Industry Notice

April 20, 2011

TO: ALL FEDERALLY REGISTERED FISH ESTABLISHMENTS AND IMPORTERS OF FISH

PRODUCTS

SUBJECT: THE CANADIAN FOOD INSPECTION AGENCY (CFIA) FISH PROGRAM UPDATE WITH

RESPECT TO HEALTH CANADA'S POLICY ON LISTERIA MONOCYTOGENES IN

READY-TO-EAT (RTE) FOODS

Health Canada's Policy on *Listeria monocytogenes* in Ready-To-Eat (RTE) Foods ("*Listeria Policy* (2011)") came into effect April 1, 2011 and replaces the 2004 Policy.

The CFIA, along with other federal government departments, will be working with industry to promote the recommended food safety practices detailed in the *Listeria Policy* (2011).

Federally registered processors and importers of fish products continue to be responsible for ensuring that products are in compliance with relevant legislation, and a full review of the *Listeria Policy* (2011) is encouraged to assist with understanding its key components, including:

- 1. Determining the *Listeria monocytogenes* risk categories of their products and sampling accordingly.
- 2. Developing verification activities based on the *Listeria monocytogenes* risk categories determined above, including regular environmental sampling and periodic product sampling to monitor control of the process. Higher risk category products should be given the highest priority.
- 3. Following sampling guidelines, methodologies and compliance criteria for environmental and product sampling.
- 4. Performing trend analysis to model and predict risk and to determine best oversight and compliance activities.
- 5. In the case of imported products, verifying prior to importation that the foreign manufacturer is capable of providing products that comply with Canadian regulatory requirements. When the foreign supplier does not have evidence of *Listeria* spp. environmental monitoring, the importer is encouraged to increase product sampling and analysis for *Listeria monocytogenes*.



The CFIA has updated its inspection activities in relation to RTE foods to reflect the recommended food safety practices in the *Listeria Policy* (2011). Specifically, the CFIA fish program continues to develop guidance documents that reflect the recommended food safety practices in the *Listeria Policy* (2011). The first two documents below can be accessed on CFIA's website, and the remaining three will be posted in the coming weeks.

- Bacteriological Guidelines for Fish and Fish Products (Appendix 2 of the Fish Products Standards and Methods Manual)(http://www.inspection.gc.ca/english/fssa/fispoi/man/samnem/app2e.shtml)
- Decision Tree for the Determination of the Ready-to-Eat (RTE) Product Category (http://www.inspection.gc.ca/english/fssa/fispoi/man/samnem/app2image.shtml)
- Process Control Document Requirements
- Guidelines for the Development of an Environmental Sampling Program
- Control Measures for Preventing the Contamination and Growth of *Listeria monocytogenes*

The CFIA will continue to verify compliance with regulatory requirements relating to *Listeria monocytogenes* in RTE fish. Verification of imported products will be through product inspection and the assessment of process control documents for safety parameters for RTE products. Verification of domestic establishments will be through on-site inspections and review of their Quality Management Program plans.

Please contact your CFIA area or regional program specialist if you have any questions or require additional information.

For further information on the *Listeria Policy* (2011) or to request a copy of the policy, visit Health Canada's website at:

www.hc-sc.gc.ca/fn-an/legislation/pol/policy_listeria_monocytogenes_2011-eng.php

Original signed by

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