FINAL REPORT OF AN AUDIT CONDUCTED OF

CANADA

OCTOBER 31–NOVEMBER 23, 2022

EVALUATING THE FOOD SAFETY SYSTEMS GOVERNING

MEAT, POULTRY, AND EGG PRODUCTS

EXPORTED TO THE UNITED STATES OF AMERICA

June 15, 2023

Food Safety and Inspection Service
United States Department of Agriculture

Executive Summary

This report describes the outcome of an onsite equivalence verification audit of Canada conducted by the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS) October 31–November 23, 2022. The purpose of the audit was to determine whether Canada's food safety inspection system governing meat, poultry, and egg products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and properly labeled and packaged. Canada currently exports meat and poultry that is thermally processed-commercially sterile, ready-to-eat (RTE), raw intact, raw non-intact, and not-ready-to-eat (NRTE) otherwise processed, and egg products to the United States.

The audit focused on six system equivalence components: (1) Government Oversight (e.g., Organization and Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Point (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

FSIS concluded that Canada's food safety inspection system is organized to provide ultimate control, supervision, and enforcement of regulatory requirements. The Canadian Food Inspection Agency (CFIA), Canada's Central Competent Authority, has required that the establishments certified as eligible to export products to the United States implement sanitation requirements and a HACCP system designed to ensure the safety of their products. In addition, CFIA has implemented official microbiological and chemical residue testing programs that are organized and administered by the national government to verify its system. An analysis of each component did not identify any systemic findings representing an immediate threat to public health.

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I. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture (USDA) conducted an onsite audit of Canada's food safety system October 31–November 23, 2022. The audit began with an entrance meeting October 31, 2022, in Ottawa, Canada, during which the FSIS auditors discussed the audit objective, scope, and methodology with representatives from the Central Competent Authority (CCA) – the Canadian Food Inspection Agency (Agence Canadienne d'inspection des aliments) (CFIA). Representatives from CFIA accompanied the FSIS auditors throughout the entire audit. The audit concluded with an exit meeting conducted remotely via videoconference November 23, 2023.

II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a routine ongoing equivalence verification audit. The audit objective was to determine whether the food safety inspection systems governing meat, poultry, and egg products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and properly labeled and packaged. Canada is eligible to export the following categories of products to the United States:

Process Category	Product Category	Eligible Products[1]
Raw - Non Intact	Raw Ground, Comminuted, or Otherwise Non-intact Beef	Beef and Veal - All Products Eligible except Finely Textured Beef (FTB); Low Temperature Rendered Product (LTRP); Partially Defatted Beef Fatty Tissue (PDBFT); and Partially Defatted Chopped Beef (PDCB)
Raw - Non Intact	Raw Ground, Comminuted, or Otherwise Non-intact Chicken	Chicken - All Products Eligible
Raw - Non Intact	Raw Ground, Comminuted, or Otherwise Non-intact Meat-Other (sheep, goat)	Lamb and Goat - All Products Eligible
Raw - Non Intact	Raw Ground, Comminuted, or Otherwise Non-intact Pork	Pork - All Products Eligible
Raw - Non Intact	Raw Ground, Comminuted, or Otherwise Non-intact Poultry-Other (Ducks, Geese, Squab)	Duck, Emu, Goose, Guinea, Ostrich, and Rhea - All Products Eligible except Mechanically Separated
Raw - Non Intact	Raw Ground, Comminuted, or Otherwise Non-intact Turkey	Turkey - All Products Eligible

[1] All source meat and poultry used to produce products must originate from eligible countries and establishments certified to export to the United States.

Process Category	Product Category	Eligible Products[1]
Raw - Intact	Raw Intact Beef	Beef and Veal - All Products Eligible
Raw - Intact	Raw Intact Chicken	Chicken - All Products Eligible
Raw - Intact	Raw Intact Meat-Other (Sheep, Goat)	Lamb and Goat - All Products Eligible
Raw - Intact	Raw Intact Pork	Pork - All Products Eligible
Raw - Intact	Raw Intact Poultry-Other (Ducks, Geese, Squab)	Duck, Emu, Goose, Guinea, Ostrich, Rhea, and Squab - All Products Eligible
Raw - Intact	Raw Intact Turkey	Turkey - All Products Eligible
Thermally Processed - Commercially Sterile	Thermally Processed, Commercially Sterile	Beef, Chicken, Duck, Emu, Goat, Guinea, Lamb, Ostrich, Rhea, Pork, Turkey, and Veal - All Products Eligible
Not Heat Treated - Shelf Stable	Not Ready-to Eat (NRTE) Otherwise Processed Meat	Beef, Goat, Lamb, Pork, and Veal - All Products Eligible
Not Heat Treated - Shelf Stable	NRTE Otherwise Processed Poultry	Chicken, Duck, Emu, Guinea, Ostrich, Rhea, and Turkey - All Products Eligible
Not Heat Treated - Shelf Stable	Ready-to-Eat (RTE) Acidified/Fermented Meat (without cooking)	Beef, Goat, Lamb, Pork, and Veal - All Products Eligible
Not Heat Treated - Shelf Stable	RTE Dried Meat	Goat, Lamb, Pork, and Veal - All Products Eligible
Not Heat Treated - Shelf Stable	RTE Salt-Cured Meat	Goat, Lamb, Pork, and Veal - All Products Eligible
Heat Treated - Shelf Stable	NRTE Otherwise Processed Meat	Beef, Lamb, Pork, and Veal - All Products Eligible
Heat Treated - Shelf Stable	NRTE Otherwise Processed Poultry	Chicken, Duck, Emu, Guinea, Ostrich, Rhea, and Turkey - All Products Eligible
Heat Treated - Shelf Stable	RTE Acidified/Fermented Meat (without cooking)	Beef, Lamb, Pork, and Veal - All Products Eligible
Heat Treated - Shelf Stable	RTE Dried Meat	Beef, Lamb, Pork, and Veal - All Products Eligible
Heat Treated - Shelf Stable	RTE Dried Poultry	Emu, Guinea, Ostrich, Rhea, and Turkey - All Products Eligible
Heat Treated - Shelf Stable	RTE Salt-Cured Meat	Lamb, Pork, and Veal - All Products Eligible
Fully Cooked - Not Shelf Stable	RTE Fully-Cooked Meat	Beef, Goat, Lamb, Veal, and Pork - All Products Eligible

Process Category	Product Category	Eligible Products[1]
Fully Cooked - Not Shelf Stable	RTE Fully-Cooked Poultry	Chicken, Duck, Emu, Goose, Guinea, Ostrich, Rhea, Squab, and Turkey - All Products Eligible
Fully Cooked - Not Shelf Stable	RTE Meat Fully-Cooked Without Subsequent Exposure to the Environment	Beef, Goat, Lamb, Veal, and Pork - All Products Eligible
Fully Cooked - Not Shelf Stable	RTE Poultry Fully-Cooked Without Subsequent Exposure to the Environment	Chicken, Duck, Emu, Goose, Guinea, Ostrich, Rhea, Squab, and Turkey - All Products Eligible
Heat Treated - Not Fully Cooked - Not Shelf Stable	NRTE Otherwise Processed Meat	Beef, Veal, Lamb, Goat, and Pork - All Products Eligible
Heat Treated - Not Fully Cooked - Not Shelf Stable	NRTE Otherwise Processed Poultry	Chicken, Duck, Emu, Guinea, Ostrich, Rhea, and Turkey - All Products Eligible
Products with Secondary Inhibitors - Not Shelf Stable	NRTE Otherwise Processed Meat	Beef, Lamb, Goat, Pork, and Veal - All Products Eligible
Products with Secondary Inhibitors - Not Shelf Stable	RTE Salt-Cured Meat	Pork - All Products Eligible
Products with Secondary Inhibitors - Not Shelf Stable	NRTE Otherwise Processed Poultry	Chicken, Duck, Emu, Guinea, Goose, Ostrich, Rhea, Turkey - All Products Eligible
Eggs/Egg Products	Egg Products	Poultry - All Products Eligible

The USDA's Animal and Plant Health Inspection Service recognizes beef imported from Canada as subject to requirements specified in Title 9 of the United States Code of Federal Regulations (9 CFR) 94.18 or 9 CFR 94.20 and lamb and goat imported from Canada is subject to requirements in 9 CFR 94.25. Poultry and egg products are subject to requirements specified in 9 CFR 94.6.

Prior to the onsite equivalence verification audit, FSIS reviewed and analyzed Canada's Self-Reporting Tool (SRT) responses and supporting documentation, including official chemical residue and microbiological sampling plans and results. During the audit, the FSIS auditors conducted interviews and reviewed records to determine whether Canada's food safety inspection systems governing meat, poultry, and egg products is being implemented as documented in the country's SRT responses and supporting documentation.

FSIS applied a risk-based procedure that included an analysis of country performance within six equivalence components, product types and volumes, frequency of prior audit-related site visits, point-of-entry (POE) reinspection and testing results, specific oversight activities of government offices, and testing capacities of laboratories. The review process included an analysis of data collected by FSIS over a 3-year period, in addition to information obtained directly from CFIA through the SRT.

Determinations concerning program effectiveness focused on performance within the following six components upon which system equivalence is based: (1) Government Oversight (e.g., Organization and Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Point (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

The FSIS auditors reviewed administrative functions at CFIA headquarters, 3 regional offices, and 13 local inspection offices within the establishments. The FSIS auditors evaluated the implementation of control systems in place that ensure the national system of inspection, verification, and enforcement is being implemented as intended.

A sample of 13 establishments was selected from a total of 501 establishments certified to export to the United States. This included three meat and poultry processing establishments; two beef slaughter and processing establishments; two pork slaughter and processing establishments; one beef, veal, goat, and sheep slaughter and processing establishment; one sheep, lamb, and goat slaughter and processing establishment; one poultry slaughter and processing establishment; one egg products establishment; one poultry processing establishment; and one meat processing establishment. The products these establishments produce and export to the United States include meat and poultry that is thermally processed-commercially sterile (TPCS), ready-to-eat (RTE) , raw intact, raw non-intact, not ready-to-eat (NRTE) otherwise processed, and egg products.

During the establishment visits, the FSIS auditors paid particular attention to the extent to which industry and government interacted to control hazards and prevent noncompliance that threatens food safety. The FSIS auditors assessed the CFIA's ability to provide oversight through supervisory reviews conducted in accordance with FSIS equivalence requirements for foreign food safety inspection systems outlined in 9 CFR 327.2, 381.196, and 590.910.

The FSIS auditors also visited a third-party (private) chemical residue laboratory and a government microbiological laboratory to verify that these laboratories are capable of providing adequate technical support to the food safety inspection system.

Competent Authority Visits		#	Locations
Competent Authority	Central	1	• CFIA Headquarters, located in Ottawa
	Area	1	• CFIA Area Office, located in Guelph
	Regional	2	• CFIA Bureau Régional, located in St-Hyacinthe • CFIA Regional Office, located in Burnaby
Laboratories		2	• CFIA St-Hyacinth Microbiological Laboratory, government laboratory located in St-Hyacinthe • SGS Canada Residue Lab, private laboratory located in Burnaby
Beef slaughter and processing establishments		2	• Establishment No. 38, JBS Food Canada, located in Brooks

		• Establishment No. 93, Cargill Limited, located in High River
Pork slaughter and processing establishments	2	• Establishment No. 80, Atrahan Transformation Inc., located in Yamachiche • Establishment No. 791, Jowett Farms Corporation, located in Blumenort
Poultry slaughter and processing establishments	2	• Establishment No. 37, Hudson Valley Farms (CA) ULC, located in St-Louis De Gonzague • Establishment No. 652, Rossdown Natural Foods Ltd., located in Abbotsford
Beef, Veal, and Sheep slaughter and processing establishment	1	• Establishment No. 11, Elbee Meat Packers Limited, located in Toronto
Meat and Poultry processing establishments	2	• Establishment No. 489, Fleury Michon Amerique Inc., Rigaud • Establishment No. 251, Specialites Lassonde Inc., located in Saint-Damase
Pork processing establishments	2	• Establishment No. 468, 9450-9825 Quebec Inc., located in Yamachiche • Establishment No. 781, Italia Salami Company Limited, located in Guelph
Poultry processing establishment	1	• Establishment No. 835, Volaille Novo Inc., located in Varennes
Egg product facility	1	• Establishment No. 66E, Egg Solutions-Vanderpols Inc., located in Abbotsford

FSIS performed the audit to verify that the food safety inspection systems meet requirements equivalent to those under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 United States Code (U.S.C.) Section 601 et seq.);
- The Humane Methods of Slaughter Act (7 U.S.C. Sections 1901-1906);
- The Meat Inspection Regulations (9 CFR 301 to the end);
- The Poultry Products Inspection Act (21 U.S.C. Section 451 et seq.);
- The Poultry Products Inspection Regulations (9 CFR 381);
- The Egg Products Inspection Act (21 U.S.C. Section 1031 et seq.); and
- The Egg Products Inspection Regulations (9 CFR 590).

The audit standards applied during the review of Canada's inspection systems for meat, poultry, and egg products 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 by FSIS under provisions of the World Trade Organization's Agreement on the Application of Sanitary and Phytosanitary Measures.

III. BACKGROUND

From May 1, 2019, to April 30, 2022, FSIS import inspectors performed 100 percent re-inspection for labeling and certification on 4,536,537,879 pounds of meat, 552,910,687 pounds of poultry, and 22,862,748 pounds of egg products from Canada. Of these amounts, additional types of inspection were performed on 95,899,295 pounds of meat, 64,230,262 pounds of poultry, and 5,012,574 pounds of egg products, including physical examination, condition of container examination for TPCS products, chemical residue analysis, and testing for microbiological pathogens including Shiga toxin-producing *Escherichia coli* (STEC) O157, O26, O45, O103, O111, O121, and O145 in beef or veal, *Listeria monocytogenes* (*Lm*) and *Salmonella* in RTE products, and *Lm* and *Salmonella* in egg products. As a result of this additional inspection and testing, 146,266 pounds of meat and poultry products were rejected for issues directly related to public health, including violative levels of veterinary drugs, swollen lids in TPCS products, *Lm* positive RTE products, *Salmonella* positive RTE products, STEC positive beef products, off condition, under processing, and presence of fecal material, ingesta, or milk. An additional 330,545 pounds of meat and poultry products were rejected for the identification of other issues including bone or blood clots, extraneous materials, abscesses, or ineligible products. FSIS evaluated CFIA's corrective action responses, found them sufficient, and closed the POE violations.

The previous FSIS audit in 2018 identified the following findings:

Summary of Findings from the 2018 FSIS Audit of Canada
Component 1: Government Oversight (e.g., Organization and Administration)
• The Canadian Food Inspection Agency (CFIA) allows inspection personnel to issue an export certificate for product intended for export to the United States before test results are known from the CFIA routine chemical residue program. • In 13 of 14 audited establishments, the FSIS auditors identified deficiencies due to inadequate enforcement of sanitation standard operating procedures (Sanitation SOP) and sanitation performance standards (SPS) requirements by CFIA inspection personnel.
Component 2: Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation, Product Standards and Labeling, and Humane Handling)
• In the sole establishment audited that was operating under the HACCP-Based Inspection Program for swine, during the veterinary disposition of retained carcasses, CFIA did not require pluck (heart, lung, and liver) or viscera to be presented for final disposition by the veterinarian when a carcass was railed out for pathology. In another establishment, caul (omental) fat was being harvested prior to CFIA evisceration inspection for the presence of pathology. The establishment did not demonstrate how it would maintain segregation of harvested fat as a batch or a similar system for proper disposition of the product.
Component 4: Government Hazard Analysis and Critical Control Point (HACCP) System
• In six of 14 audited establishments, the FSIS auditors identified deficiencies related to HACCP plan design, monitoring, and recordkeeping.
Component 6: Government Microbiological Testing Programs
• The CFIA does not require poultry establishments to collect and analyze samples for microbial organisms at the pre-chill location.

- Unfinished tasks were not properly documented as required in the CFIA's laboratory standard operating procedure.
- The tracking sheet related to analytical method MFLP76 did not indicate the date and time when the sample was put in and taken out of the incubator. The tracking sheet also did not indicate whether the sample remained in the incubator for the specified duration.

FSIS continues to work with CFIA to resolve audit findings related to review of chemical residue test results prior to certification for export to the United States and for poultry carcass testing requirements to ensure sampling verification of process control throughout the slaughter and dressing process (e.g., through sampling for microbial organisms at two points in the process). The FSIS auditors verified corrective actions for the remaining previously reported findings were implemented and effective in resolving the findings.

The FSIS final audit reports for Canada's food safety inspection system are available on the FSIS website at: www.fsis.usda.gov/foreign-audit-reports.

IV. COMPONENT ONE: GOVERNMENT OVERSIGHT (e.g., ORGANIZATION AND ADMINISTRATION)

The first equivalence component the FSIS auditors reviewed was Government Oversight. FSIS import regulations require the foreign food safety inspection system to be organized by the national government in such a manner as to provide ultimate control and supervision over all official inspection activities; ensure the uniform enforcement of requisite laws; provide sufficient administrative technical support; and assign competent qualified inspection personnel at establishments where products are prepared for export to the United States.

CFIA is the CCA of Canada's meat, poultry, and egg products inspection system and has the overall authority and responsibility for policy decisions, and implementation and enforcement of legislation in supervised establishments. The Safe Food for Canadians Act legislates the requirements for licensing of food businesses, with Safe Food for Canadians Regulations (SFCR) setting the specific requirements that establishments must meet. The passage and implementation of these acts and regulations represent a change in the CFIA food inspection system since the last FSIS audit. CFIA is also in the process of changing regulatory verification procedures and documentation of their completion. Despite the change in the legislation providing the authority and responsibility of oversight, the FSIS auditors verified that there have been no changes to the organizational structure of CFIA.

Official controls are administered through the Operations Branch of CFIA, which is divided into four management areas consisting of the Western, Ontario, Québec, and Atlantic areas, with each area having a director general and senior director. Oversight of area offices is further managed within regional offices which are led by regional directors (RD), followed by district offices with oversight by inspection managers (IM) then subdistrict offices or a complex dependent on the nature of operations at individual establishments located within the oversight area of the respective subdistrict office or complex. IMs provide oversight of veterinarians in charge (VIC) at each subdistrict office or the supervisors of each complex who then have oversight of inspectors and veterinarians assigned to individual establishments. Regional veterinary officers

(RVO) and regional program officers (RPO) provide program area support to subdistrict offices and complexes and report to RDs or IMs, respectively.

CFIA ensures adequate staffing levels at individual establishments and that regulatory verification occurs according to current system programs. During the audit, the FSIS auditors verified CFIA has effective oversight of inspection officials. CFIA inspectors and veterinarians are present and conduct inspections of every carcass and its parts continuously during slaughter operations and inspectors or veterinarians are present in processing establishments at least once per shift. CFIA inspectors are also present and conduct inspections continuously during egg processing operations. The FSIS auditors also verified that all personnel performing CFIA inspection and export certification activities are government employees paid directly by CFIA.

The FSIS auditors verified the process for CFIA's certification of an establishment as eligible to export meat, poultry, or egg products to the United States. An establishment uses the Application for Establishment Approval (Annex I) to apply for approval and start the process of export certification by indicating they are aware of and meet all applicable requirements. The CFIA inspector or VIC then verifies the establishment facilities and implementation of programs required for the establishment to meet U.S. export requirements. The Annex I application is then sent to the area office for review and approval by the area export specialist (AES). The AES then sends the application to CFIA headquarters, and CFIA sends a request to FSIS that the establishment be listed as certified to export product to the United States.

The FSIS auditors verified that CFIA is authorized to take actions in establishments as necessary to ensure compliance with requirements including control of potentially affected products. CFIA considers the potential of harm, history of compliance at the establishment, and indications of intent in determining the appropriate level of enforcement response. Actions which may be taken include issuance of a letter of non-compliance, notice of violation which may include monetary fines, and suspension or cancellation of an operator's license. CFIA Enforcement and Investigation Services may also perform investigations which can lead to a letter of warning, monetary fines, criminal prosecution, or suspension or cancellation of an operator's license. The FSIS auditors verified that CFIA has followed their guidelines in taking enforcement action up to and including cancellation of an operator's license when necessary.

CFIA ensures that only products that have been inspected and eligible for export to the United States are certified for export. A certified establishment bears full responsibility and must provide an inspector or veterinarian with documentation that substantiates that U.S. requirements are met in order for export certification to occur. The FSIS auditors verified that inspection officials maintained official control of certificates for export, export stamps, and stickers printed for marking of exports. The FSIS auditors did identify that CFIA does not require certified establishments to hold carcasses and parts when routine scheduled samples are taken for the National Chemical Residue Monitoring Program (NCRMP). CFIA inspectors and veterinarians are permitted to certify products for export prior to availability of test results, as was also observed during the FSIS audit during November-December of 2018.[2] The FSIS auditors did not identify that any affected product was exported to the United States based on a review of available records.

[2] FSIS continues to work with CFIA to resolve the previous audit finding.

CFIA requires establishments to maintain traceability and be able to recall products in accordance with SFCR requirements. The FSIS auditors verified that CFIA has a mechanism in place to notify FSIS of the shipment of non-compliant or adulterated product to the United States. Certified establishments are required to maintain separation of eligible products from those not eligible for export to the United States. Products imported to Canada from a third-country source must be accompanied by an official attestation from the CCA of that country indicating the product meets United States export requirements for the product to be eligible for processing and subsequent export to the United States. The FSIS auditors verified traceability within certified establishments and local inspection staff knowledge of these requirements where applicable.

CFIA requires chemical residue and microbiological laboratories conducting analysis of official samples to be accredited by the Standards Council of Canada (SCC) or the Canadian Association of Laboratory Accreditation (CALA) according to International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17025 standards. The FSIS auditors confirmed that CALA or SCC conduct biannual accreditation audits and reviewed the most recent audit results including actions in response to any audit findings. CFIA has a program specialty agreement in place and provides technical assessors to assist CALA or SCC with the accreditation audits of any third-party (private) laboratories which are contracted to perform analysis of official samples. Additionally, CFIA conducts a separate yearly audit of any third-party laboratory based on contracts in place for analysis of official samples.

The FSIS auditors verified controls at audited laboratories by interview of staff and review of documents to verify controls are in place for package and sample integrity including CFIA sample seals at receiving, use of recognized and approved analysis methods, calibration of laboratory equipment, ongoing control testing to verify methods, proficiency testing, sample tracking and recordkeeping, and results of analyses reporting. The FSIS auditors also reviewed internal employee training records and proficiency requirements for testing methods in use for official sample analysis. The FSIS auditors also reviewed results of the most recent internal laboratory audit and responses to observed findings.

CFIA requires that veterinary staff graduate from a school recognized by the Canadian Veterinary Medical Association (CVMA) or from a veterinary school with a certificate of qualification granted by the CVMA's National Examining Board. Inspection staff must meet minimum requirements which may be completion of post-secondary education in a relevant technical science or a combination of education, training, and/or experience. All employees are trained based on their specific job duties including ante-mortem, post-mortem, animal welfare and humane handling, transport of animals, export certification, sanitation, pre-requisite control programs or HACCP, and sampling techniques. Employees are also provided training about specific FSIS requirements including labeling, test and hold, pre-shipment review, and any unique changes or updated procedures.

The auditors verified that Canada’s meat, poultry, and egg products inspection system is organized and administered by the national government, and that CFIA inspection officials are authorized, assigned, and act to enforce the laws and regulations governing meat products,

providing ultimate control, supervision, and enforcement of regulatory requirements. However, CFIA is still addressing a prior audit finding where certified establishments are not required to hold carcasses and parts until results of routine NCRMP samples are known.

V. COMPONENT TWO: GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS (e.g., INSPECTION SYSTEM OPERATION, PRODUCT STANDARDS AND LABELING, AND HUMANE HANDLING)

The second equivalence component the FSIS auditors reviewed was Government Statutory Authority and Food Safety and Other Consumer Protection Regulations. The system is to provide for good commercial practices in poultry; humane handling and slaughter of livestock; ante-mortem inspection of animals; post-mortem inspection of every carcass and its parts; controls over condemned materials; controls over establishment construction, facilities, and equipment; at least once per shift inspection during processing operations; and periodic supervisory visits to official establishments.

The FSIS auditors verified that CFIA requires a veterinarian or an inspector under supervision of a veterinarian to perform ante-mortem inspection no more than 24 hours prior to the time of slaughter of animals. CFIA performs ante-mortem inspection of all animals at rest and are required to observe a minimum of 5-10 percent of bovine animals in motion from both sides. Establishment employees observe all animals at unloading and are required to identify and segregate any animals showing signs of injury or illness. CFIA also performs ante-mortem inspection of poultry by observing live birds on the transport truck or in the staging area prior to slaughter. The FSIS auditors verified that CFIA has documentation and recordkeeping controls in place to ensure ante-mortem inspection is conducted on all animals and poultry prior to slaughter occurring.

CFIA verifies establishments meet humane handling and humane slaughter requirements according to SFCR. Establishments are required to have written preventive control programs for humane handling and humane slaughter of animals, including monitoring and recordkeeping of the effective performance of the program. The FSIS auditors verified that CFIA conducts observations of the unloading of animals, inspection of holding pens and alleyways for design and maintenance to prevent injury to animals, and verification of the effectiveness of stunning or restraint prior to the slaughter process. The FSIS auditors observed that all holding pens for animals had water available, and provisions were made for feed availability if animals were held over 24 hours. The FSIS auditors also verified that CFIA takes immediate action if they observe a violation of any of the humane handling or humane slaughter requirements, and the observations are referred for elevated enforcement actions as appropriate.

The FSIS auditors verified that post-mortem inspection of each carcass is achieved through various inspection systems including CFIA's traditional inspection for beef, High Line Inspection System (HLIS) of beef, HACCP-based Inspection Program (HIP) of hogs, Modernized Slaughter Inspection Program (MSIP) of hogs, traditional inspection for poultry, and Modernized Poultry Inspection Program (MPIP) of poultry. The FSIS auditors verified that CFIA was following required inspection procedures for each applicable inspection system at slaughter establishments. CFIA performed inspection of each carcass, head, and viscera at

establishments operating under traditional, HLIS, HIP, and MSIP inspection systems, and performed inspection of each carcass at establishments operating under MPIP inspection systems. CFIA was also verifying additional establishment controls were implemented and effective through presentation standards tests, pre- and post-evisceration tests, finished product standard tests, defect detection tests, and rejection process control tests as appropriate and applicable for each inspection system.

The FSIS auditors verified that establishments slaughtering cattle implemented control systems to determine the age of cattle and ensured all specified risk materials (SRM) were identified for removal as appropriate. CFIA requires verifiable records documenting the age of cattle or the use of dentition to determine cattle age. CFIA ensures adequate removal of SRMs in beef slaughter operations through visual inspections of each carcass and verification of establishment marking systems for removal of SRMs during the deboning process. SRMs are removed and identified as such and are handled, controlled, and disposed of appropriately. The FSIS auditors also verified that CFIA ensures the control of all other condemned materials and animals as part of their routine verification procedures of identification and marking control systems at each certified establishment.

The FSIS auditors verified that CFIA conducts supervisory oversight of slaughter, processing, and egg products establishments to verify inspection activities are conducted and documented according to prescribed policies and procedures, and that decisions made by official inspection personnel are uniform, consistent, and in accordance with prescribed policies, procedures, and regulations. RVOs are responsible for conducting supervisory oversight of slaughter facilities at least semi-annually with separate follow-up activities as needed. A complex supervisor is responsible for conducting supervisory oversight of all processing and storage establishments within the complex on a semi-annual basis with separate follow-up activities as needed. Supervisors of egg processing establishments provide supervisory oversight through review of inspection reports with support from RPOs and operations specialists.

The FSIS auditors verified that CFIA requires certified establishments to properly label products according to the requirements of the United States. Labels must include product name, shipping identification mark, country of origin, name and address of the manufacturer or distributor, net weight of the product, a handling statement, and safe handling instructions. Any labels with claims must be approved by FSIS prior to their use by a certified establishment. Veterinarians or inspectors conduct reviews of labels for specific FSIS labeling requirements during the export procedure verification process.

The FSIS analysis and verification activities indicate that CFIA maintains the legal authority and a regulatory framework that is consistent with the criteria for this component and therefore continues to meet the core requirements.

VI. COMPONENT THREE: GOVERNMENT SANITATION

The third equivalence component the FSIS auditors reviewed was Government Sanitation. The FSIS auditors verified that the CCA requires each official establishment to develop, implement, and maintain written sanitation standard operating procedures (Sanitation SOP) to prevent direct

product contamination or insanitary conditions, and to maintain requirements for sanitation performance standards (SPS) and sanitary dressing.

The FSIS auditors verified that CFIA personnel perform preventive control inspections (PCI) under the standard inspection process (SIP) to verify SFCR requirements for physical structure of the buildings, surroundings and maintenance, equipment design and maintenance, biosecurity, pest control, hygiene, employee training, receiving, transportation, and storage. Frequency of PCIs are risk-based and determined through a risk assessment of each establishment, which considers factors including processes conducted, products produced, and production volumes. CFIA personnel document the result of the PCIs in the Digital Service Delivery Platform (DSDP) and an inspection report is issued which indicates if non-compliance was observed during the verification procedure.

The SFCR also requires establishments to have a written cleaning and sanitation program with procedures describing persons responsible; rooms or areas, equipment, food contact surfaces, utensils, structures, overheads, walls, and floors required to be cleaned; and the frequency of cleaning, sanitizers, cleaning tools and cleaning compounds which must be used. The written program must include step-by-step details for how cleaning and sanitizing will be performed, and special instructions to ensure effective cleaning and sanitizing and any general housekeeping required to maintain sanitary conditions. Establishments must also maintain evidence that the cleaning and sanitizing control program is effective, and record that the procedures were conducted and verified by an establishment monitor.

The FSIS auditors verified that CFIA ensures establishments meet SFCR which requires establishments to slaughter and dress livestock and poultry in a sanitary manner. Certified establishments maintained written procedures describing how carcasses would be dressed to prevent contamination throughout the slaughter and dressing process. Establishments maintained records documenting monitoring of dressing procedures and steps taken if an observation indicated dressing procedures were not followed according to the written programs. The FSIS auditors verified through review of records and observation that CFIA routinely performs verification of sanitary dressing procedures through pre- and post-evisceration verification activities, finished product standards tests for livestock, and process control standards in MPIP.

The FSIS auditors verified through observations and review of records that CFIA inspectors perform inspection of every carcass to identify any feces, ingesta, or milk contamination on livestock or fecal contamination of poultry. If contamination is identified, it is recorded as a zero-tolerance failure and requires corrective action by the certified establishment. CFIA officials also conduct random carcass checks during each production shift, and any findings of feces, ingesta, or milk contamination on livestock or fecal contamination of poultry is identified as a zero-tolerance failure requiring corrective actions by the certified establishment.

The FSIS auditors assessed the adequacy of CFIA inspection verification by observing in-plant inspection officials conducting pre-operational sanitation in two of the certified establishments. CFIA officials conducted verification procedures after the certified establishment had conducted its own pre-operational sanitation verification procedures. The FSIS auditors also observed in-plant inspection officials verifying operational sanitation procedures and sanitary dressing procedures. The FSIS auditors' review of CFIA records at each certified establishment indicated

that in-plant inspection officials identify and document findings with sanitation and dressing procedures and require establishments to take corrective actions, when necessary.

The FSIS analysis and verification activities indicate that CFIA requires operators of certified establishments to develop, implement, and maintain preventive control programs to ensure sanitary dressing, sanitation of operations, and sanitary design and maintenance of the building, rooms, equipment, and grounds. FSIS concluded that CFIA continues to meet the core requirements for this component.

VII. COMPONENT FOUR: GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM

The fourth equivalence component the FSIS auditors reviewed was Government HACCP System. The food safety inspection system is to require that each official establishment develop, implement, and maintain a HACCP system.

The FSIS auditors verified that under the requirements of SFCR, an establishment is required to prepare, keep, maintain, and implement a preventive control plan (PCP). CFIA further defines that a PCP is based on internationally accepted principles of Codex Alimentarius General Principles of Food Hygiene including Good Manufacturing Practices and HACCP. SFCR requires the PCP to include a description of the hazards presenting a risk, control measures for preventing, eliminating, or reducing the identified hazards to an acceptable level, and evidence the control measures are effective. Further, the establishment must include a description of the critical control points (CCP), critical limits, monitoring procedures, corrective action procedures, verification procedures, and records that show implementation.

The FSIS auditors verified that CFIA personnel perform PCIs under the SIP to verify SFCR requirements are met for PCPs. Frequency of PCIs is risk-based and determined through a risk assessment of each establishment that considers factors including processes conducted, products produced, and production volumes. CFIA documents the result of the PCIs in the DSDP, and an inspection report is issued which indicates if non-compliance was observed during the verification procedure.

The FSIS auditors verified that CFIA personnel continue to verify that establishments conduct a pre-shipment review prior to export certification of products for shipment to the United States. CFIA personnel verify the establishment has conducted a pre-shipment review under a Compliance Verification System inspection task. The FSIS auditors verified that export certification of product cannot occur until all microbiological test results are returned as negative for STEC in beef products, *Lm* and *Salmonella* in RTE products, and *Lm* and *Salmonella* in egg products.

The FSIS auditors conducted onsite observation and document review of CCPs in certified establishments that were visited as part of the audit. The FSIS auditors observed CFIA verification of establishment personnel conducting zero-tolerance monitoring for fecal, ingesta, and milk contamination on livestock carcasses and fecal contamination for poultry carcasses. The FSIS auditors reviewed CFIA records, including findings when there was a CCP failure,

documentation of actions taken by CFIA, and records of corrective actions taken by the certified establishment in response to the findings.

The FSIS audit verification activities indicate that CFIA requires operators of certified establishments to develop, implement, and maintain a system equivalent to the principles of HACCP. FSIS concludes that CFIA continues to meet the core requirements for this component.

VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS

The fifth equivalence component the FSIS auditors reviewed was Government Chemical Residue Testing Programs. The food safety inspection system is to present a chemical residue testing program, organized and administered by the national government, which includes random sampling of internal organs, fat, or muscle of carcasses for chemical residues identified by the exporting country's meat, poultry, and egg products inspection authorities or by FSIS as potential contaminants.

The FSIS auditors verified that CFIA annually develops an NCRMP to assess human dietary exposure, perform risk assessments, monitor trends, and verify compliance with Canadian maximum residue limits (MRL). The design of CFIA's NCRMP follows principles outlined by the Codex Alimentarius Commission. Sampling under the NCRMP is statistically based and conducted year-round at various animal health and food safety sectors across Canada. CFIA's Science Branch is responsible for the development of a risk model analysis designed to generate the annual number of samples required per product type for the NCRMP.

The FSIS auditors reviewed the residue sampling records and confirmed that the sampling schedule had been adhered to at all certified establishments visited as part of the audit. CFIA also ensures that inspection personnel comply with NCRMP procedures and sampling timeframes during the semi-annual supervisory reviews. Through interviews of inspection personnel and records review, the FSIS auditors confirmed that the Science Branch sends the sampling schedule to inspection personnel at slaughter establishments with detailed instructions about the date and time of sampling, the tissues to be sampled, and the laboratory to which the sample should be submitted. Third-party laboratories under contract with CFIA may be used to analyze official residue samples. Once the results are available, the Laboratory Sample Tracking System issues an email to the sample collector to inform the availability of results. Results from third-party laboratories are provided directly to the CFIA's Science Branch.

The FSIS auditors verified test results are sent directly to the Food Safety Science Services Division (FSSD), Chemistry within the Science Branch who will determine if a result is violative based on CFIA's MRLs. In the event of a violative residue sample, FSSD Chemistry opens a traceback case in the automated Residue and Antimicrobial System and requires a follow-up (farm visit) in accordance with internal administrative guidelines. If a routine chemical residue test result is determined to be violative, a food safety risk assessment is conducted in consultation with Health Canada to determine if there is a food safety risk and further action such as a recall is warranted.

The FSIS analysis and onsite verification activities indicate that CFIA has overall authority of a chemical residue testing program which is designed and implemented to prevent and control the presence of veterinary drugs and contaminants in meat, poultry, and egg products destined for export to the United States.

IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS

The last equivalence component the FSIS auditors reviewed was Government Microbiological Testing Programs. The food safety inspection system is to implement certain sampling and testing programs to ensure that meat, poultry, and egg products prepared for export to the United States are safe and wholesome. This component also addresses requirements for TPCS meat and poultry products.

CFIA Annex T: Testing for *Escherichia coli* (*E. coli*) in Slaughter Establishments requires that all livestock and poultry slaughter establishments implement carcass testing for generic *E. coli* to demonstrate the effectiveness of dressing procedures. Annex T also mandates that slaughter establishments develop written sampling procedures that include sampling frequency based on production volume, identification of sampling locations, analytical methods compliant with AOAC methods or other validated methods, use of a statistical process control to analyze the results, and corrective actions when the slaughter process is out of control. Annex T requirements are consistent with FSIS' requirements in 9 CFR 310.25 for beef and 9 CFR 310.18 for swine. The FSIS auditors verified that CFIA inspectors were verifying that the establishments adhere to their sampling frequency and take corrective actions when their process is out of control. The FSIS auditors did identify that CFIA has not addressed FSIS' revised poultry slaughter carcass sampling requirements (9 CFR 381.65) to collect and analyze samples for microbial organisms to ensure control throughout the slaughter and dressing process, as was also observed during the previous FSIS audit in 2018.[3]

CFIA implements the National Microbiological Monitoring Program (NMMP) to verify industry compliance with microbial standards, facilitate access of Canadian food products to international markets, provide information on the effectiveness of food safety control measures and interventions, and maintain consumer confidence in the safety of the food supply. The NMMP also includes environmental sampling at licensed establishments that produce RTE meat and poultry products to verify control of *Lm* within the processing areas. The FSIS auditors confirmed that each year, the Operations Branch receives from the Science Branch a food sample collection plan (FSCP) that includes the number of samples that are scheduled for each of the different CFIA sampling programs that are implemented. In addition to the FSCP, all CFIA management areas receive a document that identifies sample quotas and the official laboratories to which CFIA inspectors should send the samples.

CFIA's Annex U: USDA Performance Standards for *Salmonella* requires that licensed Canadian establishments eligible to export meat and poultry products to the United States which are amenable to a USDA Performance Standard for *Salmonella* must produce these products in accordance with the applicable standard. The FSIS auditors verified that establishments conduct

[3] FSIS continues to work with CFIA to resolve the previous audit finding.

sampling according to Annex U and that chicken and turkey slaughter establishments additionally test carcasses according to Annex U-1 for *Campylobacter* performance standards. The FSIS auditors confirmed that CFIA inspectors identify what class of product the establishment will test each year, routinely observe establishment personnel collecting samples, receive sampling results, and verify corrective actions and follow-up sampling in compliance with Annex U and Annex U-1. Annex U currently contains requirements for verification of control of *Salmonella* in chicken and turkey carcasses, and ground chicken and turkey. CFIA does not currently implement *Salmonella* performance standard requirements to address control of *Salmonella* in chicken parts or consistent with FSIS' comminuted chicken and turkey performance standards.[4]

The FSIS auditors verified at the audited beef slaughter establishments and at the regional offices that CFIA inspectors were collecting beef trim sampling for *E. coli* O157:H7 testing in accordance with CFIA's M218 sampling plan. CFIA inspectors collect trim samples using the N60 sampling method, and all sampled lots of beef trimmings and precursor materials are held until acceptable test results are obtained. The FSIS auditors also confirmed that all positive results from establishment sampling are reported to CFIA along with the trend analysis of high event periods. The FSIS auditors confirmed that the audited official laboratory was using a method from Canada's Compendium of Methods, MFLP-30 to screen and MFHPB-10 to confirm the presence of *E. coli* O157:H7 in beef trimmings.

Annex D-2: CFIA Risk-Based Shiga toxin-producing *E. coli* Verification Sampling of Beef Trimmings for Abattoirs Eligible for Export to the USA requires that all licensed slaughter establishments producing raw beef manufacturing trimmings for export to the United States sample those products for non-O157 STEC (O26, O103, O111, O121, O45, and O145) under the supervision of CFIA inspectors and that the samples are submitted to third-party laboratories for analysis. Licensed slaughter establishments are required to use the N60 sampling method or an alternative CFIA-approved method when N60 sampling is not possible. Sampled lots are held until acceptable test results are obtained and all results are reported from the third-party laboratory to CFIA. Establishments are to follow the sampling frequency established in CFIA's M218 sampling plan, which is based on production volume.

The FSIS auditors confirmed CFIA inspectors were randomly sampling RTE products twice a year in accordance with CFIA's M200 sampling plan at the audited RTE establishments. CFIA's M200 sampling plan is implemented to verify the effectiveness of the establishments' interventions designed to control contamination of RTE products with *Lm* and *Salmonella*, and for *E. coli* O157:H7 in dry, semi-dry, or fermented RTE beef products. In addition, the FSIS auditors verified that on the same day and on the same line, CFIA inspectors sample the food contact surfaces (FCS) of the production lines used to produce post-lethality exposed products, as required by CFIA's M200RB sampling plan. Through interviews and record review at a regional office, the FSIS auditors verified that CFIA inspectors were also sampling RTE products that were not exposed to the environment after the lethality process and the FCS of their production line to verify the effectiveness of the establishments' control of *Lm*. The FSIS

[4] FSIS continues to work with CFIA to ensure that equivalent programs for official verification of control of *Salmonella* are implemented for Canadian establishments that intend to export products to the United States.

auditors reviewed the sample results at the audited RTE establishments and confirmed that the sampling scheduled had been adhered to and verified during the periodic supervisory reviews.

The FSIS auditors verified at the audited RTE establishments that CFIA inspectors also collect product for Lm and Salmonella testing twice a year under the M200 sampling plan. At the audited microbiological laboratory, the FSIS auditors confirmed that the audited official laboratory personnel were following a method from Canada's Compendium of Methods, MFLP-29 to screen and MFHPB-20 to confirm the presence of *Salmonella* in RTE products. Regarding egg products, the FSIS auditors confirmed that CFIA samples these products for *Salmonella* under the 2022_E200 and the 2022_E208 sampling plans.

The FSIS auditors verified that CFIA conducts risk-based verification sampling of RTE meat and poultry products and conducts FCS sampling in certified establishments that produce RTE product. CFIA collects product and FCS samples for the same lot. CFIA sampling frequency is based on three factors: the risk category of the products, the use of antimicrobial agents in the process, and post-lethality treatments. Processes for RTE not-heated treated products, such as dry-cured, salted, and dry-cured fermented meat products, are required to achieve a 5-log reduction of *Salmonella*, and processes for similar poultry products are required to achieve a 7-log reduction. The processes must also adhere to good manufacturing practices designed to minimize contamination. The establishment is responsible for validating the process, which is reviewed and approved by a CFIA inspector. Those establishments which prepare RTE beef products without applying heat as a lethality control (e.g., fermented) are also subjected to official verification testing by CFIA for *E. coli* O157:H7.

CFIA requires that establishments producing egg products for export to the United States sample each lot of products with 10 samples taken and composited for analysis for *Salmonella*, *Lm*, aerobic colony counts, and coliform count. The establishment must send the samples to an accredited laboratory for analysis, and the results for each lot of egg products are reported to CFIA. Export certification of product cannot occur until test results are received and determined as acceptable. The FSIS auditors verified that samples of egg products were properly analyzed using methods from Canada's Compendium of Methods, MFLP-28 and MFLP-29 to screen and MFHPB-30 and MFHPB-20 to detect and confirm the presence of *Lm* and *Salmonella*, respectively.

The SFCR outlines requirements for licensed establishments producing TPCS products. The regulation states that licensed establishments must apply a scheduled process which is defined as a process in which a treatment is applied to a food to render the food commercially sterile, considering the critical physical and chemical factors that affect the treatment's effectiveness. FSIS auditors verified through observation, record review, and interviews with CFIA personnel that a process schedule was developed and critical factors and a process authority were designated in accordance with CFIA requirements at the audited TPCS establishments. In addition, the FSIS auditors confirmed that CFIA inspectors verify the establishments' control measures, the design and upkeep of the thermal processing equipment, and the proper packaging and labeling of the products as part of CFIA's verification of the establishments' PCPs under SIP. The FSIS auditors identified no issue regarding CFIA inspectors' verification of the establishments' production of TPCS products.

The FSIS onsite verification activities determined that CFIA maintains the legal authority to implement its microbiological sampling and testing programs to ensure that products destined for export to the United States are unadulterated, safe, and wholesome. However, CFIA is still addressing a prior audit finding to address sampling verification using indicator organisms throughout the slaughter and dressing process for poultry. CFIA has also submitted proposed changes to its official verification of control of *Salmonella* in certified poultry establishments.

X. CONCLUSIONS AND NEXT STEPS

An exit meeting was held November 23, 2022, by videoconference with representatives from CFIA. FSIS concluded that Canada's food safety inspection system is organized to provide ultimate control, supervision, and enforcement of regulatory requirements. CFIA has required that the establishments certified as eligible to export products to the United States implement sanitation requirements and a HACCP system designed to ensure the safety of their products. In addition, CFIA has implemented official microbiological and chemical residue testing programs that are organized and administered by the national government to verify its system. An analysis of each component did not identify any systemic findings representing an immediate threat to public health.

APPENDICES

Appendix A: Individual Foreign Establishment Audit Checklists

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Specialties Lassonde 3810 Rue Alfred-La Liberté Boisbriand, QC, J7H 1P8	11/01/2022	251	Canada
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	X
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	X
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	
55. Post Mortem Inspection	O
	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
58.	
59.	

Establishment Operations:	Beef, Veal, Chicken, Turkey, Pork processing.
Prepared Products:	Thermally processed, commercially sterile products, heat-treated shelf stable products

60. Observation of the Establishment

7. Government inspection personnel are not verifying the sanitation program design once per year, as required by CFIA (no record of last time task was done)

9. The SSOP Program not signed and dated by individual with overall authority onsite.

10. a) Government inspection personnel are not verifying the implementation of the sanitation program onsite during sanitation once per quarter, as required by the CCA,

b) Government inspection personnel are not conducting pre-operational sanitation verification onsite twice per month, as required by the CCA.

39. Rust buildup observed on numerous overhead structures in the thermal processing area.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/01/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Elbee Meat Packers Limited Toronto, Ontario	11/01/2022	11	Canada
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	X
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
58.	
59.	

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	

60. Observation of the Establishment

22. During the site visit it was determined that for one CCP, the HACCP verification records (record review and on-site observation) did not include results of the verification procedure.

45. During the site visit it was observed that metal tubing used for the process of chilling offal were in a condition which does not allow inspection to ensure they are adequately cleaned. Inspection and establishment personnel effectively took action to identify product that was potentially affected for further evaluation and disposition.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/01/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Fleury Michon Amerique. 26 rue Seguin Rigaud Quebec	11/02/2022	489	Canada
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	
55. Post Mortem Inspection	O
	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
58.	
59.	

Establishment Operations:	Chicken processing.
Prepared Products:	

60. Observation of the Establishment

There were no significant findings to report after consideration of the nature, degree, and extent of all observations.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/02/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Italia Salami Company Limited Guelph, Ontario	11/02/2022	781	Canada
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	X
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	O
56. European Community Directives	O
57. Other	X
58.	
59.	

Establishment Operations:	Pork processing.
Prepared Products:	

60. Observation of the Establishment

45. During the site visit it was observed that metal equipment had a hole in the framework which created a condition which does not allow inspection to ensure they are adequately cleaned. No product was involved or affected due to the observation.

57. During the site visit it was observed that the *Listeria* control program did not identify all potential food contact surfaces on the required listing.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/02/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Hudson Valley Farms. 228 Rue Principale St-Louis-de-Gonzague Quebec	11/03/2022	37	Canada
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
58.	
59.	

Establishment Operations:	Duck slaughter and processing.
Prepared Products:	Duck cuts

60. Observation of the Establishment

There were no significant findings to report after consideration of the nature, degree, and extent of all observations.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/03/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Jowett Farms Corporation Blumenort, Manitoba	11/04/2022	791	Canada
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	X
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
58.	
59.	

Establishment Operations:	Pork slaughter and processing.
Prepared Products:	

60. Observation of the Establishment

45. During the site visit it was observed that metal equipment had cracks which creates a hard to clean surface which also may not allow inspection to ensure they are adequately cleaned. No product was involved or affected due to the observation.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/04/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Volaille Novo Inc. 125 Rue Jean-Coutu, Varennes, QC, J3X 0EL	11/04/2022	835	Canada
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57.	
58.	
59.	

Establishment Operations:	Processing
Prepared Products:	RTE Products

60. Observation of the Establishment

There were no significant findings to report after consideration of the nature, degree, and extent of all observations.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/04/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Egg Solutions-Vanderpols Inc Abbotsford British Columbia	11/07/2022	66E	Canada
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	
55. Post Mortem Inspection	O
	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Other	X
58.	
59.	

Establishment Operations:	Egg processing.
Prepared Products:	

60. Observation of the Establishment

46. During the site visit, it was observed that an employee hand wash sink was also being used to store dirty egg cups in the basin of the sink when removed from the breaking machine as well as clean egg cups on the upper back edge as replacements placed back into the breaking machine creating the potential for cross contamination. No product was observed to be affected.

57. During the site visit, it was observed that the establishment was not maintaining adequate support for hazard analysis decisions, establishment was using paper test strips with a maximum range of 200ppm to monitor application of sanitizer with an acceptable range of 100-200ppm. Establishment was able to perform titration to ensure no product was affected due to this observation.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/07/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Rossdown Natural Foods LTD. Abbotsford, British Columbia	11/08/2022	652	Canada
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Other	X
58.	
59.	

Establishment Operations:	Chicken and Turkey slaughter and processing.
Prepared Products:	

60. Observation of the Establishment

39. During the site visit, loose caulking was observed to be hanging from structures in several production areas. No product was observed to be affected.

46. During the site visit in the whole bird entry area of cutup a hard piece of plastic was observed wedged behind white plastic siding of a conveyor, when removed product residue buildup likely from previous operations was observed. Additionally, in the production cutup and debone area an employee was observed to scoop product remnants from the floor and place them into a container used for edible purposes. In both instances of observation, CFIA/ACIA ensured the establishment took appropriate measures to restore sanitary conditions and identify any affected product.

57. During the site visit, it was observed that the establishment was not maintaining adequate support for hazard analysis decisions, establishment was not monitoring use of the anti-microbial levels according to their written program. Additionally, the monitoring record did not include documentation of actions taken when the anti-microbial level was outside of operational parameters. No product affected due to this observation.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/08/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Atrahan Transformation Inc. 860 Chemin des Acadiens Yamachiche Quebec	11/09/2022	80	Canada
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
58.	
59.	

Establishment Operations:	Pork slaughter and processing.
Prepared Products:	Primals and subprimals

60. Observation of the Establishment

There were no significant findings to report after consideration of the nature, degree, and extent of all observations.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/09/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
9071-3975 Quebec Inc. 212 Rang Canton Sud Yamachiche Quebec	11/11/2022	468	Canada
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	
55. Post Mortem Inspection	O
	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
58.	
59.	

Establishment Operations:	Pork processing.
Prepared Products:	Primals and subprimals

60. Observation of the Establishment

There were no significant findings to report after consideration of the nature, degree, and extent of all observations.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/11/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Cargill Limited High River, Alberta	11/14/2022	93	Canada
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
58.	
59.	

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	

60. Observation of the Establishment

46. During the site visit, the air hose for air injection of the carcass prior to cutting was observed to be touching the floor and also came into contact with a carcass due to employee operations. Inspection and establishment personnel identified potentially affected product for further evaluation and disposition.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/14/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
JBS Food Canada Inc. Brooks, Alberta	11/15/2022	38	Canada
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	X
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Other	X
58.	
59.	

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	

60. Observation of the Establishment

46. During the site visit, employees were observed to not be following establishment procedures including work tools not stored properly at several workstations, an employee not washing hands prior to working with product, and an employee washing personal protective equipment in a product wash station. Inspection and establishment personnel took action to control affected products as needed.

52. During the site visit, a piece of broken metal edge of approximately one inch was observed protruding in the main alleyway of the pens. No animals were observed to be injured at the time of the observation. Inspection personnel took immediate action to ensure no use of the affected alleyway could occur until adequate repairs could be completed and verified.

57. During the site visit, it was observed that the establishment was not properly implementing the in-process contamination audit SAFE program according to their written guidelines. No product was identified as affected with a food safety issue based on this observation.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	11/15/2022

Appendix B: Foreign Country Response to the Draft Final Audit Report

Canadian Food Inspection Agency | Agence canadienne d'inspection des aliments

1400 Merivale Road
Tower 1, 4th Floor
Ottawa, Ontario
K1A 0Y9

Tel.: (613) 325-8256

June 9, 2023

Dr. Michelle Catlin
International Coordination Executive, Office of International Coordination
United States Department of Agriculture, Food Safety and Inspection Service
1400 Independence Avenue, SW
Washington, DC 20250
USA

Subject: **Canada's Response to the United States Department of Agriculture, Food Safety and Inspection Service (USDA-FSIS) Draft Report of an Audit Conducted of Canada from October 31 to November 23, 2022 Evaluating the Food Safety Systems Governing Meat, Poultry and Egg Products Exported to the United States of America**

Dear Dr. Catlin:

I am responding to your letter dated April 5, 2023, regarding the draft audit report pertaining to the above-mentioned audit conducted from October 31 to November 23, 2022. I would like to thank you for the report and the observations noted during the audit.

The Canadian Food Inspection Agency (CFIA) takes all of the observations very seriously and I am confirming that all establishment observations were captured in Corrective Action Requests (CARs) and that the follow-up has been verified by CFIA Operations Branch to be acceptable. As a result, all CARs have been closed.

The enclosed Annex I contains the CFIA's comments on the content of the draft audit report. I would also like to reiterate the CFIA's committement to address the previous audit findings as acknowledged in the draft report, outside of the audit process.

I look forward to continued collaboration between the USDA-FSIS and the CFIA. Please do not hesitate to contact me should you have any questions.

Sincerely,

Rheault, Nancy

Digitally signed by Rheault, Nancy
Date: 2023.06.09 15:18:33 -04'00'

Dr. Nancy Rheault
Senior Director
Food Import and Export Division

Attachment(s) 1. Annex I – CFIA comments on the 2022 USDA-FSIS draft audit report

c.c.: Dr. Ashok Mengi, National Manager, Meat Import, CFIA
Andrea Leclair, National Manager, Food Export, CFIA
Dr. Navjot Kaur, National Manager, Meat Export, CFIA

Canada

Annex I

Canadian Food Inspection Agency (CFIA) comments on the United States Department of Agriculture, Food Safety and Inspection Service (USDA-FSIS) draft report of an audit conducted of Canada (October 31 – November 23, 2022) evaluating the food safety systems governing meat, poultry and egg products exported to the USA

Draft Report Reference	Draft Report Text	CFIA Comments
VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS P.14 Paragraph 3	The FSIS auditors reviewed the residue sampling records and confirmed that the sampling schedule had been adhered to at all certified establishments visited as part of the audit. CFIA also ensures that inspection personnel comply with NCRMP procedures and sampling timeframes during the semi-annual supervisory reviews. Through interviews of inspection personnel and records review, the FSIS auditors confirmed that the Science Branch sends the sampling schedule to inspection personnel at slaughter establishments with detailed instructions about the date and time of sampling, the tissues to be sampled, and the laboratory to which the sample should be submitted. Third-party laboratories under contract with CFIA may be used to analyze official residue samples. ***Once the results are available, the Laboratory Sample Tracking System issues an email to the sample collector to inform them of the availability of results.***	While this is technically correct, this only applies to testing by CFIA laboratories and not for third-party laboratories under contract with the CFIA. These results are provided to the CFIA's Science Branch directly. We suggest the following text: **Once the results are available from a CFIA laboratory, the LSTS issues an email to the sample collector to inform the availability of results. Results from third-party laboratories are provided directly to the CFIA's Science Branch.**
IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS P. 16 Paragraph 2	The FSIS auditors verified at the audited beef slaughter establishments and at the regional offices that CFIA inspectors were collecting beef trim sampling for E. coli O157:H7 testing in accordance with CFIA's M218 sampling plan. CFIA inspectors collect trim samples using the N60 sampling method, and all sampled lots of beef trimmings and precursor materials are held until acceptable test results are obtained. The FSIS auditors also confirmed that all positive results from	The information as written is not factual. We suggest replacing with the following text: **The FSIS auditors confirmed that the audited official laboratory was using a method from Canada's Compendium of Methods, MFLP-30 to screen and MFHPB-10 to confirm the presence of E. coli O157:H7 in beef trimmings.**

	establishment sampling are reported to CFIA along with the trend analysis of high event periods. ***The FSIS auditors confirmed that the audited official laboratory was using an equivalent method from Canada's Compendium of Methods, MFLP-30, to screen and confirm the presence of E. coli O157:H7 in beef trimmings.***	
IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS P.17 Paragraph 1	The FSIS auditors verified at the audited RTE establishments that CFIA inspectors also collect product for Lm and Salmonella testing twice a year under the M200 sampling plan. ***At the audited microbiological laboratory, the FSIS auditors confirmed that laboratory personnel were following an equivalent method from Canada's Compendium of Methods, MFLP-29, for screening and confirmation of Salmonella in RTE products.*** Regarding egg products, the FSIS auditors confirmed that CFIA samples these products for Salmonella under the 2022_E200 and the 2022_E208 sampling plans.	The information as written is not factual. We suggest replacing with the following text: **…, the FSIS auditors confirmed that the audited official laboratory personnel were following a method from Canada's Compendium of Methods, MFLP-29 to screen and MFHPB-20 to confirm the presence of Salmonella in RTE products.**
IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS P.17 Paragraph 3	CFIA requires that establishments producing egg products for export to the United States sample each lot of products with 10 samples taken and composited for analysis for Salmonella, Lm, aerobic colony counts, and coliform count. The establishment must send the samples to an accredited laboratory for analysis, and the results for each lot of egg products are reported to CFIA. Export certification of product cannot occur until test results are received and determined as acceptable. ***The FSIS auditors verified that samples of egg products were properly analyzed using equivalent methods from Canada's Compendium of Methods, MFLP-28 and MFLP-29, to detect and confirm the presence of Lm and Salmonella, respectively.***	The information as written is not factual. We suggest replacing with the following text: **The FSIS auditors verified that samples of egg products were properly analyzed using methods from Canada's Compendium of Methods, MFLP-28 and MFLP-29 to screen and MFHPB-30 and MFHPB-20 to detect and confirm the presence of Lm and Salmonella, respectively.**