



United States
Department of
Agriculture

Food Safety
and Inspection
Service

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Dr. Richard Arsenault
Director, Meat Programs Division
Canadian Food Inspection Agency
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Dear Dr. Arsenault:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Canada's meat/poultry/egg inspection system August 25 to October 1, 2009. Comments received from the government of Canada have been included in the final report. Enclosed is a copy of the final audit report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 205-3969, by facsimile at (202) 720-0676, or electronic mail at james.adams (IAS) @fsis.usda.gov.

Sincerely,

James Adams
James Adams, DVM
Director
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Enclosure

cc:

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OCT 28 2010

FINAL REPORT OF AN AUDIT CONDUCTED IN

CANADA

AUGUST 25 THROUGH OCTOBER 1, 2009

EVALUATING THE FOOD SAFETY SYSTEMS GOVERNING
THE PRODUCTION OF MEAT AND POULTRY
PRODUCTS INTENDED FOR EXPORT TO
THE UNITED STATES OF AMERICA

Food Safety and Inspection Service
United States Department of Agriculture

Executive Summary

This audit report describes the outcome of an on-site audit of Canada's meat and poultry inspection system conducted by the Food Safety and Inspection Service (FSIS) from August 25 through October 1, 2009.

This was a routine ongoing equivalence verification audit. The audit objective was to ensure that Canada continues to maintain a food safety system for meat and poultry that is equivalent to that of the United States, with the resultant capacity to produce products that are safe, unadulterated, and properly labeled. Between January 1 and October 31, 2009, Canada exported 1,366,300,636 pounds of raw and processed meat and poultry products to the United States. Although Canada is eligible to export egg products to the United States, FSIS' risk-based analysis of this system resulted in the determination not to include this particular product category within the current audit scope.

Although the central competent authority (CCA) maintains the legal authority and the responsibility to enforce all applicable laws and regulations governing Canadian and third-country requirements, the auditors found that these requirements were not consistently applied throughout the system, as enforcement actions were initiated by the CCA in six of the 23 establishments audited, as follows:

- Three establishments were removed from the list ("delisted") of establishments that are eligible for export to the United States.
- Three establishments were issued a Notice of Intent to Delist (NOID) for conditions within the establishment that were not immediately rectifiable, yet did not pose an imminent threat to public health and would warrant decertification if not corrected within thirty days from the time of issuance.

The CCA demonstrated systemic control of the supervisory review and oversight process. The audit revealed localized and specific deficiencies concerning the CCA's implementation of supervisory reviews. Principal areas of weakness included the inability of inspection personnel to implement consistent sanitation and HACCP verification procedures, and, more significantly, the lack/loss of consistent supervisory reviews to identify weaknesses in inspection personnel performance when it occurred. Many of the deficiencies encountered were repetitive, both from a historical perspective and within the context of the current audit.

Most importantly, the number of upper-level enforcement actions taken during the course of audit is an indication of the system weakness to maintain the country's standards in a broad and consistent fashion, but are not indicative of a systemic failure.

The overall audit process revealed that the CCA demonstrated adequate verification in the following areas: humane handling and slaughter, microbial and residue control, testing for generic *E. coli*, testing for *Listeria monocytogenes* and *Salmonella* in ready-to-eat products, species verification, and administrative and technical support.

The CCA proffered corrective actions in the design and execution of the food safety system. If these actions are effectively implemented, the system weaknesses should be remedied.

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority (Canadian Food Inspection Agency)
CCP	Critical Control Point
CFIA	Canadian Food Inspection Agency
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
<i>Lm</i>	<i>Listeria monocytogenes</i>
NOID	Notice of Intent to Delist
OIA	Office of International Affairs
POE	Port of Entry
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point
RTE	Ready-to-Eat
<i>Salmonella</i>	<i>Salmonella</i> species
SRM	Specified Risk Material
SSOP	Sanitation Standard Operating Procedures

1. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture conducted an audit of Canada's meat and poultry food safety system from August 25 through October 1, 2009.

The audit began with an entrance meeting held on August 25, 2009, in Ottawa with the participation of representatives from the Central Competent Authority (CCA) – the Canadian Food Inspection Agency (CFIA) – and two auditors from the FSIS, Office of International Affairs (OIA), International Audit Staff (IAS). The meeting was attended by additional CFIA personnel via teleconference.

2. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was an ongoing equivalence verification audit with special emphasis on CCA controls addressing the contamination of RTE meat and poultry products by *Listeria monocytogenes (Lm)* in the post-lethality environment. The audit objective was to ensure that Canada's food safety system governing meat and poultry continues to be equivalent to that of the United States, with the resultant capacity to produce products which are safe, unadulterated, and properly labeled. This audit included special emphasis on the verification of CCA controls addressing the prevention of contamination of RTE meat and poultry products by *Lm* in the post-lethality environment.

In pursuit of this objective, FSIS used a risk-based procedure to determine the audit scope, which included an analysis of country performance, production types and volumes, and port-of-entry (POE) testing results. Although Canada is eligible to export egg products to the United States, FSIS' analysis resulted in the determination not to include this particular product category within the identified scope.

The FSIS auditors were accompanied throughout the entire audit by representatives from the CCA or representatives from the regional and local inspection offices. Program effectiveness determinations focused on government controls and oversight within five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP), (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis/Critical Control Point (HACCP) programs and a testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including a government verification testing program for *Salmonella* species.

Administrative functions were reviewed at CCA headquarters, one area office, two regional offices, and 23 local inspection offices, during which the auditors evaluated the implementation of those management control systems in place which ensure that the national system of inspection, verification, and enforcement was being implemented as intended.

A sample of 23 establishments was selected from a total of 455 establishments certified to export to the United States. During the establishment visits, particular attention was paid to the extent to which industry and government interact to control hazards and prevent non-compliances that

threaten food safety, with an emphasis on the CCA's ability to provide oversight through supervisory reviews conducted in accordance with 9 CFR 327.2 and 381.96.

Additionally, one microbiology laboratory and one residue laboratory were audited to verify their ability to provide adequate technical support to the inspection system.

Table 1: Audit Scope Summary

Competent Authority Visits		Locations
Competent Authority	Central Authority	1 Ottawa
	Area Offices	1 Western Area Office
	Regional Offices	2 Montreal West Regional Office Toronto Regional Office
Microbiology Laboratories		1 Private Laboratory: Markham, Ontario
Residue Laboratories		1 Official Laboratory: Saskatoon, SK
Bovine Slaughter/Processing Establishments		2 Toronto, Alberta South
Swine Slaughter/Processing Establishments		2 Manitoba
Poultry Slaughter/Processing Establishments		3 British Columbia Interior, Manitoba, Toronto
Meat/Poultry Processing Establishments		16 Alberta North, British Columbia, Manitoba, Montreal West, Saskatchewan

3. LEGAL BASIS FOR THE AUDIT AND AUDIT STANDARDS

The audit was performed under the specific provisions of United States' laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/Hazard Analysis and Critical Control Point (PR/HACCP) regulations.
- The Poultry Products Inspection Act (21 U.S.C. 451 et seq.).
- The Poultry Products Inspection Regulations (9 CFR Part 381).

The audit standards applied during the review of Canada's meat and poultry inspection system included: (1) All applicable legislation originally determined by FSIS as equivalent as part of the initial review process, and (2) any subsequent equivalence determinations that have been made under provisions of the Sanitary/Phytosanitary Agreement, which include the following:

- Modifications within the government testing program for *Salmonella* in raw product, which permit:
 - Establishments to select samples
 - Analysis of samples in private laboratories
- The government verification testing program for *Listeria monocytogenes* in RTE products, including specific provisions for official sampling of product contact surfaces and product, and oversight of the verification sampling conducted by operators

- The method for compositing of samples prior to screening tests for *Escherichia coli* O157:H7
- The use of the High Line-Speed Inspection System (HLIS) for bovine slaughter
- The government residue control program
- Testing for generic *E. coli* in minor species
- The government RTE verification testing program for *Lm* in meat and poultry
- The use of the following analytical methods in association with microbiological testing:
 - MFLP-16 for *E. coli* O157:H7 analysis in raw ground beef and beef components
 - MFHPB-30 for *Listeria monocytogenes* analysis in meat and eggs
 - MFLP-28 for *Listeria monocytogenes* analysis in eggs (with a special emphasis on ensuring that the methodology is sufficiently specific and sensitive to detect *Lm* least one colony forming unit (cfu) in a 25 gram sample; this special focus is necessary because Canada allows *Lm* to persist on foods that don't support growth at a level of up to 100 cfu and some methods are only capable of identifying a sample as positive if there are greater than 100 cfu)
 - MFLP-29 for *Salmonella* spp. analysis in meat and eggs
 - MFHPB-20 for *Salmonella* spp. analysis in meat and eggs
 - MFLP-80 for *E. coli* O157:H7/NM analysis in meat and eggs
 - MFLP-28 Bax® for *Listeria monocytogenes* analysis in RTE products
 - MFLP-15 – for the detection of *Listeria* spp. from environmental surfaces using DuPont Qualicon BAX®
 - MFHPB-24 for *Salmonella* spp. analysis in foods in association with the VIDAS SLMTM screening method
 - MFLP-20, Genequence®, for *Salmonella* spp. analysis in meat and eggs

4. BACKGROUND

Canada is eligible to export raw and processed red meat products, raw and processed poultry products, and egg products to the United States. Between January 1 and October 31, 2009, Canada exported 1,366,300,636 pounds of raw and processed meat and poultry product to the United States, of which 60,890,451 pounds were re-inspected at U.S. Ports of Entry (POE). A total of 440,532 pounds were rejected at POE, of which 7,277 pounds involved food-safety concerns (see Slaughter/Processing Controls).

The Canadian Food Safety System was last audited by FSIS in May/June of 2008. The findings of that audit resulted in one Notice of Intent to Delist (NOID) with no removal of establishments from the list of those eligible to export meat, poultry, or egg products to the United States. This was a routine audit which identified deficiencies, which were subsequently corrected and verified, in the following risk areas:

- *Government Oversight*: lack of available documentation reflecting the performance of periodic supervisory reviews
- *Sanitation Controls*: inconsistent implementation and verification of sanitation programs within the system, including deficiencies in performing pre-operational and operational sanitation procedures, and verification of recordkeeping requirements

- *Slaughter/Processing Controls*: inconsistent implementation and verification core HACCP regulatory requirements, including those for reassessment, recordkeeping, and scientific support of CCPs
- The deficiencies were addressed and verified by the CFIA.

The analysis of these prior deficiencies within the context of current findings indicates a potential trend in the CCA's ability to provide consistent oversight for the implementation of sanitation and HACCP programs within its inspection system.

5. MAIN FINDINGS CONCERNING GOVERNMENT OVERSIGHT

FSIS import eligibility requirements require that the foreign inspection system be organized and administered by the national government of the foreign country and provide standards equivalent to those of the Federal system of meat and poultry inspection in the United States. For Canada, the authority to enforce CFIA inspection laws is granted in the Canadian Meat Inspection Act and the Canadian Meat Inspection Regulations, and is exercised through the Meat Hygiene Manual of Procedures.

Although the CCA maintains the legal authority and the responsibility to enforce all applicable laws and regulations governing Canadian requirements, it was observed that these requirements were not consistently applied throughout the system, as enforcement actions were initiated during the audit by the CCA in six of the 23 establishments audited, as follows:

- Three establishments were removed from the list ("delisted") of establishments that are eligible to export to the United States.
- Three establishments were issued a Notice of Intent to Delists (NOID) for conditions within the establishment that were not immediately rectifiable, yet did not pose an imminent threat to public health and would warrant decertification if not corrected within thirty days from the time of issuance.
- Four of the six enforcement actions taken were against establishments producing RTE products.

When a foreign certified establishment is issued an NOID or is delisted, it is because there has been a questionable process control or basic sanitation issues within the facility. While FSIS expects these actions to occur in relation to the CCA's ongoing responsibilities for inspection and for oversight of its inspection personnel, these events carry a different significance when they occur within the context of an FSIS audit, as it calls into question why the conditions within a particular establishment have gone unaddressed and resulted in an enforcement action during the audit.

An important subcomponent of FSIS' eligibility requirements is the need for *the assignment of competent, qualified inspectors*. The CFIA Regional Offices are responsible for the hiring, training, assigning, and overseeing inspection personnel. During the course of the audit, the following deficiencies were identified as they relate to this subcomponent:

- At one establishment, it was noted that CFIA was not consistently assigning inspectors to each shift of operation when product was being produced for export to the United States. Further discussions with CFIA indicated that this was not an isolated event. CFIA immediately reacted to this finding and subsequently committed to rectify the deficiency.
- CFIA records reflecting daily inspection activities reviewed at some audited establishments indicated a low number of documented non-compliances, which did not consistently reflect the conditions encountered at the time of the audit.

With regard to the latter finding, the auditors identified a concurrent lack of evidence that inspection personnel increased their inspection activities appropriately, as documents reviewed indicated a tendency to perform tasks only at their minimum frequency. This lack of response held particularly true for those tasks involving verification of sanitation requirements. FSIS' further discussions within the CFIA hierarchy revealed that, while it is management's expectation that inspection tasks would intensify, specific instructions were not clearly communicated to in-plant inspection personnel as to how this should be accomplished.

FSIS expects that documented periodic supervisory reviews, addressing core components of a foreign country's export eligibility requirements, be performed in all establishments that are eligible for export to the United States. These reviews serve as a fundamental layer of oversight to ensure that the standards are being met on a routine basis.

During the audit, system weaknesses were identified in the manner in which supervisory reviews were conducted; these included an inconsistent documentation of reviews at the established frequency, as well as an inconsistent identification of potential non-compliances or potential inadequate performance by the inspection personnel. The deficiency concerning the lack of supervisory documentation is a repeat finding from the 2008 audit.

The progression of audit findings outlined above identifying system weaknesses in the assignment and performance of in-plant personnel and the performance of supervisory reviews with the concomitant need to take enforcement actions during the audit suggests a need for CFIA to improve its channels of communication, its employee training and awareness, and its feedback systems in order to bring the implementation of its program to the level necessary to effectively maintain equivalence.

6. SANITATION CONTROLS

The first of the five risk areas that the FSIS auditors reviewed was Sanitation Controls. The inspection system must contain requirements for sanitation, for sanitary handling of products, and for the development and implementation of sanitation standard operating procedures (SSOP).

While the review of relevant manuals and procedures at CFIA's administrative offices indicated that the CCA continues to maintain equivalent legislative controls for sanitation, the actual conditions of the establishment visits were often not entirely consistent with the corresponding documentation.

The establishment visits indicated that both in-plant inspection personnel and individuals conducting supervisory reviews were not routinely carrying out the procedures as described in the CFIA manual, as indicated by:

- Lack/loss of consistent identification of contaminated product and product-contact surfaces and other insanitary conditions,
- Inconsistent verification of adequate corrective actions provided by the establishment with regards to repetitive non-compliances,
- Inconsistent and loss of documentation of non-compliances in a manner that reflects actual establishment conditions, and
- Lack/loss of increased inspection activities when noncompliance is observed accordingly.

Many of these findings are closely related to those identified during the previous audit. Furthermore, because many of the enforcement actions taken by the CCA during the course of the audit were related to sanitation deficiencies, the need for more consistent application of controls within the interim periods became evident.

7. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditors evaluated was Animal Disease Controls, including review of mechanisms for animal identification, control of condemned and restricted product, implementation of the requirements for non-ambulatory disabled cattle and specified risk materials (SRM), and procedures for sanitary handling of returned and reconditioned product. No findings were identified as a result of this audit, therefore indicating process control by the CCA.

8. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditors reviewed was Slaughter/Processing Controls, which included ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, post-mortem disposition, implementation of HACCP systems in all establishments, and implementation of a testing program for generic *E. coli* in slaughter establishments.

The review of applicable legislation and procedures indicated that the CFIA continues to maintain sufficient written controls with respect to this risk area. However, an analysis of POE findings and subsequent establishment visits identified system weaknesses regarding implementation and verification of HACCP systems within the CFIA.

In preparation for the audit, an analysis of POE findings identified several occurrences of zero-tolerance failures in addition to two positive results for *E. coli* O157:H7 in ground beef, for which the audit scope was adapted to include those establishments where regulatory oversight for these hazards could be observed and the corrective actions verified. The POE violation corrective actions were verified as adequate. Although specific deficiencies directly attributable to these POE findings were not identified, the establishment visits identified similar inadequacies

to those found in sanitation controls, including the inability to effectively implement specific procedures concerning fundamental aspects of the HACCP system, such as:

- Inaccurate analyzing of hazards and to develop a HACCP plan for a given process,
- Inadequate implementation of basic elements of the HACCP plan, including monitoring and ongoing verification procedures,
- Inappropriate verification of corrective actions taken in response to deviations from the critical limit, and
- Inconsistent to maintain appropriate records of noncompliance, e.g., initialing of entries, recording of actual quantifiable values and actual times when the entries were made

The auditor's observance of implementation of the remaining portions of CFIA's Slaughter/Processing controls resulted in no findings, with the exception of one occasion on which the auditor identified that post-mortem viscera inspectors were not routinely incising the appropriate lymph nodes of the lungs. However, the significance of this finding is more likely related to the method by which supervisory reviews are conducted than to a lack of adequate training.

9. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditors reviewed was Residue Controls. The inspection system must have a chemical residue control program, organized and administered by the national government, which includes random sampling of internal organs and fat of carcasses for chemical residues identified by the exporting country's meat and poultry inspection authority or by FSIS as contaminants. As part of the verification methodology, the auditors' preparatory review of POE findings before going to Canada did not identify areas of concern within this risk area. Subsequently, one government residue laboratory was reviewed and no deficiencies were observed. In addition, interviews with CCA personnel and the review of relevant records indicated that Canada's residue control plan was being followed appropriately, therefore demonstrating process control.

10. ENFORCEMENT CONTROLS

The last of the five risk areas that the FSIS auditors reviewed was Enforcement Controls. These controls included the enforcement of inspection requirements, the government and industry's verification testing programs for *Salmonella* spp, *Escherichia coli* O157:H7, *Lm*, and species verification.

During the on-site audit FSIS was unable to fully verify CFIA *Lm* control measures. Subsequent to the on-site audit, CFIA provided documentation demonstrating *Lm* verification control. CFIA utilizes both industry and government verification. CFIA employs four risk based sampling programs to verify *Lm* control, CCA environmental testing, CCA product testing, establishment product/product contact surface testing, and RTE imported product testing. Establishments producing RTE products are required to adopt *Lm* control measures similar to FSIS's Alternatives 1, 2, and 3.

In addition to testing programs CFIA uses a food safety investigation enforcement strategy similar to FSIS's Food Safety Assessment. The audit strategy is two pronged, periodic verification and in-depth for cause. Periodic verifications are risk based and occur annually, semi-annually, or quarterly. In-depth verifications are precipitated by events such as repetitive non-compliance, positive microbial tests, and recalls.

While no deficiencies were identified concerning the testing programs for the relevant pathogens, weaknesses associated with the enforcement of sanitation and HACCP requirements, the performance of supervisory reviews, and the assignment of inspectors have been duly noted in previous portions of this report.

11. EXIT MEETING

An exit conference was held in Ottawa on October 1, 2009, with the CFIA. At this meeting, the preliminary findings from the audit were presented by the FSIS lead auditor.

12. PROFFERED CORRECTIVE ACTIONS

At the time of drafting of this report the CFIA has provided the following corrective actions to FSIS's audit findings:

CFIA Inspection Coverage

The CFIA implemented additional inspection visits in 126 of the 190 establishments certified to export to the United States and that operate more than 12 hours per day. The CFIA Manual of Procedures is being revised to reflect current overtime coverage for establishments operating more than 8 hours but less than 12 hours. The 126 establishments include all establishments producing RTE meat products, and all establishments actively exporting to the United States. The CFIA committed to provide inspection coverage to the remaining certified establishments by September 2010.

Supervisory Oversight

To improve awareness of in-plant conditions, supervisors are now required to accompany inspectors on a quarterly basis during one forecasting activity in each establishment. This supervisory activity, in addition to a new method for targeting past quality issues, will be incorporated into the existing QMS.

Compliance Verification System (CVS) Tasks

Verification tasks have been reviewed and revisions made including re-organization, title changes, combining tasks, removing tasks, updating the Manual of Procedures (MOP) references and improved wording. Highlights of changes made are as follows:

- The sanitation task was re-structured to focus more on a global assessment of plant sanitation including more emphasis on RTE areas/equipment.

- A new once per month “forecasting” inspection activity has been added to augment inspection awareness of current establishment conditions. Inspectors will use this activity to forecast and prioritize verification tasks for the upcoming month by conducting a tour of the establishment and reviewing the company HACCP log book.
- Introduction of a requirement for inspectors to document follow-up activities for minor deviations which do not require a formal Corrective Action Request (CAR) (i.e. “Acceptable with comments”) & amendment to MOP Chapters 14 and 18 to include updated changes made to CVS and the Food Safety Enhancement Program (FSEP), further clarify responsibilities for the Quality Management System (QMS) (slaughter) and enforcement, and improve communication through the addition of the inspector generated “Enforcement Tracking Form” which will assist in obtaining timely feedback from Managers during enforcement actions. Work to finalize the related policies and procedures will be completed by May 15, 2010. Staff will receive a 1 day training session in the above – training will begin immediately after this date and will be completed by mid-October 2010.

Risk Based Inspection

The CFIA has introduced the concept of risk based inspection into the CVS. The frequency for delivering each verification task is determined through the use of a risk model which utilizes the risk inherent with each task and the category of the establishment (RTE vs. Non-RTE).

The application of risk in determining verification task frequencies has resulted in increased inspection coverage for the following:

- Critical Control Points (e.g. minimum quarterly for all kill step CCPs)
- *Listeria* related inspection tasks associated with operational/pre-operational sanitation, ventilation (e.g. condensation), building construction (condition of premises) and maintenance of equipment.
- Establishment employee training program (e.g. general food hygiene)

Compliance Verification System Data and Reports

CVS performance data is being used to improve accountability and timeliness of management follow-up on actions required for issues of concern. CVS reports are provided on a quarterly basis to all levels of CFIA management indicating delivery of verification tasks, follow up inspection activities conducted and industry compliance rates.

CVS data is also being used to populate the risk based model and to conduct trending exercises. An electronic application is being developed to allow inspection staff access to historical data at the field level which will provide for more timely compliance decisions.

Food Safety Enhancement Program (FSEP)

FSEP has been amended to reflect changes in meat policy and industry technologies. An inspection activity has been developed and implemented within CVS (Group 4 verification task) to verify the design of an establishment's HACCP system. This verification task will ensure establishment HACCP systems meet the mandatory requirements of FSEP including emphasis on the reassessment of HACCP plans, management commitment and the content/use of validation studies.

CFIA Inspector Training

A National Training Plan (NTP) for meat processing inspectors has been developed to address technical and inspection skills. The new training plan outlines a 29-week series of training modules consisting of in-class instruction, coaching/mentoring, self-study and e-learning.

All new processing inspectors will receive the following training modules:

- 3 week in-class covering technical and inspection skills
- 3 day in-class Food Safety Enhancement Program (FSEP)
- 3.5 day in-class Compliance Verification System
- Half-day Quality Management System (delivered with CVS training)
- On-site mentoring (includes final evaluation)

In addition to the four day in-class training course and on-site mentoring program, current processing inspectors will receive the following training modules (in-class and on-site):

- CVS update
- FSEP update
- Reinforcement training detailing:
 - Sanitation methods and procedures
 - Pre-operational inspection of equipment and premises
 - Sanitary conditions associated with design of food processing equipment and premises
 - Cross-contamination points in food processing establishments

The CFIA recognizes the importance of employee development and is committed towards building its knowledge capacity, both on an organizational and individual level as outlined in its Renewal Plan for 2008-2013. The Agency will strive to continually review and improve the meat inspection program and enhance the skill level of inspection staff. The flexibility of the CVS is conducive to implementing policy/program changes and addressing training needs in an effective and timely manner.

13. CONCLUSION

The audit revealed several areas of systemic concern, both in system design and system execution. The CFIA has taken significant actions, which, if adequately implemented and effectively executed, should strengthen those weakness identified in the audit.

Francisco Gonzalez, DVM

Faizur Choudry, DVM

Faizur Choudry

FC _____