

# **Alternative 19.1 Deviation Procedure for Supplier Assessment**

For those operations in which it is impracticable to satisfy the requirements of 19.1 as printed in Canada Gap manual, the following is an example of an outline assessment offering a comparable degree of Food Safety to 19.1 when considering produce end use (further processing).

Operations may have an assessment in place that currently satisfies their customers Food Safety concerns. This example shows various Food safety Activities that customers may request concerning a Industry where produce is to receive a kill step.

## **Current Requirements of 19.1**

The person responsible selects/purchases harvested/market product from operations that have successfully completed one of the options below and requests a copy of a current/valid certificate:

The person responsible selects/purchases harvested/market product from operations that have successfully completed one of the options below and requests a copy of a current/valid certificate:  
Canada GAP or Other industry recognized third party food safety audit/certification

(\*\*\*Note: Person responsible for export ensures destination market MRLs are met for product being selected/purchased as per Section 6.2. The certificate would not replace this requirement).

The person responsible receives only the harvested/market product that was selected/purchased along with the certificate (one certificate per season per supplier) (File under Tab: Letters of Assurance/Certificates)

## **Example of an Alternative Procedure**

When produce is destined for further processing with kill step, Station (Grading) and or Grower (Supplier), will perform an assessment to assure the Receiver (Customer), that produce was grown in accordance to Industries best practices considering produces end use (further processing).

1. Prior to the start date of your operation, write on Form R of your Canada GAP manual a deviation. State that you will be following an alternative practice regarding requirements of 19.1. This will indicate an intent to follow some type of assessment that will offer a comparable degree of Food Safety to 19.1 when considering produce will undergo further processing.
2. Each Grower (Supplier), prior to sourcing out produce, will undergo an assessment by completing the following forms: One set of forms per grower- These are examples and operations may use alternative forms
  - a. Supplier Assessment Form
  - b. Canada GAP Form V,
    - i. (multiple Form V could be used depending on growers' operations)
  - c. Canada GAP Appendix K,
    - i. (multiple appendix K could be used depending on grower's operations)
3. Review and accepting of assessment can be done various ways. Its up to the Station.
  - a. Grower and receiver may fill out and verify forms together.
  - b. Grower may fill out and hand in to Station, where reviewed and verified.
  - c. Station may fill out as a second party on behave of Grower.
4. The grower (supplier) which cannot supply satisfactory mitigation strategies for any documented hazard, further verification to use grower (supplier) would need to be obtained from stations upper management.
5. For this purpose, this assessment outline has provided a key with suggestive mitigation strategies, in addition to mitigation strategies already written within Canada Gap Appendix K, Form V, and the Supplier Assessment Form.
6. Prior to accepting of any produce from a Grower (supplier), verify that the Grower (Supplier's) agricultural chemical practices, such as chemical sprays, comply with the standards and regulations you and your intended market require (including post-harvest intervals).
  - a. For this purpose, it is recommended the spray monitoring program be traced thru Authentix.
  - b. Or that a comparable practice is in place to verify all field sprays and compliance to PHI harvest.

# Supplier Assessment Form

## Supplier Contact Information

Name: \_\_\_\_\_ Phone: \_\_\_\_\_

Email: \_\_\_\_\_ Additional Info here: \_\_\_\_\_

Field Identification:(Address / Plot ID)

*(List all locations this assessment encompasses)*

\_\_\_\_\_  
\_\_\_\_\_

### CIRCLE ONE

1. Have any field locations been used for anything more than agricultural crops? YES NO NA
2. In the last year were farm animals allowed to pasture on or adjacent to any field locations? YES NO NA
3. Has supplier used manure on any fields in the last 120 days or will supplier in the future? YES NO NA
4. Has or will there be raw municipal waste been applied to fertilize any field? YES NO NA
5. Fertilizer and pesticide records are available for review upon request? YES NO NA
6. All agricultural chemicals and soil amendments will be applied according to the manufacturer's labels, entered in the Authentix program or comparable tracking method, with guarantee all harvest dates will be PHI verified? YES NO NA  
*(When USA MRL'S (Maximum Residue Level) are lower than Canada – USA Label is to be followed).  
(When USA PHI's (Pre-Harvest Interval) are greater than Canada – USA Label is to be followed).*
7. Irrigation water is sourced from: (more than one can apply – check each that applies)  
a.  Well (ground water)     Canal or Pond (open water source)     No irrigation
8. A risk assessment of water sources and production area is conducted and reviewed on an annual basis by supplier and facility representative? (ex: Form V and Appendix K CanadaGap Manual) YES NO NA
9. Harvesting containers are used only for produce, inspected daily/weekly, and cleaned if required? (if records needed, they can be obtained by using Form I CanadaGap Manual) YES NO NA
10. Harvesting equipment is inspected daily/weekly prior to use in the fields and cleaned if required? (if records needed, they can be obtained by using Form I CanadaGap Manual) YES NO NA
11. Employee hygiene practices training is provided to all employees on a minimum annual basis. (if needed, Form C of the CanadaGAP Manual can be used to train and record training) YES NO NA
12. Toilets and hand washing are available for all employees and maintained daily? (if needed, records can be obtained by using Log J CanadaGap Manual) YES NO NA
13. Does supplier have the latest copy of Canada Gap Grower Manual to reference current practices? YES NO NA

Filled out by \_\_\_\_\_ Date: \_\_\_\_\_

Reviewed and Verified by: \_\_\_\_\_ Date: \_\_\_\_\_

## V. Production Site Assessment

**Instructions:** Assess whether the following potential hazards exist in your production site(s). All scenarios should be considered and recorded below. If any items in the left hand column have NOT been checked off, more information should be provided in the next two columns regarding the actual hazard and the action(s) taken.

**Production Site(s):** \_\_\_\_\_ **Commodity:** \_\_\_\_\_

**Completed by:** \_\_\_\_\_ **Date:** \_\_\_\_\_

| Assess the following potential hazards:                                                                                                                                                                                                                           | If a box in the left hand column has NOT been checked off, describe the potential hazard that may exist. | For potential hazards that may exist, chose or describe the action(s) taken to reduce the potential hazard:                                                                                                                                                                                                                                                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> Sewage sludge has NOT been applied to the production site                                                                                                                                                                                |                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                          |
| <input type="checkbox"/> No adjacent areas where livestock excrement, dust, aerosols or feathers may drift or leach (also consider exhaust fans from barns blowing dust into fields)                                                                              |                                                                                                          | <ul style="list-style-type: none"> <li>○ Install fencing around production sites</li> <li>○ Increase or create buffer zones around productions sites - record approximate distances: _____</li> <li>○ Plant hedges or windbreaks</li> <li>○ Seek expert advice and/or cooperation from neighbours</li> <li>○ Other:</li> </ul>                                           |
| <input type="checkbox"/> No adjacent areas where crop production inputs may drift or leach (e.g., agricultural chemicals, soil amendments, fertilizers, pulp sludge)                                                                                              |                                                                                                          | <ul style="list-style-type: none"> <li>○ Increase or create buffer zones around production sites - record approximate distances: _____</li> <li>○ Plant hedges or windbreaks</li> <li>○ Seek expert advice and cooperation with neighbours</li> <li>○ Other:</li> </ul>                                                                                                  |
| <input type="checkbox"/> No potential manure usage or storage on adjacent land                                                                                                                                                                                    |                                                                                                          | <ul style="list-style-type: none"> <li>○ Increase or create buffer zones around production sites - record approximate distances: _____</li> <li>○ Seek expert advice and/or cooperation with neighbours</li> <li>○ Incorporate manure into soil (if under your control)</li> <li>○ Ensure manure is stored properly (if under your control)</li> <li>○ Other:</li> </ul> |
| <input type="checkbox"/> No adjacent areas where non-agricultural activities contribute to air, water or soil pollution [i.e., industrial activities (refineries, manufacturing plants), roadside debris, road salt, foreign objects (e.g., glass bottles, etc.)] |                                                                                                          | <ul style="list-style-type: none"> <li>○ Increase or create buffer zones around production sites - record approximate distances: _____</li> <li>○ Plant hedges or windbreaks</li> <li>○ Seek information from source of hazard, experts or government on potential risks</li> <li>○ Other:</li> </ul>                                                                    |

|                                                                                                                                                                                                                                       |                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> No risks from urban areas (e.g., pet access to production sites, leaching of septic beds, walking trails, campsites, etc.)                                                                                   |                                                                                       | <ul style="list-style-type: none"> <li>○ Seek expert advice and/or cooperation with neighbours, land owners, government, etc.</li> <li>○ Other:</li> </ul>                                                                                                                                                                                                                                          |
| <input type="checkbox"/> No unusually high levels of animal and bird activity (e.g., migratory paths, nesting or feeding areas, presence of animal feces, large areas of animal tracks or burrowing, etc.)                            |                                                                                       | <ul style="list-style-type: none"> <li>○ Remove habitat or food sources (e.g., cull piles)</li> <li>○ Conduct ongoing monitoring for evidence of animal intrusion (e.g., footprints, feces)</li> <li>○ Train employees to monitor and report evidence of pest intrusion</li> <li>○ Install wildlife deterrents (e.g., bird scaring devices)</li> <li>○ Describe: _____</li> <li>○ Other:</li> </ul> |
| <input type="checkbox"/> No flooding of production site in the past year                                                                                                                                                              |                                                                                       | <ul style="list-style-type: none"> <li>○ Allow soil to dry and be reworked before planting</li> <li>○ Take soil samples (Note: sampling does not guarantee that the crop will not be contaminated)</li> <li>○ Other:</li> </ul>                                                                                                                                                                     |
| <input type="checkbox"/> Other (please describe):                                                                                                                                                                                     |                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                     |
| <ul style="list-style-type: none"> <li>● Pest control products are used in production site?           <ul style="list-style-type: none"> <li><input type="checkbox"/> YES</li> <li><input type="checkbox"/> NO</li> </ul> </li> </ul> | If YES was answered in the left hand column, describe the pest control products used: | <input type="checkbox"/> Pest control products used in the production site are stored according to the requirements found in Section 14.2 Storage                                                                                                                                                                                                                                                   |

**Confirmation/Update Log:**

|                 |  |  |  |  |  |  |
|-----------------|--|--|--|--|--|--|
| <b>Date</b>     |  |  |  |  |  |  |
| <b>Initials</b> |  |  |  |  |  |  |

## K. Agricultural Water Source Assessment

**NOTE:**

**NOTE: The Appendices were originally developed for Canadian operations, and provide examples only, based on Canadian and international resources. If your operation is outside of Canada, the following information may be relevant to you. It is recommended that you check whether country-specific requirements or guidance are available instead.**

Assess whether the following hazards exist in areas adjacent to your water sources. All scenarios should be considered and recorded below. Place a check mark in the appropriate column; describe the hazard (if yes) and actions (if any) taken to reduce the risk.

Place a check mark in the appropriate column; describe the risk (if yes) and actions (if any) taken to reduce the potential risk.

| Are the following items present (place a check mark in the appropriate column)?                      | Y | N | Specific hazards and location (e.g., cattle grazing on SW side of pond 7); : | Action(s) taken to reduce potential hazard<br><br>NOTE: The following are options; there may be other appropriate actions.                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------------------------|---|---|------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Assessment of risks from hazards adjacent to agricultural water sources:</b>                      |   |   |                                                                              |                                                                                                                                                                                                                                                                                                                                          |
| Upstream contamination sources (e.g., livestock with access to water, campsites)                     |   |   |                                                                              | <input type="checkbox"/> Seek information and cooperation from source of hazard, experts or government on potential risks and solutions<br><input type="checkbox"/> Water tests<br><input type="checkbox"/> Other: _____<br>_____                                                                                                        |
| On-site domestic animal access                                                                       |   |   |                                                                              | <input type="checkbox"/> Seek information and cooperation from source of hazard, experts or government on potential risks and solutions<br><input type="checkbox"/> Water tests<br><input type="checkbox"/> Other: _____<br>_____                                                                                                        |
| Wildlife access                                                                                      |   |   |                                                                              | <input type="checkbox"/> Create steep or rocky sides to discourage wildlife from using or nesting in ponds<br><input type="checkbox"/> Fence ponds<br><input type="checkbox"/> Water tests<br><input type="checkbox"/> Other: _____<br>_____                                                                                             |
| Sources of sewage contamination (e.g., faulty sewage or septic systems, portable or outdoor toilets) |   |   |                                                                              | <input type="checkbox"/> Seek information and cooperation from source of hazard, experts or government on potential risks and solutions<br><input type="checkbox"/> Call municipality or hire professionals to service sewage or septic system<br><input type="checkbox"/> Water tests<br><input type="checkbox"/> Other: _____<br>_____ |

| Are the following items present (place a check mark in the appropriate column)?                 | Y | N | Specific hazards and location (e.g., cattle grazing on SW side of pond 7); : | <b>Action(s) taken to reduce potential hazard</b><br>NOTE: The following are <b>options</b> ; there may be other appropriate actions.                                                                                                                                                                                                                           |
|-------------------------------------------------------------------------------------------------|---|---|------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Agronomic inputs (e.g., chemical storages, manure storage, down slope from agricultural fields) |   |   |                                                                              | <input type="checkbox"/> Plant vegetative buffer zones to slow down runoff<br><input type="checkbox"/> Implement or build proper storage facilities for manure and chemicals<br><input type="checkbox"/> Seek cooperation from neighbours on protecting water sources<br><input type="checkbox"/> Water tests<br><input type="checkbox"/> Other: _____<br>_____ |

# Supplier Assessment Form

## Corrective Action Suggestion

At each question, an area has been left to make notes on if corrective actions were recommended or completed. General information may also be written that the Grading station wants to relay to Grower (Supplier) regarding the assessment.

1. **Have any field locations been used for anything more than agricultural crops?**

**If answered Yes**

Investigate prior field use. Determine the field's ability to produce a compliant crop.

Field must be compliant in the fact that if grown on, the produce harvested from field will not be contaminated from the field's previous usage. Form V can be used to Assess.

2. **In the last year were farm animals allowed to pasture on or adjacent to any field locations?**

**If answered Yes**

Field compliant if 120 days has expired before harvest. This would also be Noted on V (Production assessment)

If not, further verification would be needed in accepting produce that it will be processed to kill microbials.

3. **Has supplier used manure on any fields in the last 120 days?**

**If answered Yes**

Field cannot be harvested until 120 days expire. This application must be recorded to verify a compliant 120-day waiting period was satisfied. If a pre-processing of manure can be verified that the application will not render the field contaminated according to the FSMA Produce Safety Ruling the field can be harvested. If not, further verification would be needed in accepting produce that it will be processed to kill microbials.

4. **Has or will there be raw municipal waste been applied to fertilize any field?**

**If answered Yes**

An approved process must can be validated and verified supporting the application of the waste and will not render the field contaminated according to FSMA Produce Safety Ruling. Documentation must be kept on file with proof of verification and validation.

5. **Fertilizer and pesticide records are available for review upon request?**

**If answered NO**

Field will be rejected unless a complete set of records can be obtained, reviewed, and deemed compliant prior to accepting harvested product. Obtain copies if available.

6. **All agricultural chemicals and soil amendments will be applied according to the manufacturer's labels, entered in the Authentix program or comparable tracking method, with guarantee all harvest dates will be PHI verified?**

**If answered NO**

Supplier must be able to submit proof of all agricultural chemicals and soil amendments applied for the current growing season, and that these applications along with PHI are compliant prior to shipping harvested product.

# Supplier Assessment Form

## Corrective Action Suggestion

At each question, an area has been left to make notes on if corrective actions were recommended or completed. General information may also be written that the Grading station wants to relay to Grower (Supplier) regarding the assessment.

7. **Irrigation water is sourced from: (more than one can apply)**

Water sampling is not mandatory, and circumstances differ greatly (customer controls). It will be up to the receiving station to decide if produce from this field area can be accepted for use or needs a water sample to be accepted

8. **A risk assessment to water sources and production area is conducted and reviewed on an annual basis by supplier and facility Representative? (ex: Form V and Appendix K Canada Gap manual)**

**If answered NO**

Grower must complete Appendix K and Form V or use other sources to assess and mitigate answers for water and land use as long as sources provide a comparable degree of Food Safety.

9. **Harvesting Containers are used only for produce, inspected daily/weekly and cleaned if needed?**

*(if records needed, they can be obtained by using Form I CanadaGap Manual)*

**If answered NO**

Review Canada Gap manual.

10. **Harvesting equipment is inspected daily weekly prior to use in the fields and cleaned if needed?**

*(if records needed, they can be obtained by using Form I CanadaGap Manual)*

**If answered NO**

Review Canada Gap manual.

11. **Employee hygiene practices training is provided to all employees on a minimum annual basis.**

*(if needed, Form C of the CanadaGAP Manual can be used to train and record training)*

**If answered NO**

Review Canada Gap manual.

12. **Toilets and hand washing are available for all employees and cleaned daily?**

*(if needed, records can be obtained by using Form J CanadaGap Manual)*

**If answered NO**

Review Canada Gap manual.

13. **Does supplier have the latest copy of Canada Gap Grower Manual to reference current practices?**

**If answered NO**

If grower is not following The Canada Gap manual or another Food safety a manual that provides a comparable degree of Food safety. Then the person assessing the Grower (Supplier) needs to be provided a copy of a manual. If this is a new Grower (Supplier) have Grower fill out Canada Gap manual and sign off on each chapter indicating they understand what they have read.