CANADAGAP®
Food Safety for Fresh Fruits and Vegetables

CanadaGAP Training Note

TO: CanadaGAP Auditors, Certification Bodies and Program Participants

DATE: December 18, 2020

SUBJECT: Additional Guidance for Lot Code Requirements

This note provides additional information regarding the "Lot Code" requirements found in Version 9.0 of the CanadaGAP Manuals under:

- Section 17 Packaging Materials 17.2 Use of Packaging Materials
- Section 22. Identification and Traceability 22.1 Traceability System
- Record keeping Forms O, P1/P2, and Q

Please note the following key points:

1. "Lot Code" requirements have been added to the CanadaGAP manuals to align with the *Safe Food for Canadian Regulations (SFCR)*, which came into full force and effect for the fresh produce industry on January 15, 2020. CFIA granted a one-year extension for "Lot code" labelling on consumer prepackaged fresh fruits and vegetables. Therefore, CFIA will enforce compliance starting January 15, 2021.

2. CanadaGAP Glossary definition of "**Lot Code**":

   "A code that can be used to identify a lot that was manufactured, prepared, produced, stored, graded, packaged or labelled, under the same conditions. A lot code can be numeric, alphabetic or alphanumeric. Examples of lot code include: production date, best before date, establishment number, or CFIA SFCR licence number. In addition, the lot code may also be the harvest date, grower identification number, growing region or any other code that may be used for traceability purposes".

3. Additional information on "Lot Code" can be found at:

   Refer to CFIA's website for more information on Lot Code
   - Glossary of key terms: https://inspection.gc.ca/food/toolkit-for-food-businesses/glossary-of-key-terms/eng/1430250286859/1430250287405#a104
   - What to consider when selecting a lot code: https://www.inspection.gc.ca/food-safety-for-industry/traceability/lot-code/eng/1607618442777/1607618443168

   Refer to CPMA's website for further guidance on Lot Code https://cpma.ca/docs/default-source/industry/traceability_guidance_document_for_industry_compliance_with-the_sfcr.pdf

4. "Lot Code" is different from the below terms which are used within the CanadaGAP manuals. Ensure that you fully understand the difference between each.
   - Correct Identifying Information
   - PACK ID
   - Lot ID

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Depending on how the operation implements the three elements above, they MAY also satisfy the "Lot Code". For example, if the PACK ID is JD0220 where "JD" is the grower and "0220" is the pack date, nothing further would be required for Lot Code. This is because the JD would satisfy the "lot code" requirement of "grower identification number". Another example would be if the correct identifying information contained Florenceville, New Brunswick. This would satisfy the "lot code" requirement for "growing region".

The requirements within the CanadaGAP Manual(s) for "Lot Code" are as follows:

Section 17.2 Use of Packaging Materials

b) Market Ready Primary Packaging Materials

- The person responsible uses materials that are:
    - ❐ Labelled with Lot Code (see glossary definition)

    Note: Including Pack ID on the primary market ready packaging materials can also satisfy the Lot Code requirement (i.e., producer identification).

c) Market Ready Secondary Packaging Materials

- The person responsible uses materials that are:
    - ❐ Labelled with Lot Code (see glossary definition)

    Note: Including Pack ID on the secondary market ready packaging materials can also satisfy the Lot Code requirement (i.e., producer identification).

d) Packaging Accessories

❐ The person responsible ensures that tags attached to a confining band (e.g., holding bunches of asparagus, kale, etc.) are labelled with Lot Code (see glossary definition)

Section 22.1 Traceability System

- The person responsible for putting product into market ready packaging materials:
    - ❐ Identifies all market product with a Lot code on the packaging materials
    - Records Lot code, Pack ID and lot ID for market product on:
        - ❐ Form (Q) Packing, Repacking, Storing and Brokerage of Market Product OR _____

        AND

    - ❐ Form (O) Transporting Product OR _____

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Incoming Product (INCLUDES BROKERAGE)

- The person responsible for incoming product:
  - Records incoming information (e.g., Field/Block #/Pallet/ Bin Tag/Lot code/Pack ID/Lot ID, etc.) for incoming product on:
    - ☐ Form (P1/P2) Harvesting and Storing Potatoes/Product OR _____

      AND/OR

    - ☐ Form (Q) Packing, Repacking, Storing and Brokerage of Market Product OR _____

Outgoing Product (INCLUDES BROKERAGE)

- The person responsible for outgoing product:
  - Records outgoing information (e.g., Field/Block #/Pallet/ Bin Tag/Lot code/Pack ID/Lot ID, etc.) for product on:
    - ☐ Form (O) Transporting Product OR _____

      AND/OR

    - ☐ Form (P1/P2) Harvesting and Storing Potatoes/Product OR _____

      AND/OR

    - ☐ Form (Q) Packing, Repacking, Storing and Brokerage of Market Product OR _____

General Guidance to Follow:

1. To meet the requirements within the SFCR, **all** market ready packaging materials must be labelled with "Lot Code".

2. To determine which materials qualify as 'market ready packaging materials', consult the CanadaGAP manual(s) Glossary for the following definitions:
   - Market ready packaging materials (primary and secondary)
   - Product wrap
   - Packaging accessories

3. Read the definitions carefully to ensure that they are understood fully so that no packaging materials or accessories are missed.

4. Examples of "Lot Codes" that would be compliant may include:

Lot Code	Example
Harvest Date	AU 2120 (August 21, 2020)
Growing region	Okanagan, BC Ontario NS
Grower identification number	DV (producer Don Van Camp) 20 (20 is designated as producer John Smith in the operation's records)
Production date	Pack ID – JS020720 (producer John Smith, packed on July 2nd, 2020)