less) provides insufficient space for detailed feeding instructions they can be abbreviated (for example: feed adult cat two 75 g cans daily).

Where packaging size provides insufficient space detailed feeding information should be available through an alternative source. Alternative sources include company web site and/or pamphlets.

4.2.2 Nutrition Analysis

Nutritional analysis must be shown on the label and include the following:
(Values should be stated on an "as fed" basis):

[Crude] protein	Minimum percent
[Crude] fat	Minimum percent
[Crude] fiber	Maximum percent

Moisture Maximum percent

CARPFM recommends that dog and cat food labels include a statement of nutritional adequacy or product purpose, except when the product is clearly and conspicuously identified on the principal display panel as a "snack" or "treat."

If the label calls attention to preservatives or other similar ingredients, these need not be included in the nutrient analysis statement.

4.2.3 Ingredients

A Ingredient Definitions

a. Feed ingredient definitions can be found in the CFIA regulation chapter 7.

b. The onus is on the manufacturer or importer to ensure that all ingredients are allowable under Canadian law and that the addition of any ingredient, or the addition of any ingredient beyond certain levels, does not make the product a drug as defined by the *Food and Drugs Act*.

B Ingredient Statements

a. Ingredients must be listed and identified by the common or usual name of the ingredient. Brand or trade names must not be used.

b. Each pet food label must carry under the heading “Ingredients” a complete list of major ingredients. Preservatives must also be listed. Minor ingredient categories such as vegetable gums or vitamins and minerals may be grouped or expressed as a group.

c. All ingredients (major, minor or categories), as mentioned above must be listed in descending order by percentage of weight.

d. When water is added in the preparation of pet food, a statement of that fact, for example, “sufficient water has been added for processing” may appear at the conclusion of the ingredient list.

4.2.4 Product Name

When used as part of a raw pet food name or statement of identity, the name of a specific ingredient must not create the impression that there is a greater proportion of that ingredient than is actually contained in the product.

When an ingredient or combination of ingredients constitutes 75% or more of total mass of all ingredients in the raw pet food formula, the name or names of such ingredients may

form part of the product name of the raw pet food without any qualification(s) (for example: "*My Brand" Beef Dog Food*).

When a product has a protein source that constitutes 75% or more of total mass of all ingredients in the raw pet food formula, the name of such protein source may form a part of the product name of the raw pet food without any qualification(s) (for example: "*My Brand" Beef Dog Food*).

a. If more than one ingredient appears in the product name, they must be listed in descending order by percentage of weight (for example: "*My Brand Beef and Chicken Dog Food*").

b. For the purposes of this requirement, water sufficient for processing, trace amounts of preservatives and condiments and trace nutrients will not be considered ingredients.

When an ingredient or combination of ingredients constitutes 50% or more of the total mass of all ingredients in the raw pet food formula, the name of any ingredient or combination of ingredients may appear in the product name, followed by the designation "blend" (for example: "*My Brand" Beef Dog Food Blend*).

When a product has a protein source that constitutes 50% or more of the total mass of all ingredients in the raw pet food formula, the name of such protein source may appear in the product name, followed by the designation "blend" (for example: "*My Brand" Beef Dog Food Blend*).

When an ingredient or a combination of ingredients constitutes at least 10% but less than 50% of the total mass of all ingredients of a raw pet food formula, the name of any ingredient or combination of ingredients may appear in the product name, preceded by the designation "with" or a similar term, providing each named ingredient constitutes at least 10% of the total mass of all ingredients of a pet food formula (for example: "*My Brand Dog Food with Beef and Vegetables"*). The descriptor, "with" shall be the same size, style and color print as the ingredient name(s).

a. If more than one ingredient appears in the product name, they must be listed in descending order by percentage of weight.

b. For the purposes of this requirement, water sufficient for processing, trace amounts of preservatives and condiments and trace nutrients will not be considered ingredients.

c. For the purposes of this requirement, the 10% minimum level does not apply to claims for nutrients. This includes, but is not limited to, vitamins, minerals, fatty acids and condiments.

When an ingredient or combination of ingredients is less than 10% of the total mass of all ingredients of a pet food formula, the name or names of such ingredients may form a part of the product name, only if associated with the term "added" (for example: "*My Brand Beef Dog Food, Added Kelp*"). The descriptor "added (ingredient)" shall not be bigger or of the same size as the designation(s).

a. If more than one ingredient appears in the product name, they must be listed in descending order by percentage of weight.

b. For the purposes of this requirement, water sufficient for processing, trace amounts of preservatives and condiments and trace nutrients will not be considered ingredients.

c. This requirement does not apply to claims related to vitamins, minerals, fatty acids and condiments.

4.4.5 Claims

1) GENERAL

a. The following guidelines are applicable to statements made on labels, labeling or other promotional material, including but not limited to print and broadcast media and electronic commerce.

b. Claims, including, but not limited to, representations in the form of statements, guarantees of performance and efficiency, and explanatory statements:

- must be accurate and not misleading
- must be based on adequate and proper tests
- must be relevant to that particular product, and used only in an appropriate context or setting
- must not imply that the product is endorsed or certified by an independent third-party organization when it is not
- must not be made if, despite the representation being literally true, it is likely to be misinterpreted by consumers or is misleading through the omission of relevant facts
- must be presented in a manner that clearly indicates that the representation and the explanatory statement should be read together
- must, if based on a pre-existing but previously undisclosed aspect, be presented in a manner that does not lead consumers to believe that the representation is based on a new process or product modification (for example saying "now with added calcium" when the product has always contained calcium)
- must not be made where they are based on the absence of ingredients which have never been associated with the product category
- must be reassessed and updated as necessary to reflect changes in circumstances that could alter the accuracy of the representation

Data to justify the claim(s) should be kept on file with the manufacturer and must be made available to government officials upon written or verbal request.

c. A statement on a pet food label stating "new", "improved" or a similar designation shall be substantiated and its use limited to a maximum of one year's production.

d. All claims that a product meets the criteria for nutritional adequacy must be accurate and verifiable.

4.4.5 Claims

1) GENERAL

The following guidelines are applicable to statements made on labels, labeling or other promotional material. The guidelines include statements made in printed material and broadcast media and electronic commerce.

CARPFM recommends that claims, including but not limited to, representations statements, performance and efficiency guarantees and explanatory statements must be:

- accurate and not misleading
- based on adequate and proper tests
- relevant to that particular product, and used only in an appropriate context or setting
- presented in a manner that clearly indicates that the representation and the explanatory statement should be read together
- presented in a manner that does not lead consumers to believe that the representation is based on a new process or product modification if based on a pre-existing but previously undisclosed aspect (for example saying "now with added calcium" when the product has always contained calcium)
- reassessed and updated as necessary to reflect changes in circumstances that could alter the accuracy of the representation

CARPFM recommends that claims, including but not limited to, representations statements, performance and efficiency guarantees and explanatory statements must:

- not imply that the product is endorsed or certified by an independent third-party organization when it is not
- not be made if, despite the representation being literally true, it is likely to be misinterpreted by consumers or is misleading through the omission of relevant facts
- not be made where they are based on the absence of ingredients which have never been associated with the product category

Data to justify the claim(s) should be kept on file with the manufacturer and must be made available to government officials upon written or verbal request.

c. A statement on a pet food label stating "new", "improved" or a similar designation must be substantiated and its use limited to a maximum of one year's production.

d. All claims that a product meets the criteria for nutritional adequacy must be accurate and verifiable.

2) SPECIAL DIETARY USE CLAIMS

If a product is intended to be used under the direction of supervision of a veterinarian, then the following claim must be used on the product label:

"Use only as directed by your veterinarian."

3) Comparative Claims

(E.g. palatability preference, greater digestibility, less fat, reduced calorie or similar terms)

a. Whenever a comparison is made within a company's line, the product of comparison must be listed. Legal advice should be obtained prior to listing the names of competitors' products when making a comparison.

b. If the comparison involves nutrients such as fat or calories, the percentage change must also be included with the product of comparison.

c. Comparisons of nutrient content must be:

- accurate
- on a similar basis (example: dry vs. dry),
- fully disclosed and not misleading, and
- expressed using common quantitative units.

d. The use of claims stating preference or comparable attributes must be substantiated by adequate and proper tests. These claims are valid for one year, unless there has been a reformulation of the test product or comparative product, which is generally available at retail.

e. Data confirming the comparison will be kept on file with the manufacturer and will be made available to government officials upon written or verbal request.

4) Health Claim

a. Adequate and proper tests must confirm the benefit of the nutritional link to the health claim.

b. Health claims must comply with existing Canadian law with respect to drug claims. For example, the words “diagnose”, “cure”, “mitigate”, “treat” or “prevent disease” must not be used.

c. Current data confirming the health claim must be kept on file with the company and must be made available to government officials upon written or verbal request.

5) Nutrient Claims

a. If the label of a pet food product calls prominent attention to a nutrient, outside of the ingredient panel, then a nutrient list must appear in the nutrition analysis statement as outlined in section 4.2.

Examples of nutrient claims include:

- Fortified with calcium;
- Extra vitamin E;
- Added vitamin C;
- Low magnesium.

Statements for educational uses are exempted from this requirement. This exemption is restricted to non-quantitative representations provided for purposes of educating consumers on traditional roles of required nutrients.

b. If nutrient claims are made in promotional materials but not on the label of the product, then the nutrition analysis section of the label does not need to reflect this ingredient.

c. Nutrient statements must be accurate and not misleading.

6) Misrepresentation of the Character & Size of Business, Extent of Testing etc.

CARPFM members must not, directly or indirectly, by way of its company, brand, trade name, or otherwise, make any false or misleading representations regarding:

- length of time in business;
- extent of sales;
- rank in the industry as a producer or distributor of a product or product type;
- any other material aspect of its business or products;
- owning or operating a laboratory, breeding or experimental kennel when such is not the case;
- product testing in any particular manner or for any period of time or with any particular results when such is not the case;

• product, ingredient or manufacturing process is new or exclusive when such is not the case.

4.2.7 Deceptive Endorsements, Testimonials & Awards

CARPFM members must not, directly or indirectly, by way of endorsement, testimonial, awards, advertising, labeling, brand, trade name or otherwise, make any false or misleading representation that a product or ingredient:

• has been prepared according to the formula, direction or personal supervision of
• is prescribed by
• is the first choice of
• has been inspected, guaranteed, recognized, approved or used by
• meets or exceeds the specifications or standards of; or
• is otherwise endorsed by a particular individual or class of individuals.

when such is not the case.

These endorsement, testimonial, award, advertising, labeling, brand, trade name or otherwise include:

- governmental or non-governmental agency;
- professionals such as veterinarians or chemists
- organizations,
- breeders,
- kennels,
- sportsmen,
- hunt clubs or
- animal hospitals.

CARPFM members must not claim that a product is the recipient of a bona fide merit award or seal of approval when such is not the case.

Data justifying claims of this type must be kept on file and be made available to government officials upon written or verbal request.

4.3 Appendices

5.1 Definitions

Adequate quality water: water that is safe and sanitary, at suitable temperatures, and under pressure as needed for all uses should, at a minimum, comply with applicable Federal, Provincial, and local requirements and not contaminate the RPF products.

Common Name is the generally known and used name for an object (e.g. dog food).

Companion Animal Remain refers to the whole body or body parts of previously owned dogs and cats that have passed away.

Contamination is the presence of unsuitable foreign materials such as microorganisms, chemicals or metal in the raw pet food.

Clean: to wash and rinse food or food-contact surfaces with safe and sanitary water and make visually free of dust, dirt, food residues, and other debris.

Distributor is a person or a company who acts as the middleman in the selling an imported product or a product made by another manufacturer.

Endorsements/Certification is the procedure by which official certification bodies or officially recognized certification bodies provide written or equivalent assurance that raw pet foods or raw pet food control systems conform to requirements. Certification of pet food may be, as appropriate, based on a range or inspection activities, which may include continuous on-line inspection, auditing of quality assurance systems, or examination of finished products.

Feeding Instruction is the direction and guideline on how to feed a companion animal including the amount and frequency.

Food hazard: a biological, chemical, or physical agent that is reasonably likely to cause human illness or injury in the absence of its control.

Ingredient includes components of the formulation of raw pet foods.

Label is a tag, paper, imprint or any similar form attached to the product, which has a brief description of the raw pet food for the purposes of identification and to provide information.

Manufacturer is a person or a company that develops ingredients into raw pet food.

Net Weight is the weight of raw pet food alone excluding packaging or container.

Pathogen: a microorganism capable of causing human illness or injury.

Preservative (Food Additives and Preservatives) includes but not limited to chemical agents that inhibit the growth of microorganisms, change color or taste and prolong shelf life of raw pet foods.

Provincial/ Federal inspection is the examination of meat products or system for control of meat products, raw materials, processing, and distribution including in process and finished product testing, in order to verify that they conform to requirements by the provincial or the federal agencies.

Pet refers to companion animals that are either a dog or a cat.

Raw Pet Food is a commercially manufactured uncooked frozen meat product for the consumption of dogs or cats after being defrosted.

Sanitation Standard Operating Procedures (SSOPs): Procedures established by an operator for the day-to-day sanitation activities involved in the production of safe and wholesome food.

Specific Life Stage refers to different life stages of a pet, for example in dogs, puppy hood, adulthood etc.

Supplemental Feeding is when the main meal of the pet cannot provide sufficient nutrients to the pet; we feed the pet with supplementation products. However, the supplementation product alone cannot be served as a main meal to the pet.

Standard Operating Procedures (SOPs): Procedures established by an operator for the day-to-day activities involved in the production of safe and wholesome food.

Vignette is a short small illustration or decorative design or literary sketch.

5.2 MEMBERSHIP EVALUATION FORM

Company Profile
Company Name: _____

Company Address: _____

Production facility Location: _____

Contact Person

Name: _____

Title: _____

Date of Inspection: _____

Part one: Production Performance:

1 Personnel Evaluation:

i**. Required company training program records**

☐ **Personal health and personal hygiene training**

☐ **Employee Roles and Responsibilities Training**

☐ **Sanitation Principles and Sanitary Practices Training**

☐ **Employee disease report**

ii. Employees understand why it is necessary to undertake the above precautions.

☐ Yes ☐ No

iii. Employees practice the trainings.

☐ Yes ☐ No

Description of evaluations: _____

_____

Score: 0 1 2 3 4 5

2. Buildings and Facilities: production facility and ground

i. Area around the production facility is free from litter, weeds, grass and brush.

☐ Yes ☐ No

ii. Standing or stagnant water on the ground

☐ Yes ☐ No

iii. External production area doors and windows are fitted with fine mesh screens to keep out insects.

☐ Yes ☐ No

iv. Evidence of the presence of domestic animals, such as cats and/or dogs.

☐ Yes ☐ No

v. Leaks in the roof, skylight, windows, screens or overhead piping.

☐ Yes ☐ No

Description of evaluations: _____

_____

Score: 0 1 2 3 4 5

3. Buildings and Facilities: **Facility Layout**

i. The production facility design adheres to the following regulations:

☐ Rest room door location ☐ Processing door location

☐ Microbiology lab location ☐ Footbath location

☐ Storage room designs ☐ Sanitizing facilities location

ii. The production facility has worker flow design?

☐ Yes ☐ No

iii. The company has production flow design?

☐ Yes ☐ No

Description of evaluations:_____

_____

Score: 0 1 2 3 4 5

4. Buildings and Facilities: Equipment

i. All equipment that comes in contact with food is cleaned and sanitized as necessary.

☐ Yes ☐ No

ii. The production facility has equipment monitoring and maintenance records.

☐ Yes ☐ No

iii. Equipment is designed, or otherwise suitable, for use in a food production facility.

☐ Yes ☐ No

iv. There is "excessive unused space" around production machinery that allows for food and other debris to collect.

☐ Yes ☐ No

v. Equipment surfaces can be sanitized.

☐ Yes ☐ No

vi. Equipment is difficult to disassemble for cleaning, sanitizing and inspection.

☐ Yes ☐ No

Description of evaluations:_____ _____

_____

Score: 0 1 2 3 4 5

5. Buildings and Facilities: Sanitation operation

i. The production facility has sanitation standard operating procedures.

☐ Yes ☐ No

ii. The production facility has regular cleaning and sanitizing schedules.

☐ Yes ☐ No

iii. The house-keeping program is being performed.

☐ Yes ☐ No

iv. Routine microbiological tests are being performed.

☐ Yes ☐ No

v. Sanitizing chemicals are being used accordance with the manufacturer's directions.

☐ Yes ☐ No

vi. All chemicals are clearly labeled.

☐ Yes ☐ No

Description of evaluations:_____ _____

_____

Score: 0 1 2 3 4 5

6. **Buildings and Facilities: Pest Control**

i. Raw materials and other materials are properly stored.

☐ Yes ☐ No

ii. All pesticides, traps, bait, and chemicals used have been approved for use in a food processing facility?

☐ Yes ☐ No

iii. All pesticides, traps, bait and chemicals are stored so that they will not contaminate raw materials and other materials.

☐ Yes ☐ No

Description of evaluations:_____ _____

_____

Score: 0 1 2 3 4 5

7. **Buildings and Facilities: Sanitary Facilities and Controls**

i. Garbage quickly removed and dumped in appropriate bins.

☐ Yes ☐ No

ii.Garbage, both inside and outside the production facility, is disposed of quickly to ensure removal of hiding places for pests.

☐ Yes ☐ No

ii. All sanitation chemicals used in the production facility are CFIA approved.

☐ Yes ☐ No

iv. All hoses are being kept in proper position.

☐ Yes ☐ No

v. Back flow and vacuum breaker valves have been installed on all taps, in the production area, to prevent water supply contamination.

☐ Yes ☐ No

vi. Hand-washing instructions signs are posted.

☐ Yes ☐ No

vii. Water control devices, such as knee, foot, or elbow faucet controls, have been installed.

☐ Yes ☐ No

Description of evaluations:_____ _____

_____

Score: 0 1 2 3 4 5

8 Buildings and Facilities: **Environmental Monitoring**

i. The production facility follows Environmental Sampling Procedure.

☐ Yes ☐ No

ii. The production facility has record of sampling information.

☐ Yes ☐ No

iii. The production facility has records of corrective actions and follow-up for all positive microbial test results.

☐ Yes ☐ No

Description of evaluations:_____ _____

_____

Score: 0 1 2 3 4 5

9. **Source of Ingredients:**

i. Source of Raw Materials

All meats (including organ meats), vegetables and fruits have passed Federal or Provincial Inspection.

☐ Yes ☐ No.

If no, explain: _____

ii. No companion animal remains are used as ingredients.

(With initial of personnel in charge)

☐ Yes ☐ No

iii. The production facility has appropriate water quality and supply.

☐ Yes ☐ No

iv. All food additives and preservatives are on the *List of Acceptable Non-medical Ingredients* approved by Health Canada.

☐ Yes ☐ No

Description of Evaluations: _____
_____

Score: 0 1 2 3 4 5

10. Production and Process Controls

i. Raw materials are stored on a first-in, first-out basis to reduce the possibility of contamination through spoilage.

☐ Yes ☐ No

ii. All incoming materials are dated to ensure a proper rotation of inventory and for internal tracking purposes.

☐ Yes ☐ No

iii. Items are overstocked.

☐ Yes ☐ No

iv. Incoming vehicles are inspected.

☐ Yes ☐ No

v. Dusty, faded or discolored containers are checked regularly.

☐ Yes ☐ No

vi. All products spoiled by damage, insects, rodents or other causes are stored in a designated "Quarantine Area" to prevent their contact with safe products.

☐ Yes ☐ No

vii. Quarantined items are disposed of quickly to prevent the development of pest breeding place.

☐ Yes ☐ No

viii. Incoming materials are inspected for damage or contamination.

☐ Yes ☐ No

ix. Unused raw materials are properly resealed to prevent contamination.

☐ Yes ☐ No

x. Materials stored in a safe manner.

☐ Yes ☐ No

xi. The production facility has temperature control records.

☐ Yes ☐ No

xiii. The production facility has correction action record.

☐ Yes ☐ No

xiv. The production facility has a description of the system used to trace RPF to its first shipping destination.

☐ Yes ☐ No

xv. The production facility has a recall procedure.

☐ Yes ☐ No

Description of evaluations: _____ _____

_____

Score: 0 1 2 3 4 5

Part two: Labeling and Advertising Performance

1. Label Content Declaration

i. All product labels contain the following legible information:

☐ Yes ☐ No

If no, explain: _____

☐ Common Name ☐ Storage info. ☐ List of Ingredients
☐ Net Weight ☐ Handling info. ☐ Nutrition Analysis
☐ Dealer Name ☐ Feeding Directions ☐ Business Address

ii. Some products labels contain the following legible information:

☐ Yes ☐ No

If no, explain: _____

☐ Common Name ☐ Storage info. ☐ List of Ingredients
☐ Net Weight ☐ Handling info. ☐ Nutrition Analysis
☐ Dealer Name ☐ Feeding Directions ☐ Business Address

iv. Not all product labels contain the above legible information; however, all the legible information is available through the following alternative source(s).

☐ Yes ☐ No

If no, explain: _____

☐ Company Web Site ☐ Pamphlets ☐ Information sheets
☐ Other 1: _____ ☐ Other 2: _____

Description of Evaluations: _____
_____

Score: 0 1 2 3 4 5

2. Evaluation of Legible Information

i.The product identity correctly use generic name.

☐ Yes ☐ No

ii. The product name is displayed in both English and French.

☐ Yes ☐ No

If no, explain: _____

Description of Evaluations: _____
_____

Score: 0 1 2 3 4 5

3. Net Weight

i. Net quantity statement shown is on the label.

☐ Yes ☐ No

ii. Net quantity statement is shown in metric.

☐ Yes ☐ No

If no, explain: _____

iii. Net weight of product matches stated net weight on label.

☐ Yes. ☐ No

iv. Dealer's name and address printed on labels is sufficient for postal delivery. (incl. postal code)

☐ Yes ☐ No

Description of Evaluations: _____
_____

Score: 0 1 2 3 4 5

4. Storage and Handling Information

i. Production date is printed on labels.

☐ Yes ☐ No

ii. Storage temperature/frozen/refrigerated is printed on label.

☐ Yes ☐ No.

If no, explain: _____

iii. Product life is printed on label after being defrosted in:

☐ Refrigerator ☐ Room Temperature

iv. Handling Guidelines for Safe Use are printed on label.

☐ Yes ☐ No

If no, explain: _____

Description of Evaluations: _____
_____

Score:0 1 2 3 4 5

5. Feeding Directions

i.Suggested serving size printed on label.

☐ Yes ☐ No

If no, explain: _____

ii. Recommendation for supplementation printed on label.

☐ Yes ☐ No

If no, explain: _____

Description of Evaluations: _____
_____

Score: 0 1 2 3 4 5

6. List of Ingredients

i. Common name used.

☐ Yes ☐ No

ii. Major and minor ingredients printed on label.

☐ Yes ☐ No

If no, explain: _____

iii. Ingredients listed in descending order by percentage weight.

☐ Yes ☐ No

If no, explain: _____

Description of Evaluations: _____
_____
_

Score:0 1 2 3 4 5

7. Nutrition Analysis (Analysis results from an independent laboratory are required to complete this section):

i. Nutrition Analysis is printed on label.

☐ Yes ☐ No

If no, explain: _____

☐* [Crude] protein	Minimum % stated: _____	Lab result (%): _____
☐ [Crude] fat	Minimum % stated: _____	Lab result (%): _____
☐ [Crude] fibre	Maximum % stated: _____	Lab result (%): _____
☐ Moisture	Maximum % stated: _____	Lab result (%): _____

ii.Statement of nutritional adequacy or purpose of the product is printed on the label.

☐ Yes ☐ No

Description of Evaluations: _____
_____

Score: 0 1 2 3 4 5

8. Product Name

*An inspection of the proportion of ingredients used in the production line is required.

i.Naming of product is appropriate according to the percentage of ingredients used.

☐ Yes ☐ No

If no, explain: _____

ii. Ingredients are listed in descending order by percentage.

☐ Yes ☐No

If no, explain: _____

iii. Is there any misleading/deceiving information on the label?

☐ Yes ☐No

If yes, the misleading/deceiving information on the label is in the form of:
_____ (e.g. vignette, picture, verbal etc.)

iv. The misleading/deceiving information is with regard to:

☐ Composition ☐ Form ☐ Suitability ☐ Quality
☐ Color ☐ Flavour ☐ Performance ☐ Ingredients
☐ Method of Manufacture ☐ Intended Use of Product
☐ Other 1: _____ ☐ Other 2: _____

Description of Evaluations: _____
_____

Score: 0 1 2 3 4 5

9. Claims

i. Product label(s) hold one or more of the following claims.

☐ Yes ☐ No Media: _____
☐ Yes ☐ No Special Dietary Claim _____

☐ Yes ☐ No Health Claim _____
☐ Yes ☐ No Comparative Claim _____

☐ Yes ☐ No Nutrient Claim _____

ii. The claim(s) made in i. above match the regulations 4.6.2 to 4.6.5 of this manual

☐ Yes ☐ No

If no, explain: _____

iii. Claim(s) made in i. above is (are):

☐ Accurate
☐ Adequately/ Properly Tested
☐ Relevant/ Appropriate
☐ Correctly Presented
☐ Reassessed/ Updated
☐ Falsely Implicated (Certification)
☐ Easily Misinterpreted
☐ Misleading of New Process
☐ Deceptive of Unrelated Ingredient

iv. Justification data to backup the claim(s) present.

☐ Yes ☐ No

If no, explain: _____

v. Terms such as “new” or “improved” or a similar designation are printed on the label.

☐ No ☐Yes.

If yes, term used: _____

Date claim started: _____ DD/MM/YY

☐ Claim Still in Effect ☐ Claim Expired

Description of Evaluations: _____
_____

Score: 0 1 2 3 4 5

10. Misrepresentation

All of the followings representations are correctly made:

☐ Time in business
☐ Sales Volume
☐ Industrial Ranking
☐ Operation of a Laboratory/ Breeding Facility/ Experimental Kennel
☐ Product Testing (Including Method/ Time/ Result)
☐ New/ Exclusive Manufacturing Process
☐ Other Material Aspect of the Business/ Products

Specify: _____

Description of Evaluations: _____
_____

Score: 0 1 2 3 4 5

11. ENDORSEMENTS, TESTIMONIALS & AWARDS

Complete this section if there are statements of endorsements, testimonials and/or awards.

i. Statement of Endorsement(s).

☐ No ☐ Yes

If yes, specify: _____

ii. Statement of Testimonial(s).

☐ No ☐ Yes

If yes, specify: _____

iii. Statement of Award(s).

☐ No ☐ Yes

If yes, specify: _____

iv. Justification data to backup the Statement(s) is available for review.

☐ Yes ☐ No

If no, explain: _____

Description of Evaluations: _____
_____

Score: 0 1 2 3 4 5

12. Company Records

The company must present the following information to the inspector:

☐ Canadian company address for not less than one year
☐ Name of the President
☐ Business address of the President
☐ Business telephone number of the President

☐ Name and title of the person in charge of the production facility
☐ Business address of the person in charge of the production facility
☐ Business telephone number of the person in charge of the production facility

☐ Name and title of the quality control contact
☐ Business address of the quality control contact
☐ Business telephone number of the quality control contact

☐ Location of files and records of quality control program

Shipping description:

☐ Customer name and address
☐ Type of Product
☐ Quantity of Product
☐ Method of transportation
☐ Shipment Date

Description of Evaluations: _____

____
Score: 0 1 2 3 4 5

Part three: Comments

i. Achievements: ____
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ii. Scope of Improvements: ____
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Canadian Association of Raw Pet Food Manufacturers
Inspector Information
Name: ____
Organization: ____
Title: ____

_____

_____

Signature Date

5.3 References

2003 Official Publication, *Association of American Feed Control Officials Incorporated*. 2003.

Guidance for Industry Manufacture and Labeling for Raw Meat Foods for Companion and Captive Noncompanion Carnivores and Omnivores, *U.S. Department of Health and Human Services Food and Drug Administration Center for Veterinary Medicine*. December 2, 2002.

Guide for the Labeling and Advertising of Pet Foods, *Industry Canada*.
www.strategis.ic.gc.ca *U.S. Department of Health and Human Services Food and Drug Administration Center for Food Safety and applied nutrition*

CFIA Regulation Guideline for Meat hygiene manual of procedure
CFIA Regulation Guideline for Pet Food Labeling
Guidance for Industry: Guide to Minimize Microbial Feed Safety Hazards of Fresh-cut Fruits and Vegetables draft guidance
http://www.cfsan.fda.gov/~dms/prodgui2.html#docu

FDA: Guideline for RTE Producers to use to Developing Good Manufacturing Practices April 1999

5. MEMBERSHIP GUIDELINES

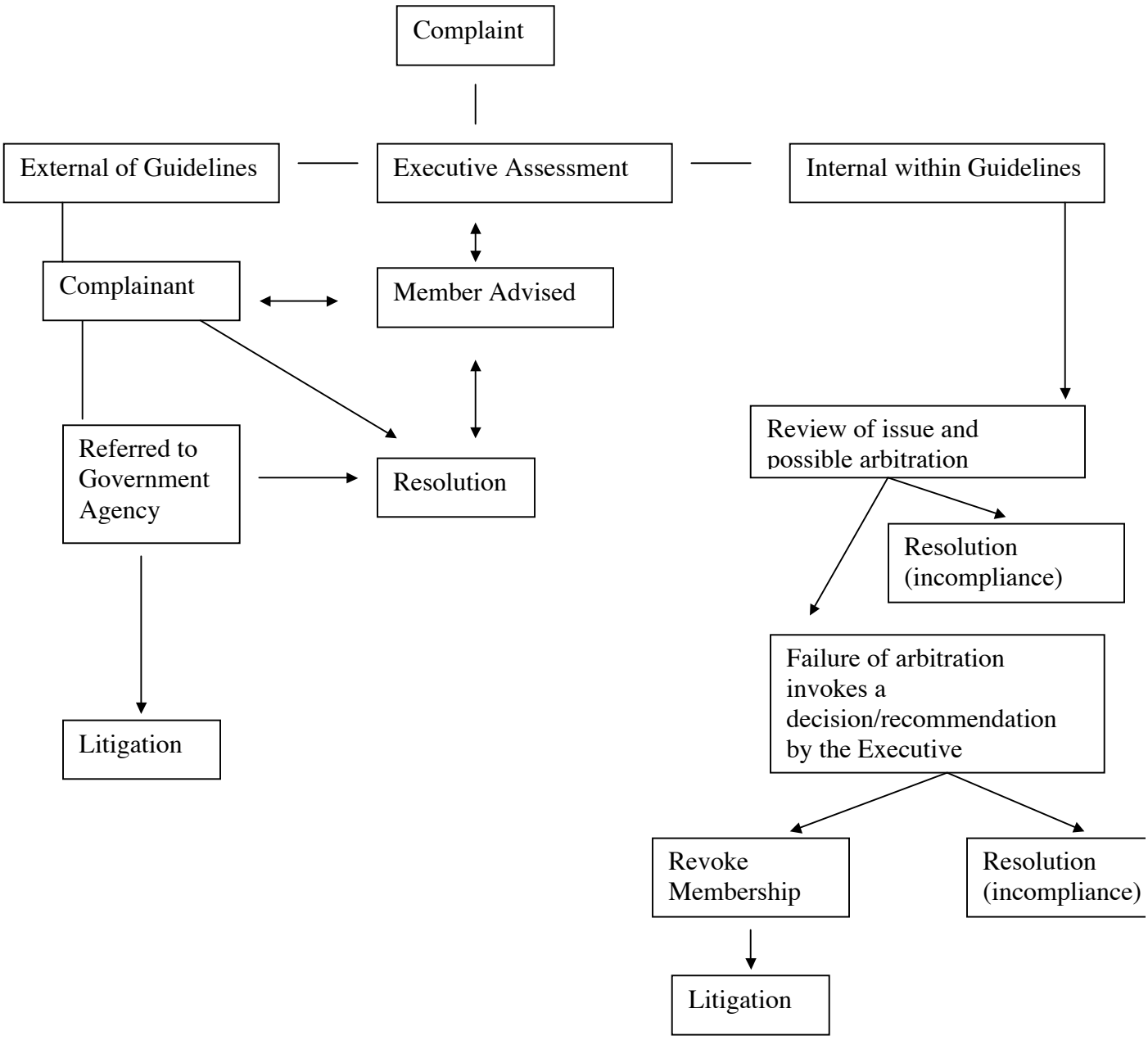
The Canadian Association of Raw Pet Food Manufacturers is an organization committed to the development of quality pet food. These guidelines are the foundation, the group of member companies has voluntarily accepted as the minimum standard of excellence they pursue in production and marketing activities. Each member has committed to meet or exceed these standards willingly and without reservation. Members agree that these guidelines are the minimum standards that complete the philosophy of wholesome food production for the pet population.

1. The **Mission Statement** represents the goals of the association and it is each member's responsibility to work with the association in furthering ideals represented there. Upon granting of membership to the association the member company agrees to support the association and executive to maintain these goals.
2. The **Code of Ethics** defines the minimum standard of conduct each member agrees to uphold in their activities, both in production and marketing of their products. This document symbolizes the commitment each member has to the philosophies of wholesome raw pet food production.
3. The **Constitution** outlines the power of the executive. The elected executive has the decision-making responsibility and power in the association. All member companies are eligible to promote an individual for elected. The **Good Manufacturing Practices** manual is the unwavering technical standard that each member company agrees to meet or exceed in their production of wholesome raw food products. It is the standard by which they will be judged and held accountable. Their membership will be based on satisfactory audit results within specified time frames.
4. **Membership Guidelines** define the relationship every member has with the association. Membership is dependent on execution of all responsibilities outlined in this document and agrees to the process as defined in the Complaint Resolution Tree.

Membership Responsibilities and Rights

1) The member agrees to adhere to the guidance outlined in all the following documents in their entirety as provided by the association:
   a) Mission Statement
   b) Code of Ethics
   c) Constitution
   d) Good Manufacturing Practices
   e) Membership Guidelines
2) New members will be provided these documents after an initial application form is submitted along with payment of membership fees (see attached).

3) Prospective members will be submitted to the Executive for approval at the next available meeting.
4) The Executive will assess the suitability of the applicant and proceed in one of 3 ways:
    a) Accept the applicant and provide all documentation relating to membership.
    b) Reject the applicant and return any fees.
    c) Return the application for clarification and response. The applicant may at this time withdraw their application and have fees returned.
5) Once the applicant is accepted they will be eligible for an opportunity to be inspected per the GMP's. Acceptable inspectors are, Federal or Provincial Food inspectors, Local Municipal Health inspectors, and Contract inspections. A six month period will be available to correct deficiencies and meet the minimum criteria. The minimum criteria being a score of 83 out a possible 110 points as outlined in the GMP's. Once the criteria is met, at the next Executive meeting, the member status will be elevated to MEMBER IN GOOD STANDING and will be granted use of their membership in marketing and promotion. Once a member has achieved this status they will be required to have annual inspections meeting the minimum criteria. Should the applicant fail the minimum criteria for acceptance they will have two options:
    a) Request a suspension of application/membership until corrections and re-inspection are complete.
        i) Suspension will only be granted based on a detailed plan for correction being submitted and accepted as appropriate by the executive.
    b) Withdraw their application forgoing all fees.
6) Complaints made to the association will be managed based on the following criteria and follow the appropriate course of action:
    a) Any complaints must be made in writing to the association Executive.
    b) The complaint will be assessed for merit and the member company advised of the issue.
    c) Complaints having merit will be held on file until resolution has been achieved or sent to litigation.
    d) The member company is responsible for advising the Executive resolution has been achieved or is in arbitration or litigation.
    e) Should the complaint be the result of conflict between member companies, or the association and a member company, the Executive will arbitrate a settlement and render a binding ruling that may include revoking a company's membership.
    f) Some complaints may necessitate action by both government agencies and the Association.


Complaint
External of Guidelines
Executive Assessment
Internal within Guidelines
Complainant
Member Advised
Referred to Government Agency
Resolution
Review of issue and possible arbitration
Resolution (incompliance)
Failure of arbitration invokes a decision/recommendation by the Executive
Litigation
Revoke Membership
Resolution (incompliance)
Litigation

7) **Members in Good Standing** once recognized will have the right to display and use the logo of the Association in their individual promotion and marketing programs. It is the intent of the association to use this as a seal of approval that the member in question has met and sustains the minimum standards of compliance. Obviously this is up for continual review based on inspection reports and complaint resolution however once achieved maintenance of this level of compliance should be readily attainable.