



# Gap Assessment Checklist

**INSTRUCTIONS BEGIN ON PAGE 26 - CONFIDENTIAL**

|   |                        |              |                |     |               |    |                  |     |                |     |               |
|---|------------------------|--------------|----------------|-----|---------------|----|------------------|-----|----------------|-----|---------------|
| <b>Name of Firm:</b>  |                        |              |                |     |               |    |                  |     |                |     |               |
| <b>Company Category:</b>  |                        |              |                |     |               |    |                  |     |                |     |               |
| <b>Assessor Name:</b>   | <b>Assessment date</b> |              |                |     |               |    |                  |     |                |     |               |
|   | <b>YEAR</b>            | <b>MONTH</b> | <b>DAY</b>     |     |               |    |                  |     |                |     |               |
| <b>Assessor Signature:</b>  |                        |              |                |     |               |    |                  |     |                |     |               |
| <p><b>Processing Plant Background:</b><br/> <i>Briefly describe the products and processes:</i></p><br><br><br><br><br><br><br><br><br><br><p><b>Does the processing facility have a potentially high-risk product or situation?</b></p> <p><input type="checkbox"/> Refrigerated ready-to-eat food capable of supporting the growth of pathogens</p> <p><input type="checkbox"/> Raw Food of Animal Origin in the plant</p> <p><input type="checkbox"/> Thermal Process</p> <p><input type="checkbox"/> Allergens in some products</p> <p><b>What Prerequisite Programs are important for the plant?</b></p><br><br><br><br><br><br><br><br><br><br><p><b>What Standard Operating Procedures are important for the plant?</b></p><br><br><br><br><br><br><br><br><br><br><p><b>Has a Product Background Form been completed for any products?</b></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p><b>Are there items from the Product Background Form that should be further addressed?</b></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> <i>If yes, these items become part of the workplan.</i></p> |                        |              |                |     |               |    |                  |     |                |     |               |
| <i>Rating System</i>  |                        |              |                |     |               |    |                  |     |                |     |               |
| FM  | Fully Meets            | SM           | Somewhat Meets | DNM | Does not Meet | CF | Critical Failure | N/A | Not Applicable | N/E | Not Evaluated |
| <i>Optional Scoring System</i>  |                        |              |                |     |               |    |                  |     |                |     |               |
| 3   | Fully Meets            | 2            | Somewhat Meets | 1   | Does not Meet | 0  | Critical Failure | N/A | Not Applicable | N/E | Not Evaluated |

## **A. PREMISES**

*Outcomes:*

*Depending on the nature of the operations, and the risks associated with them, premises and facilities should be located, designed and constructed to ensure that:*

- *contamination is minimized;*
- *the use of areas where the environment poses a threat to the safety of food is avoided;*
- *design and layout permit appropriate maintenance, cleaning and disinfections and minimize air-borne contamination;*
- *surfaces and materials, in particular those in contact with food, are non-toxic in intended use and, where necessary, suitably durable, and easy to maintain and clean;*
- *where appropriate, suitable facilities are available for temperature, humidity and other controls; and*
- *there is effective protection against pest access and harbourage.*

*Rationale:*

*Attention to good hygienic design and construction, appropriate location, and the provision of adequate facilities, is necessary to enable hazards to be effectively controlled.*

|                              |   |                         |                       |  |  |
|------------------------------|---|-------------------------|-----------------------|--|--|
| <b>A.1 Building Interior</b> |   |                         |                       |  |  |
|                              | <p>General Design, Construction, and Maintenance</p> <ul style="list-style-type: none"> <li>• Floors, walls, doors, windows, ceilings, etc. are foodgrade, durable, smooth, cleanable and suitable – appropriate items are on the CFIA reference listing.</li> <li>• Consider ventilation, drains, waste disposal, water storage facilities, product flow.</li> </ul> |                         |                       |  |  |
|                              | <table border="1" style="width: 100%;"> <tr> <td style="width: 50%; text-align: center;">In – Plant Observations</td> <td style="width: 50%; text-align: center;">Written Program Notes</td> </tr> <tr> <td style="height: 100px;"></td> <td style="height: 100px;"></td> </tr> </table>  | In – Plant Observations | Written Program Notes |  |  |
| In – Plant Observations      | Written Program Notes   |                         |                       |  |  |
|                              |   |                         |                       |  |  |
|                              | Sanitary facilities sufficient and maintained (Hand wash stations, lunch room, changeroom, washrooms).  |                         |                       |  |  |
|                              | <table border="1" style="width: 100%;"> <tr> <td style="width: 50%; text-align: center;">In – Plant Observations</td> <td style="width: 50%; text-align: center;">Written Program Notes</td> </tr> <tr> <td style="height: 100px;"></td> <td style="height: 100px;"></td> </tr> </table>  | In – Plant Observations | Written Program Notes |  |  |
| In – Plant Observations      | Written Program Notes   |                         |                       |  |  |
|                              |   |                         |                       |  |  |

|                              |   |                       |
|------------------------------|---|-----------------------|
|                              | Lighting (Protected, adequate intensity).   |                       |
|                              | In – Plant Observations   | Written Program Notes |
| <b>A.2 Building Exterior</b> |   |                       |
|                              | General Environment <ul style="list-style-type: none"> <li>• Not in close proximity to environmental contaminants.</li> <li>• Surroundings maintained, free from refuse, appropriate drainage.</li> </ul>               |                       |
|                              | In – Plant Observations   | Written Program Notes |
|                              | General Design, Construction, and Maintenance. <ul style="list-style-type: none"> <li>• Prevents entry of contaminants and pests (i.e., roof, walls, air intakes, windows).</li> <li>• Foundation maintained</li> </ul> |                       |
|                              | In – Plant Observations   | Written Program Notes |

**A.3 Water, Ice and Steam**

Water, Ice, and Steam Testing Program

- Analyzed at appropriate frequency to confirm potability
- Non-municipal supplies must be treated and tested (formalized water treatment program)
- Water storage facilities and recirculated water systems treated and monitored

In – Plant Observations

Written Program Notes

## **B. Transportation and Storage**

*Outcomes:*

### **Transportation**

*Measures should be taken where necessary to:*

- *protect food from potential sources of contamination and cross-contamination is minimized*
- *protect food from damage likely to render the food unsuitable for consumption*
- *provide an environment which effectively controls the growth of pathogenic or spoilage micro-organisms and the production of toxins in food (adequate cold chain)*

*Rationale:*

*Food may become contaminated, or may not reach its destination in a suitable condition for consumption, unless effective control measures are taken during transport, even where adequate hygiene control measures have been taken earlier in the food chain.*

### **Storage**

*Where appropriate, suitable facilities are available for temperature, humidity and other controls*

### **Product Labelling**

*Products should bear appropriate information to ensure that:*

- *adequate and accessible information is available to the next person in the food chain to enable them to handle, store, process, prepare and display the product safely and correctly*

*Information for industry or trade users should be clearly distinguishable from consumer information, particularly on food labels.*

*Rationale:*

*Insufficient product information, and/or inadequate knowledge of general food hygiene, can lead to products being mishandled at later stages in the food chain. Such mishandling can result in illness, or products becoming unsuitable for consumption, even where adequate hygiene control measures have been taken earlier in the food chain.*

### **Allergen Control Program**

*The presence of an allergen must be declared on the product label*

*Controls must be in place to minimize the likelihood of undeclared allergens*

### **Supplier Quality Assurance**

*Measures should be taken to purchase ingredients and materials from suppliers that have programs in place to ensure that primary producers manage production such that food is safe and suitable for its intended use including:*

- *avoiding the use of areas where the environment poses a threat to the safety of food;*
- *controlling contaminants, pests and diseases of animals and plants in such a way as not to pose a threat to food safety;*
- *adopting practices and measures to ensure food is produced under appropriately hygienic conditions.*

*Rationale:*

*To reduce the likelihood of introducing a hazard which may adversely affect the safety of food, or its suitability for consumption at later stages of the food chain.*

**B.1 Receiving Of Incoming Material**

Incoming Materials (Ingredients, chemicals, and packaging materials)

- Received in an appropriate area
- Carrier inspection, product inspection, lot #'s, temperature check for carrier and product, specifications, returned products, allergen ID, guidelines for rejecting shipments)

In – Plant Observations

Written Program Notes

Non-Food Materials (**Acceptable/Approved Chemicals**), Reference listing?

In – Plant Observations

Written Program Notes

Incoming Materials and Finished Product Storage

- Refrigerated/frozen product, Chemicals, segregation, proper rotation, allergens)

In – Plant Observations

Written Program Notes

**B.2 Finished Product Control**

Finished Product Shipping

- Carrier inspection, product inspection, temperature check for carrier and product

In – Plant Observations

Written Program Notes

**B.3 Allergen Control Program**

Allergen Identification and Control (Segregation, Color-Coding, Master List of Products / Ingredients / Allergens)

- Controlled during transport, receiving, storage, shipping

In – Plant Observations

Written Program Notes

Allergen Production Controls (Sanitation Procedures, Production Controls, Rework Procedures, Training)

In – Plant Observations

Written Program Notes

**B.4 Product Labelling and Packaging**

Product Labelling (Appropriate, Allergens Identified, Procedures for Updating)

In – Plant Observations

Written Program Notes

**B.5 Supplier Quality Assurance**

Supplier Quality Assurance Program (Vendor Approval Process, Letters of Guarantee, Supplier Assessment)

In – Plant Observations

Written Program Notes

Approved Supplier Records (Master List of Products, Approved Suppliers)

In – Plant Observations

Written Program Notes

***B.6 Product Specifications***

Product Specifications (Contain information for each ingredient, Complete, Adequate, monitor through evaluation)

In – Plant Observations

Written Program Notes

### C. EQUIPMENT

*Outcomes:*

*Depending on the nature of the operations, and the risks associated with equipment should be located, designed and constructed to ensure that:*

- *contamination is minimized;*
- *design and layout permit appropriate maintenance, cleaning and disinfections and minimize air-borne contamination;*
- *surfaces and materials, in particular those in contact with food, are non-toxic in intended use and, where necessary, suitably durable, and easy to maintain and clean;*

*To establish effective systems to monitor the effectiveness of maintenance and sanitation procedures.*

*Rationale:*

*To facilitate the continuing effective control of food hazards, pests, and other agents likely to contaminate food.*

|   |                       |
|---|-----------------------|
| General Equipment Design and Installation (Food-grade, Adequate, Cleanable)                         |                       |
| In – Plant Observations   | Written Program Notes |
| Food Contact Surfaces (Non-corrosive, Non-absorbent, Cleanable, Smooth, Color-Coding)               |                       |
| In – Plant Observations   | Written Program Notes |
| Equipment Maintenance and Calibration Program (Instrumentation, Procedures, Preventive Maintenance) |                       |
| In – Plant Observations   | Written Program Notes |

## **D. PERSONNEL**

*Outcomes:*

*To ensure that those who come directly or indirectly into contact with food are not likely to contaminate food by:*

- *maintaining an appropriate degree of personal cleanliness;*
- *behaving and operating in an appropriate manner.*
- *adopting practices and measures to ensure food is produced under appropriately hygienic conditions*
- *training, and/or instructing in food hygiene to a level appropriate to the operations they are to perform*

|   |                       |
|---|-----------------------|
| <b><i>D.1 Policy Development</i></b>  |                       |
| In – House Food Safety and Hygiene Policy (Posted, Complete, Prescriptive, Illness, Injury) |                       |
| In – Plant Observations   | Written Program Notes |
| Visitor Food Safety and Hygiene Policy (Posted, Complete, Prescriptive, Access Controlled)  |                       |
| In – Plant Observations   | Written Program Notes |

|  |                       |
|--|-----------------------|
| <b>D.2 Training</b>  |                       |
| Food Safety and Hygiene Training (Covers both Skills and Knowledge, Adequate, Procedures, Appropriate Training Materials)  |                       |
| In – Plant Observations  | Written Program Notes |
| Technical Training (Covers both Skills and Knowledge, professional training as necessary, Training in critical processes, Sanitation, Calibration, Maintenance, General Plant Knowledge) |                       |
| In – Plant Observations  | Written Program Notes |

## E. SANITATION AND PEST CONTROL

*Outcomes:*

*To establish effective systems to:*

- *ensure adequate and appropriate maintenance and cleaning*
- *control pests; and*
- *monitor effectiveness of maintenance and sanitation procedures.*

**RATIONALE:**

*To facilitate the continuing effective control of food hazards, pests, and other agents likely to contaminate food.*

|  |                       |
|--|-----------------------|
| <b>E.1 Sanitation</b>  |                       |
| Sanitation Program <ul style="list-style-type: none"> <li>• Master cleaning schedule and SOP's</li> <li>• Appropriate Chemicals (concentrations tested), temperature and pressure</li> </ul> |                       |
| In – Plant Observations  | Written Program Notes |
| Pre-operational Sanitation and Sanitation during Operation <ul style="list-style-type: none"> <li>• Monitoring in place</li> </ul>   |                       |
| In – Plant Observations  | Written Program Notes |

|  |                       |
|--|-----------------------|
| <b><i>E.2 Pest Control</i></b>   |                       |
| Pest Control Program (Pest control company certificate (license), Evidence of Pest Activity, Approved Chemicals) |                       |
| In – Plant Observations  | Written Program Notes |
|  |                       |

## **F. COMPLAINT HANDLING AND RECALLS**

*Outcomes:*

*Products should bear appropriate information to ensure that:*

- *the lot or batch can be easily identified and recalled if necessary.*

|   |                       |
|---|-----------------------|
| <b><i>F.1 Complaint Handling</i></b>  |                       |
| Product Complaints (Documented, Investigated, Corrective Actions)   |                       |
| In – Plant Observations   | Written Program Notes |
| <b><i>F.2 Recall System</i></b>   |                       |
| Recall Capability <ul style="list-style-type: none"> <li>• Persons responsible and roles</li> <li>• Master list of ingredients and suppliers complete with contact info</li> <li>• Master list of finished products and customers complete with contact info</li> <li>• Methods to identify, locate and control effected product</li> <li>• Traceability of ingredients to finished products AND coded/lot #'s for finished products</li> <li>• Mock recalls</li> <li>• Corrective Actions</li> </ul> |                       |
| In – Plant Observations   | Written Program Notes |

## G. Critical Control Points

*Outcomes:*

*To produce food which is safe and suitable for human consumption by:*

- *formulating design requirements with respect to raw materials, composition, processing, distribution, and consumer use to be met in the manufacture and handling of specific food items*
- *designing, implementing, monitoring and reviewing effective control systems to reduce the risk of unsafe food by taking preventive measures to assure the safety and suitability of food at an appropriate stage in the operation by controlling food hazards.*

*Rationale:*

*To reduce the risk of unsafe food by taking preventive measures to assure the safety and suitability of food at an appropriate stage in the operation by controlling food hazards.*

|   |                       |
|---|-----------------------|
| <b>G.1 Identification of Critical Control Points</b>                                      |                       |
| Critical Control Points Identified, Critical Limits and Monitoring Procedures Established |                       |
| In – Plant Observations   | Written Program Notes |
| <b>G.2 Records - Control of Operation</b>   |                       |
| Product Preparation / Blending Records  |                       |
| In – Plant Observations   | Written Program Notes |

|  |                       |
|--|-----------------------|
| Process Control Records  |                       |
| In – Plant Observations  | Written Program Notes |
| <b><i>G.3 Deviations, Corrective Action and Verification</i></b> |                       |
| Corrective Actions (Appropriate, Documented, Problem Addressed)  |                       |
| In – Plant Observations  | Written Program Notes |
| Verification Procedures (Procedures, Appropriate)                |                       |
| In – Plant Observations  | Written Program Notes |



**B. Transportation, Receiving & Storage**

Items that are well-performed:

Items that need improvement:

Items that must be addressed immediately:

**Optional Scoring Section**

|   |  |
|---|--|
| Transportation, Receiving & Storage Total Points    |  |
| Transportation, Receiving & Storage Possible Points |  |
| Score Percentage                                    |  |

***C. Equipment***

**Items that are well-performed:**

**Items that need improvement:**

**Items that must be addressed immediately:**

**Optional Scoring Section**

|                                  |  |
|----------------------------------|--|
| <b>Equipment Total Points</b>    |  |
| <b>Equipment Possible Points</b> |  |
| <b>Score Percentage</b>          |  |

***D. Personnel***

**Items that are well-performed:**

**Items that need improvement:**

**Items that must be addressed immediately:**

**Optional Scoring Section**

|                                  |  |
|----------------------------------|--|
| <b>Personnel Total Points</b>    |  |
| <b>Personnel Possible Points</b> |  |
| <b>Score Percentage</b>          |  |

**E. Sanitation & Pest Control**

Items that are well-performed:

Items that need improvement:

Items that must be addressed immediately:

**Optional Scoring Section**

|   |  |
|---|--|
| Sanitation & Pest Control Total Points    |  |
| Sanitation & Pest Control Possible Points |  |
| Score Percentage                          |  |

***F. Recall***

**Items that are well-performed:**

**Items that need improvement:**

**Items that must be addressed immediately:**

**Optional Scoring Section**

|                               |  |
|-------------------------------|--|
| <b>Recall Total Points</b>    |  |
| <b>Recall Possible Points</b> |  |
| <b>Score Percentage</b>       |  |

**G. Critical Control Points**

Items that are well-performed:

Items that need improvement:

Items that must be addressed immediately:

**Optional Scoring Section**

|                                  |  |
|----------------------------------|--|
| Critical Factors Total Points    |  |
| Critical Factors Possible Points |  |
| Score Percentage                 |  |

|                     |                 |       |     |
|---------------------|-----------------|-------|-----|
| Name of Firm:       |                 |       |     |
| Company Category:   |                 |       |     |
| Assessor Name:      | Assessment date |       |     |
|                     | YEAR            | MONTH | DAY |
| Assessor Signature: |                 |       |     |

**H. Workplan for Items that must be addressed immediately:**

**I. Workplan for Items that need improvement:**

**J. Items the plant commits to work on immediately:**

## Gap Assessment

### *Definition*

A gap assessment is an on-site evaluation of the current food safety system in your facility as compared with the general principles of food hygiene as stated by Codex Alimentarius. The gap assessment will indicate the strengths and weaknesses in your plant and provide the basis for a workplan to improve the food safety system. Once the workplan has been adopted and implemented, the Gap Assessment can be repeated to demonstrate that the food safety system has been improved.

At the beginning of the Gap Assessment form there is a section that outlines the background of the processing plant. This is an important area as this assists with the prioritization of items that are listed in the workplan for the plant.

The first page of the Gap Assessment asks questions about what the processor produces, whether or not a higher risk condition is in the plant and a description of the high risk condition. The next questions ask for a determination of which Prerequisite Programs are important for the processor and, flowing from this determination, a list of the important Standard Operating Procedures.

You will note that this Gap Assessment can be based on either comments or a score; it is your choice which system you use. Comments are made after each section; what is performed well, what needs improvement and what items should be addressed immediately.

The final workplan summarizes and prioritizes each section's items. As stated above, the prioritization of items in the workplan is dependent on what products are produced and which Prerequisite Programs and Standard Operating Procedures are most important.

### *Performing a Gap Assessment*

Each item on the Gap Assessment is described in more detail below:

## **A. Premises**

### A.1 Building Interior

The floors, walls, doors, windows, and ceilings should be designed such that they can be cleaned and maintained to ensure they do not become a source of contamination in the plant. The facility should be designed such that the product and employee flow minimize the likelihood of cross-contamination. The possibility of glass breakage is minimized.

There should be adequate and fully operational handwashing stations and employee washrooms. The lunchroom should be clean.

Lighting should be such that employees can adequately see what they are doing.

## **A.2 Building Exterior**

The building should not be located in an area where environmental contamination is a concern. There is no garbage or similar items around the facility. The facility is maintained to minimize the potential for harbouring pests.

The premises are designed such that the entry of pests is prevented.

## **A.3 Water, Ice and Steam**

Non-municipal water supplies should be tested to ensure potability. Water recirculation systems should be monitored to ensure they are of adequate microbiological quality. An action plan should be in place for when a "boil water" advisory is issued.

# **B. Transportation & Storage**

## **B.1. Receiving of Incoming Materials**

A receiving program for evaluating incoming materials and monitoring temperature-controlled shipments should be in place. The program should evaluate the condition of both the carrier and the shipment itself. The program should also include a check to ensure the ingredient is on the Master List of Ingredients.

Non-food materials should be approved for use in a food plant. Check the Reference Listing found at: <http://www.inspection.gc.ca/english/fssa/reference/refere.shtml>.

Incoming materials should be stored in the appropriate storage area. Non-food chemicals should be stored separately from food.

## **B.2 Finished Product Control**

A shipping program should be in place and include temperature monitoring of the product and carrier and an inspection of the load and carrier.

## **B.3 Allergen Control Program**

There should be a program for identifying allergens in incoming ingredients and controlling them in the plant

This program includes assigning designated storage areas, designated utensils and equipment, production planning, sanitation scheduling and employee training.

## **B.4 Product Labelling and Packaging**

Product labelling meets regulations. All allergens have been identified. Triggers for redoing package labels are identified.

## **B.5 Supplier Quality Assurance**

There should be Letter of Guarantee for higher-risk products. For example, there should be a Letter of Guarantee for:

- the absence of *Salmonella* in cocoa/chocolate
- acceptable aflatoxin levels in nuts
- the absence of *Listeria monocytogenes* in sandwich meats

The facility should have an Approved Supplier and Ingredient list. A more advanced program will have a system by which to qualify new suppliers and ingredients.

Each input should have a specification sheet on file. A more advanced program will have a program to monitor the input.

## **C. Equipment**

Equipment is designed for use in a food plant. It is installed following manufacturer's specifications in a location that allows for adequate maintenance and cleaning.

The food contact surfaces are resistant to corrosion and are able to be cleaned adequately.

There is a program for fixing equipment as necessary. There are maintenance records document calibration and equipment validation activities. A more advanced program will include a preventive maintenance program for critical equipment.

## **D. Personnel**

### **D.1 Policy Development**

There is a written, posted food safety and hygiene policy.

There is a written, posted visitor's policy that is followed.

### **D.2 Training**

Employees have been trained in food safety and hygiene. There are appropriate training materials on-site.

Employees in critical areas are well-trained and understand why they are performing their tasks. Employees will be adequately trained to perform sanitation and maintenance tasks. A more advanced program will have a comprehensive employee training program for all employees.

## **E. Sanitation**

### **E.1 Sanitation**

The sanitation program uses appropriate, approved chemicals at the correct concentration. There is a master cleaning schedule for scheduling more infrequent sanitation tasks. There are written sanitation procedures. The concentration of sanitizer levels is monitored.

There is a program for inspecting equipment before use. An appropriate program of cleaning during processing is in place. This program may be an important aspect of allergen control.

### **E.2 Pest Control**

There is an adequate pest control program in place. Ideally, an outside service is used. There is a pest control map on-site and regular inspection of pest control stations is in place.

## **F. Complaint Handling & Recalls**

### **F.1 Complaint Handling**

Product Complaints are investigated and documented. Corrective actions are taken and documented.

### **F.2 Recall System**

Adequate tracking records are maintained such that an ingredient and/or finished product can be identified if necessary. A recall plan is available. Mock recalls are performed regularly.

## **G. Critical Control Points**

### **G.1 Identification of Critical Factors**

Critical factors have been identified.

### **G.2 Records – Control of Operations**

Product preparation or batch records are in place. Process control records are in use.

### **G.3 Deviations, Corrective Actions and Verification**

Critical limits have been set and monitoring and deviation procedures are in place. Corrective actions have been followed as necessary.

Verification of Critical Control Points is in place. This includes a review of documentation and confirmation that the employee is following the correct procedure.

## H. Workplan

Written comments are also part of the Gap Assessment. The remarks will focus on both in-plant operations and documented activities. This is an important part of the Gap Assessment because it is likely that many aspects of a food safety program are likely operating in the plant without accompanying documentation; this fact will be noted.

The marks, if used, will be tabulated for each of the seven sections. For each section the items that are well-performed, the items that need improvement and the items that should be addressed immediately will be documented.

A summary workplan will be developed based on the results of each of the seven sections. This final workplan should make sense for the plant and will concentrate on priority items. For example, if the Critical Control Point section scores low, this will be prioritized. The final workplan will have two parts, those items that should be addressed immediately to ensure the plant is controlling critical hazards and those that, while important, can be implemented over a longer period of time.

Finally, the plant will clearly state which items they commit to working on immediately.