Canadian Food Inspection Agency
Agence canadienne d'inspection des aliments

在供應鍊控管未宣告的過敏原：第二天

Managing undeclared allergens across the supply chain: Day 2

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Housekeeping items 注意事項

- Pre-questions and registration
  事前提問及報名
- Agenda of Modules
  兩大單元的議程
- Guest speakers
  受邀講者
- Q&A at the end of the presentation
  報告結束後有問答時段

Overall webinar objectives
舉辦webinar的目的

- Recognize the priority allergens in Canada
- 認識加拿大「重點過敏原」
- Outline Canadian allergen labelling requirements
- 介紹加拿大「過敏原標示規定」的概要
- Identify principles of preventative control activities
- 辨識預防控管的原則
- Locate Canadian reference documents and regulations
- 知道參考資料和法規在哪裡
- Identify resources for more information
- 介紹更多資訊的來源

Modules in this Webinar單元介紹

MODULE 1 - Focus of Canada's technical assistance on undeclared allergens

單元一 –聚焦在加拿大針對「未宣告的過敏原」所提供的技術協助

- Recognize the priority allergens in Canada
- 認識加拿大「重點過敏原」
- Outline Canadian allergen labelling requirements
- 介紹加拿大「過敏原標示」規定

MODULE 2 - Managing undeclared allergens across the food supply chain

單元二- 在整個食品供應鏈中控管「未宣告的過敏原」

- Identify principles of preventative control activities
- 辨識「預防控管措施」的原則
- Locate Canadian reference documents and regulations
- 知道參考資料和法規在哪裡
- Identify resources for more information
- 介紹更多資訊的來源

Allergen Labelling Requirements

過敏原標示的規定

Crustaceans甲殼動物
Eggs 蛋
Fish魚
Milk 奶類
Mustard seeds芥菜子
Peanuts花生
Sesame seeds芝麻子
Shellfish 貝類
Soy黃豆
Tree Nuts*堅果
Wheat and triticale小麥及黑小麥

Gluten from barley, oats,
rye, triticale or wheat (or a hybridized strain);
麩質，來自大麥、蕎麥、黑麥、黑小麥、小麥或
雜交品系
Sulphites (More than 10 ppm) 亞硝酸鹽(超過10ppm)

On the CFIA channel : 在CFIA頻道
http://bit.ly/2H6eo4t

Allergen Labelling Tips for Food Industry
http://bit.ly/1U3G125 食品業過敏原標示要訣

Allergen labelling in Canada
加拿大的過敏原標示

Ingredients:
Organic skim milk, organic cream, bacterial cultures.

成分：有機脫脂奶、有機鮮奶油、菌叢

Contains: milk

含有：牛奶

Ingrédients:
Lait écrémé biologique, crème biologique, cultures bactériennes.

Contient: du lait

英文、法文並列

Modules 2 單元二

MODULE 1 - Focus of Canada's technical assistance on undeclared allergens

單元一 -加拿大對「未宣告的過敏原」提供技術協助的重點

- Recognize the priority allergens in Canada
- 認識加拿大「重點過敏原」
- Outline Canadian allergen labelling requirements
- 介紹加拿大「過敏原標示」規定

MODULE 2 - Managing undeclared allergens across the food supply chain

單元二- 在整個食品供應鏈中控管「未宣告的過敏原」

- Identify principles of preventative control activities
- 指出預防控管的原則
- Locate Canadian reference documents and regulations
- 知道參考資料和法規在哪裡
- Identify resources for more information
- 介紹更多資訊的來源

Module 2 Objectives 單元2的目的

By the end of this module, you should be able to:

本單元結束前，你應該可以做到：

- Describe the import process, roles and responsibilities for imports (for Canadian importers and foreign suppliers)

  (加拿大進口商及海外供應商的觀點)敘述進口程序、角色及責任

- Recognize the relevant legislation: 認識相關法規
  - Food and Drugs Act and its Regulations 加拿大食品藥物法及其條例
  - Safe Food for Canadians Act and its Regulations 加拿大食品安全法及其條例
- Identify controls that industry can apply to achieve product safety

  認識業界可用的食品安全控管措施

- Locate compliance promotion tools and resources

  找到「遵循規定」的線上工具和資源

Canadian Context 加拿大簡介

- Canada is the 6th largest importer of agricultural and agri-food products in the world.

  全世界第六大「農產品及農產食品」的進口國

- Imports are sourced from over 190 countries, many with differing levels of food safety controls, oversight and standards.

  進口農產、食品來自190多國，許多國家各有食安控管、督導架構及

  適用標準

- Approximately $1 billion and over 200 thousand import transactions per month – increasing every month.

- 每個月有20多萬筆交易，金額超過10億，而且每個月持續成長。

2017 Ranking: Commodities imported into Canada with Taiwan as country of origin 017排名:從台灣原產地輸入到加拿大的大宗食品

Source: Canadian International Merchandise Trade Database		
Rank	Trade Commodity	Value: (CAN$) 2017
1	Cuttle fish and squid, frozen魷魚及墨魚，冷凍	12 711 873
2	Food preparations各種預作調味包/料理包	11 355 846
3	Tunas, albacore/longfinned鮪魚、長鰭鮪	7 968 029
4	Communion wafers, and sim products and bakers'聖餐餅	6 260 000
5	Fish, frozen, o/t fish 魚、冷凍、魚內臟	6 219 811
6	Non-alcoholic beverages, o/t beer, fruit/veg juices非酒精飲料、啤酒、蔬果汁	4 289 978
7	Fillets, of fish, frozen,魚排	4 183 103
8	Guavas, mangoes and mangosteens, fresh or dried番石榴、芒果、山竹，新鮮或乾燥	3 778 936
9	Tilapias, frozen 鯛魚，冷凍	3 480 160
10	Tapioca and substitutes, prepr from starch薯粉及代用品	2 910 265
11	Sesame oil and its fractions芝麻油及其調理油	2 647 741
12	Sweet biscuits甜餅乾	2 507 483
13	Black tea, fermented, partly fermented紅茶,發酵 /半發酵	2 365 053
14	Pasta麵類	2 318 938
15	Sauces and preparations, and mixed condiments and mixed seasonings醬料、醬料包、綜合調味劑	2 280 326
16	Tea or maté extracts, essences and concentrates preparations thereof 茶葉、茶翠取物、茶精及濃縮茶	2 247 600

CFIA's Generic Import Process
CFIA一般進口程序

1. • Requirements 規定事項
2. • Permission 許可
3. • Clearance 通關
4. • At-border 邊境
5. • Inspection (Destination) 檢查(目的地)
6. • Reporting 書面報告

Pre-Border 入邊境前

Importer Responsibilities 進口商責任 (1/2)

- Importers are responsible for the import/sale of food that meets Canadian requirements, so they must

  進口商要負保食品的進口/販賣合乎加拿大的規定，因此必須

1. Obtain an import licence 取得進口許可證
2. Verify food safety controls that foreign suppliers have in place

   檢核外國供應商所作食品安全管控措施

3. Notify CFIA/CBSA of shipment intended for import and provide all relevant information/documentation

   通知CFIA/CBSA 有該批食品即將進口，並提供所有資訊/文件

Pre-Border 入邊境前

Importer Responsibilities(cont'd) 進口商責任 (2/2續)

2. Verify food safety controls that foreign suppliers have in place
   檢核外國供應商所作食安管控措施
   - Foreign supplier certified by recognized food safety scheme 外國供應商有食品安全認證
   - Foreign supplier verification by importer 進口商對外國供應商檢核確認
   - Oversight by foreign competent authority 外國主管機關督導
   - Sampling and analysis of received product for appropriate hazards, composition and net quantity 收到的產品作採樣，分析是否有某些危害因子、其組成及淨含量是否正確
   - Requesting results of relevant analyses 相關分析結果要取得報告
   - Conducting internal/external audits 進行內部/外部稽核
3. Notify CFIA/Canadian Border Services Agency (CBSA) of shipment intended for import and provide all relevant information/documentation
   通知CFIA/CBSA 有該批食品即將進口，並提供所有資訊/文件

Pre-Border 入邊境前

CFIA Responsibilities 加拿大食品檢驗局(CFIA)職責

1. Maintain and consider new recognition arrangements with foreign competent authorities (FCA)
   執行並適時更新「承認外國主管機關(FCA)證明文件」的國際協議
2. Conduct offshore missions and foreign establishment inspections
   派員出國考察，對外國業者進行查訪
3. Assess shipment information/documentation
   檢核評估各批貨品的資訊/文件
4. Verify certification of food shipments requiring certification by FCA (e.g. meat shipments)
   檢核需要FCA出具證明的那批食品(尤其是肉品)的證明書
5. Implement temporary import restrictions where necessary e.g. leafy greens from California, berries from Guatemala
   必要時啟動暫時進口管制(例如加州綠葉蔬菜、瓜地馬拉莓果)

At-Border (admissibility) 在邊境(是否允許進口)

CFIA Responsibilities
CFIA責任

1. Validate import license and verify, as req'd:
   檢核進口許可證，並依規定核對
   a) basic shipment information
      基本出貨資訊
   b) certificates (e.g. Meat, fresh fruit & vegetable), prohibited foods etc.
      證明書(肉、生鮮蔬果)、禁品
2. Provide release recommendation to CBSA
   核發「放行建議」函給CBSA

Importer Responsibilities
進口商責任

1. Declare shipment
   貨品報關
2. Provide all relevant documentation to CBSA
   提供所有相關文件給CBSA

CBSA Responsibilities
CBSA責任

1. Initial import inspection at Canadian border points per MOU
   依照MOU在加大邊境作初步檢查
2. Make release decision and communicate need for secondary inspection where necessary
   決定放行或必要時告知需要再度檢查

Through integrated automation of these activities, CFIA can realize efficiency gains and reduce burden for industry.
Paper Import Declaration and Fish Import Notification will be eliminated – increased reliance on IT system solutions
以上活動陸續整合到自動化系統， CFIA可提升效率，減少業者負擔。
紙張的進口報關單和魚類進口通知會逐步淘汰—以後對IT系統的仰賴更深。

Roles and Responsibilities 角色和責任

CFIA

CFIA conducts risk-based inspection of importer and imported food in Canada

CFIA負責進口商和進口食品的風險查核

Importer進口商 /broker仲介

推托責任
Shifting Responsibility

Canada's at-border presence. Conduct interviews and inspections at border, review paperwork and make final decision on whether goods can enter Canada

加拿大邊境管制機關。進行邊境面談和檢查、審核文件、裁斷貨品能否進入加拿大

CBSA

Canadian Border 邊境

Carrier貨輪

Work together to meet Canada's import requirements

彼此合作以符合加拿大進口規定

Vendor業者, exporter出口商 and foreign supplier外國供應商

Importer Responsibilities 進口商責任

Regulated parties are responsible for the safety of their products, including addressing potential risks associated with the presence of allergens/gluten/sulphites.

受法律規範，負責確保產品安全，包括處理過敏原／麩質／亞硫酸鹽存在的可能風險。

It is the importer's responsibility to verify foreign supplier food safety controls. Controls may include:

進口商有責任去檢核外國供應商的食品安全管控措施，例如：

- Foreign supplier certified by recognized food safety scheme 外國供應商有取得食安認證
- Foreign supplier verification by importer 外國供應商資訊由進口商檢核確認
- Oversight by foreign competent authority外國供應商有該國主管機關督導
- Sampling and analysis of received product for appropriate hazards, composition and net quantity 收到的產品予以採樣，針對危害因子、組成及淨含量做分析
- Requesting results of relevant analyses 相關分析要拿到結果
- Conducting internal/external audits 進行內部/外部稽核

CFIA's Legislative Authority – Food
CFIA's的法定職責—食品

The Safe Food for Canadians Regulations are the only regulations that apply to food in Canada?

在加拿大只有「加拿大食品安全條例SFCR」可以規範境內食品？

Yes or No?

對或錯?

CFIA's Legislative Authority – Food
CFIA's的法定職責—食品 (1/2)

- Food and Drugs Act (FDA) & Regulations (FDR)

  食藥法FDA及其條例FDR
  - **Support innovation** through modernized ingredient and nutrition labelling including regulations incorporated by reference that are forward reaching and can be updated in a timely manner**支持創新**：提倡「新穎」成分及營養標示，相關法規要與時俱進，參酌有前瞻性的資訊，適時更新
  - **Promote health, safety and protection against misrepresentation for consumers** and a **level playing field for industry** through enhanced allergen labelling regulations, nutrition labelling, compositional standards.**宣導健康、安全、保護消費者不受誤導；給業者公平競逐的機會；**制定完備的法規和標準來規範過敏原標示、營養標示、成分組成
- The Safe Food for Canadians Act (SFCA) & Safe Food for Canadians Regulations (SFCR)

  加拿大食品安全法SFCA及其條例SFCR

  .

CFIA's Legislative Authority – Food
CFIA's的法定職責—食品 (2/2)

- Food and Drugs Act (FDA) & Regulations (FDR)

  食藥法FDA及其條例FDR
- The Safe Food for Canadians Act (SFCA) & Safe Food for Canadians Regulations (SFCR)

  加拿大食品安全法SFCA及其條例SFCR
  - **Reflect consistent, internationally recognized requirements** for all food imported, exported, or traded inter-provincially, and across food sectors 執行均一、國際認可的各種規定來規範所有食品：進口、出口、跨省交易、跨食品行業交易
  - **Support ongoing market access** for food businesses and increase confidence in food safety, and **align with many trading partners** moving to preventive and outcome-based approaches for managing risk. 支持開放「市場准入」給食品業者，提升大眾食安信心，跟貿易夥伴同步調，逐步採取「預防」及「成果導向」作法來管控食安風險

CFIA's Legislative Authority – Food
CFIA's的法定職責—食品

Which legislation outlines the allergen labelling requirements?
哪個法律有過敏原標示的規定？
食藥法條例FDR 還是食安法條例 SFCR?

Which outlines the traceability requirements?
哪個有食品履歷的規定？
食藥法條例FDR 還是食安法條例 SFCR?

Answers to follow in the coming slides
答案以下幾頁

FDR: Elements relevant to Allergens
食品藥物法規：關於過敏原的部分

Food and Drugs Act* and *Regulations
食品及藥物法規

ALLERGEN DECLARATION
宣　告

Source of food allergens declared in the list of ingredients or in a food allergen source, gluten source and added sulphites statement
在成分清單宣告食物過敏原的來源，或是用文字敘述「有含過敏原、麩質的物質，有添加亞硫酸塩」

PRECAUTIONARY ABELLING
警　語

Alerting consumers that, due to a risk of cross-contamination, the product may contain the source of a food allergen, gluten or sulphites
提醒消費者，由於交叉污染的風險，該產品可能有帶過敏原、麩質或亞硫酸塩的物質

LANGUAGE
文　字

Allergen labelling that is missing in an official language, when required, is considered as information that is unavailable to the consumer
「過敏原標示」若少列一個官方語言，視為沒有告知消費者

Expected Result: Safe food choices for allergic individuals 預期結果：過敏者有安全食物可選擇

FDR: Allergen Declaration
食藥法條例：過敏原宣告

- Sources of allergen, gluten and sulphites can appear:
  表達“含有過敏原、麩質和亞硫酸塩”可以在…
- Within the list of ingredients (i.e. after the heading “Ingredients”),
  成分清單呈現(即,在“成分”標題之後) , 或是
- In a separate “food allergen source, gluten source and added sulphites ” statement (i.e. after the heading “Contains”)
- 另外用文字敘述「含有帶過敏原，麩質的物質，有添加亞硫酸塩」(在”包含”標題之後）
- If a contains statement is used, it must be complete.
- 如果使用文字敘述，必須資訊完備

How to **label** allergens:

Within the **ingredients** list

Ingredients: Apples, Pie crust [Flour (wheat), Shortening, Liquid albumen (egg), Salt], Sugar, Flour, Lemon juice, Whole milk, Cinnamon.
May contain pecans.

OR

Using a **contains** statement

Ingredients: Apples, Pie crust [Flour, Shortening, Liquid albumen, Salt], Sugar, Flour, Lemon juice, Whole milk, Cinnamon.
Contains: Wheat, Egg, Milk.
May contain pecans.

FDR: Precautionary Labelling
食藥法條例：警語

- “May contain” statements / Cross-contamination statements are:
  「可能含有」/「交叉污染」的文字敘述：
- warning statements to inform consumers about the possibility that the food has been cross contaminated with a food allergen
  警告消費者，該食品可能已受到食物過敏原的交叉污染
- not substitutes for good manufacturing practices
  使用警語不能作為『未遵循GMP製造標準」的補救藉口
- used when, despite all reasonable measures, the inadvertent presence of allergens in food is unavoidable
  只有在竭盡所能後，仍無法避免食品中有過敏原，才能用警語
- not to be used when an allergen or allergen-containing ingredient is deliberately added to a food).
  「蓄意」在食品中添加過敏原、或已受過敏原污染的成分，這種情況不得用警語
- Ingredients成分: White beans, Water, Sugars, Pork, Salt, Modified cornstarch, Onion powder, Mustard, Spices.
- Contains包含: Mustard. May contain可能包含: Sesame, Soybeans.

FDR: Language
食藥法條例：語言

French and English are the official languages in Canada:

加拿大官方語言是法語和英語

- Mandatory information is required in French and English, unless otherwise provided for in legislation. 必要資訊必須雙語呈現，除非法律另有規定
- Allergen labelling that is missing in English or French, when required, is considered as information that is unavailable to the consumer 英語或法語的過敏原標示，若違反規定而欠缺其一，則視為沒有告知消費者。
- Information in other languages can be provided in addition, must be properly located 可額外提供其它語言資訊，但位置要合宜

Ingredients:
Organic skim milk, organic cream, bacterial cultures.

Contains: milk

Ingrédients:
Lait écrémé biologique, crème biologique, cultures bactériennes.

Contient: du lait

SFCR: Elements relevant to Allergens

加拿大食安條例:關於過敏原的部分

Safe Food for Canadians Act* and *Regulations
加拿大食品安全條例

LICENSING
許可證

Clear mechanisms for identification and oversight of regulated parties

明確的機制來辨識並督導業者

PREVENTIVE CONTROLS
預防控管

Industry documentation of hazards, and measures to address them in preventive control plans (PCPs)

業界自我記錄各種危害因子,以及防範控管計畫(PCPs)的措施

TRACEABLITY
食品履歷

Facilitating effective response in case of non-compliance

某一環節違規時才可以有效因應

Expected Result: Stronger, more consistent and outcomes-based rules
預期效果：法規更有力，更一致，成果導向

SFCR: Trade – Import Requirements
加拿大食安條例：貿易-進口規定

Canadian businesses who **import** food will need to: **進口**食品的加拿大業者必須：

- Have a license to import 有進口許可證
- Have a preventive control plan (in most cases) 有防範控管計畫(大部份)
- Keep traceability records: one step before, one step after. 食品履歷記錄：前後各一步
- Import food that is manufactured, prepared, stored, packaged and labelled **under** similar food safety controls as food prepared in Canada
  所進口的食品在製造、處理、儲存、包裝、標示的食安管控必需跟加拿大國內食安管控措施類似
- Provide information prior to the time of import such as: 在進口前提供以下資訊
  - their licence number; 許可證號碼
  - a description of the food(s); 食品說明
  - who they received the food from; 食品的來源業者
  - where the food is going. 食品下一步去哪裡。

SFCR: Preventive Control Measures

加拿大食品安全條例：預防式控管措施

Preventive control requirements (e.g. allergen controls):

預防式控管規定(過敏原控管)：

- Outcome based, where possible to allow for flexibility and innovation

  成果導向，也鼓勵彈性及創新

- Cover treatment processes, establishment conditions, sanitation, pest control, competency, etc.

  涵蓋處理過程、業者廠房情況、衛生條件、蟲害防治、遵循能力

Preventive control plan (PCP) requirements: 預防式控管計畫的規定

- Document that outlines potential hazards associated with the food and demonstrate how they will be controlled (consistent with HACCP).

  跟該食品相關的可能危害因子要記錄，並且說明如何控管(遵照HACCP)

- Not always required, however the preventive control requirements must be met irrespective of whether or not the PCP is required.
- 這種記錄並非一定要有，但是必須合乎「預防式控管的規定」，不論是否有作PCP

SFCR: Traceability

加拿大食安條例：食品履歷

Importers will be required to maintain records to identify the food and trace the food “one step forward, one step back”.

進口商必須詳實記錄「經手前、經手後」的情況，才能夠辨識該批食品，並據以追蹤上、下游業者。

Traceability records will need to be: 履歷記錄必須

- ✓ clear and readable 清楚易讀
- ✓ kept for 2 years 保留兩年
- ✓ accessible in Canada and 在加拿大可以讀取
- ✓ If electronic, provided to the CFIA in a format which can be opened and used by standard commercial software.

如果是電子記錄，交給CFIA 的檔案格式必須可以用標準商業軟體開啟。

SFCR加拿大食品安全條例：
Preventive Control Measures – Importers
預防式管控措施–進口商

Canadian importers are responsible for ensuring the food they import from their foreign suppliers was prepared in conditions that provide the same level of protection as provided under the regulations. Canadian importers will need to:

進口商要負責確認，海外供應商運進來的食品在製作時的防護措施跟本法規要求的是同等規格。進口商必須：

了解國外供應商

1. Know their foreign supplier

Are they implementing good manufacturing practices and HACCP principles?

是否遵循GMP和HACCP原則?

了解進口食品

2. Know the food

What are the hazards associated with the food you import?

How will those hazards be managed?

該進口食品有什麼危害因子？如何控管？

有所規劃

3. Have a plan

Do you have a Preventive Control Plan describing the steps taken to ensure your food is safe and meets Canadian requirements?

有列出食安程序，且符合加拿大法規的「預防式管控計畫」嗎？

SFCR: Importer's PCP
加拿大食安條例：進口商的PCP

Importer's Preventive Control Plan 進口商的預防式控管計畫

Hazards associated with the food to be imported has been identified
已經指認出所進口食品有什麼危害因子

Documents showing the foreign supplier is implementing good manufacturing practices and preventive controls
有文件證明海外供應商在實行GMP及預防性控管措施

Description of how importer is meeting applicable requirements
說明進口商如何遵循相關規定

- Labelling 標示
- Packaging 包裝
- Standard of Identity 食品身分標準
- Grading 分級

Document outlining the controls of how the importer is meeting the PCP requirements
文件概述控管方法:進口商如何滿足PCP規定

- Hazard analysis 危害因子分析
- Control measures 控管措施
- Monitoring 追踪監督
- Corrective actions 矯正行動
- Verification procedures 核校的程序

Documents demonstrating you are implementing your PCP effectively
有文件證明你(進口商)有落實PCP

SFCR: Impact on Foreign Exporters
加拿大食安條例：對國外出口商的影響

Your Canadian importer may ask:

向你採購的加拿大進口商會向你：

- for information about the products you are exporting (such as allergen controls);
- 索取你要出口的產品的資訊(例如過敏原控管措施）
- for information about the industry controls (e.g. allergen controls) and manufacturing practices for the food being exported;
- 索取業者管控(例如過敏原管控)資訊，以及該出口食品的製造過程方法
- how you are addressing any hazards associated with the food;
- 問你如何處理該食品的危害因子
- if you are part of a food safety certification program;
- 問你是否有參加食安認證制度
- to visit you to verify the effectiveness of your controls.
- 要求現場核驗你的控管措施是否有效。

Industry Controls 業者控管措施

Options to achieve safety of their products (but not limited to):

以下選項可確保業者產品的安全(還有其他選項)

- Putting production system or process controls in place,
- 在生產系統或製程設置控制措施
- Performing sampling of end product for allergen presence,
- 最終產品作採樣，分析過敏原是否存在
- Working with suppliers on ingredient specifications, and
- 跟供應商合作，制訂成份規格表
- Carrying over precautionary labelling to final products intended to be sold at retail.
- 「預警標示」要一路跟隨，從原料到可零售的最終產品。

During inspections, CFIA inspectors may request information from manufacturers or importers to demonstrate how potential health risks to allergic consumers are being addressed.

在檢核時，CFIA檢查員可能會索取製造商或進口商提供的資訊,以資證明他們如何處理過敏原，來降低過敏消費者的潛在健康風險。

Industry Controls 業者控管措施

Food manufacturers, importers (or exporters from foreign states), retailers and food service providers are urged to do the following:

強烈建議：所有食品製造商、進口商(或外國出口商)、零售業者、食品服務業者都要:

- Be aware of the priority allergens in Canada 了解加拿大「重點過敏原」是哪些
- Comply with specific Canadian food safety and allergen labelling regulations and follow guidelines to clearly identify the presence of priority allergens
  遵循加拿大食安及過敏原標示的具體法規，並且按照指示找出有哪些重點過敏原存在
- Implement an allergen control program 實施過敏原管控專案
- Ensure the levels of allergens are as low as reasonably possible when there is high chance of cross-contamination due to processing methods and/or facility design 若加工法或機械設計導致交叉污染機率高，就盡可能降低過敏原含量
- Apply precautionary statements where risk actually exists (and not as a generic legal disclaimer for all foods) 當風險真的存在時，要加註警語(而不是用一般免責陳述來涵蓋所有食品)

Industry Controls 業者控管措施

On-site visits of foreign manufacturers are one way for Canadian importers to determine if allergen controls are sufficient to import the food into Canada. During an on-site visit, importers can verify that manufacturers are implementing control measures such as:

要判斷過敏原管控是否落實，產品是否可輸入加拿大，最有效的作法就是加拿大進口商去實地拜訪國外製造商。在查廠時，進口商核驗製造商是否有實施以下控管措施：

- Verifying ingredient labels 檢核食材(成分)的標籤
- Reviewing practices and manufacturing steps 審查作業方式及製程步驟
- Confirming that allergens are properly declared on the final product intended for Canadian consumption

  要確認：加拿大人要食用的最終產品上面，有照章宣告過敏原
- Implementing periodic testing of final products and ingredients for allergens

  最終產品和成分食材都有定期測試，檢驗過敏原是否存在。

Tools for Industry and Consumers
給業者和消費者的線上工具

CFIA has created a number of compliance promotions tools:
CFIA開發了若干線上工具， 宣導(食品標示)法規遵循：

Industry 業者

- Checklists 檢查清單
- Model allergen programs (for non-registered plants) 過敏原專案範例(給尚未註冊的工廠)
- Infographics 資訊圖表
- Guidance documents (Industry Labelling Tool) 指導文件

Consumers 消費者

- Fact sheets 過敏原的知識
- Interactive labels 互動式標籤
- Reference materials 參考資料
- Recall alerts 產品回收警訊

標示規定的檢查清單

Labelling Requirements Checklist

Labelling

- Contacts
- Food Labelling for Consumers
- Food Labelling for Industry
- Former - Food Labelling for Industry
- Labelling Legislative Framework
- Labelling Modernization Initiative
- Meat Cuts

This page is part of the Guidance Document Repository (GDR).

Looking for related documents?
Search for related documents in the Guidance Document Repository

Important Notice

On December 14, 2016, amendments to nutrition labelling, list of ingredients and food colour requirements of the Food and Drug Regulations came into force. Regulated parties have a five (5) year transition period to meet the new labelling requirements.

Consult the Former – Labelling Requirements Checklist for information on the former requirements.

The following checklist is a self-assessment tool to help industry understand labelling requirements set out in the Food and Drugs Act and Regulations and the Consumer Packaging and Labelling Act and Regulations.

The checklist only covers core labelling requirements applicable to all foods. For more information on voluntary claims or statements and commodity specific labelling requirements, visit the Industry Labelling Tool.

Labelling Requirements Checklist Disclaimer: Adherence to the Labelling Requirements Checklist does not preclude the Canadian Food Inspection Agency (CFIA) from taking regulatory action in cases on non-compliance to regulatory and legislative labelling requirements. This publication is not a legal document. The user is encouraged to consult the official version of the applicable legislation the Food and Drugs Act and the Consumer Packaging and Labelling Act for the purposes of interpreting and applying the law. The Labelling Requirements Checklist was last modified in March 2018.

食品業者的預防性管控措施

Preventive controls for food businesses

SFCR

- Food safety and emergency response
- Food-specific requirements and guidance
- General food requirements and guidance
- Imports
- Information for media and consumers
- Regulatory compliance
- Timelines
- Toolkit for businesses
- Videos
- Exports

Disclaimer

On January 15, 2019, the Safe Food for Canadians Act (SFCA) and the Safe Food for Canadians Regulations (SFCR) will come into effect.

► **Read the full disclaimer**

The Safe Food for Canadians Regulations (SFCR) require that food businesses have preventive controls in place. Whether you import food into Canada or make food for export or to be sold interprovincially, you are required to understand and control potential food safety hazards.

The basics

Fact sheet: Preventive food safety controls

Infographic: Key preventive controls

Infographic: Categories of hazards

Questions and answers: Preventive controls and preventive control plans

Know the requirements

Application of preventive control requirements to food businesses
Find out if and when you need to comply with the preventive control requirements.

Regulatory requirements: Preventive controls
An explanation of the requirements found in Part 4 – Preventive controls of the SFCR. Get a better understanding of the requirements to help you determine if you meet them.

Preventive control plan
Find out if and when you need to have a written preventive control plan and learn how you can build and implement one.

「食物過敏原、麩質、亞硫酸塩添加」的預防控管措施

Preventive controls for food allergens, gluten and added sulphites

SFCR

- Food safety and emergency response
- Food-specific requirements and guidance
- General food requirements and guidance
- Imports
- Information for media and consumers
- Regulatory compliance
- Timelines
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- Videos
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Introduction

Certain foods, ingredients or their components can cause adverse or life threatening reactions in individuals with food sensitivities. Food allergens, gluten and added sulphites are considered chemical hazards that food operators should consider during their hazard analysis and when establishing control measures.

Undeclared allergens, gluten and added sulphites are a leading cause of food recalls. The presence of allergens, gluten and added sulphites cannot be reduced or eliminated by a thermal treatment or post-processing step. Preventive control measures are necessary throughout the preparation steps to prevent them from coming into contact with a food in which they are not an intended ingredient. Proper declaration of ingredients on the food label is necessary to inform consumers that may be sensitive to a food allergen, gluten or added sulphites.

In Canada, the common food allergies and related disorders are:

- peanuts
- tree nuts (almonds,Brazil nuts, cashews, hazelnuts, macadamia nuts,

Gluten

Is a protein found in certain grains such as barley, oats, rye, triticale, and wheat. It can trigger an autoimmune reaction in individuals with Celiac disease.

Cross-contact

Is the inadvertent, unintentional transfer of residues of an allergenic food into another food that is not intended to contain the allergen.

Food allergy

Is a reaction of the body's immune system to specific proteins in a food.

供應商的食安保證專案

Supplier Food Safety Assurance Program

SFCR

- Food safety and emergency response
- Food-specific requirements and guidance
- General food requirements and guidance
- Imports
- Information for media and consumers
- Regulatory compliance
- Timelines
- Toolkit for businesses
- Videos
- Exports

Disclaimer

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► **Read the full disclaimer**

Introduction

Having a Supplier Food Safety Assurance Program (SFSAP) is one type of control measure that can help ensure that the ingredients, materials and non-food chemicals you receive as part of your food business are safe and suitable for use.

A SFSAP could enable you to:

- determine the ability and willingness of a supplier to meet your product specifications; and
- establish a formal agreement with your chosen supplier(s) to ensure compliance of the products you receive. Establishing a formal agreement helps ensure that they share the responsibility for safe food and may reduce the level of preventive controls needed by you upon receiving

Purpose

The Canadian Food Inspection Agency (CFIA) created this document as guidance to help regulated parties comply with the Safe Food for Canadians Regulations.

It's your choice!

You may use other guidance documents that have been developed by provincial governments, industry associations, international partners or academic bodies, as long as they can achieve the same outcome. Always ensure that the document you choose is relevant for your particular business, product or products, and market requirements.

Industry Labelling Tool 線上工具

The "Food Labelling for Industry" Tool is accessible through the CFIA web site:

「業者作食品標示」線上工具可從CFIA 官網進入

Home

- Food
  - Labelling
    - Food Labelling for Industry

At the following address: 網址

http://inspection.gc.ca/food/labelling/food-labelling-for-industry/eng/1383607266489/1383607344939

Industry Labelling Tool　ILT線上工具

Industry Labelling Tool

The Industry Labelling Tool is the food labelling reference for all food inspectors and stakeholders in Canada. It replaces the Guide to Food Labelling and Advertising, and the Decisions page to provide consolidated, reorganized and expanded labelling information. This tool provides:

- Food Products that Require a Label
- General Principles for Labelling and Advertising
  - Factsheet - Allergen Labelling Tips for Food Industry
  - Infographic: Food Allergen Labelling
- Labelling Requirements Checklist
- Frequently Asked Questions: Industry Labelling Tool (ILT)

Search Labelling

標示規定的重點

Core Labelling Requirements

- Bilingual Labelling
- Common Name
- Country of Origin
- Date Markings and Storage Instructions
- Identity and Principal Place of Business
- Irradiated Foods
- Legibility and Location
- List of Ingredients and Allergens
- Net Quantity
- Nutrition Labelling
- Sweeteners
- Food Additives
- Fortification
- Grades
- Standards of Identity

聲明和敘述

Claims and Statements

- Advertising
- Allergens and Gluten
- Composition and Quality
- Health Claims
- Method of Production
- Pictures, Vignettes, Logos and Trade-marks
- Organic
- Origin
- Nutrient Content

Industry Labelling Tool

Labelling

- Contacts
- Food Labelling for Consumers
- Food Labelling for Industry
- Former - Food Labelling for Industry
- Labelling Legislative Framework
- Labelling Modernization Initiative
- Meat Cuts

Allergen-Free, Gluten-Free and Cross Contamination Statements 無過敏原、無麩質、交叉污染的陳述

This page is part of the Guidance Document Repository (GDR).

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Search for related documents in the Guidance Document Repository

Complete text

Important Notice

On December 14, 2016, amendments to nutrition labelling, list of ingredients and food colour requirements of the Food and Drug Regulations came into force. Regulated parties have a five (5) year transition period to meet the new labelling requirements.

Consult the Former – Allergen-Free, Gluten-Free and Precautionary Statements for information on the former requirements.

On this page

Overview
Gluten-Free Claims
- Gluten-Free versus Wheat-Free
- Gluten-Free and Oats
- Gluten-Free and Canary Seed
- Quantitative Statements
- Low Gluten or Reduced Gluten Claims
- Gluten-Free Beer

Fortification of Gluten-Free Foods
- Advertising of Gluten-Free Foods to the General Public

Food Allergen Cross Contamination (or Precautionary) Statements
- Precautionary Labelling of Food Ingredients

Allergen-Free Claims
- "(Naming the Food Allergen)-Free" Claims
- Allergen-Free Claims in Conjunction with Precautionary Labelling
- General "Allergen-Free" or "No Allergens" claims
- "(Naming the Food Allergen Source)-Free" Symbols
- Wheat-Free Claims on Products Containing Canary Seed
- "Does Not Contain Nuts" Claims on Products Containing Coconut

Additional Information
- Information Letters/Policy Updates

Industry Labelling Tool

Labelling

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Allergen-Free, Gluten-Free and Cross Contamination Statements

Gluten-Free Claims 無麩質聲明

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- Gluten-Free versus Wheat-Free
- Gluten-Free and Oats
- Gluten-Free and Canary Seed
- Quantitative Statements
- Low Gluten or Reduced Gluten Claims
- Gluten-Free Beer

A gluten-free claim is any representation in labelling or advertising that states, suggests or implies that a food is free of gluten. In order for a food to be represented as "gluten-free", it must comply with section B.24.018 of the Food and Drug Regulations (FDR). Claims to the effect that a food does not contain an ingredient or substance must be factual and not misleading.

Section B.24.018 of the FDR prohibits the labelling, packaging, advertising or sale of a food in a manner likely to create an impression that it is a gluten-free food if the food contains any gluten protein or modified gluten protein, including any gluten protein fraction, from wheat, oats, barley, rye, triticale or their hybridized strains.

Examples:

a. Battered fish that is formulated to use batter and other ingredients that do not contain gluten, and processed in such a way to meet the specifications of FDR B.24.018, may be labelled "gluten-free".

b. Rice flour, which is a food that in the absence of specific processing controls may be cross-contaminated with gluten, may be represented as "gluten-free" when it meets the specifications of FDR B.24.018

Although Health Canada's regulatory requirements for "gluten-free" foods do not refer to any specific threshold for gluten in products represented as "gluten-free", Health Canada considers that levels of gluten protein below 20 ppm generally do not represent health risks to consumers with celiac disease. The Canadian Food Inspection Agency (CFIA) has published a position on the Compliance and Enforcement of Gluten-Free Claims that reflects the Health Canada position, and takes into account whether gluten is present due to intentional addition or to cross-contamination.

Industry Labelling Tool

某些食品的標示有具體規定

Food-Specific Labelling Requirements

糖果:巧克力、零嘴

- Alcohol 酒精飲料
- Confectionery, Chocolate and Snack Foods
- Dairy 乳製品
- Eggs-Processed 加工蛋
- Eggs-Shelled 帶殼蛋
- Fats and Oils 油脂
- Fish and Seafood 魚和海鮮
- Foods for Special Dietary 特殊飲食
- Fresh Fruit and Vegetables 生鮮蔬果
- Grain and Bakery 穀類及烘製品
- Honey 蜂蜜
- Infant Food and Infant Formula 嬰兒食品及配方奶
- Maple 楓
- Meat and Poultry 禽畜肉
- Processed Products 加工食品
- Retail Foods 零售食品
- Salt 鹽
- Shipping Containers 運輸容器
- Water and Ice 水和冰

In Closing結語

Undeclared food allergens, gluten and sulphites represent a health risk and are priority food safety issues in Canada. 未宣告的食物過敏原、麩質、亞硝酸鹽造成健康風險，在加拿大是重大食安議題。

The overall objective is to minimize risks while maximizing choice.

整體目標是降低風險，同時又增加選擇

In Canada, the health risk from food allergens and sensitivities is managed by: 在加拿大「食物過敏原和過敏反應」造成的健康風險，以下列方式管控：

- Research 研究
- Testing and Surveillance 測試及大規模監控
- Enhanced Regulations 制定詳細法規
- Labelling Compliance Promotion 宣導遵守「食品標示法規」
- Industry Guidance 業者指南
- Inspections 檢查
- Food Safety Investigation and Recalls 食品安全調查及勒令回收

Recap of objectives
回顧本課程的目的

- Recognize the priority allergens in Canada

  認識加拿大的「重點過敏原」
- Outline Canadian allergen labelling requirements using the Industry Labelling Tool

  用線上工具Industry Labelling Tool 得知「加拿大過敏原標示規定」概要
- Identify principles of preventive control activities

  辨識「防範控管措施」的原則
- Locate Canadian resources for more information

  知道去哪裡找加拿大資訊來源

Canada

Allergen Trivia 過敏原趣味問答

Did you know? 你本來知道嗎?

- With the updated definition of gluten, companies that manufacture products made with barley, oats, rye, triticale or wheat will have the option of labelling their products as gluten-free in Canada, if they have been formulated or processed to contain 20 ppm or less of gluten protein

根據麩質的「更新」定義，廠商使用大麥、燕麥、黑麥、黑小麥或小麥製造產品，只要經過配方或加工使麩質降到20ppm或以下，就可把產品標示為不含麩質。

- Only the tree nuts identified in Canadian regulations will have to be declared as food allergens. These are almonds, Brazil nuts, cashews, hazelnuts, macadamia nuts, pecans, pine nuts, pistachios, and walnuts. However, coconut will have to be declared in the same manner as any other ingredient that is not a food allergen.

唯有「加拿大法規中列名」的堅果才必須宣告為過敏原：也就是杏仁、巴西堅果、腰果、榛果、夏威夷豆、山核桃、松子、開心果、核桃。但是椰子，跟別的「非過敏原」一樣，必須宣告/標示。

Exercise: Allergen Trivia
練習題：趣味問答

Did you know? 你本來知道嗎？

- Tahini is a paste made of sesame seed. Tahini是芝蔴籽做的醬
- Cream of tartar (aka. potassium acid tartrate or tartaric acid) is not derived from milk. It is obtained as a by-product of wine manufacture.
  塔塔粉(酒石酸氫鉀或酒石酸)並非牛奶衍生物，而是釀造葡萄酒的副產品
- Canadian regulations require that gluten sources to be declared by the grain name, such as barley, oats, rye, triticale or wheat.
- 加拿大法規要求，宣告麩質需註明穀類來源，例如大麥、燕麥、黑麥、黑小麥或小麥

Allergen Trivia 趣味問答1/2

Did you know?　你本來知道嗎？

- You can include other foods that may be considered as allergens in other countries in the "Contains" statement.
  在「含有：」的敘述中可以列入其它國家認定的過敏原
- The specific sources of all hydrolysed plant proteins, starches and modified starches, and lecithins must be identified by their common names in the list of ingredients. For example, lecithin derived from soybean would be declared as “soy lecithin” in the ingredient listing.
  所有水化植物蛋白、澱粉或修飾澱粉、卵磷脂的具體來源必需以俗名標示在成分清單中。例：黃豆衍生的卵磷脂要註明是「黃豆卵磷脂」

Allergen Trivia 趣味問答2/2

Did you know?　你本來知道嗎？

- Whole fresh fruit or vegetables packaged in a wrapper or confining band of less than 1/2 inch (12.7 mm) in width do not require any labelling (including allergen labelling), unless a label is applied voluntarily.
- 整顆出售的生鮮蔬果，用透明物包覆，或捆紮成(小於半英寸)單束，就不需標示(過敏原)，除非業者主動標示
- There are exemptions for certain prepackaged foods, such as a stick of chewing gum, sold individually. Because these foods do not require any labelling, food allergens do not need to be declared as long as no label is applied voluntarily.
- 某些包裝食品可免標籤，例如個別販售的單片口香糖。除非業者主動加標籤，否則不需要宣告食物過敏原。

- Although certain foods are exempt from declaring components, priority food allergens such as egg must be declared when present.
- 雖然某些食品可豁免宣告其原料，不過如果食物中有「重點過敏原」(例如蛋)，仍必需宣告