

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 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.



Gap Assessment Checklist - Instructions for Use

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.