

## Example Major Deviations and Corrective Actions □

The following are major deviations and their respective corrective actions. It is assumed that the deviation can be corrected on the premises and that the product has not left the operation. In certain situations, there may be other appropriate actions and guidance should be sought from qualified experts. **Note:** These are just some of the problems that could occur.

Section	Major Deviations	Specific Examples	Corrective Action(s)
<b>Premises</b>	Producer/storage intermediary/packer selects a packinghouse or storage area that could contaminate product or packaging material	<ul style="list-style-type: none"> <li>• Debris or spills on the floor</li> <li>• Animals present</li> <li>• Broken glass or lights</li> <li>• Incorrect lights (not shatterproof or covered)</li> <li>• Leaking of fluid or liquid on to product or packaging</li> </ul>	Producer/storage intermediary/packer: <ul style="list-style-type: none"> <li>• Identifies and isolates any contaminated product, packaging material or equipment</li> <li>• Cleans and maintains the packinghouse and storage areas (e.g., storage for product and market-ready packaging materials)</li> <li>• Selects another storage area if storage area cannot be cleaned (i.e. is not usable)</li> <li>• Replaces lighting (uses shatterproof or covered lighting)</li> <li>• Disposes of product and market-ready packaging materials if they have come into direct contact with contamination</li> </ul>
<b>Manure, Compost/ Compost Tea and Other By-Products</b>	Producer receives compost/compost tea that has not been properly composted or without knowing if it has been properly composted	<ul style="list-style-type: none"> <li>• No letter of assurance</li> <li>• Composting records are incomplete or missing</li> <li>• Composting records indicate full composting process has not been achieved</li> </ul>	Producer: <ul style="list-style-type: none"> <li>• Refuses, returns or disposes of compost/compost tea and reorders new compost/compost tea</li> <li>• Producer again asks for letter of assurance and does not spread the compost/compost tea until the letter is received</li> <li>• Continues/restarts composting process for compost/compost tea made on site and does not spread compost/compost tea until the proper process has been completed</li> <li>• Waits 120 days before harvesting product if compost/compost tea was spread without knowing if it was properly composted</li> </ul>
	Producer spreads manure when the interval between application and harvest is less than 120 days		Producer: <ul style="list-style-type: none"> <li>• Identifies which fields and crops are affected and does not harvest the product until the 120 days has elapsed [refer to the Agronomic Inputs Form]</li> </ul>

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<b>Agricultural Chemicals</b>	Producer/packer receives the incorrect agricultural chemical from supplier	<ul style="list-style-type: none"> <li>• Agricultural chemical is not registered for the applicable product</li> <li>• Containers are damaged and/or labels are illegible</li> </ul>	Producer/packer: <ul style="list-style-type: none"> <li>• Returns or refuses and reorders agricultural chemicals</li> <li>• Identifies whether field/product has been sprayed with wrong agricultural chemicals</li> <li>• Disposes of incorrect chemical</li> <li>• Re-trains employees or takes refresher course on agricultural chemical application</li> </ul>
	Producer/packer uses a storage location for agricultural chemicals that is not designated only for that purpose and/or is not covered, clean, dry and controlled access	<ul style="list-style-type: none"> <li>• Leaks or spills from agricultural chemicals because they are not properly stored</li> </ul>	Producer/packer: <ul style="list-style-type: none"> <li>• Moves chemicals to a proper storage facility/location or conducts maintenance on agricultural chemical storage</li> <li>• Cleans any spills or leaks resulting from improper storage</li> <li>• Identifies whether product/packaging materials has been contaminated and disposes of any affected product</li> <li>• Re-trains employees on storage location</li> </ul>
	Producer/packer applies the incorrect agricultural chemical	<ul style="list-style-type: none"> <li>• Agricultural chemical used is not registered for the applicable product</li> </ul>	Producer/packer: <ul style="list-style-type: none"> <li>• Identifies whether fields/products have been sprayed with wrong agricultural chemicals</li> <li>• Identifies whether product has been contaminated and if disposal of affected product is required</li> <li>• Obtains expert advice as required and, if necessary, disposes of product</li> <li>• Re-trains employees on chemical application</li> </ul>
	Producer/packer fails to follow the label recommendations and directions when applying agricultural chemicals	<ul style="list-style-type: none"> <li>• Too much or too little agricultural chemical is applied</li> <li>• Agricultural chemical is mixed incorrectly</li> </ul>	Producer/packer: <ul style="list-style-type: none"> <li>• Stops spraying</li> <li>• Identifies which fields/products are affected</li> <li>• Obtains expert advice on the risk of contamination and, if necessary, disposes of product</li> <li>• Retrains employees or takes refresher training on applying agricultural chemicals</li> <li>• Identifies whether product has been contaminated and disposes of any affected product</li> </ul>

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<b>Equipment</b>	Producer does not clean or maintain production site equipment regularly (e.g., annually, weekly) or properly (e.g., pressure washer, sanitizer)	<ul style="list-style-type: none"> <li>• Visible debris or contamination is observed on equipment</li> <li>• Equipment breaks down causing chemical or physical contamination</li> <li>• Lubricants, oils and fuels leak on to food contact surfaces</li> </ul>	Producer: <ul style="list-style-type: none"> <li>• Stops activities (harvesting)</li> <li>• Isolates any product in contact with contaminated equipment</li> <li>• Cleans and maintains affected production site equipment</li> <li>• Makes necessary changes to cleaning procedure or schedule</li> <li>• Re-trains employees to adhere to annual/weekly cleaning and maintenance schedule</li> <li>• Disposes of product if it has come into direct contact with contamination.</li> </ul>
	Storage intermediary/packer does not clean or maintain packinghouse equipment regularly (e.g., daily, weekly) or properly (e.g., pressure washer, sanitizer)	<ul style="list-style-type: none"> <li>• Visible debris or contamination is observed on equipment</li> <li>• Equipment breaks down causing chemical or physical contamination</li> <li>• Lubricants, oils and fuels leak on to food contact surfaces</li> </ul>	Storage intermediary/packer: <ul style="list-style-type: none"> <li>• Stops activities (sorting, grading packing)</li> <li>• Isolates any product in contact with contaminated equipment</li> <li>• Cleans and maintains affected packinghouse equipment</li> <li>• Makes necessary changes to cleaning procedure or schedule</li> <li>• Re-trains employees to adhere to daily/weekly cleaning and maintenance schedule</li> <li>• Disposes of product if it has come into direct contact with contamination.</li> </ul>
	Producer/packer applies inaccurate rates of agricultural chemicals because he/she did not calibrate spray equipment properly or at all	<ul style="list-style-type: none"> <li>• Sprayer runs out of chemical too early</li> <li>• Sprayer has too much chemical left over after spraying</li> </ul>	Producer/packer: <ul style="list-style-type: none"> <li>• Identifies and isolates affected product</li> <li>• Obtains expert advice on the risk of contamination and, if necessary, does not harvest the product</li> <li>• Re-calibrates equipment</li> <li>• Re-trains employees on calibration schedule and procedures</li> </ul>
	Producer/packer applies inaccurate rates of water treatment aids because he/she did not calibrate water treatment equipment properly or at all (i.e., chlorinators and ORP/pH meters)	<ul style="list-style-type: none"> <li>• Unusually high or lack of chemical (chlorine) odours</li> <li>• Change in rate that treatment aids are used</li> <li>• Discolouration or pitting of product</li> </ul>	Producer/packer: <ul style="list-style-type: none"> <li>• Stops washing/fluming activities</li> <li>• Calibrates equipment</li> <li>• Re-checks ORP/chlorine levels/pH</li> <li>• Treats the water and re-tests to check potability OR disposes of the water.</li> <li>• Rinses or disposes of any product that has come into direct contact with the contaminated water</li> <li>• Re-trains employees on calibration schedule and procedures</li> </ul>

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	Packer is unsure that the temperature reading on the thermometer is accurate (i.e., that internal temperature of the tomatoes is at least 10°F colder than the water), or packer knows thermometer was not calibrated	<ul style="list-style-type: none"> <li>Thermometer is not calibrated according to manufacturer's instructions</li> </ul>	Packer <ul style="list-style-type: none"> <li>Stops washing or fluming activities</li> <li>Disposes of any tomatoes that have been submerged</li> <li>Calibrates the thermometer</li> <li>Re-trains employees on calibration schedule and procedures</li> </ul>
<b>Cleaning and Maintenance Materials</b>	Producer/storage intermediary/packer did not follow instructions for use, or used the wrong product for water treatment	<ul style="list-style-type: none"> <li>Using high concentrations</li> <li>Using wrong product</li> </ul>	Producer/storage intermediary/packer: <ul style="list-style-type: none"> <li>Stops washing/fluming activities</li> <li>Rinses or disposes of any product that has come into direct contact with the contaminated water</li> <li>Re-trains employees on treatment methods</li> </ul>
	Producer/storage intermediary/packer notices equipment (e.g., gear boxes, hydraulic lines) leaking oils, lubricants onto the sorting/grading equipment (cups, belts, tables)	<ul style="list-style-type: none"> <li>Visible contamination is observed on equipment</li> <li>Equipment breaks down causing chemical or physical contamination</li> <li>Lubricants, oils and fuels leak on to food contact surfaces</li> </ul>	Producer/storage intermediary/packer: <ul style="list-style-type: none"> <li>Stops activities</li> <li>Isolates any product in contact with contaminated equipment</li> <li>Cleans and maintains affected equipment</li> <li>Makes necessary changes to cleaning procedure or schedule</li> <li>Re-trains employees to adhere to daily/weekly cleaning and maintenance schedule</li> <li>Disposes of product if it has come into direct contact with contamination.</li> </ul>
<b>Personal Hygiene Facilities</b>	Personal hygiene facilities are not maintained and cleaned weekly (while in use) and daily (during peak season)	<ul style="list-style-type: none"> <li>Washrooms are not properly stocked (paper towels, soap, sanitizer)</li> <li>Visible debris or contamination in facilities</li> </ul>	Producer/storage intermediary/packer: <ul style="list-style-type: none"> <li>Ensures and confirms that hygiene facilities are cleaned and stocked</li> <li>Instructs employees to re-wash hands</li> <li>Re-trains employees on weekly/daily cleaning and maintenance schedule</li> <li>Re-evaluates maintenance schedule</li> <li>Determines whether any equipment or product has been contaminated</li> <li>Washes equipment as necessary</li> <li>Disposes of product if they have come into direct contact with contamination</li> </ul>

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<b>Pest Program for Buildings</b>	Producer/storage intermediary/packer does not have an effective pest control program	Evidence of pest infestation is noticed such as: <ul style="list-style-type: none"> <li>• presence of rodents, animals or feces</li> <li>• chewed boxes, walls or packaging</li> <li>• nests or nesting materials</li> </ul>	Producer/storage intermediary/packer: <ul style="list-style-type: none"> <li>• Removes all feces, nesting materials rodents or animals</li> <li>• Washes equipment and building areas as necessary</li> <li>• Disposes of any product or packaging materials that may be contaminated</li> <li>• Develops and implements a pest control program, hires a third party pest control company or seeks expert advice on improving pest control program</li> <li>• Re-trains employees on use of chemicals</li> <li>• Re-evaluates and revises pest control program where necessary</li> </ul>
	Producer/storage intermediary/packer does not follow the pest control program properly	<ul style="list-style-type: none"> <li>• Bait inside buildings is not secured in a trap</li> <li>• Pest control products are used improperly and/or not approved for usage</li> </ul>	Producer/storage intermediary/packer: <ul style="list-style-type: none"> <li>• Removes all bait that is not secured in a trap</li> <li>• Disposes of any product that has come in to contact with bait or other pest control products</li> <li>• Washes any equipment that has come into contact with pest control products or pests</li> <li>• Re-trains employees on proper use of pest control products</li> </ul>
<b>Water (for Fluming and Cleaning)</b>	Producer/storage intermediary/packer purchases/selects a water source that is not potable	<ul style="list-style-type: none"> <li>• Water test results show contamination</li> <li>• Notification from municipality</li> <li>• Adverse event causing contamination of source</li> </ul>	Producer/storage intermediary/packer: <ul style="list-style-type: none"> <li>• Stops using water</li> <li>• Treats the water and re-tests to check potability before using water.</li> <li>• Rinses (with potable water) (except for tomatoes – these must be discarded) or disposes of any product that has come into contact with contaminated water</li> </ul>
	Producer/storage intermediary/packer receives water from a source that is not potable	<ul style="list-style-type: none"> <li>• Water test results show contamination</li> <li>• Notification from municipality</li> <li>• Adverse event causing contamination of source</li> </ul>	Producer/storage intermediary/packer: <ul style="list-style-type: none"> <li>• Stops using water</li> <li>• Treats the water and re-tests to check potability before using water.</li> <li>• Rinses (with potable water) (except for tomatoes – these must be discarded) or disposes of any product that has come into contact with contaminated water</li> </ul>

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	<p>Producer/storage intermediary/packer stores water in an unclean cistern, tank or container or with a damaged lid/no lid</p>	<ul style="list-style-type: none"> <li>● Water test results show contamination from cistern</li> <li>● Adverse event causing contamination of cistern</li> </ul>	<p>Producer/storage intermediary/packer:</p> <ul style="list-style-type: none"> <li>● Stops using water</li> <li>● Empties and cleans cistern or treats water then cleans cistern when tank is empty</li> <li>● Re-tests to check potability before using water</li> <li>● Repairs or replaces lid</li> <li>● Rinses (with potable water) (except for tomatoes – these must be discarded) or disposes of any product that has come into contact with contaminated water</li> <li>● Re-trains employees on water treatment procedures</li> </ul>
	<p>Packer does not treat water properly (i.e., for potability)</p>	<ul style="list-style-type: none"> <li>● Free chlorine test strips show that free chlorine in wash or flume water is below 2 ppm</li> <li>● Water tests results show contamination</li> <li>● ORP reading is below 650 mV</li> </ul>	<p>Packer</p> <ul style="list-style-type: none"> <li>● Stops using water</li> <li>● Treats the water and re-tests to check potability before using water.</li> <li>● Rinses (with potable water) (except for tomatoes – these must be discarded) or disposes of any product that has come into contact with contaminated water</li> </ul>
	<p>Packer does not use potable water to fill or replenish flumes/washers</p>	<ul style="list-style-type: none"> <li>● Water tests indicate water is contaminated</li> </ul>	<p>Packer:</p> <ul style="list-style-type: none"> <li>● Stops using water</li> <li>● Empties the flumes/washer, cleans and refills them with potable water OR treats the water for potability.</li> <li>● Rinses (with potable water) (except for tomatoes – these must be discarded) or disposes of product in direct contact with the contaminated water</li> </ul>

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	Packer does not treat flume or wash water to keep it potable when it is the last water in contact with product (fails to use a final potable water rinse)	<ul style="list-style-type: none"> <li>Product is flumed or washed with water that is not kept potable and there is no final rinse step</li> </ul>	Packer: <ul style="list-style-type: none"> <li>Stops washing and identifies product that has come into contact with contaminated water</li> <li>Empties the flumes/washer and cleans them</li> <li>Treats the water for potability and re-tests OR implements a final potable water rinse</li> <li>Rinses (with potable water) or disposes of any product in contact with contaminated water</li> <li>Disposes of any products that have the potential to internalize water (e.g. tomatoes) and have been submerged in contaminated water.</li> <li>Re-trains employees on water treatment procedures</li> </ul>
	Packer flumes or washes product, has no treatment to keep water potable and does not have a final potable water rinse	<ul style="list-style-type: none"> <li>There is no final rinse after fluming or washing (when flume/ wash water is not kept potable)</li> </ul>	Packer: <ul style="list-style-type: none"> <li>Stops washing and identifies product that has come into contact with contaminated water</li> <li>Empties the flumes/washer and cleans them</li> <li>Implements a final potable water rinse if possible or implements a water treatment system for flume/wash water</li> <li>Rinses (with potable water) (except for tomatoes – these must be discarded) or disposes of any product in contact with contaminated water</li> <li>Re-trains employees on water treatment procedures</li> </ul>
	Packer submerges tomatoes in water that is not potable and is not at least 10°F warmer than the internal temperature of the tomatoes (tomatoes only) (e.g., internal core temperature of the tomatoes is not at least 10°F colder than the water)	<ul style="list-style-type: none"> <li>Hot tomatoes from the production site are flumed in cold water where potability is not maintained</li> </ul>	Packer <ul style="list-style-type: none"> <li>Stops washing or fluming activities</li> <li>Empties the flumes/washer and cleans them</li> <li>Disposes of any tomatoes that have been submerged in contaminated water</li> <li>In future, cools the tomatoes or warms water so that the water is at least 10°F warmer than the internal temperature of the tomatoes OR treats water and re-tests to check potability</li> </ul>

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<b>Ice</b>	Producer/packer purchases/selects contaminated ice (e.g., not made from potable water)	<ul style="list-style-type: none"> <li>Ice or water tests show contamination</li> <li>Adverse event occurs (spills) causing contamination</li> </ul>	Producer/packer: <ul style="list-style-type: none"> <li>Disposes of ice</li> <li>Determines whether product has been contaminated and isolates and disposes of any product in contact with contaminated ice</li> </ul>
	Producer/packer does not receive ice that was purchased	<ul style="list-style-type: none"> <li>No letter of assurance</li> <li>Visible contaminants in ice (dirt, debris)</li> </ul>	Producer/packer: <ul style="list-style-type: none"> <li>Refuses and reorders ice or requests a letter of assurance and does not use the ice until the letter is received</li> <li>Disposes of contaminated ice</li> <li>Identifies and disposes of any product in contact with contaminated ice</li> </ul>
<b>Packaging Materials</b>	Packer fails to clean reusable (non-porous) packaging materials properly before use	<ul style="list-style-type: none"> <li>Reusable packaging materials have dirt or debris</li> </ul>	Packer: <ul style="list-style-type: none"> <li>Stops packing</li> <li>Cleans reusable packaging according to SSOP</li> <li>Disposes of or rewashes any product in contact with contaminated packaging</li> <li>Retrains employees on cleaning procedures for reusable packaging</li> </ul>
	Packer fails to check market-ready packaging materials before use	<ul style="list-style-type: none"> <li>Packaging materials are damaged, or dirty</li> <li>The wrong packaging materials are reused (e.g. Porous packaging materials are reused without a new liner); packaging materials marked as not for reuse are used</li> </ul>	Packer: <ul style="list-style-type: none"> <li>Stops packing</li> <li>Checks packed product for dirty or damaged packaging</li> <li>Disposes or rewashes any product in contact with contaminated packaging</li> <li>Disposes of any damaged and unusable packaging</li> <li>Washes any reusable packaging</li> <li>Re-trains employees on procedures for inspecting and using market ready packaging</li> </ul>
<b>Growing and Harvesting</b>	Producer harvests product without allowing the proper interval (of more than 120 days) to elapse between the application of manure and harvest		Producer: <ul style="list-style-type: none"> <li>Identifies which fields/products are affected</li> <li>Disposes of product</li> </ul>
	Producer harvests product without allowing the pre-harvest interval to elapse for the application of agricultural chemicals		Producer: <ul style="list-style-type: none"> <li>Identifies which fields/products are affected</li> <li>Disposes of product</li> </ul>

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<b>Sorting, Grading and Packing</b>	Packer receives harvested product from a producer not following a food safety program or without a letter of assurance		Packer: <ul style="list-style-type: none"> <li>Refuses the product and reorders the product; or asks for letter of assurance and does not pack or sell the product until it is received</li> </ul>
	Packer receives contaminated wax	<ul style="list-style-type: none"> <li>Wax is received without a letter of assurance or letter of no objection</li> </ul>	Packer: <ul style="list-style-type: none"> <li>Refuses and reorders wax or asks for a letter of assurance or letter of no objection and does not wax product until the letter is received</li> </ul>
	Packer uses contaminated wax to wax product or uses the wrong product	<ul style="list-style-type: none"> <li>Manufacturer recalls wax, packer uses the wrong product when waxing</li> </ul>	Packer: <ul style="list-style-type: none"> <li>Stops waxing</li> <li>Identifies which product has been contaminated and disposes of affected product</li> </ul>
<b>Storage of Product</b>	Producer/storage intermediary/packer selects a storage area that could contaminate product or packaging material	<ul style="list-style-type: none"> <li>Garbage, spills or other contaminants in the storage</li> <li>Lighting not covered or shatterproof</li> <li>Broken glass or lights in the storage</li> </ul>	Producer/storage intermediary/packer: <ul style="list-style-type: none"> <li>Isolates any contaminated product or packaging</li> <li>Cleans and maintains the storage area (e.g., storage for product and market ready packaging materials)</li> <li>Replaces broken lights with shatterproof or covered lighting</li> <li>Selects another storage area if storage area cannot be cleaned (e.g., is not usable)</li> <li>Disposes of product and market-ready packaging materials that have come into direct contact with contamination</li> </ul>