

CanadaGAP Training Note

TO: CanadaGAP Auditors, Certification Bodies and Program Participants

DATE: April 17, 2020

SUBJECT: General Guidance for Environmental Monitoring Programs (EMPs)

This note provides general guidance regarding the intent of the Environmental Monitoring Program (EMP) requirements found in the following sections of the CanadaGAP Manuals.

- Section 19.6 of the Fruit and Vegetable Manual
- Section 19.5 of the Greenhouse Manual

NOTE: An environmental monitoring program is an operation-specific program that helps to assess the effectiveness of sanitation practices and to provide information for preventing potential microbial contamination of product.

Please note the following key points:

- Environmental Monitoring Programs have been introduced to the program in Version 8.0 of the CanadaGAP Manuals; therefore, it will take time for all users to understand and complete the related requirements.
- An EMP risk assessment must be completed by ALL operations that **handle or store market product**.
 - A reminder that “market product” is defined in the CanadaGAP Glossary as: “Produce that is in market ready packaging materials. It may be packed in the production site or packed/repacked in the packinghouse”.
- Appendix X *Environmental Monitoring Program (EMP) - Resources* is designed to provide helpful information for completion of the EMP but is not mandatory.

General Guidance:

CanadaGAP Requirement: A risk-based approach must be in place to define the microbiological environmental monitoring program. The program must be established, implemented and maintained to reduce the risk of product contamination.

1. The risk assessment is to be completed using a general, common sense approach where the operation demonstrates they are mindful of possible risks related to their product, activities, premises, and equipment.
2. The operation should read the risk assessment criteria carefully and check off the appropriate boxes as the assessment is carried out for each of the items, areas, etc. that pertain to their operation. The assessment is site-specific. Any boxes that are non-applicable should be marked as N/A.

3. Once the operation's risks have been determined, each listed section of the manual will be assessed to determine if the procedures that are already in place as part of the operation's food safety program are adequately controlling the identified risk. If there are "other" controls in place, these should also be listed.
4. Checking off these boxes may suffice as adequate documentation. During the audit, the auditor will verify the provided documentation through observation of the premises and records and by interviewing the person responsible for the operation and designated employee(s) responsible for the EMP (risk assessment).
5. Based on the risk assessment, each operation will determine whether there is a need to take further measures (e.g., swabbing, testing) to confirm the cleanliness of the environment or the effectiveness of sanitation.
6. It may be possible to conclude from the risk assessment that a sampling plan is **NOT** necessary. This will depend on each operation's unique situation. This is because the risk assessment is dependent on factors such as commodity, equipment, facility, and the operation's procedures: therefore, every operation's EMP will be site-specific.

For example: Three beet operations have different procedures. One packs beets dry, one washes/final rinses the beets with potable water, while the last also washes/final rinses the beets but all of the water is properly treated consistently with chlorine. It's the same commodity where the activity is the same (packing), yet all three operations have different practices for that commodity and within that activity. This means different risks.

7. If it is determined that a sampling plan is not necessary, the auditor will verify the justification for this decision during the audit through interviewing, observation and review of records.
8. **IF** the operation determines there is a need for a sampling plan:
 - a. The operation can follow the guidance in Appendix X as well as utilize the many resources listed as a source of help. Remember, an EMP is used to assess the effectiveness of sanitation practices.
 - b. During the audit, the auditor will review the sampling plan developed and any applicable results. If the results had indicated that further action was required, those will also be evaluated along with the relevant documentation.
9. Completing the section so that it aligns with the operation's processes and procedures shows the operation's due diligence and awareness of environmental monitoring. That is what is required at this time.

Reminder: Due to the site-specific nature of EMPs, CanadaGAP is unable to provide additional guidance beyond what is already provided in Appendix X. The program needs to be tailored to the operation's commodities/activities/processes, etc.