

**Food Safety Management System Requirements – Comparison - Private & Public Sector Programs -  
Version 4 – 19 June 2013**

<b>FSMS Element</b>	<b>ISO 22000:2005 Plus ISO 22002-1:2009</b>	<b>GFSI Criteria Guidance Document v 6.2 – 2012</b>	<b>FSMA draft proposed regulations – January 2013</b>	<b>FSEP Manual 2012</b>	<b>Alberta HACCP Advantage V 1.1 2011</b>	<b>CFIA Inspection Modernization - Version 2 - 28 March 2013</b>	<b>CFIA New Regulatory Framework – 3 June 2013</b>
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<b>Generic FSMS</b>							
Documented FSMS	4.1 <sup>i</sup>	FSM 1 <sup>ii</sup>	117.126 <sup>iii</sup> Food Safety Plan	2.2.6 <sup>iv</sup>	Eligibility Criteria - 3 <sup>v</sup>	Documented Preventive Control Plan – 2.7 <sup>vi</sup>	Documented Preventive Control Plan PCP p. 11 <sup>vii</sup>
Meet scheme or standard requirements	4.1	FSM 1	Not Applicable (NA)	2.2.1	Eligibility Criteria – 3a	NA	NA
FS Policy	4.2.1 & 5.2	FSM 2	Not Specified (NS)	NS	NS	NS	NS
FS Manual		FSM 3	NS	NS	NS	NS	NS
Measurable Objectives related to food safety policy	4.2.1	FSM 2	NS	NS	NS	Annex B - Introduction	Could include measurable regulatory performance criteria
Include statutory & regulatory requirements in FSMS system	5.1	NS [general reference in Forward p. 11]	See below	See below	Eligibility Criteria - 2	See below	See below

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Regulatory Obligation	See above	See above	FSMA & Regulations	FSEP 2.2.1 Meat & Fish, etc Inspection Acts & Regulations	See above	Safe Food for Canadians Act & PCP – E: 1.1, 1.2, 1.3.1, 2.7.1 (b)	Safe Food for Canadians Act & Regulations
Outsourced Processes	4.1	FSM 17	NS	NS	PRP -H 2.1	NS	PCP pp 11 -13
Documented specifications for inputs & services		FSM 9	NS		PRP – H2.1	Annex B – 1.1	Annex 1 – 1.1.1, 1.1.2 Annex 2 – 1.1.1
Document Control Procedure	4.2.2	FSM 8	117.175	2.2.6	Eligibility Criteria - 5	NS Documents required	NS Documents required
Record Control Procedure	4.2.3	FSM 8	117.175	2.2.7	Eligibility Criteria – 5 & various PRPs	NS Records required	Annex 1 – 7.3 Annex 2 – 7.3
Management Responsibility	5.1	FSM 4	117.155 requires “qualified individual”	2.2.1	Eligibility Criteria - 1	PCP – E: 2.7.1 (f) (implied not stated)	PCP pp. 11-13 (implied)

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Management Commitment	5.1	FSM 5	117.310 requires owner signature on FS Plan	2.2.1  See above Regulatory Obligation	Eligibility Criteria - 1	PCP – E: 7.1 in context of enforcement / Annex A.1 in limited context of license application  See above Regulatory Obligation	See above Regulatory Obligation
FSMS System Planning	5.3	NS	NS	NS	Eligibility Criteria - 4	NS	NS
Defining responsibility & authority	5.4	FSM 4	117.155 [qualified individual]	2.2.1	NS	NS	PCP pp. 11-13 Annex 1 – 3.4 Annex 2 – 3.4
Team Leader	5.5	HACCP EL 1	117.155 [qualified individual]	2.2.2	Eligibility Criteria – 3d	PCP – E: 2.7.1 (implied in context of management review)	PCP pp. 11-13 Annex 1 – 3.4 Annex 2 – 3.4

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External Communication (excludes recall)	5.6.1	NS			NS	NS	NS
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Customer complaints	5.6.1	FSM 18			PRP – F3	PCP – E: 2.7.1 Annex B – 7.3	Annex 1 – 7.2 Annex 2 – 7.2
Internal Communication	5.6.2	NS		2.2.1	NS	NS	NS
Emergency Preparedness	5.7	NS			NS	Annex A – in context of emergency contact info	Question 12 p. 13 raises matter for input
Management Review	5.8	FSM 6	NS	NS / HACCP System annual review – 3.4.2	NS / FSMS review – Eligibility Criteria – 4	PCP – E: 2.7.1 (f)	PCP p. 12
Provision of resources	6.1	FSM 7		2.2.1	Eligibility Criteria - 1	PCP – E: 2.7 (implied)	PCP pp. 11-13 (implied)
Human Resources, including Competence & Training	6.2	FSM 7 GMP EL 17	117.10	2.2.1 3.1.1.4	Eligibility Criteria – 1 PRP - D	PCP – E: 2.7.1 Annex B – 3.2	Annex 1 – 3.4 Annex 2 – 3.4

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Infrastructure	6.3	FSM 7		NS – 2.2.1	NS	Annex B -5	Annex 1 – 5 Annex 2 – 5
Work Environment	6.4	FSM 7		NS – 2.2.1	NS	NS	NS
<b>Planning &amp; realization of safe product</b>							
<b>Prerequisite Programs (PRP)</b>							
Building construction	7.2.3	GMP EL 1, 2, 3, 4	117.20	3.1.1.1	PRP - A	Annex B – 5.2	Annex 1 – 5.1, 5.2, 5.3 Annex 2 – 5.2, 5.3
Premise layout	7.2.3	GMP EL 1, 2, 3, 4	117.20	3.1.1.1	PRP - A	Annex B – 5.1	Annex 1 – 5.1, 5.2 Annex 2 – 5.1, 5.2, 5.3
Utilities (air, water, etc)	7.2.3	GMP EL 12	117.20 117,35	3.1.1.1	PRP - A	Annex B – 5.3 & 5.2	Annex 1 – 5.3.4, 5.3.5, 5.4 Annex 2 – 5.3.4, 5.3.5, 5.4

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Supporting services (waste, sewage, etc)	7.2.3	GMP EL 13	117.35	3.1.1.1	PRP - A	Annex B – 5.4	Annex 1 –, 5.4 Annex 2 – 5.5
Suitability of equipment & maintenance	7.2.3	GMP EL 5 & 6	117.40	3.1.1.3	PRP - C	Annex B - 4	Annex 1 – 4.1, 4.2, 5.4 Annex 2 – 4.1, 4.2
Purchasing	7.2.3	FSM 15		3.1.1.2	PRP - B	Annex B – 1.1 & 1.2 (a)	Annex 1 – 1.1.1, 6 Annex 2 – 1.1.1, 6
Supplier approval	22002-1	FSM 16	NS / Comments invited	NS	PRP – H 2.1	Annex b – 1.3 only in context of imported ingredients	NS Implied PCP – p.12 refers to other supply chain segments that need to be included in a PCP

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Analysis of inputs (lab testing to ISO 17025)	22002-1 [not lab to 17025]	FSM DEL 24	NS / FSMA raises ISO 17025 in context of analyses re: regulatory tests	NS	PRP – H 2.1 [partial]	PCP – E: 2.7.1 (d) [not lab to 17025]	NS
Handling of product (storage, transport, etc)	7.2.3	GMP EL 10 GMP EL 15	117.80 117.206(a)(4) 117.40(e) 117.130(c)(3) 117.93	3.1.1.2	PRP - B	2.7.1 Annex B - 6	Annex 1 – 5.3.7.1, 6 Annex 2 – 5.3.7.1, 6
Cross contamination	7.2.3	GMP EL 9	117.20(b)(6) 117.135(d)(3)		PRP - E	Annex B – 5.2 (c)	Annex 1 – 1.1.1,1.1.3, 1.2.1, 3.2, 5.2.3, 6 Annex 2 – 1.1.1, 1.1.2, 3.2, 5.3.3, 6
Pest control	7.2.3	GMP EL 14	117,35	3.1.1.5		Annex B – 2.2 & 2.3	Annex 1 – 2.3 Annex 2 – 2.3

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Personnel Hygiene	7.2.3	GMP EL 16	117.10	3.1.1.4	PRP - D	Annex B – 3.1	Annex 1 – 3.1, 3.2, 3.3 Annex 2 – 3.1, 3.2, 3.3
Employee facilities	22002-1	GMP EL 7	117.20	3.1.1.1	PRP - A	Annex B – 5.2 (f)	Annex 1 – 5.2.6.1, 5.2.7.3 Annex 2 – 5.3.6.1, 5.3.7.2
Cleaning & sanitizing	22002-1	GMP EL 11	117.35	3.1.1.5	PRP - E	Annex B – 2.1 & 2.3	Annex 1 – 2.1, 2.2, 5.3.6.2 Annex 2 - 2.1, 2.2, 5.3.6.2
Generic Processes & controls	NS	NS	117.80	NS	NS	Annex B – 1.2	Annex 1 – 1.1.3, 1.2 Annex 2 – 1.1.2
Rework	7.10 & 22002-1	GMP FD 18	117,80	3.1.1.6	PRP – F1	NS	Annex 1 – 1.1.1, 1.1.2, 6 Annex 2 – 5.3.7.1, 6
Product recall	7.10 & 22002-1	FSM 19	117.137	3.1.1.6	PRP – F1	PCP – E: 2.7.1 Annex B – 7.2	Annex 1 – 7.1 Annex 2 - 7.1
Recall testing	7.10.4	FSM 19	117.137	3.1.1.6	PRP – F1	Annex – B – 7.2	Annex 1 – 7.1 Annex 2 - 7.1



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Warehousing	22002-1	GMP EL 10	117.93	3.1.1.2	PRP - B	PCP – E: 2.7.1 Annex B - 6	Annex 1 – 5.2.7.1, 6 Annex 2 – 5.3.7.1, 6
Product information &/or labelling	22002-1	FSM 22	NS	3.1.1.6	PRP – F2	Annex B – 1.2 (b)	PCP – p. 11 Annex 1 – 1.1.1, 1.1.2, 1.2.2 Annex 2 – 1.2.2, 1.1.2.3, 1.2.2
Allergen Control	22002 - 1	GMP M 8	117.126 117.135(d)(2)	3.1.1.7	PRP - G	PCP – E: 1.1 PCP – E: 2.7.1 PCP – E: 5.2(c)	NS [? Viewed as chemical hazard]
Food defence	22002-1	FSM 21	FSMA - voluntary	NS	NS	NS	NS

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Hazard Analysis	Modified Codex HACCP approach covering all control measures	Codex HACCP Approach	Modified NACMCF HACCP approach	Modified Codex HACCP Approach	Modified FSEP approach based on Codex	Hazard analysis based on Codex principles & standards	Systematic approach based on Codex HACCP principles [could be site specific or generic (HACCP-based)]
Documented Record	7.3.1	HACCP EL 1	117.130(a)(2)	3.2	Eligibility Criteria – 3c	3 Preventive Control Plan	PCP pp. 11-13
FS Team appointed	7.3.2	HACCP EL 1	Recommend (Rec)	2.2.3	Eligibility Criteria – 3d	NS	PCP p. 11 - 13
FS Team competence	7.3.2	NS	Rec	2.2.4	NS	NS	PCP - pp. 11-13 Annex 1 – 3.4 Annex 2 - 3.4
Selection of methodology	7.4.3	Codex approach	7 HACCP principles Rec 12 steps	3.2 FSEP forms	AHA Forms	NS (refers to Codex)	PCP pp. 11-13
Product Inputs documented	7.3.3.1	HACCP EL 1	117.30 ( c)	3.2.2	Form 2	Annex B – 1.1 (a)	PCP - pp. 11-13

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End Product Characteristics	7.3.3.2	HACCP EL 1	117.30 ( c )	3.2.1	Form 1	Annex B – 1.1 (b)	PCP - pp. 11-13
Intended Use	7.3.4	HACCP EL 1	117.30 ( c )	3.2.1	Form 1	NS	PCP – pp. 11-13
Flow Diagrams	7.3.5.1	HACCP EL 1	117.30 ( c )	3.2.3	Form 3	Annex B – 1.1 (c)	PCP - pp. 11-13
Plant schematic/ Operation Diagram	NS	NS	NS	3.2.4	Form 4	NS	PCP - pp. 11-13
Description of External requirements	7.3.5.2	NS	NS	NS	NS	NS	NS
Description of Process Steps & Control Measures	7.3.5.2	HACCP EL 1	117.30 ( c )	3.2.4	Form 5	Annex B – 1.1 (c)	Annex 1- 1.1.3 Annex 2 - 1.1.2
Hazard Identification & Acceptable Levels	7.4.2.1 [B,C,P] 22002-1 [A]	HACCP EL 1	117.30 (b) [B,C,P,R <sup>viii</sup> ]	3.2.5 [B,C,P] 3.1.1.7 [A]	Form 5 [B,C,P,A]	PCP – E: 2.7.1 (a)	PCP - pp. 11-13
Hazard Assessment	7.4.3	HACCP EL 1	117.30 ( c )	3.2.5	Form 5	PCP – E: 2.7.1 (a)	PCP - pp. 11-13
Hazards not controlled	NS	NS	NS	3.2.6.2 Form 9	Form 6	NS	NS
Selection of Control	7.4.4 [PRP, OPRP, CCP]	HACCP EL 1 [CCPs]	117.135 [preventive	3.2.6 [PRPs,	Form 5	PCP – E: 2.7.1 (a)	Annex 1 – 1.1.3

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Measures			controls]	process controls, OPRPs, CCPs]			Annex 2 -1.1.2
Establishing PRPs	7.2.3 ISO 22002 series of PRPs	GMPs prescribed	117.135 117.140	3.2.6	Form 5	PCP – E: 2.7.1 (a) Annex B – all applicable	Annex 1 – 1, 2, 3, 4, 5, 6 Annex 2 – 1, 2, 3, 4, 5, 6
Establishing OPRPs	7.5	NS	NS	3.1.1.7 [narrowly defined as allergens, nutrients, food additives & processing aids]	NS	NS	NS
Establishing CCPs	7.6	HACCP EL 1	117.135 117.140	3.2.7	Form 7	PCP – E: 2.7.1 (a)	PCP pp. 11-13 Annex 1 – 1.1.3 Annex 2 – 1.1.2
Establishing Process Controls (multiple steps)	Similar to ISO OPRPs – 7.5	NS	NS	3.2.8	NS	Annex B - 1	PCP pp. 11-13 Annex 1 - 1.1.3 Annex 2 - 1.1.2

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Updating Preliminary Information	7.7	NS	NS	3.4.1	Eligibility Criteria – 4	PCP – E: 2.7.1 (a)	Annex 1 – 1.1.3 Annex 2 – 1.1.2
Permits Externally Developed Combinations of Control Measures (i.e. HACCP-based) as option to site specific analysis	1 – Scope Guidance in ISO 22004 EDCCM must be developed using ISO 22000 Sections 7 & 8	Yes – CanadaGAP GlobalGAP	Yes - 117.126(a)	No - site specific	No – site specific	NS  Note: CFIA is considering developing model systems and tools to assist MSMEs	NS  Note: CFIA is proposing to help MSMEs with models, guidance, etc PCPs – pp 13 & 30
Verification Planning - PRPs	7.8		117,126	1.10	Eligibility Criteria – 3a	PCP – E: 2.7.1 (d)	PCP – p. 1113
Verification Planning - OPRPs	7.8	NS	NS but 117.126	3.1.1.7	NS	PCP – E: 2.7.1 (d)	NS PCP – p. 11-13
Verification Planning - CCPs	7.8	HACCP EL 1	117.126	3.2.7.4	Eligibility Criteria – 3c	PCP – E: 2.7.1 (d)	PCP – p. 11-13
Verification Planning – Process controls	NS	NS	117.126	3.2.8	NS	PCP – E: 2.7.1 (d)	PCP – p. 11-13

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Traceability System	7.9	FSM DEL 23	US Bioterrorism Act & Sec 204 FSMA	3.1.1.6	PRP – F2	PCP – E: 2.7.1 Annex B – 7.1	Traceability pp. 15-16
Control of non-conformity							
Corrections	7.10.1	NS	NS	3.2.7.3	Eligibility Criteria – 3a, 3b, 3c	NS PCP – E: 2.7.1 (e)	PCP pp. 11-13
Corrective Actions	7.10.2	FSM12	117.145	3.2.7.3	Eligibility Criteria – 3a, 3b, 3c PRP – D, E, F	PCP – E: 2.7.1 (e)	PCP – pp. 11-132
Potentially unsafe product	7.10.3	FSM 13	117.145	3.2.7	NS	Annex B – 7.2	PCP – pp. 11-132
Evaluation for release	7.10.3.2	FSM 14	117.145	3.2.7.3.1	NS	PCP – E: 2.7.1 (e)	NS
Disposition of nonconforming product	7.10.3.3	FSM 13	117.145	3.2.7.3.2	NS	Annex B – 7.2	NS
Withdrawal or Recall	7.10.4	FSM 19	117.137	3.1.1.6	PRP - F	PCP – E: 2.7.1 Annex B – 7.2	Annex 1 – 7.1 Annex 2 – 7.1

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<b>Validation, Verification &amp; Improvement</b>							
Validation of control measure combinations	8.2 (OPRPs & CCPs)	NS	117.150(a) With limited exceptions	3.3 (CCPs)	Eligibility Criteria – 3c [CCPs only]	PCP – E: 2.7.1 (a)	Annex 1 – 1.1.3 Annex 2 – 1.1.2
Monitoring & Measuring	8.3	FSM 20	117.150	3.1.1.3	PRP - B	PCP – E: 2.7.1 (c)	PCP – p. 12 Annex 1 – 5.3 Annex 2 – 5.4
<b>FSMS Verification</b>							
Internal Audit	8.4.1	FSM 11	NS / maybe covered by 117.150(d)		Eligibility Criteria – 4 [suggested]	NS	NS
Evaluation of individual verification results	8.4.2	NS	NS	3.2.8.3	NS	NS	NS
Analysis of results of verification activities	8.4.3	NS	NS	3.4.2	NS	NS	NS
Continuous Improvement	8.5.1	FSM 1	NS	2.2.1	NS	PCP – E: 2.7.1 (f)	NS

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Updating documented FSMS	8.5.2	FSM 6	117.150 [3 years]	3.4.1 3.4.2 [annual]	Eligibility Criteria – 4 [annual]	PCP – E: 2.7.1 (f)	Annex 1 – 1.1.3 Annex 2 – 1.1.2
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**Prepared for the Canadian Supply Chain Food Safety Coalition:**

**Albert Chambers**

*Monachus Consulting*

<sup>i</sup> For ISO standards, the numbered references are to the clauses of ISO 22000. ISO 22002-1 is a technical specification that sets out additional requirements for prerequisite programs (PRPs) for food manufacturers.

<sup>ii</sup> For GFSI the references are to “key elements” set out in Part III of the Guidance Document v 6.2. FMS = food management system. GMP = good manufacturing practice. Other letters indicate GFSI scope or benchmarking category (e.g. E – covers various types of food processing).

[http://mygfsi.com/gfsifiles/GFSI\\_Guidance\\_Document\\_Sixth\\_Edition\\_Version\\_6.2.pdf](http://mygfsi.com/gfsifiles/GFSI_Guidance_Document_Sixth_Edition_Version_6.2.pdf)

<sup>iii</sup> US FDA published its proposed regulations for food businesses under the Food Safety Modernization Act “*Current Good Manufacturing Practice and Hazard Analysis and Risk-Based Preventive Controls for Human Food*” in the Federal Register on 4 January 2013. The sections referenced can be found starting on p. 562 [http://www.ofr.gov/OFRUpload/OFRData/2013-00125\\_PI.pdf](http://www.ofr.gov/OFRUpload/OFRData/2013-00125_PI.pdf) A document prepared by Leavitt Partners which compared FSMA requirements with SQF requirements was also utilized to identify relevant FSMA requirements <http://www.sqfi.com/wp-content/uploads/SQF-Preventive-Controls-Comparison-FULL-REPORT-April-2013.pdf>

<sup>iv</sup> FSEP references are from the FSEP Manual accessed on 6 January 2013 at <http://inspection.gc.ca/food/fsep-haccp/program-manual/eng/1345821469459/1345821716482>

<sup>v</sup> AHA references are to the program “Standard” version 1.1 2011 accessed on 6 January 2012 at

[http://www1.agric.gov.ab.ca/\\$Department/deptdocs.nsf/all/afs9851/\\$FILE/aha\\_standard\\_v1\\_1\\_2011\\_10\\_12.pdf](http://www1.agric.gov.ab.ca/$Department/deptdocs.nsf/all/afs9851/$FILE/aha_standard_v1_1_2011_10_12.pdf)

<sup>vi</sup> References are to *Improved Food Inspection Model Revised Draft* RDIMS #3710347 (28 March 2013) accessed on 22 May 2013 at:

[http://www.inspection.gc.ca/DAM/DAM-aboutcfia-sujetacia/STAGING/text-texte/acco\\_modernization\\_modeldraft\\_revised\\_1364176438375\\_eng.pdf](http://www.inspection.gc.ca/DAM/DAM-aboutcfia-sujetacia/STAGING/text-texte/acco_modernization_modeldraft_revised_1364176438375_eng.pdf)

<sup>vii</sup> References are to *A New Regulatory Framework for Federal Food Inspection: Discussion Document* (June 2013) accessed on 3 June 2013 at:

<http://inspection.gc.ca/food/action-plan/food-safety-regulatory-forum/presentations/eng/1369757934028/1369757989311>



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<b>FSMS Element</b>	<b>ISO 22000:2005 Plus ISO 22002- 1:2009</b>	<b>GFSI Criteria Guidance Document v 6.2 – 2012</b>	<b>FSMA draft proposed regulations – January 2013</b>	<b>FSEP Manual 2012</b>	<b>Alberta HACCP Advantage V 1.1 2011</b>	<b>CFIA Inspection Modernizati on - Version 2 - 28 March 2013</b>	<b>CFIA New Regulatory Framework – 3 June 2013</b>
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