HOW CAN I PROVIDE FOR MEASURES TO AVOID COMMINGLING OR CROSS-CONTAMINATION?

1. Separation
   - You could have separate equipment or facilities for the manufacture, processing, or storage of prohibited and non-prohibited materials. This could be entirely separate buildings, rooms, or other locations; or separate storage containers for incoming material and finished product, and separate manufacturing lines.
   - Separate equipment for prohibited material should be clearly identified to help ensure that prohibited material is not mistakenly added to product intended to contain non-prohibited material only. Or

2. Clean-out
   - Clean-out could be physical cleaning, flushing, sequencing, or other means, either alone or in combination with separation measures that are adequate to prevent carryover of prohibited material into non-prohibited material. Clean-out procedures should be used on all equipment and conveyances that handle both prohibited and non-prohibited material.
   - Documentation for clean-out should include a description of how clean-out is implemented - who is responsible; how clean-out is monitored and verified; how volume of clean-out flush material was determined; and a description of how clean-out flush material is handled.

3. Combination of separation and clean-out
   An example would be use of some separate and some common equipment (cleanout would be required for the latter).

   - Written procedures should include the procedures followed from the time of receipt of incoming material until the time of shipment of finished products. They should reflect what actually happens in your operation.
   - Written procedures should have enough detail to provide a clear understanding of your actual procedures. An inspector should be able to easily identify operations that are described in the written procedures.
EXAMPLES OF CLEANOUT MEASURES

- Use cleaning by physical means (e.g., vacuuming, sweeping, washing, etc.)
- Alternatively, flushing, sequencing or other equally effective techniques may be used. Under these methods, the equipment is cleaned through use of non-prohibited product or materials.
- The volume of flushed material should be sufficient to prevent carryover of products or materials that may contain prohibited material. Generally, the system should be flushed with a sufficient volume of non-prohibited product to accomplish one complete change of operating volume of the entire system. Due to the degree of variability among facilities, each facility should determine their individual characteristics and apply appropriate time and volume requirements for flushing material to accomplish the intent of the procedures. The volume used should be stated in the written procedures, and should be based on a documented analysis or test of the facility’s system.
- Non-prohibited material used in the cleaning should be prohibited and should be identified, stored, and handled so that it does not become incorporated in products for export to Canada.
- Sequencing should be done on a predetermined basis and be designed to prevent contamination of products for export to Canada.