



## OPERATING POLICY & PROCEDURE (OPP)

<b>OPP Policy #:</b>	<b>8.18</b>
<b>Policy Heading:</b>	<b>Field Operations</b>
<b>Policy Title:</b>	<b>PILOT PROJECT - Start Clean - Stay Clean™ for Unregulated Producers</b>

### POLICY

**Last Updated:**

**May 31, 2018**

Since 1998, Canada's egg industry has been using the Start Clean - Stay Clean™ (SC-SC) Layer on farm food safety program for applying good management practices during the production, storage and distribution of shell eggs for the purposes of ensuring food safety. As of December 31, 2009, accreditation in the SC-SC Layer Program became mandatory for registered Egg Farmers in Alberta. In 2011, a complimentary program for pullets, the SC-SC Pullet program, was introduced to strengthen food safety through the egg industry's supply chain.

While there have been significant strides forward in improving food safety through the egg supply chain in recent years, EFA feels there is still one significant gap: unregulated producers. With unregulated producers selling their eggs to consumers across the province with no food safety program in place, the entire egg industry remains vulnerable.

While Egg Farmers of Alberta has no regulatory authority over unregulated producers, we believe we have a role to play in educating these producers on best practices for food safety.

As a first step in addressing this risk, we have asked Egg Farmers of Canada to adopt a pilot project in Alberta where EFC Field inspectors will conduct on farm SC-SC evaluations (parts 1 and 2) for unregulated producers in Alberta on a request basis. Taking part in this program will give unregulated producers the opportunity to learn more about how to implement these best practices such as biosecurity, pest management and cleaning & disinfection. The pilot project will run until the end of 2020, at which time EFA and EFC will review the success of the program and determine if the program will remain in place.

Interested unregulated producers will contact EFA to request a SC-SC evaluation. EFA will collect information from the producer and communicate this request to EFC. EFC will conduct the SC-SC on farm evaluations free of charge to any producers who have an exemption number and are shipping eggs to an EFA Registered Grading Station. Producers who do not have an exemption number and do not ship to a grading station will be charged a fee of \$300.00 for their annual SC-SC field visits. The fee is charged to cover the cost of providing training on the program, sending a field inspector to your farm, and the administrative time required to set-up your visit and follow-up afterwards.

EFA has sent a formal request to Alberta Agriculture asking that they consider establishing an SE sampling program for unregulated producers that are taking part in the Start Clean – Stay Clean



program. Until approval is confirmed, SE sampling will be excluded from the pilot project. This policy will be updated as this program evolves.

***EFA Shall:***

- Be responsible for distributing information about the pilot project to potential participants
- Manage participants (no more than 10, collect contact information, receive signed agreement before proceeding)
- Provide an initial training session with the farmer on the SC-SC program including a review of requirements
- Provide participants with a SC-SC Manual and record keeping book
- Following the completion of a SC-SC assessment, will distribute a letter outlining corrective actions and work with the farmer to address them

***EFC Shall:***

- Complete an annual on farm SC-SC assessment on participating farms
  - Assessments will be scheduled subject to availability of Field Inspectors
  - Stringent biosecurity practices will be maintained, in accordance with EFC's Field Operations policies.
  - Unregulated producer audits will not take place on the same day as a commercial producer audit.
- Issue a SC-SC Certificate to any participating farms that score over 90% in the program, which is the industry requirement for passing SC-SC.

***The participating Unregulated Producer Shall:***

- Maintain necessary records for SC-SC
- Work to adopt the principles outlined in the SC-SC program with the goal of achieving accreditation in the program
- Allow EFC Field Inspectors to complete an on farm SC-SC assessment once per year
- Address Corrective actions