



2020

Traceability Guidance Document for Industry Compliance with the Safe Food for Canadians Regulations (SFCR)

Version 2.1

General Guidance



- This document provides an overview of the regulatory requirements on traceability, as found in [Part 5](#) of the *Safe Food for Canadians Regulations* (SFCR). **In addition to traceability requirements, industry must also ensure that mandatory labelling requirements found in the [SFCR](#) (including, but not limited to [Part 11](#), [Part 12](#), and [Part 13](#)) [Safe Food for Canadians Act \(SFCA\)](#), [Food and Drug Regulations \(FDR\)](#), and [Food and Drugs Act \(FDA\)](#) are also satisfied.**
- Readers are urged to understand and apply ALL regulatory and business requirements specific to the target market for which products are destined.

Table of Contents

Glossary of Terms.....	3
Introduction	5
Traceability Overview	5
Traceability Document Requirements	6
Traceability Documents for Retail.....	6
Traceability Documents for Businesses Other than Retail.....	7
Retention, Accessibility, and Production of Traceability Documents Upon Request	7
Traceability Labelling Requirements.....	9
Consumer Prepackaged Fresh Fruits or Vegetables: Traceability Labelling	9
Special Considerations: For Consumer Fresh Fruits or Vegetables	9
Cases/Shipping Containers: Traceability Labelling Requirements.....	12
Lot Code	14
General Information	14
Location of Lot Code	15
Growing Region used as a Lot Code.....	16
Dates Used as the Lot Code	17
Does My Product Require a Lot Code?	18
Monitoring/Enforcement of Lot Code Labelling.....	19
Decision Tree: Does my Consumer Product Require a Lot Code?	20
Examples: Does my Consumer Product Require a Lot Code?.....	21
Appendix A: Traceability-Specific Labelling Chart for Fresh Fruits or Vegetables (FFV) and Exemptions	22
Legend.....	22
Appendix B: Safe Food for Canadians Regulations	24

PLEASE NOTE:

CPMA makes every effort to ensure that accurate information is provided but cannot accept any responsibility for any errors or omissions no matter how caused, including but not limited to whether as a result of an error by CPMA or in change in policy by the Canadian Food Inspection Agency. It is important that members consult the pertinent acts and regulations prior to developing its package and nutrition labels for the Canadian marketplace.

All information is provided “as is”, without warranty or guarantee of any kind as to its accuracy, completeness, operability, fitness for particular purpose, or any other warranty, express or implied. CPMA shall not be liable for any damages, loss, expense or claim of loss arising from the use, or reliance on the information.

Glossary of Terms

Case/Shipping container

Shipping containers are an outer receptacle in which foods are sold or distributed at levels of trade other than to consumers at the retail level (i.e., not [consumer prepackaged \(definition below\)](#)). The foods inside shipping containers may be in bulk (i.e. not further packaged) or they may be pre-packaged (e.g. in smaller units of prepackaged foods such as fresh fruits or vegetables in clamshells, bags (clear or opaque), boxes etc.) For the purpose of this document, a case and shipping container are used interchangeably.

Consumer prepackaged

The *Safe Food for Canadians Regulations* define "consumer prepackaged", in respect of a [food](#), as meaning "packaged in a container in the manner in which the food is ordinarily sold to or used or purchased by an individual – or in which the food may reasonably be expected to be obtained by an individual – without being repackaged, to be used for non-commercial purposes."

Examples of consumer prepackaged food: clamshell of blueberries, bag of potatoes, 3 peppers in a plastic sleeve sold in a grocery store for consumers

Container

[Container](#) means an outer receptacle or covering that is used or to be used in connection with a food. It includes a wrapper and a confining band but does not include a conveyance or any container that is an integral part of a conveyance.

Label

The *Safe Food for Canadians Act* defines "label" to include "a legend, word or mark that is or is to be applied or attached to or included in, or that accompanies or is to accompany, a [food commodity](#) or a [package](#)."

Lot code

The term "[lot code](#)" is not specifically defined in the *Safe Food for Canadians Act* nor in the *Safe Food for Canadians Regulations* (SFCR). In general terms, "lot code" when used in [Part 5 - Traceability of the SFCR](#) refers to 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
- SFC licence number

In addition, for fresh fruits or vegetables (FFV), the lot code may also be the:

- harvest date
 - grower identification number
 - GPS coordinates
 - growing region*
- or any other code** that may be used for traceability purposes.

*A growing region cannot be a country of origin. However, the growing region may be a province/state or sub-provincial/state within a country.

- Growing region, as part of the principal place of business can be used, if it is truly the province or state where the fresh fruit or vegetable is grown and harvested.
- For imported prepackaged fresh fruits and vegetables, the country of origin is required. It is not mandatory to indicate origin below the country level, but this information, such as a province/state, region or municipality, can be voluntarily applied, and be used to indicate the growing region, as long as the information is truthful and not misleading and as long as the country of origin remains identifiable.
E.g. If a product is grown in Salinas, California, the country of origin could be stated as: Product of Salinas, California, USA

Note: Country of origin information must be provided in both official language (English and French) for consumer prepackaged products. It may be in only one of the official languages for cases/shipping containers provided they are not resold to consumers at retail. ([SFCR 205\(1\)](#))

** A trademark or third party logo as growing region (e.g. Foodland Ontario, Aliments Quebec) may be used. This type of declaration would be a voluntary declaration; however, **when used to fulfill the lot code requirement** it becomes mandatory and, must comply with all applicable requirements.

Note: If the FFV supplier decides to use a third party trademark or logo as their lot code, it is recommended they communicate with the owner of the trademark or logo to make sure the owner is in agreement with its use and is aware of impacts its use may have. For example, in case of a recall or food safety investigation, the trademark or logo, if used as the lot code, may be provided in the publicized recall notice that is issued on CFIA's website.

Industry is urged to consider how their choice of lot code will impact scope of product withdrawal in the event of a recall or food safety incident. Particularly at the case level, industry is strongly urged to use a traditional lot code that provides sufficient specificity to identify the brand owner, a specific timeframe in which it harvested or packed (e.g. 24 hour period) and other information.

Person

"Person" can be an individual, including employees, visitors, contractors, inspectors, or an organization, including an association, company, or corporation. It can also include a grower, harvester, licence holder, importer, or processor.

Prepackaged

The *Safe Food for Canadians Regulations* define "[prepackaged](#)", in respect of a [food](#), as meaning "packaged in a container in the manner in which the food is ordinarily sold or used or purchased by a [person](#), and includes [consumer prepackaged](#)."

Examples of prepackaged foods: cases/shipping containers which contain clamshells of blueberries, cases/shipping containers containing bulk unpackaged avocados, consumer prepackaged clamshell of blueberries sold in a grocery store for consumers.

Retail

The term "retail" is not specifically defined in the *Safe Food for Canadians Act* nor in the *Safe Food for Canadians Regulations*. In general terms, "retail" refers to the sale of food to consumers for consumption. Examples include supermarkets, farmers' markets, grocery stores, bakeries and butcheries.

Unique identifier

The term "unique identifier" is not specifically defined in the *Safe Food for Canadians Act* nor in the *Safe Food for Canadians Regulations* (SFCR). In general terms, "unique identifier" when used in [Part 5 – Traceability of the](#)

[SFCR](#), refers to a code that can be used to identify a defined quantity of food. This may include a [lot code](#), purchase order number, ASN (Advance Ship Notice) or a bill of lading number.

Introduction

Traceability compliance is a core component of the *Safe Food for Canadians Regulations* (SFCR) and supports the quick identification and withdrawal of products in the event of a recall or other event. Companies will choose tools to capture, store and share data across the supply chain but the principles of traceability inherent in the regulations must be implemented.

This document was prepared in consultation with the Canadian Food Inspection Agency (CFIA) to provide a practical guide to support traceability regulatory compliance for the fresh fruit and vegetable supply chain.

The [traceability](#) requirements in the SFCR are based on the international standard established by Codex Alimentarius - tracking of food forward to the immediate customer and back to the immediate supplier.

Developing an effective traceability system will allow you to:

- reduce costs associated with [recalls](#) by narrowing the scope to only food that may present a risk of injury to human health
- protect consumers against risk of injury to their health from [hazards](#) in your food
- increase consumer trust in the safety of the food you sell

Traceability Overview

Q: Where can I find more information on other mandatory labelling requirements for consumer prepackaged fresh fruits or vegetables? (i.e. beyond traceability labelling requirements)

A: In addition to meeting traceability requirements in [Part 5](#) of the SFCR, industry must ensure that all labelling requirements of the Food and Drug regulations and the SFCR are also satisfied.

Please refer to the CFIA [Industry Labelling Tool](#) and [CPMA Labelling Checklist](#) for additional information on labelling requirements.

CPMA members are also entitled to two free label reviews per membership year. For more information, please visit the [CPMA Label Review website](#).

Q: Who is impacted by the Traceability Requirements?

A: Traceability requirements apply to:

- licence holders,
- businesses that grow or harvest fresh fruits or vegetables to be sent or conveyed interprovincially or exported,
- businesses that sell fresh fruits or vegetables at retail, and
- businesses that import, export, or trade them interprovincially

Q: When do the Traceability Requirements Come into Force?

A: On **January 15, 2020**, most businesses in the fresh fruits or vegetables (FFV) sector became subject to new requirements under the SFCR. These include: preventive controls, preventive control plans and traceability. New requirements for lot code labelling of consumer prepackaged fresh fruits or vegetables will also come into force at that time. However, businesses will have until **January 15, 2021**, to use up existing packaging. Please refer to the Canadian Food Inspection Agency's (CFIA) [traceability interactive tool and regulatory requirements: traceability](#) to help you determine if, how, and on which date the traceability requirements will apply to your food business.

Q: What are the Traceability Requirements?

A: Businesses impacted by the traceability requirements will need to prepare and keep traceability documents. Businesses will also need to ensure that a [label](#) containing the required traceability information*, is applied, attached, or accompanies the prepackaged fresh fruits or vegetables when provided to another person, for example consumers or other businesses.

* Required traceability information- common name- exceptions for prepackaged and consumer prepackaged foods described in [219\(1\)\(a\) and \(b\)](#), name and address (exception for consumer prepackaged prepared at retail described in [SFCR Section 220](#)), and for a consumer prepackaged product packaged at **other than retail** the unique identifier must be a lot code ([SFCR 92\(2\)](#))

Traceability Document Requirements ([SFCR, 90 and 91](#))

Q: Why do I need to keep traceability documents?

A: [Traceability documents](#) will allow you to identify from where you sourced the [food](#) and/ or [food commodity](#) (one step back), and to whom you provided the food (one step forward). Preparing, keeping, and retaining traceability documents will allow you to accurately identify the scope of a [recall](#), and thereby ensure that consumers are protected against risk of injury to their health.

Traceability Documents for Retail

Q: If I sell fresh fruits or vegetables to consumers at retail, what documents do I need to keep? ([SFCR, 90\(2\)](#))

A: If you sell food to consumers at retail (ex: grocery stores, farmer's markets), other than at a [restaurant or other similar enterprise](#) (ex: cafeterias, food stands) where the food is sold as a meal or snack, you must have access to documents that:

- identify the food, by indicating the:
 - common name
 - [lot code](#) or other [unique identifier](#); and
 - [name and principal place of business of the person by whom or for whom the food was manufactured, prepared, produced, stored, packaged or labelled](#)
- trace the food one step back, if someone else provided you with it, by indicating the:
 - date on which it was provided to you; and
 - name and address of the person who provided you with the food

For more information on traceability requirements for retailers, please refer to the *RCC Safe Food for Canadians Member Exclusive Guidebook* provided by the [Retail Council of Canada \(RCC\)](#).

Traceability Documents for Businesses Other than Retail

Q: If I provide fresh fruits or vegetables to another business, what documents do I need to keep? ([SFCR, 90\(1\)](#))

A: If you provide food to another business and the traceability requirements apply to you, you must prepare and keep [documents](#) that:

- identify the [food](#) you provide by indicating the:
 - [common name](#)
 - [lot code](#) or other [unique identifier](#); and
 - [name and principal place of business of the person by whom or for whom the food was manufactured, prepared, produced, stored, packaged or labelled](#)
- trace the food one step back, if someone else provided you with it, by indicating the:
 - date on which it was provided to you; and
 - name and address of the person who provided it to you.
- trace the food one step forward by indicating the:
 - date you provide it; and
 - name and address of the person to whom you provide it.

Retention, Accessibility, and Production of Traceability Documents Upon Request ([SFCR, 90\(3\)](#)), ([SFCR, 91\(1\)](#))

Q: How long do I need to keep the traceability documents?

A: You must keep the traceability documents **two years** after the day on which:

- the food was provided to you; and
- you provided the food to another person.

If you sell food at retail, you must have access to the documents for two years after the day on which you sold the food.

Q: Where can I keep the traceability documents?

A: Traceability documents must be accessible in Canada:

- If you keep hard copies of the traceability documents, you must store them on-site or off-site in a way that allows you to quickly access them.
- If you keep traceability documents electronically, they can be stored on a server outside of Canada, however, they are accessible from locations within Canada.

Q: If requested by CFIA to provide traceability documents, what should I expect?


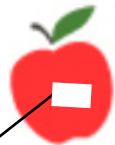
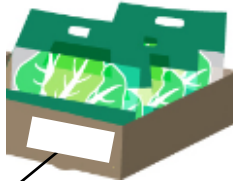

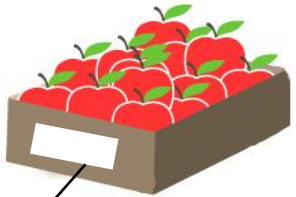

A: If requested by CFIA, you must provide the traceability documents:

- in English or French; and
- within 24 hours of the CFIA making the request
- within a shorter period of time if the CFIA believes there is a risk of injury to human health; and
- within a longer period of time if the CFIA believes that the information is not necessary for a [recall](#)

If you provide the traceability documents electronically, they:

- are in a [single file](#)
- are in [plain text \(i.e. not encrypted\)](#); and
- are capable of being imported into and [manipulated](#) by [standard commercial software](#)

Summary: Traceability-Specific Labelling Requirements (More details to follow) (SFCR, 92)

Consumer Prepackaged Fresh Fruits and Vegetables	Bulk (not prepackaged) Fresh Fruits and Vegetables for Consumers	Cases Containing Consumer Prepackaged Fresh Fruits and Vegetables <small>(Case not sold to consumers)</small>	Cases Containing Bulk (not prepackaged) Fresh Fruits and Vegetables <small>(Case not sold to consumers)</small>
<p>E.g. Consumer pre-packaged romaine lettuce</p> <div style="text-align: center;">  </div> <div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;"> <p style="text-align: center;">What's on the label?</p> </div> <p>A label must include*:</p> <ul style="list-style-type: none"> • Common name (if required) • Name and principal place of business (if not packaged at retail) • Lot code <p>Although a lot code can be applied, attached, <u>or</u> accompany a food, CPMA strongly encourages industry to apply or attach the lot code directly to the label of a consumer prepackaged product.</p> <p><i>*Labelling exceptions may apply. See Special Considerations below</i></p>	<p>E.g. Individual apples sold from bulk displays at retail</p> <div style="text-align: center;">  </div> <div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;"> <p style="text-align: center;">What's on the label?</p> </div> <p>No traceability labelling information is required at retail.</p>	<p>E.g. Case containing consumer prepackaged romaine lettuce</p> <div style="text-align: center;">  <div style="display: inline-block; vertical-align: middle; margin-left: 20px;">  Document </div> </div> <div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;"> <p style="text-align: center;">What's on the label?</p> </div> <p>A label must include*:</p> <ul style="list-style-type: none"> • Common name (if required) • Name and principal place of business • A unique identifier or if preferred a lot code must be applied, attached to, <u>or</u> accompany the case <ul style="list-style-type: none"> ○ May include another document (e.g. bill of lading) that accompanies the case ○ If lot code is on the packages within, it does not need to be on the case label or accompanying document <p>CPMA strongly encourages industry to be familiar with buyer best practices and to include the lot code on the label directly applied or attached to the case for business purposes.</p> <p><i>*Labelling exceptions may apply. See Special Considerations below</i></p>	<p>E.g. Case containing bulk apples</p> <div style="text-align: center;">  <div style="display: inline-block; vertical-align: middle; margin-left: 20px;">  Document </div> </div> <div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;"> <p style="text-align: center;">What's on the label?</p> </div> <p>A label must include*:</p> <ul style="list-style-type: none"> • Common name (if required) • Name and principal place of business • A lot code or unique identifier must be: <ul style="list-style-type: none"> ○ Attached or applied to the label, or ○ On another document (e.g. bill of lading) that accompanies the case <p>CPMA strongly encourages industry to be familiar with buyer best practices and to include the lot code on the label directly applied or attached to the case for business purposes.</p> <p><i>*Labelling exceptions may apply. See Special Considerations below</i></p>

Traceability Labelling Requirements

Consumer Prepackaged Fresh Fruits or Vegetables: Traceability Labelling

The following questions refer to fresh fruits or vegetables that are sold directly to consumers.

Q: What traceability information is needed on a label of a consumer prepackaged fresh fruit or vegetable (ex: clamshell of blueberries for consumers)?

A: A label of a consumer prepackaged fresh fruit or vegetable must include:

- the [common name](#)
- the [name and principal place of business of the person by or for whom the food was manufactured, prepared, produced, stored, packaged or labelled](#); and
- the [lot code](#)

Note: Traceability-specific labelling exceptions may apply. Please see [Special Considerations](#) below.

Special Considerations: For Consumer Fresh Fruits or Vegetables

Q: What traceability information is needed on a label of bulk fresh fruits or vegetables sold to consumers (ex: avocados sold in bulk in a display to consumers)?

A: No traceability labelling information is required on bulk fresh fruits or vegetables at time of sale to consumers at retail. However, traceability requirements do apply at the case level, prior to retail sale.

If a case of bulk (not prepackaged) fresh fruits or vegetables are sold to consumers (ex: a case of bulk (not prepackaged) mangoes are sold to consumers), this would be considered consumer prepackaged fresh fruit or vegetables and require the following on the label:

- the [common name](#)
- the [name and principal place of business of the person by or for whom the food was manufactured, prepared, produced, stored, packaged or labelled](#); and
- the [lot code](#)

Q: What fresh fruits and vegetables sold to consumers are exempt from all traceability labelling requirements when sold at retail? ([SFCR, 92 \(3\)\(b\) and \(c\)](#))

A: At the time of sale to consumers at [retail](#), there are particular foods for which you are **not required** to have the following information on the label applied, attached or accompany the food with :

- the common name
- the [name and principal place of business by or for whom the food was manufactured, prepared, produced, stored, packaged or labelled](#)
- the [lot code](#) or [unique identifier \(if packaged at retail\)](#)

These foods are:

- bulk (not pre-packaged) fresh fruits and vegetables sold to consumers
- [fresh fruits or vegetables](#) packaged in a wrapper or confining band less than 13 millimeters (1/2 inch) in width[^] (ex: bunch of asparagus with a band less than 13mm (½ inch))
- fresh fruits or vegetables packaged in a protective wrapper, or a protective bag, that is clear and transparent and on which **no information is shown other than** a price, bar code, number code,

environmental statement, or product treatment symbol

^ if a bib or tag is attached to the confining band then this exemption is lost, and all required information must be included on or with the product. (Common name, and name and address must be applied or attached)

Q: What fresh fruits or vegetables sold to consumers are exempt from declaring “common name” on the label? ([SFCR, 92\(3\)\(b\) to \(c\), and 92\(4\)](#))

A: At the time of sale to consumers at [retail](#), there are particular foods for which you are **not required** to have the label applied or attached to the food with the [common name](#) of that food.

These foods are:

- prepackaged fresh fruits or vegetables that are visible and identifiable in their container
- bulk (not prepackaged) fresh fruits and vegetables sold to consumers
- fresh fruits or vegetables packaged in a wrapper or confining band^ less than 13 millimeters (1/2 inch) wide
- fresh fruits or vegetables packaged in a protective wrapper, or a protective bag, that is clear and transparent and on which **no information is shown other than** a price, bar code, number code, environmental statement or product treatment symbol
- consumer prepackaged apples which are labelled with variety name on any surface except solely on the bottom. ([SFCR, 219 \(1\)\(b\)](#))

^ if a bib or tag is attached to the confining band then this exception is lost and all required information must be included on or with the product (Common name, and [name and principal place of business](#) must be applied or attached to the food.)

Q: What consumer prepackaged fresh fruits or vegetables are exempt from declaring “name and principal place of business” on the label? ([SFCR, 92\(5\)](#))

A: At the time of sale to consumers at [retail](#), there are particular foods for which you are **not required** to have the label applied or attached to the food with the [name and principal place of business](#) of that food.

These foods are:

- bulk (not prepackaged) fresh fruits and vegetables sold to consumers
- fresh fruits or vegetables packaged in a wrapper or confining band^ less than 13 millimeters (1/2 inch) wide
- fresh fruits or vegetables packaged in a protective wrapper, or a protective bag, that is clear and transparent and on which **no information is shown other than** a price, bar code, number code, environmental statement or product treatment symbol

^ if a bib or tag is attached to the confining band then this exception is lost and all required information must be included on or with the product. (Common name, and [name and principal place of business](#) must be applied or attached to the food.)

For consumer prepackaged fresh fruits or vegetables that you package at [retail](#) such that they are visible and identifiable in the container, you are **not required** to label them with the [name and](#)

principal place of business of the person by or for whom the food was manufactured, prepared, produced, stored, packaged, or labelled.

Q: I work in the food service industry. How am I impacted by the traceability requirements?

A: Traceability requirements apply to:

- licence holders,
- businesses that grow or harvest fresh fruits or vegetables to be sent or conveyed interprovincially or exported,
- businesses that sell fresh fruits or vegetables at retail, and
- businesses that import, export, or trade them interprovincially

Depending on the type of activity you engage in, certain traceability requirements may apply to you.

For example, if you import or trade fresh fruits and vegetables interprovincially, you will need to prepare and keep traceability documents that identify the food, traces the food one step back, and traces the food one step forward. You will also need to ensure that a label or other document containing the required traceability information is applied, attached, or accompanies the case when provided to another business.

As opposed to retail businesses, the traceability requirements do not apply to food service operations, such as cafeterias, restaurants, buffets, fast food restaurants, caterers, food trucks, and coffee shops.

To find out what traceability requirements apply to your food business, please refer to the:

- [CFIA Traceability interactive tool](#)
- [CFIA Traceability-specific labelling requirements](#)
- [CFIA timelines for complying with traceability requirements](#)

Q: If I export fresh fruits or vegetables, what traceability requirements apply to me? ([SFCR, 92 \(3\)\(a\)](#))

A: Exporters must prepare and keep [documents](#) that:

- identify the [food](#) you provide by indicating the:
 - [common name](#)
 - [lot code](#) or other [unique identifier](#); and
 - [name and principal place of business of the person by whom or for whom the food was manufactured, prepared, produced, stored, packaged or labelled](#)
- trace the food one step back, if someone else provided you with it, by indicating the:
 - date on which it was provided to you; and
 - name and address of the person who provided it to you.
- trace the food one step forward by indicating the:
 - date you provide it; and
 - name and address of the person to whom you provide it.

Traceability information is not required on the label at the time of export but is required as it travels through the supply chain in Canada. Foreign states may have specific labelling requirements that are different from the SFCR.

Cases/Shipping Containers: Traceability Labelling Requirements

The following questions refer to cases that are never sold directly to consumers. Cases sold directly to consumers at retail are considered consumer prepackaged, which have different traceability requirements.

Q: Do I have to put a label with traceability information on every case of produce?

A: No, the traceability label provisions are outcome based and can be applied, attached, or accompany the food (examples include accompanying the case via a bill of lading or electronically as the ASN – Advance Ship Notice, or for cases containing prepackaged product with the lot code on the package within suffices).

CPMA encourages industry to be familiar with buyer best practices and to include traceability information directly on the label for buyer business purposes.

Q: What traceability information is needed on cases/shipping containers that are sold or distributed at levels of trade other than to consumers (ex: case with bulk (not prepackaged) avocados or case with clamshells of blueberries)?

A: A label or other document (ex: bill of lading, ASN – Advanced Ship Notice, etc.) must be applied, attached, or accompany the fresh fruits or vegetables when you provide it to another business. This label or other document must include:

- the [common name \(for exception see SFCR 219\(1\) \(a\)\)](#)
- the [name and principal place of business of the person by or for whom the food was manufactured, prepared, produced, stored, packaged or labelled;\(for exception see SFCR 220\) and](#)
- the [lot code](#) or [unique identifier](#)

Examples:

- A bill of lading which contains common name, name and principal place of business, and a unique bill of lading number that accompanies a case of bulk avocados would meet traceability requirements.
- Information or a sticker applied directly to the case which includes common name, name and principal place of business, and lot code would meet traceability requirements.
- for cases containing prepackaged product with the lot code on the package within suffices).

CPMA encourages industry to be familiar with buyer best practices and to include traceability information directly on the label of a case for buyer business purposes. This also aligns with [Produce Traceability Initiative](#) (PTI) guidance.

Q: If a case/shipping container is also sold to consumers, would it have to include a lot code on the case?

A: The traceability label provisions are outcome based and can be applied, attached, or in the case of lot code, may accompany the food. If the lot code is on the individual consumer prepackaged product

within the case/shipping container, the lot code would not have to be included on the case/shipping container as this would be sufficient for accompanying the food.

However, CPMA encourages industry to be familiar with buyer best practices and to include traceability information directly on the label for business purposes.

Q: If I export fresh fruits and vegetables directly to a foreign jurisdiction, what is required to comply with traceability requirements ([SFCR, 92 \(3\)\(a\)](#))

A: Exporters must prepare and keep [documents](#) that:

- identify the [food](#) by indicating the:
 - [common name](#)
 - [lot code](#) or other [unique identifier](#); and
 - [name and principal place of business of the person by whom or for whom the food was manufactured, prepared, produced, stored, packaged or labelled](#)
- trace the food one step back, if someone else provided you with it, by indicating the:
 - date on which it was provided to you; and
 - name and address of the person who provided it to you.
- trace the food one step forward by indicating the:
 - date you provide it; and
 - name and address of the person to whom you provide it.

Note:

- **SFCR Traceability information is not required on the label of the case, or any consumer packages within, at the time of export, as long as the product is directly exported.**
- **If that same food is also being interprovincially traded, (sold to another company within Canada before it is to be exported) then the traceability labelling requirements apply.**
- **Foreign states may have specific labelling requirements that are different from the SFCR.**

Q: Our company follows the [Produce Traceability Initiative](#) (PTI) on our case labels. Do I need to include additional traceability information on the case label?

A: No, companies who have implemented the PTI should already have a traceability system in place which would satisfy the SFCR traceability labelling requirements. However, companies would have to keep traceability documents, as outlined in the [traceability document requirements](#).

Q: Where can I find more information on other mandatory labelling requirements for cases/shipping containers?

A: Please refer to the CFIA [Industry Labelling Tool](#) and the [CPMA Labelling Guidance for Cases/Shipping Containers of Fresh Fruits and Vegetables in the Canadian Marketplace](#) for additional information on labelling requirements.

CPMA members are also entitled to two free label reviews per membership year. For more information, please visit the [CPMA Label Review website](#).

Lot Code

General Information

Please see [Glossary of Terms](#) for the definition of lot.

Q. Which labelling provisions in the Safe Food for Canadians Regulations (SFCR) and Food and Drug Regulations (FDR) apply to lot code on consumer prepackaged products?

A: If the lot code is **not** part of an existing labelling requirement (e.g. Growing region used when it is part of the name and principal place of business), section [208](#) (legibility) and [206\(1\)](#) (bilingualism) of the SFCR would apply:

208 Any information that a label is required by these Regulations to bear must be clearly and prominently shown and readily discernible and legible to the purchaser under the customary conditions of purchase and use.

206 (1) The information that is required by these Regulations to be shown on the label of a consumer prepackaged food must be shown in both official languages, except in the case where the label of that food is authorized to show information in only one official language under subsections B.01.012(2) to (10) of the [Food and Drug Regulations](#).

Examples of lot code which need to be bilingual:

- Growing region that is not part of the principal place of business and is additional information on the label (e.g.: Grown in California). Please note: there is no requirement to include words such as “Grown in” preceding the growing region, simply noting “California/Californie”, “Nova Scotia/Nouvelle-Écosse”, etc. would be sufficient; however, if words such as “Grown in” are included as additional information they must be bilingual.
- Date descriptions (e.g. harvest date, packing date, best before date, etc.) and the dates themselves must be bilingual.
 - Example: Packaged on/Empaqueté le
JN 28
- Descriptive words that are voluntarily used with lot code (e.g. Lot code, license number, etc.)

Examples of lot code which **do not** need to be bilingual include:

- Numeric, alphabetic, or alphanumeric code
- Growing region used as part of the name and principal place of business (Bilingual exemption as per [SFCR, 206\(1\)](#)) and [FDR, B.01.012 \(9\)](#)
- Grower identification number
- SFC Licence number
- Establishment number
- GPS coordinates

Q: Can you provide examples of lot codes that would be compliant with traceability regulations?

A:

Lot Number Format	Label Examples
Traditional lot #	JH670523
Harvest date	Harvest date/Date de la récolte AU 21
Growing region (state/province), used as part of the name and principal place of business if produce is grown in region declared on label	Berry Company Fresno, CA 12345 Apple Packer Norfolk, Ontario K2G 3X2
Growing region (e.g. state/province, region or municipality), used separately from name and principal place of business, if produce is grown in another region	California / Californie Salinas, California / Salinas, Californie Nova Scotia/Nouvelle-Écosse Centreville, Nova Scotia / Centreville, Nouvelle- Écosse
Growing region included in Country of origin	Product of Salinas, California, USA / Produit de Salinas, Californie, USA

Q: Does the text “lot code” need to be included before the actual lot number?

A: No

Q: Is there a colour or type size requirement for lot code?

A: No, however, a lot code is required to comply with the labelling requirements of section [208](#) (legibility)of the SFCR

Q: Does the lot code have to be human readable? Is a QR code acceptable?

A: Yes, a lot code needs to be human readable.
A: A QR code is not acceptable at this point in time.

Q: If we have a unique grower UPC on a bag, could this be considered a grower ID?

A: The lot code must be a code that can be used to identify a defined quantity of food. It is up to the person who provides the food to ensure that the code they choose satisfies this definition. Please see glossary of terms for how to choose a [lot](#).

Location of Lot Code

Q: Does a lot code need to appear on a specific place on the label? Can it appear on the bottom of a label?

A: No, a lot code does not need to be on a specific place on the label and can appear on the bottom of a label. However, if a lot code is used in combination with another labelling requirement, for example, name and principal place of business, the labelling provisions would apply for that requirement. For example, name and principal place of business cannot solely appear on the bottom of a container.

Otherwise, a lot code would only be required to comply with the labelling requirements of section [208](#) (legibility) of the SFCR.

Q: Can a lot code be put onto a “packed on” sticker on a clamshell?

A: Yes, the traceability label provisions are outcome based and can be applied, attached, or accompanying the food.

Q: Can a lot code be applied to an apple tag?

A: Yes, the traceability label provisions are outcome based and can be applied, attached, or accompanying the food.

Growing Region used as a Lot Code

If a company chooses to use growing region as their lot code on a consumer prepackaged item, the following will help clarify its use. As noted previously, lot code can also be a more traditional alphanumeric, numeric, etc. code.

Q: Does the growing region apply to state designations in other countries, such as Mexico?

A: It is acceptable to use a province/state or sub-provincial/state region where the fresh fruits or vegetables (FFV) were grown and is already included on the label as a lot code for domestic and imported consumer prepackaged FFV.

Examples of acceptable growing regions include: California, Ontario, and Yucatan.

The less specific the lot code the larger the scope of the recall when it happens. As a best practice, CFIA strongly recommends using a more specific lot code – for example: alphanumeric codes, harvest date, packed on dates, an establishment or a license number – as it will reduce the scope of implicated product and help ensure a more timely removal during a food safety investigation or recall.

Industry is encouraged to continue using a more traditional lot code at the case level.

Q: Would the terms “Grown in Atlantic Canada” be considered acceptable for growing region?

A: Grown in Atlantic Canada would not be an acceptable growing region because it is not an official level of governance such as province/state.

Q: Can a company use principal place of business as the growing region if a sub-national division within the country is listed (ex: California)? What if the state is the same, but the city listed is different?

A: Yes, if it is truly the province or state where the FFV was grown and harvested. If the growing region is a province or state found within the name and principal place of business, the city is not required to be the same as the city in which the FFV was grown. During an inspection or food safety investigation, it is the responsibility of industry to clearly identify the lot code on the label.

Q: If a company decides to use growing region as a lot code on a consumer prepackaged product that is not part of the principal place of business, how should this information be declared on the label?

A: If the growing region is **not** part of an existing labelling requirement (e.g., name and principal place of business), section [208](#) (legibility) and [206\(1\)](#) (bilingualism) of the SFCR would apply:

208 Any information that a label is required by these Regulations to bear must be clearly and prominently shown and readily discernible and legible to the purchaser under the customary conditions of purchase and use.

206 (1) The information that is required by these Regulations to be shown on the label of a consumer prepackaged food must be shown in both official languages, except in the case where the label of that food is authorized to show information in only one official language under subsections B.01.012(2) to (10) of the [Food and Drug Regulations](#).

Q: Can a growing region be abbreviated (ex: California as CA)?

A: Yes, an abbreviated province or state is acceptable. Lot code, as defined in the SFCR glossary, refers to 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. If the growing region is different from the name and principal place of business, on a consumer prepackaged product, it must be bilingual. Internationally approved alpha codes, such as the bilingual abbreviations used by [Stats Canada](#) for provinces and territories in Canada, can be used.

Dates Used as the Lot Code

Q: If a date is used as the lot code, is a description of that date required?

A: A date shown on a label should be accompanied by a description of the date to prevent consumer confusion about its meaning including that it could be mistaken as the durable life date of the food. For example, if a company added a harvest date as the lot code, that company would have to explain what that date was.

Q: If a harvest date is used, does the expression “harvest date” need to be bilingual? Does the date itself need to be bilingual? Does the harvest date need to be expressed in the same manner that is currently prescribed for the best before date?

A: As per [206\(1\)](#) of the SFCR, the expression “harvest date” and the date itself must be bilingual on consumer prepackaged products. Please refer to section [B.01.007](#) in the Food and Drug Regulations (FDR) for a list of bilingual abbreviations for months that can be used. Harvest date does not need to follow the prescribed manner of expression that is required for the best before date in the FDR.

Q: Can I use a “packed on” date (not packaged at retail) as my lot code for consumer prepackaged products? If a “packed on date” is used (not packaged at retail) for a consumer prepackaged product, does it need to be expressed in the same manner that is currently prescribed for the best before date?

A: Yes, it is acceptable to show a packaging date on the label of a prepackaged food that is packaged at a place other than the retail premises from which it is sold and that is exempted from showing a durable

life date; either because it has a durable life of greater than 90 days or because it is specifically exempted under subsection [B.01.007 \(3\)](#), as is the case for fresh fruits and vegetables. **This only applies** if the product is not further labelled with other information that together with the packaging date could confuse the consumer as providing the durable life date of the food. For example, showing the packaging date plus information about the freshness of the product (i.e. freshest within “X” days of packaging) **would not be acceptable** as it would not meet [B.01.007 \(6\)](#).

A packed on date (not packaged at retail) on consumer prepackaged products does not have to follow the prescribed manner of expression listed in the FDR under [B.01.007](#). The expression “packed on” and the date itself, must however, be bilingual on consumer prepackaged products. Please refer to section [B.01.007](#) in the Food and Drug Regulations (FDR) for a list of bilingual abbreviations for months that can be used.

Does My Product Require a Lot Code?

Q: Would a shrink-wrapped cauliflower that only displays company brand on it, require a lot code?

A: Yes, the presence of company brand on the cauliflower would trigger **all SFCR labelling requirements**, including traceability labelling requirements including lot code inclusion. If the cauliflower only has the information noted in **213(c)** below, it is exempt from SFCR labelling and traceability requirements at the time of sale at retail and does not require a lot code. This exemption has been present in the regulations for numerous years and has not changed.

*[213 \(c\)](#) fresh fruits or vegetables that are packaged in a protective wrapper, or a protective bag, that is transparent and on which **no information is shown other than** a price, bar code, number code, environmental statement, or product treatment symbol.*

Q: Would open bags like grapes require a lot code?

A: Under the SFCR, grapes in a protective wrapper or a protective bag are considered a prepackaged food (which includes consumer prepackages), regardless of whether they are open or closed. However, if the bag only has the information noted in 213(c) below, it is exempt from SFCR labelling and traceability labelling requirements at the time of sale at retail and does not require a lot code.

*[213 \(c\)](#) fresh fruits or vegetables that are packaged in a protective wrapper, or a protective bag, that is transparent and on which **no information is shown other than** a price, bar code, number code, environmental statement, or product treatment symbol.*

If additional information appears on the consumer prepackaged grape bag (i.e.: brand name, country of origin, etc.), the exemption no longer applies and grape bags must comply with all FDR and SFCR labelling, including traceability labelling requirements, such as lot code, common name, where applicable, and name and address. In addition, all language requirements apply.

Q: Would wooden/fibre containers of berries for consumers without any type of labelling information, require a lot code? These containers do not have surfaces that labels can stick to, and traceability information is provided on the master containers.

A: Yes, these types of products are considered consumer prepackaged products and would not only require a lot code but would also have to adhere to all labelling requirements in the SFCR. Please refer to the [Industry Labelling Tool](#) for additional information on labelling requirements.

Q: If a pineapple has a tag punctured into the core, that contains labelling information, would this label also require a lot code?

A: No, the pineapple in this example would not require a lot code since it is not in a container.

Q: If a bunch of kale is held together by a twist tie that is less than 13 mm (1/2 inch), with a bib containing common name and logo, would this product require a lot code?

A: According to [SFCR 213 \(b\)](#), fresh fruits or vegetables or vegetables that are packaged in a wrapper or confining band that is less than 13 mm (1/2 inch) in width are exempt from SFCR labelling and traceability labelling requirements. However, this exemption is lost with the presence of a bib or tag on the wrapper or confining band. The bunch of kale in this example requires a lot code and would have to comply with all mandatory labelling requirements for prepackaged fresh fruits and vegetables.

To determine whether your consumer product requires a lot code, please refer to the decision tree and additional examples provided on the following pages.

Monitoring/Enforcement of Lot Code Labelling

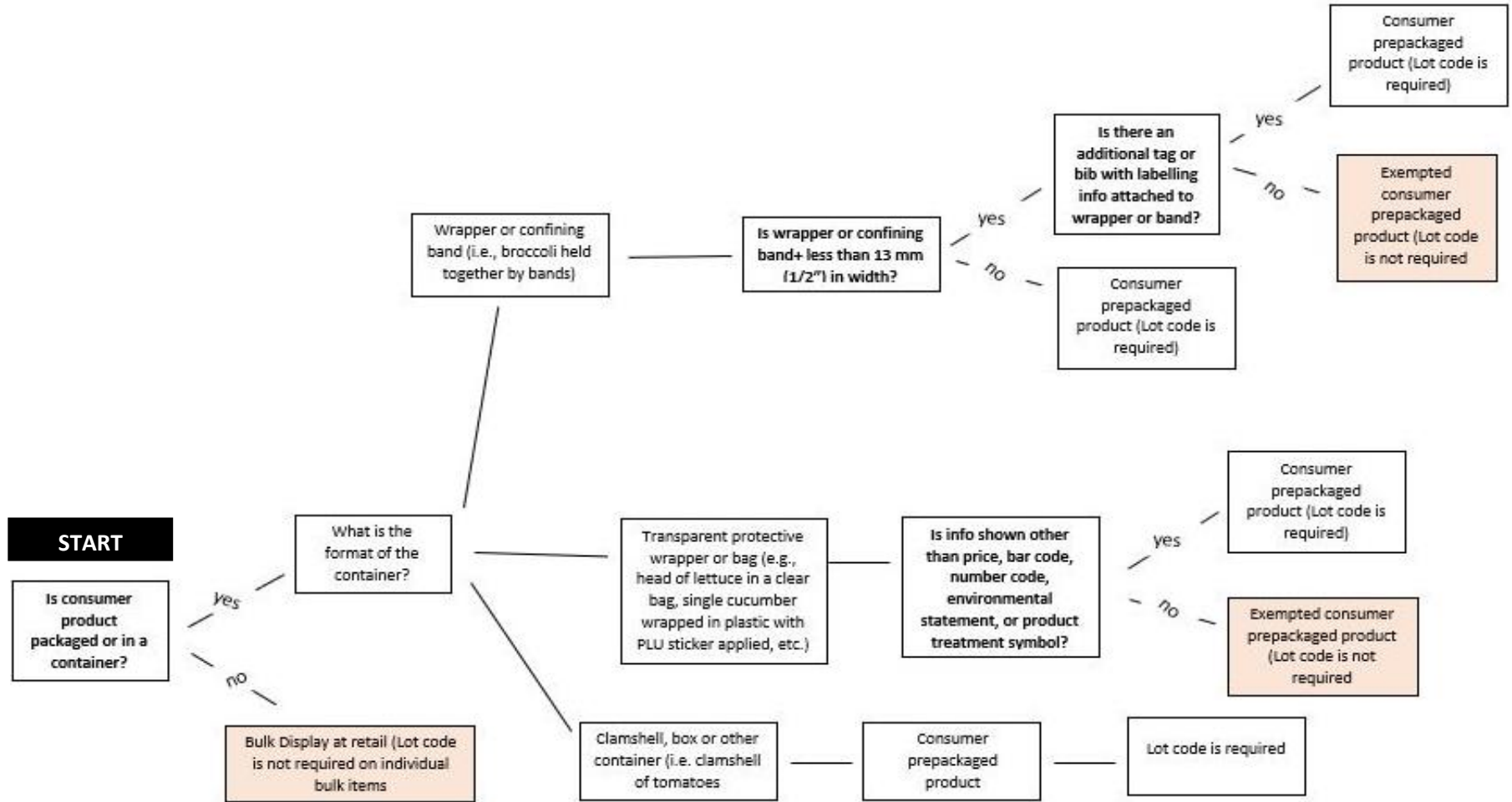
Q: How will this new traceability regulation be monitored/enforced?

A: During an inspection or food safety investigation, it is the responsibility of industry to clearly identify the lot code on the label. Inspections from CFIA will be no different from inspections that CFIA currently performs. The type, frequency, and extent of CFIA's oversight activities for your business will be proportional to the risks that need to be managed. CFIA verifies compliance by conducting a range of inspection activities, such as making visual observations, interviewing personnel, sampling, measuring, or testing, and evaluating documentation.

Note Please see [Compliance and Enforcement Policy](#) which includes the [Standard Regulatory Response Process](#).












Decision Tree: Does my Consumer Product Require a Lot Code?

Use this decision tree to determine whether your consumer product requires a lot code. Consumer prepackaged fresh fruits and vegetables must comply with SFCR and FDR labelling regulations, including lot code requirements. Exemptions exist from labelling regulations, including lot code requirements, for bulk products and certain prepackaged products. Other traceability requirements apply in the rest of the supply chain, such as at the case level.



Legend
 *Container is defined as an outer receptacle or covering that is used or to be used in connection with a food. It includes a wrapper and a confining band but does not include a conveyance or any container that is an integral part of a conveyance.
 +regardless of what information is printed on wrapper or band

Examples: Does my Consumer Product Require a Lot Code?

Consumer Prepacked Products (Requires a lot code)		
<p>Asparagus held together by rubber bands with a tag attached</p> 	<p>Strawberries in open boxes</p>  <p>Basil plant meant for human consumption, with a tag</p> 	<p>Cucumber wrapped in clear plastic with information on label (i.e. brand, country of origin, etc.) other than price, bar code, number code, environmental statement, or product treatment symbol</p> 
Exempted Consumer Prepacked Products (Does not require a lot code)		
<p>Beets held together with a band that is less than 13mm (1/2inch) in width</p> 	<p>Lettuce wrapped in clear plastic bag with no labelling information</p>  <p>Cucumber wrapped in clear plastic with no information on PLU (i.e. brand, country of origin, etc.) other than price, bar code, number code, environmental statement, or product treatment symbol</p> 	<p>Leeks held together with a band that is less than 13 mm (1/2inch) in width and contains labelling information on band</p> 
Consumer (unwrapped) Bulk Products (Does not require a lot code)		
<p>Pineapple with tag in retail display</p> 	<p>Bunch of bananas in retail display</p> 	<p>Avocados in retail display</p> 

Appendix A: Traceability-Specific Labelling Chart for Fresh Fruits or Vegetables (FFV) and Exemptions

Legend
The "X" is used to indicate when a requirement is either not applicable or not required and is accompanied by the applicable regulatory reference(s).
The "✓" is used to indicate when a requirement is applicable and is accompanied by the applicable regulatory reference.
The numbers in [xxxx] refers to the regulatory requirement in the Safe Food for Canadians Regulations . (Part 5 Traceability sections can be found in Appendix B)

Table 1: Traceability-specific labelling requirement for fresh fruits or vegetables (FFV) [SFCR reference] *

Growers, Harvesters, Licence holders who manufacture, process, treat, preserve, grade, store, package, or label , and Distributors who send food across interprovincial borders, and Importers				
Type of Packaging	Must have lot code , Attached applied or accompanying	Must choose between: Lot code or unique identifier	Name and principal place of business	Common name
Consumer prepackaged FFV (for example, clamshell of blueberries, prepackaged fresh fruits and vegetables (whole or fresh cut), sold to consumers in a grocery store, (not packaged at retail))	✓ [92(2)]	X [92(2)]	✓ [92(1)]	✓ [92(1)]
Consumer prepackaged FFV packaged in wrapper or confining band with a tag (for example, asparagus wrapped in an elastic with a tag attached)	✓ [92(2)]	X [92(2)]	✓ [92(1)]	✓ [92(1)]
Consumer prepackaged FFV packaged in protective wrapper or bag, that is transparent and on which there is information other than price, bar code, number code, environmental statement, or product treatment symbol (e.g., cucumber, iceberg lettuce, cauliflower, grapes, cherries, tomatoes, etc.)	✓ [92(2)]	X [92(2)]	✓ [92(1)]	✓ [92(1)]

Cases/Shipping containers (Not a consumer prepackage) containing bulk (not packaged) FFV	X [92(1)]	✓ [92(1)]	✓ [92(1)]	✓ [92(1)]
Cases/Shipping containers (Not a consumer prepackage) containing prepackaged fresh fruits and vegetables (whole or fresh cut)	X [92(1)]	✓ [92(1)]	✓ [92(1)]	✓ [92(1)]
Retail (at place of sale to consumer)				
Type of Packaging	Must have <u>lot code</u> Attached applied or accompanying	Must choose between: <u>Lot code</u> or <u>unique identifier</u>	<u>Name and principal place of business</u>	<u>Common name</u>
Not packaged at retail Consumer prepackaged FFV (for example, clamshell of blueberries, prepackaged fresh fruits and vegetables (whole or fresh cut), sold to consumers in a grocery store)	✓ [92(2)]	X [92(2)]	✓ [92(1)]	✓ [92(1)]
Packaged at retail Consumer prepackaged FFV (for example, clamshell of blueberries, prepackaged fresh fruits and vegetables (whole or fresh cut), sold to consumers in a grocery store,	X [92(1)]	✓ [92(1)]	✓ [92(1)]	✓ [92(1)]

*See Table 2 below for exemptions

Table 2: Exemptions to Traceability-specific labelling requirement for fresh fruits or vegetables (FFV) at time of sale at retail [SFCR reference]

Packaging	Lot code	Choice between <u>Lot code</u> or <u>unique identifier</u>	<u>Name and principal place of business</u>	<u>Common name</u>
FFV (not prepackaged), in bulk display	X [92(3)(b)]	X [92(3)(b)]	X [92(3)(b)]	X [92(3)(b)]
Consumer prepackaged FFV packaged in wrapper or confining band that is < 13 mm wide	X [213(b); 92(3)(c)]	X 213(b); 92(3)(c)]	X [213(b); 92(3)(c)]	X [213(b); 92(3)(c)]

Consumer prepackaged FFV in a protective wrapper or bag, that is transparent and on which no information is shown other than price, bar code, number code, environmental statement, or product treatment symbol (e.g., cucumber, iceberg, cauliflower, grapes, tomatoes)	X [213(c); 92(3)(c)]	X [213(c); 92(3)(c)]	X [213(c); 92(3)(c)]	X 213(c);92(3)(c)]
Consumer prepackaged (including wrapper or band with tag) and shipping containers, with whole or fresh cut FFV that are visible & identifiable (NOT packaged at retail)	✓ [92(2)]	X [92(2)]	✓ [92(1)]	X[219(1)(a); 92(4)]
Consumer prepackaged FFV (whole & fresh cut) that are visible & identifiable (Packaged at retail)	X [92(1)]	✓ [92(1)]	X [220; 92(5)]	X [219(1)(a); 92(4)]
Consumer prepackaged fresh apples (NOT packaged at retail) where the variety name is on any part of the label, except at the bottom of the container	✓ [92(2)]	X [92(2)]	✓ [92(1)]	X [219(1)(b); 92(4)]
Consumer prepackaged fresh apples for which a grade is prescribed, where the variety name is on any part of the label, except at the bottom of the container (Packaged at retail)	X [92(1)]	✓ [92(1)]	✓92(1)]	X [219(1)(b); 92(4)]

** Reference: Table 2 in section 5 of [Regulatory requirements: Traceability](#).

Appendix B: Safe Food for Canadians Regulations

Safe Food for Canadians Regulations: [Part 5 Traceability](#)

Documents

90 (1) Any person who sends or conveys a food from one province to another, or who imports or exports it, any holder of a licence to slaughter a food animal, to manufacture, process, treat, preserve, grade, store, package or label a food or to store and handle an edible meat product in its imported condition and any person who grows or harvests fresh fruits or vegetables that are to be sent or conveyed from one province to another or exported must, if they provide the food to another person, prepare and keep documents that set out

(a) the common name of the food, a lot code or other unique identifier that enables the food to be traced and the name and principal place of business of the person by or for whom the food was manufactured, prepared, produced, stored, packaged or labelled;

(b) except if they provide the food to another person as a sale at retail, the date on which it was provided and the name and address of the person to whom it was provided.

(c) if they were provided the food by another person, the name and address of that person and the date on which it was provided; and

(d) the name of any food commodity that they incorporated into the food or from which they derived the food and, if they were provided the food commodity by another person, the name and address of that person and the date on which it was provided.

Documents — retail sale

(2) Any person who sells a food at retail, other than a restaurant or other similar enterprise that sells the food as a meal or snack, must prepare, and keep documents that include the information specified in paragraphs (1)(a), (c) and (d).

Retention period of documents

(3) The documents referred to in subsections (1) and (2) must be kept for two years after the day on which the food was provided to another person or sold at retail and must be accessible in Canada.

Production of documents

91 (1) Any person who has received a request from the Minister for a document referred to in section 90, or any part of such a document, must provide it to the Minister

(a) within 24 hours after receipt of the request, or within

(i) any shorter period that is specified by the Minister, if the Minister believes that it is necessary in order to identify or respond to a risk of injury to human health associated with a food commodity, or

(ii) any longer period that is specified by the Minister, if the Minister believes that the document is not necessary for a recall that is or may be ordered under subsection 19(1) of the [Canadian Food Inspection Agency Act](#); and

(b) if provided electronically, in a single file and in plain text that is capable of being imported into and manipulated by standard commercial software.

Definition of plain text

(2) In paragraph (1)(b), **plain text** means data that is not encrypted and whose semantic content is available.

Labelling

92 (1) Any person referred to in subsection 90(1) or (2) must ensure that a label that bears the information specified in paragraph 90(1)(a) is applied or attached to any food, or accompanies any food, that is provided to another person.

Consumer prepackaged food

(2) In the case of consumer prepackaged food that is not packaged at retail, the unique identifier referred to in paragraph 90(1)(a) must be a lot code.

Exception

(3) Subsections (1) and (2) do not apply in respect of

- (a)** a food at the time of its export.
- (b)** a food, other than a consumer prepackaged food, at the time of its sale at retail; or
- (c)** a prepackaged food described in paragraphs 213(a) to (c) at the time of its sale at retail.

Exception — foods described in paragraphs 219(1)(a) and (b)

(4) Despite subsection (1), any food described in paragraph 219(1)(a) or (b) is not required to be labelled with the common name of the food at the time of its sale at retail.

Exception — foods described in section 220

(5) Despite subsection (1), any food described in section 220 is not required to be labelled with the name and principal place of business of the person by or for whom the food was manufactured, prepared, produced, stored, packaged, or labelled.