

CANADIAN FOOD INSPECTION AGENCY
REVIEW OF THE FOOD SAFETY RECOGNITION PROGRAM (FSRP)

Prepared for:

Canadian Food Inspection Agency
Food Safety Recognition Program Management Team

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Executive Summary

The Canadian Food Inspection Agency (CFIA) is undergoing a review of its voluntary Food Safety Recognition Program (FSRP). See Appendix A for a program description. This report concludes the review of the program that began on 18 October 2021 with background research of key documents, and thirteen key informant interviews conducted between 15 December 2021 and 26 January 2022.

This Report examines and analyzes the Program's Relevance and Value, Outcomes and Benefits, Results and Impact, and the demand for the program. It also reviews aspects of the program's administration from the FRSP and NIO perspectives, and reviews various components of the program including the FSRP Program and Procedures Manuals, the FTP Policy and Protocol Documents, the Maintenance of Recognition (MoR) component, and aspects of communication and program branding. Lastly, it considers alternative programs that possibly duplicate aspects of the FSRP, and assesses both program weaknesses and opportunities for improvement.

The FSRP has been operational since 2001, and this is the first formal assessment of the program. It is being carried out at the request of the management team leading the FSRP on behalf of the CFIA, who delivers the program through a Memorandum of Understanding (MOU) with Agriculture and Agri-Food Canada (AAFC).

This Report found that the FSRP remains highly effective in ensuring that food safety systems developed by industry through national industry organizations (NIOs) meet federal government standards, that they are audited regularly, and meet consumer and industry demands and requirements. The report also found that the program has tremendous benefit for and impact on producers (farmers). While there is a limited number of NIOs in Canada, the impact of the food safety program benefits tens of thousands of Canadian producers, thereby giving the federal government unprecedented access and influence at the farm level, which is outside their jurisdiction. The FSRP suffers from limitations to its scope, and has not evolved to encapsulate other assurance programs required by Industry and export markets. The FSRP is considered a Canadian government-industry collaboration success story; however, it is largely unknown by other Government Departments (OGDs), including within the CFIA itself.

This Report recommends that the CFIA engage with industry to expand the scope of the FSRP to include other assurance programs in the areas of biosecurity, traceability, sustainability and animal welfare, among others. It furthermore recommends that the program be appropriately resourced to allow for its expansion, and that the modernization, streamlining and digitization of all program materials and manuals be updated and undertaken in the context of this revised scope and mandate. Additionally, the program should consult extensively with Provinces and Territories to include their engagement in the ongoing development of the FSRP, strengthening ties of shared responsibility for program outcomes. The FSRP should also consider levels of recognition that facilitate Full Recognition for those NIOS that require it, as well as partial recognition through verification of NIOs that only require phase 1 (Technical) and / or phase 2 (Administrative) capacity for their assurance programs. Lastly, the CFIA should address

the issue of program visibility not only within the CFIA itself, but with OGDs as well, ensuring that the FSRP is included in the Agency's Departmental Results Framework.

This Report concludes with Appendices that include a description of the FSRP, the Interview Template and List of Interviewees.

List of Acronyms

Canadian Food Inspection Agency (CFIA)

Federal, Provincial, and Territorial governments (FPT)

Full Time Equivalent (FTE)

Food Safety Recognition Program (FSRP)

CanadaGAP® (GAP) - a program developed in Canada to promote Good Agricultural Practices (GAPs) for fruit and vegetable suppliers.

Global Food Safety Initiative (GFSI)

Government of Canada (GOC)

Hazard Analysis Critical Control Points (HACCP)

Maintenance of Recognition (MoR)

National Sanitation Foundation (NSF)

National Industry Organization (or equivalent) (NIO)

Other Government Departments (OGD)

Subject Matter Expert (SME)

Safe Quality Food (SQF)

Technical Review 1 (TR1) – referring to a technical review of the Generic HACCP Model and Participant Manual.

Technical Review 2 (TR2) – referring to a technical review of the Food Safety Management System Manual and associated training materials.

Background and Objectives of the Review

At the request of the Canadian Food Inspection Agency (CFIA) and the team responsible for the implementation of the Food Safety Recognition Program (FSRP), the Consultant was asked to explore new, modern and efficient means for the federal government to maintain food safety controls on-farm and post-farm in delivering the Food Safety Recognition Program (FSRP).

The FSRP provides government recognition of on-farm and post-farm food safety assurance systems developed and implemented by national industry organizations in order to:

- enhance food safety;
- maintain the confidence of Canadian consumers; and
- facilitate market access.

The process is led by the CFIA with the participation of other federal, provincial, and territorial governments (FPTs) and involves three components:

1. Government Technical Review: provides technical advice to support Hazard Analysis Critical Control Points (HACCP)-based food safety system development and that a food safety management system has been implemented in an effective and consistent manner
2. Implementation Assessment: involves credible third-party audit and subsequent government assessment of conformance of the program based on audit findings
3. Maintenance of Recognition: national industry organizations are required to participate in an ongoing five-year cycle review process to maintain recognition and must provide evidence at 20, 40, and 60 month intervals. (currently evaluating beyond 60 months)

The recognition process provides a framework to ensure adequate government oversight to maintain confidence in industry-led food safety assurance systems.

Agriculture and Agri-Food Canada (AAFC) has provided funding to CFIA to administer the program under a Memorandum of Understanding (MOU) through AAFC's various agricultural policy frameworks (Growing Forward, Growing Forward 2, and the current Canadian Agricultural Partnership).

Objectives

- Review the FSRP program to ensure it continues to remain relevant for CFIA's modernization agenda.
- Find efficiencies in how the Program is administered to reduce the length of time to achieve full recognition and administrative burden on industry and CFIA.
- Explore ways to enhance uptake of FSRP by national industry organizations

Scope

- Analyzing the current relevance of the FSRP to the Canadian industry organizations in light of the advent of privately run assurance programs (such as Red Tractor in the UK);

- Making recommendations, if the FSRP remains relevant, on how to more efficiently deliver this Program with a view to reduce administrative burden and the duration of the recognition process;
- Explore and recommend concrete ways to enhance the uptake of FSRP by national industry organizations whether through FSRP or through alternate service delivery.

Consultant Profile and Introduction

Mr. Ben Toeg is a Senior Business Analyst and Management Consultant. He has a Bachelor of Commerce (1998), Honours: Finance & Entrepreneurial Management) and an MBA (2003) from the Telfer School of Management. He also is a member of the Canadian Association of Management Consultants and has achieved his Certified Management Consultant (2013) designation. He has over 15 years of experience working with various GOC Departments and Private Organizations. His work focuses on strategic analysis, change management processes, change implementation, operational alignment, organizational design and assessment and maximizing organizational performance.

Mr. Toeg also has previous knowledge of the CFIA, having worked there in 2007, when the Programs Branch was first introduced, working in the area of performance management when Food Safety was on the top of the agenda. He has had subsequent contracts with the Agency since that time.

Methodology and Process

The Consultant met with CFIA/AAFC FSRP subject matter experts (SMEs) to launch a review of the FSRP and to secure background information. Periodic meetings with the team were completed to answer questions arising from the review of key program documents. Finally, a methodology and set of initial questions was submitted to the team for feedback and approval in order to interview key program stakeholders.

The key stakeholders to be interviewed included:

- The CFIA-FSRP management team;
- FSRP delivery team (SMEs);
- A representative of an AAFC Assurance program;
- Representative(s) of two fully recognized NIOs (or equivalent);
- Representative(s) of at least one NIO (or equivalent) that has completed only the technical review phase (TR1);
- Representative(s) of an NIO (or equivalent) that has completed TR1 and TR2 phase towards full recognition;
- Provincial and territorial partners.

For a complete listing of interviewees see Appendix C, and Appendix D for the interview questions.

The Consultant did both material research and performed interviews to acquire information for analysis purposes.

Document Review

The document review was conducted in order to understand the context, history and methodology of the FSRP. It included key policy documents and instruction manuals. Interaction with the FSRP management team allowed for issues to be surfaced and explored, and a finalized set of questions for the interview phase to be developed (See Appendix B for a list of key program documents reviewed).

Interviewee Selection

The statement of work defined the type and number of stakeholders to be included in the interview process. The FSRP Management Team prepared the initial list of individuals to be interviewed. The Consultant contacted each interviewee individually to schedule their telephone interview, and upon confirmation of their availability, sent them a copy of the interview questions in advance so they could prepare.

Interview Questions

The Consultant put together an initial list of key questions required to assess the relevance and efficacy of the FSRP. These questions were reviewed by the FSRP management team and refined. The design of the interview was structured in three parts: 1) Program Relevancy, 2) Program Efficiency, and 3) Program Results & Recommendations. The final list of interview questions is attached in Appendix D.

The interviews were all scheduled between 22 December 2021 and 26 January 2022. The interview process was informal in nature, allowing the interviewee to talk about their experience with the program responding to the questions of most significance to them. Not all questions were equally applicable to every interviewee, as the interviewees interacted with the program each according to their role either managing the program, managing a similar assurance program, leading a NIO (or equivalent) having secured full or partial recognition, or representing a provincial or territorial government partner.

The results of each interview were recorded individually and separately. Many interviewees expressed their desire that responses be considered confidential. For reasons of confidentiality, therefore, they are not published as an Appendix to this report. However, a summary of results is included in the following section.

All interviews were conducted by telephone, and lasted from thirty-five to sixty minutes in duration.

Draft and Final Report

The Consultant tabulated the interview responses and prepared a master document of all responses for each question in MS-Excel to facilitate the analysis. This compilation of results tracked each comment by contributor using a random code and not their name, organization or affiliation to maintain anonymity. However, as the number of interviewees is relatively small, and the perspectives are coming either from the federal government, an NIO or a FPT partner, comments can be easily identified to a stakeholder type, but not necessarily to an individual stakeholder.

The report highlights inputs, observations and recommendations from the interviewees that were most frequently mentioned. The report identifies the target issue being considered from various perspectives, and draws conclusions based on those inputs where a high degree of consensus existed. There is some repetition in the results section because the importance of certain aspects of the review appeared in various places throughout the interview, as they are cross-cutting themes.

*NOTE: The summary of key findings captures feedback and opinions of the interviewees. Feedback was reported as documented by the interviewer. Not all feedback may be accurate based on the interviewees knowledge and understanding of the FSRP. In order to preserve the impartiality of this report, there was minimal to no changes made to those statements that required further clarification or contained minor inaccuracies.

Summary of Key Results

SECTION 1: Program Relevance

Program Relevancy & Value

- The FSRP remains highly relevant, in particular because it provides official recognition from the GOC;
- Most NIOs have used the methodology and framework of the FSRP to broaden the scope of their national programs to go beyond just food safety, to include other assurance program components required by industry such as biosecurity, traceability, sustainability and animal welfare;
- Different NIOs have different needs and expectations from the FSRP, but in all cases the program is highly relevant to their operations. Some NIOs require full recognition of their food safety systems, while others require only acceptance of their TR1 and TR2 components;
- NIOs benefit from technical assistance provided by CFIA and are able to transfer that knowledge to their members;
- There is growing concern that the FSRP as it stands is losing its currency because it is not keeping up with industry requirements for other assurance programs.
- There exists a high degree of consensus that the program needs to expand its mandate, and then update and modernize its materials and manuals, making them available online through a digital platform;
- Full and partial recognition within the FSRP provides NIOs and producers a high degree of confidence in their food safety systems. NIO audits of their own programs do not carry the same degree of seriousness and impact with consumers as federal recognition does.
- The FSRP as a voluntary program represents a Canadian success story of Government – Industry collaboration;
- The FSRP is flexible enough to adjust to differing NIO needs and requirements, without losing its scientific rigour around ensuring strict adherence to HACCP principles;
- The FSRP is market-driven. Most downstream stakeholders including wholesalers, retailers, restaurant chains and industry clients demand that on-farm food safety systems be in place and upheld, and once they learn that a NIO program is recognized by the federal government, their risk management concerns are minimized;
- Federal recognition lends instant credibility, and most NIO producers welcome the credibility it brings to their individual operation;
- Some NIOs value full recognition to such a high degree that they use it as part of their marketing and branding;
- The FSRP is standardized, adheres to international standards, is practical, and rigorous.

Specific relevance for the GOC

- NIOs recognize the added value of the FSRP for the GOC. Individual producers and farms lie outside the regulatory authority of the federal government as they fall under provincial and territorial jurisdiction. However, as an industry-led food safety program seeking federal government recognition, the NIOs and producers grant the federal government oversight in an area where they have no regulatory authority. With thousands of producers adopting their NIO food safety program, and accepting the maintenance of recognition of the FSRP program by the federal government, Canadian consumers are better protected;
- The FSRP lacks visibility within the CFIA and OGDs. Because the FSRP is voluntary and not a required regulatory program, the program is less known, less respected within the CFIA, and does not appear in the Agency's performance measurement reports. It is generally felt by the stakeholders interviewed that this is extremely unfortunate as the federal government gets a huge win by having this program where they have oversight in areas where they have absolutely no jurisdiction;
- The FSRP offers high value as a food safety system because federal government audits of industry-led programs to ensure they meet international standards are widely recognized and considered the national gold standard.
- The program is an affordable way for NIOs and producers to ensure their practices are safe, they are keeping up with current science and meeting HACCP principles, that their commodities are easily marketable, and that consumer confidence is maintained;
- Meets consumer, industry and client expectations, nationally and internationally;
- Optimizes SMEs within government to strengthen NIO food safety programs by providing technical assistance and auditing services;
- Enables federal – FPT and industry collaboration;
- For the NIOs, the FSRP is more cost effective than private programs which may be less relevant to them;
- Recognition provides instant credibility;
- Value could be enhanced with increased program awareness within government and industry;
- The FSRP fulfills the need to demonstrate what is actually happening on the farm, and absolutely represents good value because it provides government recognition of an industry created program. It remains practical and reasonably flexible;
- FSRP provides great value to NIOs through technically qualified and experienced SMEs who conduct rigorous reviews of their programs ensuring best practices and standards are being met and sustained. And the cost to the NIO is subsidized in large part because these resources are often FPT employees;
- Internal audits by an NIO of an NIO-created program, while valuable, is nowhere near as valuable as an external review by the federal government conducted by technically qualified experts with no vested interests.

Outcomes and Benefits

- Food safety systems adhere to HACCP principles and international standards;
- The FSRP maintains the confidence of Canadian consumers;
- The FSRP satisfies the risk management requirements of Canadian industry;
- The FSRP facilitates access to international markets if needed by the NIO;
- The FSRP ensures conformance with federal, provincial, territorial legislation, policy and protocol;
- The FSRP is unique in the world, one of the only and best examples of public-private collaboration;
- NIOs find value in the FSRP even without needing to complete all stages of the program to obtain full recognition;
- NIOs that have attained and maintain full recognition and that require their members to use the program is a significant achievement for the program;
- There is a limited number of major NIOs in Canada, approximately 17, and all the major ones are using the program and enlisting their member-producers to use the program, some even making it mandatory; (5 programs have achieved full recognition);
- Food safety systems remain industry-led, and voluntary;
- Recognition of the Industry assurance system by the federal government;
- CFIA knowledge of NIO and industry practice;
- CFIA insight to farm operations;
- Maintains the confidence of the Canadian consumer and downstream stakeholders;
- Enables market expansion, especially for international markets;
- CFIA and FPT SMEs available to NIOs for technical assistance;
- Enables CFIA inroads to NIO and on-farm practices;
- Connecting NIOs and farms to a scientific, HACCP-based, rigorous program ensures credibility;
- Methodology and framework of FSRP, while designed for food safety, has built capacity in NIOs to add to the program other assurance requirements such as biosecurity, traceability, sustainability and animal welfare;
- Industry has adopted and adheres to audited food safety standards;
- Secure knowledge of federal government recognition and auditing ensures retailers and other purchasers that food safety protocols are being upheld to mitigate food safety risks for suppliers;
- FSRP is affordable, unlike private assurance programs. Main costs are human resources, time, occasional required third-party audits, and maintenance;
- Availability of funding from the AAFC to set up food safety programs;
- Flexibility and respect of CFIA towards Industry (NIOs) and producers, not insisting on full recognition;
- The FSRP allows NIOs to improve food safety on farms, meeting requirements of downstream stakeholders including retailers, wholesalers, restaurants, etc.;

- Knowledge of and experience with the FSRP has built capacity within NIOs not only to develop and maintain a food safety system, but to leverage that capacity to incorporate and sustain other assurance programs for biosecurity; traceability, sustainability and animal welfare, using the same scientific methodology and approach as the FSRP, even though these aspects of their national programs are not yet recognized by the CFIA;
- Producer uptake of the FSRP accepted food safety programs has increased steadily since the program was introduced;
- Other industry assurance programs have been able to leverage the experience and lessons learned from the FSRP to inform their own programs, such as the CanadaGap;
- FSRP was and is extremely important for producers to have federal government recognition of their programs, as it allows them access to domestic and international markets to sell their commodities;
- Having a national program led by industry that is reviewed and recognized by the federal government that adheres to internationally known standards is attractive to international governments and seen as a model for public-private (government-industry) collaboration;
- The FSRP satisfies the buyer / consumer demand for food safety systems (risk reduction);
- The FSRP gives credibility and respect to the NIOs and producers in the eyes of stakeholders.

Results & Impact

- The mandate to recognize industry developed food safety systems has been achieved, with excellence;
- If the measurement stick for success is only NIOs that have completed the process to attain full recognition, then we are only telling half the story. Some NIOs only need partial recognition, but this is not necessarily understood;
- One indicator of success is not only the NIO that has gained full or partial recognition, but the thousands of operators who are implementing the program at the level of the farm and keeping up with the periodic auditing requirements;
- Food safety incidents have decreased significantly since the introduction of the FSRP at the farm level;
- Having a food safety system in place is now the norm and the expectation, unlike twenty years ago;
- Some NIOs have instituted policies that all their members need to implement the FSRP accepted programs on their farms, thereby extending the federal government reach to include on-farm oversight where previously they had none because it is officially outside their jurisdiction;
- FSRP program mandate and objectives are being fully met;
- There is a limited number of NIOs, and the FSRP has reached most of them in full or in part. Five programs have attained full recognition;
- While recognition of the food safety assurance is in place, industry and stakeholder requirements have involved to include other assurance requirements and the FSRP will need to adapt to remain relevant;

- Industry wants the FSRP to continue, and to be expanded. There is no viable alternative and NIOs and producers are heavily invested in it already;
- There is sufficient justification and demand for the FSRP to warrant its continuance indefinitely, and for its mandate to be increased to include biosecurity, traceability, sustainability and animal welfare, at least;
- Standardization and federal recognition of a program equates to national acceptance of the standards and collective willingness to build capacity to ensure they are met;
- The federal government is viewed as the best and most competent authority to provide review of an NIO program;
- There is value-added to the FSRP by NIOs and producers, nationwide;
- FSRP is asked for by consumers / retailers / wholesalers / restaurant chains, etc.;
- FSRP enables access to international markets;
- Value added to federal government in having oversight access to food safety and potentially other programs at the farm level;
- The impact of the program needs to be reviewed in order to acknowledge different requirements by NIOs with regard to the level of recognition they require; and acceptance of that difference;
- For visibility and accountability purposes, the FSRP should be included in the CFIA Departmental Results Framework and related performance measurement processes, if it is not already;
- The number of growers adopting the standards and the reduction of the number of food safety incidents at the farm level are the major indicators of the FSRP's impact;
- To increase the program's impact, NIOs should be required to set a minimum number of producers that implement the program at the farm level once they have received either full or partial recognition; Otherwise, the program will lose its credibility.

Demand for the FSRP

- Retail partners, wholesalers and downstream stakeholders require NIOs and operators to have a food safety program to reduce risks, and the FSRP meets this requirement;
- To expand into other markets including international markets, a recognized food safety program is required, and the FSRP satisfies this demand, in particular because the recognition is from the federal government (and not the private sector);
- Some NIOs with full recognition oblige their client members to implement the program at the farm level;
- Once the program is established, NIOs prefer to stick with the FSRP because it is efficient, and rigorous;
- There is anecdotal evidence that some foreign growers are using the FSRP accepted program to gain access to the Canadian market;
- Supply chain partners require food safety program certification or recognition, and when they hear that an NIO has the FSRP in place, they often don't require receipt of the actual letter or

other proof of completion. Just knowing the federal program is in place and has been recognized meets their requirements;

- The Safe Food for Canadians program heightened consumer and retailer awareness for the need for a food safety system, so they do ask for it;
- Producers like the FSRP because it lends credibility to their operation;
- The independent nature of the recognition and auditing process is what producers seek; and program affordability;
- Producers are proud to belong to an NIO that has achieved full recognition of its program by the FSRP;
- Producers prefer external validation of their overall program over just internal audits conducted by their NIO (but would resist federal government onsite inspections);
- Some NIOs don't want full recognition of their program, but want to be part of the FSRP to benefit from the external technical review for the TR1 and TR2 phases, as that meets their requirements.

SECTION 2: Program Implementation

FSRP Program Administration

- FSRP appears to be administered efficiently with a very small but experienced staff. FSRP has two FTEs and support from CFIA management, which is likely too low. FTEs are efficient, provide good service, are technically competent, and do the job in a timely manner. If they leave, the program would be in jeopardy;
- FSRP staff reductions has negatively impacted the program, in particular in providing training;
- Covid-19 has reduced travel and training opportunities; however, virtual meetings and engagement has increased;
- Provincial and Territorial engagement with the FSRP is waning over the years, in part because of staff turnover and the lack of resources to onboard and train new people successfully;
- There is a concern that other priorities and pressures within the CFIA regarding the level of effort for FTE and budget for the FSRP has suffered in recent years, with other priorities taking precedence, and this negatively impacts the efficiency of the program and the possibility for it to expand;
- Budget / budget management / allocation problems have prevented some activities in the past, including training and meetings. In the past, money allocated for FSRP has been used for non-FSRP activities;
- While the program takes the NIO time to set up and implement, delays from not hearing back quickly from the NIOs is a problem. While it is respected that the NIOs have limited resources, time constraints and large mandates, deadlines and timeframes should be introduced to make the use of limited resources more efficient and to keep the process moving;
- The FSRP is laid out clearly, has good templates, good direction, and thorough and complete manuals and documentation;

- Delays in funding from the AAFC to engage with the FSRP has prevented some NIOs from moving forward with the program in an efficient manner;
- One major concern regarding the efficiency of the program relates to the Maintenance of Recognition reviews, wherein all aspects of the program are reviewed each time, instead of reviewing only things that have changed or are new and spot reviews of other aspects of the program;
- There is a concern about the standardization of the programs across Canada, in part due to Provincial rules and regulations, and whether the FSRP review is sufficiently transparent;
- Sufficient human resources to develop and maintain the program remains a challenge for both the NIOs and the CFIA and causes delays in program implementation and maintenance;
- To make the program more efficient, simpler materials, a Frequently Asked Questions tool, and specific or supplemental materials that address specific processes should be introduced to help save time. Managing large manuals is cumbersome and time consuming;
- Those that have done the process know where the short cuts are that don't jeopardize quality but that can fast track the process, and these lessons learned are not being captured and fed back in to the program implementation;
- With regards to reviews, sometimes different stakeholders require different types of information, and this is inefficient;
- Lack of awareness and visibility of the FSRP reduces program efficiency, as NIOs have to educate downstream stakeholders about the Government's program, in part because even OGDs (including the CFIA itself) don't know about the FSRP;
- AAFC acknowledges feeling distant and removed from the FSRP despite being the owner of the program;

NIO Administration

- The FSRP is a detailed program that requires time and resources to develop and maintain;
- There are no shortcuts to meeting HACCP standards, and the program is as efficient and lean as it could be, given the complexities it manages;
- Each NIO is required to develop its own program and the administration of those programs is their business; however, when they seek recognition through the FSRP they must adjust and adhere to the government's requirements which if not taken into consideration at the outset of the development of the program can add cost, time, and complexity;
- Some NIOs will not take on full recognition because they feel they do not need it;
- The technical review process can be cumbersome and tedious; however, if they were combined into a single review process it may be more efficient;
- Maintenance of recognition, especially when you've done it a few times, seems redundant;
- The FSRP is not more difficult to administer than other assurance programs;
- The quality and competency of the FSRP technical team needs to be maintained, especially when and if there are changes to the current personnel due to retirement, etc. A succession plan needs to be in place that ensures not only scientific and technical competency, but familiarity with modern farm operations

FSRP Program and Procedures Manuals

- Manuals have not been reviewed or updated since they were created over twenty years ago;
- There is confusion about why a Program and a Procedures manual are required, when so much of the content is similar or the same. Could be streamlined;
- The Manuals are considered very thorough and equip the NIOs with the necessary guidelines and templates to successfully develop and maintain a food safety system, and even to use the framework to incorporate other food assurance requirements;
- The fact that they are still as useful today as they were when they were first written is a testament to their quality and excellence;
- The manuals reference positions and roles that no longer exist and could benefit from a refresh;
- Technical requirements for the audit review process including auditor technical requirements and training have been updated but are not in the manuals;
- The biggest concern with the manuals is their length. They are cumbersome. They should be digitized and made available online with search functions, FAQ section, and other amenities to facilitate ease of access and navigation;
- The FSRP is a scientific and complex process, so the length of the manuals is actually a necessity to deal with that complexity. There are no short cuts, but moving to more plain language (less scientific) would be beneficial and facilitate uptake and use;
- A thorough modernization and update of the materials would be warranted if the FSRP program mandate was to broaden beyond just food safety to include other assurance programs such as biosecurity, traceability, sustainability and animal welfare;
- Any change to the materials should be driven by a renewed vision of the FSRP that aligns with CFIA top priorities;
- Modern and younger farm operators are more technically savvy than previous generations, and are better equipped with modern information and technologies to run their operations. As such, their assurance programs should adjust to make all materials, templates, checklists, and manuals available online, and even in the cloud;
- There is a concern that in some instance questions of interpretation have arisen in different Provinces and Territories, requiring a ruling by the FSRP. These clarifications should be captured and incorporated in the manuals;
- The manuals and program materials should be modernized to reflect the new realities of 2022, including industry requirements for other assurance programs;
- There is nothing in any of the manuals that provides guidelines beyond the sixty-month Maintenance of Recognition stage, so once at that stage the NIO is are operating without clear written policy and instructions because the manuals have not been updated in 20 years;
- The manuals should include specific timelines and deadlines to complete each phase of the program, for the technical reviews, and the audits, to make it transparent, standardized and fair for all NIOs;
- The manuals are a necessary evil, but thank goodness we have them;

- Revisions and updates to the manuals should be coordinated with all program stakeholders including the FSRP, CFIA, industry, NIOs and FPT SMEs;
- Consider taking a lean review of the manuals to make them less cumbersome, rewrite in plain language, and digitize them and make them available online. No more paper binders!

FTP Policy and Protocol Documents

- Not all stakeholders are familiar with the documents as they govern the terms and conditions of provincial and territorial government engagement with the FSRP and commitment to provide technical SMEs in support of the review process;
- These documents are well written and clear, but could benefit from a review to define more precisely roles and responsibilities (federal vs provincial / territorial), to clarify new guidelines and changing requirements of provincial / territorial governments, and to renew commitment to the program;
- Ensuring that these are living or evergreen documents has proven a challenge as provincial / territorial commitment and their participation has not been easy to sustain in part because of staff turnover and lack of institutional knowledge about the program;
- These manuals are foundational documents, but could be condensed into one manual, and should include an executive summary and full description of the Program, Table of Contents, and other devices to make them more accessible (user-friendly), perhaps moving them online;
- Improving contact and more frequent communications between the CFIA and FPT counterparts would help commitment to the FSRP. The existence of a policy or protocol document that is 20 years old is now ancient history and without more frequent interaction will become obsolete, especially when there is high turnover at the provincial / territorial level;
- Digitize everything, and go online.

Maintenance of Recognition (MoR)

- Suggest to take a risk management approach to the MoR, reviewing more thoroughly those aspects of the program that are higher risk;
- Accelerate the review process by reviewing only those aspects of the program that have changed or that are new, and spot review other aspects;
- Frequency of 20, 40 and 60 months is fine; but what happens after sixty months? This is not established in the program;
- Without these rigorous reviews, the program would be vulnerable, and meaningless;
- MoR ensures provincial and territorial government participation through their SMEs; however, scheduling and availability of these resources is a challenge;

Communications & Branding

- There is a lack of integration of communication flows amongst and between entities involved with assurance programs and the federal level;

- The FSRP could benefit from increased communication with program stakeholders to ensure their commitment to, engagement with, and support of the Program, and to allow for program refinements and sharing of best practices;
- Biggest challenge to the FSRP survivability is that it is the best hidden secret out there. The program needs greater visibility within the CFIA and OGDs, and to be accepted as an industry-led and voluntary program that exemplifies what government-industry collaboration can be;
- Branding the FSRP with a specific logo or icon would be of great interest to some NIOs to aid them in their marketing efforts; however, indiscriminate use of such a logo could be harmful to the program if, for instance, an NIO has attained full recognition but its members are not implementing the program and practices on the farm. How would a consumer know whether the commodity they purchase comes from a producer with the assurance program in place, or not?
- Any consideration of branding would also need to take into consideration the levels of recognition the NIO has attained and is maintaining, for instance, TR1, TR1 and TR2, or full recognition, and whether it might compete with an NIOs branding of its program;
- NIOs have indicated their frustration in having to educate OGDs (including AAFC) about the FSRP, and don't understand why it is not known to them, especially when it has been around for two decades;
- Communication is insufficient amongst and between stakeholders (NIOs and the CFIA), and has steadily decreased over the years;

Alternative Programs & Duplication

- There are other similar type of food safety programs, like the GFSI, which are recognized by the CFIA and is basically a certification of certifications. Other food safety certification programs like BRC, SQF and FSSC 22000– are all food safety certification programs recognized by GFSI which is the authority for international food safety certification;
- Private programs come with higher costs, and possible hidden agendas;
- While there may be other programs, they are not necessarily more relevant or flexible than the FSRP;
- Programs like the UK's Red Tractor are widely known, especially in Europe, but many countries require government and not private recognition and independent auditing. The concern of programs like the Red Tractor is who conducts the actual audits, and whether it is just internal audits that may be less rigorous;
- Other programs exist from the private sector, like the National Sanitation Foundation (NSF), that offer global certification for the food safety initiative (like the GFSI), but they are complex and expensive and only if you were obliged to have that level of certification would you take on the additional cost and administrative burden;
- There is a concern that a private assurance program may not be as widely or universally accepted as a program recognized by a federal government;
- There is a trend to move to voluntary third-party assurance programs (free – not private) – because they are nimbler and more reactive. From what we know of Red Tractor – it only

requires a few people from the government to keep it going, because it is run by a third-party organization. The Government maintains oversight because of data sharing;

- Other assurance programs may exist in Canada, but they are more directed at the food processing side of the industry and not the food producer side;
- Any alternative program would need to come with federal government recognition in order for it to be attractive or better;
- Any alternative would need to be national in scope, and affordable, and come with Government recognition for it to be useful;
- There is no real competitor to the FSRP in Canada. Other private and more expensive programs exist, but the transparency of their review and audit process is not as respected as that of the federal government;
- Review by the federal government of an industry-led food safety programs that encapsulates provincial and territorial requirements, is seen as better than just a Provincial or Territorial government developed program;
- AAFC's AgriAssurance program supports and finances industry to develop, verify and integrate assurance systems to address market and regulatory requirements, including food safety;
- GFSI, Red Tractor (UK) programs (and other private sector programs) each offer unique features but are for most part complementary to the FSRP, and do not duplicate it;
- NIOs are very interested in federal government recognition of all of their assurance programs and would welcome an approach similar to what the FSRP offers for food safety, by including multiple assurance program in one larger program, so they can avoid having multiple audits for different assurance programs they have, in order to reduce costs and to save time;
- Even if there is some overlap with other assurance programs, this only strengthens the capacity of the NIOs and operators, but it is not necessarily the most efficient way to operate;
- If there is any duplication or overlap it would be with the GFSI, so this might need to be reviewed;
- Duplication may exist if having different commodities on the same farm (i.e., dairy, produce, other) requires separate assurance programs;
- Some international programs exist that include multiple assurance programs in one overall program framework, and this could be an option for Canadian NIOs; however, they are very expensive and difficult to maintain;

Program Weaknesses

- The FSRP is not comprehensive enough in today's market. The program scope needs to be increased to include other assurance program requirements. Companies and producers want all their operations in one program, and for that program to be recognized;
- Rigorous start up and investment at the outset, so need to educate and encourage NIO and producers to stick with the program;
- Impact / success measurement focuses on initial thought of every NIO attaining full program recognition; however, the reality is that some NIOs don't want or need full recognition but have and maintain partial recognition (TR1 and / or TR2), but the sense is that this is discouraged;

- Lack of clarity around permissibility to have and maintain partial recognition. This causes confusion with those NIOS that have completed full recognition. Some differentiation is required. If not, an NIO with full recognition obliging their members to apply the program on their farms feels cheated when another NIO without full recognition (or that is not obliging its members to use the program at the farm level) to say they are part of the same program. Perhaps some variation in status needs to be incorporated into the program (bronze level, silver level, gold level, for instance.);
- Not all NIOs oblige their members (producers) to implement the FSRP on their farm;
- Timelines to complete a phase of the program’s implementation and technical review are not enforced by the CFIA, so NIOs can take twice as long to complete a stage as was originally contemplated;
- Program is considered by some to be too structured, and that changes should be introduced to make it more agile;
- The major weakness of the FSRP is the lack of internal recognition within the CFIA and government. The program is not widely-known internally or appreciated. The FSRP needs to be more closely aligned with CFIA’s current priorities;
- Full recognition is not necessarily required if you are not pursuing international markets;
- Some producer organizations benchmarked their food safety programs, e.g. CanadaGap, through other international benchmarking programs like the GFSI. While only applicable to a subset of NIOs that can benefit from the GFSI, there is a need to harmonize the audit processes for the GFSI and FSRP programs to avoid duplication;

Opportunities for Improvement

- The FSRP scope needs to increase to incorporate other assurance program requirements such as biosecurity, traceability, sustainability and animal welfare;
- The FSRP has not been updated since its inception 20 years ago. While adjustments have been made on the fly, they should be formally incorporated in the program as best practices;
- The FSRP should define its policy around whether full recognition should be a requirement to participate in the program, or whether review of the TR1 and/or TR2 is sufficient in some instances;
- For NIOs that receive full recognition, the FSRP should set a mandatory percentage of NIO members required to be implementing the program on their farm in order to maintain their recognition status. This requirement should be negotiated by the CFIA, NIO, FPT and other industry stakeholders. In the absence of this policy, a consumer / retailer does not know if the commodity they purchase was produced on a farm with a recognized food safety system;
- Strengthen (and renew) relations with program stakeholders, especially FPT partners. This relationship has declined as CFIA staffing has reduced, and with mechanism such as the Working Group (stakeholder consortium) have disappeared;
- Consider additional incentives to motivate both NIOs and producers to take up the program. This may require an expanded program mandate and scope;

- Research whether there are inconsistencies in application of the program in different provinces and territories arising from different provincial / territorial rules and regulatory requirements that have emerged since the FSRP was originally created;
- Improve the program documentation, streamlining it and putting it all online;
- Improve communication within the CFIA and OGDs about the FSRP. It is an unknown and untold success story;
- Central repository of program participant information where NIOs can track their progress and see learning and experience of other NIOs, and can engage each other to share lessons learned and best practices (transparency);
- Consider staff turnover and the need for succession planning, especially within CFIA.
- Industry has already begun to expand the scope of its assurance programs, so the FSRP should update its program to include other assurance program content for biosecurity, traceability, sustainability and animal welfare, so that producers work with only one program and not multiple, and that recognition can be offered for all these aspects;
- Strengthen the program by applying more rigorous timelines for completion of phases to help motivate NIOs to keep the process moving forward;
- Introduce a multi-level recognition status that allows for full recognition and partial recognition. This would ensure that the CFIA continues to respect the diversity of requirements of the NIOs;
- Modernize the program by expanding its mandate and digitizing all existing (and future) program materials and manuals, and placing them online;
- To publicize and promote the program better both internally within government and to all stakeholders to make it more visible;

Recommendations Summary

Resulting from a consensus of perspectives informed by key informant interviews, the following conclusions and recommendations are offered to the FSRP Management Team, the CFIA, and AAFC for their consideration. The recommendations fall into two categories: Main Recommendations and Secondary Recommendations:

Main Recommendations

1. The FSRP remains a highly respected and effective food safety program, whose government recognition is coveted by NIOs and their members, and in demand by downstream stakeholders including retailers, wholesalers, restaurant chains, and consumers, among others. However, the FSRP is not keeping up with industry demands. To maintain its relevancy, the FSRP should expand its scope to include other assurance programs including biosecurity, traceability, sustainability, and animal welfare in one overall program, and secure additional resources for the program's expansion and continuance. There is no viable alternative to the FSRP in Canada, and as NIOs are heavily invested in it already, they are eager to see it continued and expanded. With an expanded scope, NIOs are confident that the program uptake by NIOs and producers will increase;
2. The expansion of the FSRP mandate should be undertaken in collaboration with all stakeholders including the NIOs, industry representatives, and the FPT SMEs to ensure that new guidelines, rules and best practices in industry are included in the expanded program framework and that the respective roles and responsibilities of each party are updated and understood;
3. The FSRP management team should engage senior management at the CFIA regarding the need for increased visibility of the FSRP, highlighting the achievements of FSRP and enlisting support to increase program awareness within the Agency itself, OGDs, the AAFC and Health Canada. The FSRP is a success story, and illustrates an example of effective industry-government collaboration. The FSRP has resulted in food safety programs developed and implemented by NIOs and subject to federal government review to obtain either full or partial recognition by the government, and whose subsequent voluntary application through the respective NIO on tens of thousands of farm operations across the country has given the federal government unprecedented access and influence at the farm level, which typically lies outside its jurisdiction;
4. With the approval and commitment to expand the FSRP mandate to include other assurance program components, the overall program budget should be increased to ensure it is appropriately resourced. At such time, the review, updating, streamlining, and digitization of all existing and future program documents and manuals to make them available online with the appropriate functionality in order to improve administrative efficiencies could be prioritized;
5. The FSRP should consider offering recognition to NIOs that complete and maintain the technical review (TR1) and / or Administrative Review (TR2) phases, but choose not to opt for full recognition

because either it is not required by industry, or other limitations, as long as they commit to and meet all Maintenance of Recognition requirements.

Secondary Recommendations

1. The FSRP should explore with the CFIA how it should be incorporated into the CFIA's Departmental Results Framework(s) and other performance measurement practices, in order to increase program awareness and visibility.
2. The FSRP should consider whether branding full recognition is beneficial to some NIOs and merits consideration, or whether increased engagement with materials to support NIO branding of their individual programs is sufficient. If any proposal for branding is considered, it will need to consider under what circumstances a brand can be used, and whether it is restricted to NIOs with full recognition whose members are obliged to implement the program on the farm.
3. The FSRP should introduce mandatory timelines for completion of the various phases of the program development, implementation and review with the caveat that if those timelines are not respected, the NIO must begin the process over.
4. To improve program efficiencies, the Maintenance of Recognition and continued reviews should adopt a risk management approach to focus reviews on elements of highest risk, to review aspects of the program that are new or have experienced changes since the last review, and to spot review parts of the program that have been reviewed previously and recognized in the past.

APPENDIX A: FSRP Description

The Food Safety Recognition Program (FSRP) includes the On-Farm Food Safety Recognition Program and the Post-Farm Food Safety Recognition Program, which provides government recognition of on-farm and post-farm food safety systems developed and implemented by national industry organizations in order to:

- enhance food safety;
- maintain the confidence of Canadian consumers; and
- facilitate market access.

The FSRP is led by the Canadian Food Inspection Agency (CFIA) with the participation of the provincial and territorial governments and other government departments.

Recognition acknowledges that a food safety program has been developed in line with a systematic and preventive approach to food safety based on international accepted standards (Hazard Analysis Critical Control Points principles); that the program conforms to federal, provincial and territorial legislation, policy and protocols; and that a Food Safety Management System has been implemented in an effective and consistent manner.

By providing a recognition framework that supports national, auditable, industry-led, HACCP-based food safety programs, the CFIA can support its goal of safeguarding Canada's food supply along the whole food continuum.

Industry organizations can submit their food safety systems to the FSRP for technical review.

Source: <https://inspection.canada.ca/food-safety-for-industry/archived-food-guidance/safe-food-production-systems/food-safety-enhancement-program/recognition-program/eng/1299860970026/1299861042890>

APPENDIX B: Inventory of Documents

#	Documents Reviewed
1	Memorandum of Understanding (MOU) under the Canadian Agricultural Partnership for Assurance Systems and Market Access between Agriculture and Agri-Food Canada (AAFC) and the Canadian Food Inspection Agency
2	CFIA-FSRP Post-Farm Food Safety Recognition Program Manual
3	CFIA-FSRP Recognition Procedures Manual
4	v5 FSRP CAP Year Three End of Year Review FY2020-2021
5	Current FSRP Overview Presentation February 2020 (PPTX deck)
6	FSRP Policy FPT On-Farm Food Safety Recognition Policy Document
7	FSRP Protocol FPT On-Farm Food Safety Recognition Protocol

APPENDIX C: List of Interviewees

#	NAME	CONTACT INFORMATION	INTERVIEW DATE
1	Martin Fournier	Senior Program Officer - AgriAssurance Program / Agriculture and Agri-Food Canada	21 Dec. 2021
2	Mylène Rochon	Canadian Food Inspection Agency	22 Dec. 2021
3	Tim Mellor	Ontario FSRP Area Coordinator	23 Dec. 2021
4,5,6	CFIA- FSRP TEAM: Wassim Khoury Shondi MacDonald Meaghan Theophilopoulos	Roles: National Manager Policy and Program Team Leader Advisor (FSRP)	7 Jan. 2022
7	Forrest Scharf	Government of Saskatchewan, Provincial Specialist, Fruit Crops, Crops and Irrigation Branch, Ministry of Agriculture	7 Jan. 2022
8	Steve Leech	Director of Food Safety and Animal Chicken Farmers of Canada	13 Jan. 2022
9	Viki Sikur	Food Safety Officer Canadian Hatching Egg Producers	14 Jan. 2022
10	Heather Gale	Executive Director, CanadaGAP® Program	17 Jan. 2022
11	Monika Frank-Ruediger	Alberta Agriculture, Forestry and Rural Economic Development	18 Jan. 2022
12	Wayne Du	Food Safety Systems Development Branch, Ontario Ministry of Agriculture	20 Jan. 2022
13	Connie Kehler	Canadian Herb, Specialty Agriculture & Natural Health Products Coalition	25 Jan 2022

APPENDIX D: Questions for Interviewees

CFIA – FSRP Interview Questions
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Interviewee:

Interviewer: Ben Toeg, Senior Business Analyst

Date: Weekday, XX Month, 202X – xx:xx am/pm

1. INTRODUCTORY REMARKS

- A bit about myself...

2. PURPOSE OF INTERVIEW – Assessment of CFIA’s “Food Safety Recognition Program”

- Why are we conducting an assessment now?
- # Participants (interviewees) – stakeholders
- Introduce structure of interview. 1) Program Relevance, 2) Program Efficiency, 3) Program Impact, 4) Other outstanding issues or concerns
- Tell me about yourself, Role, Duties, Length in position, Experience with the FSRP process
- In thinking about your role, let’s discuss first the relevance of the program from your perspective

3. PROGRAM RELEVANCY

3.1. In what ways are the outcomes of the Food Safety Recognition Program being achieved?

3.1.1. What do you think could be done to improve the program?

3.2. Do you think that the FSRP is relevant?

3.2.1. What are the key benefits of the program?

3.2.2. Are there alternative programs to the FSRP (i.e., UK Red Tractor Certified Standards) that are more relevant (to your industry) than the FSRP?

3.2.3. What are they?

3.2.4. What makes these alternative programs more relevant?

3.2.5. In what ways are they better than the FSRP?

3.2.6. What are the major weaknesses of the FSRP program that may make it less relevant?

3.2.7. What opportunities exist to make the FSRP more relevant?

3.3. Do you think the FSRP represent good value for a national industry organization (or equivalent)? If so why. If not, why not?

3.4. Do NIO members / clients ask for federal government certification of their food safety practices?

3.5. Do NIO members / clients want federal government recognition of their food safety program or is meeting their national organization program requirements sufficient?

4. EFFICIENCY

4.1. In general, do you feel that the FSRP is administered efficiently?

4.1.1. What are the main challenges or obstacles to implementing the FSRP? How might they be overcome?

4.1.2. What changes would you make to the administration of the process to make it more efficient and streamlined?

4.2. With regard to the materials provided by the CFIA regarding its FSRP, does the FSRP **Recognition Program Manual** provide national industry organizations (or equivalent) with the necessary tools and instructions for the development and review of the technical and administrative management materials of a food safety program based on HACCP principles and ISO requirements?

4.2.1. Are the contents of the Procedures Manual laid out clearly, concisely and accurately?

4.2.2. What suggestions do you have to improve the Recognition Program Manual to help streamline it and make it less burdensome?

4.2.3. Are there any redundancies in the manual that should be removed or reviewed?

4.3. Another key document prepared by the CFIA is the Food Safety Recognition Program **"Recognition Procedures Manual"**. Does this manual provide sufficient guidance on the procedures that manage the OFFSRP?

4.3.1. Are the contents laid out clearly, concisely and accurately?

4.3.2. What suggestions do you have to improve the Procedures Manual to help streamline it and make it less burdensome?

4.4. Another key document is the FSRP **Federal – Provincial – Territorial Policy Document**. Does it clearly describe the roles for the various participants involved in the recognition of an HACCP-based national food safety program?

4.4.1. What suggestions, if any, do you have to strengthen this policy document?

4.5. A related document is the FSRP **Federal-Provincial-Territorial Protocol Document**, which defines the steps to be followed for the program's recognition, including the

technical reviews, implementation assessments and maintenance of recognition status. Are the contents laid out clearly, concisely and accurately?

4.5.1. What suggestions do you have to improve the Protocol Document to help streamline it and make it less burdensome?

5. PROGRAM RESULTS

5.1. It's been nearly twenty years since the FSRP was introduced? To what extent are the objectives and mandate of the program being achieved?

5.2. What client benefits and broader outcomes, both intended and unintended, have resulted from carrying out the program?

5.3. In what manner and to what extent does the program complement, duplicate, overlap or work at cross purposes with other programs?

5.3.1. If an overlap, exists, does it threaten the purpose of maintaining the FSRP?

5.4. What can be done to accelerate the timeline and reduce the administrative burden on NIOs (or equivalent) for the technical review phase to have its audited food safety recognition program recognized by the CFIA?

5.5. What can be done to accelerate the Maintenance of Recognition (MoR) phase, and what should be the duration of that recognition once granted? With what frequency should a technical review be conducted in order to maintain that recognition?

5.6. What can be done to improve the communication and branding of the federal government's FSRP certification? Would such an initiative be welcomed by the NIOs?

5.7. Are program resources being used efficiently?

5.7.1. Are adjustments needed to the level of effort by CFIA to continue the program?

5.7.2. Are there more cost-effective ways of delivering the existing program?

5.8. Do you think there is sufficient justification and demand for federal government certification of industry food safety programs to merit continuing the FSRP? What is the value added by federal recognition?

5.9. Is the program resulting in the desired or expected impact? How can this be measured?

6. Closing remarks

6.1. In closing, do you have thoughts about things we should be assessing that weren't covered in this interview?

6.2. Do you have any additional suggestions of recommendations for the CFIA regarding the FRSP program?

6.3. Thank you – and follow-up (sharing results of assessment once documented)