

# FSRP PROPOSAL FOR ENHANCED MAINTENANCE OF RECOGNITION REVIEW PROCESS

MAY 30, 2023

## BACKGROUND

The Food Safety Recognition Program (FSRP) provides government recognition of on-farm and post-farm food safety systems developed and implemented by national industry organizations (NIO).

Led by the Canadian Food Inspection Agency (CFIA) with the participation of the provincial and territorial governments, the FSRP provides a recognition framework that supports national, auditable, industry-led, HACCP-based food safety programs.

### *Maintenance of Recognition*

The CFIA leads the process for Maintenance of Recognition (MoR) with participating federal, provincial and territorial governments. This process examines the ongoing maintenance of the NIO's On-Farm Food Safety Program (OFFSP). After receiving the initial letter of recognition of their OFFSP under the FSRP, the NIO must continue to update their OFFSP and participate in an ongoing 5 year review cycle to maintain their recognition status.

Continuous improvement is an essential part of any food safety management system, and a more robust process is needed to provide the CFIA assurance that an NIO's food safety program remains current, technically sound, is implemented as written, delivered consistently on a national basis, and is effective.

CFIA is proposing an updated MoR review process that will strengthen CFIA's reviews at 20, 40, 60 months and beyond.

### *Modernization of the FSRP*

The CFIA makes updates to the FSRP to reflect changes in federal and/or provincial and territorial legislation, developments in research, and to improve effectiveness and efficiency.

In 2022, CFIA commissioned a report on the future of the FSRP.

In 2022 and 2023, the FSRP team engaged directly with NIOs and provinces/territories to discuss the findings of the report, prioritize modernization initiatives and consider verbal and written feedback on proposed options for ongoing MoR. The CFIA also conducted post-60 month MoR pilots with two NIOs.

In verbal and written feedback as well as the MoR pilots, the NIOs recommended that CFIA build on the existing solid foundation for MoR to reduce resource impact, maintain confidentiality of producer details, and to bolster existing internal audits rather than add an additional oversight process.

The CFIA developed an enhanced review process for MoR from information collected from the pilots and meetings with NIOs.

## PROPOSAL

The CFIA proposes to maintain a 5 year cycle for maintenance of recognition, with strengthened reviews occurring at the existing 20 month intervals.

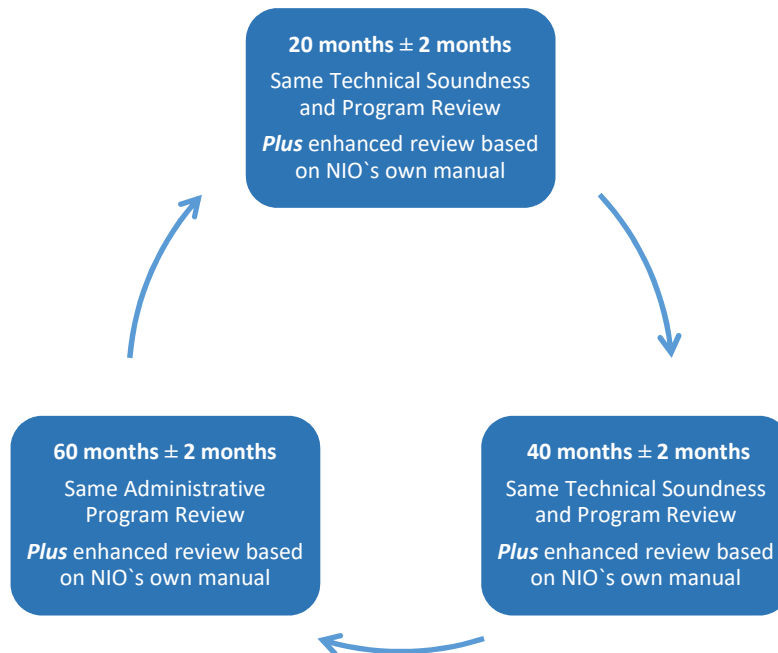
The 5 year cycle will continue to include two technical soundness and program reviews and one program administrative review. The program administrative review will include a technical soundness review and a systematic review of the NIO's administration of their on farm food safety program. The systematic review of the administration of the OFFSP will continue to require:

- confirmation that internal audits were completed
- confirmation of management system review reports
- supporting documentation as required.

In addition to the current review of the manuals, internal audits and management reports, the CFIA proposes that the FSRP team will look at a sampling of 2-4 elements taken from the NIO's management system.

See Annex 1 for an overview of potential elements for enhanced review. See Annex 2 for a practical example of the selection process of the elements that may be requested.

This proposed approach is in line with what NIOs shared with the CFIA and the findings from both pilots. The FSRP documents already include the flexibility to strengthen each 20 month interval by adding an enhanced layer of review.



## **BENEFITS TO NIOs**

A more rigorous MoR process will benefit all NIOs by supporting their ability to demonstrate the strength of their OFFSP nationally. Furthermore, a robust and credible OFFSP would be better equipped to withstand domestic and foreign food safety audits. This, in turn, will help NIOs continue to maintain market access and consumer trust.

## **BENEFITS TO GOVERNMENT**

A more rigorous MoR process will give CFIA the required confidence to continue issuing recognition to NIOs, support the food safety continuum from farm to fork in trade and market access negotiations and inform risk-based oversight.

## **MOVING FORWARD**

NIOs already within the initial 5 year review cycle will begin the new procedure at their next scheduled review. Those who haven't yet achieved full recognition will begin the enhanced MoR process after their program receives recognition.

The CFIA will continue to follow the FSRP's existing protocol regarding recognition withdrawal procedures which covers non-conformities, suspension, and withdrawal.

#### **PRIVACY**

The CFIA is committed to protecting privacy, including safeguarding the confidentiality of information provided by individuals and organizations. Records provided as substantiation do not need to include personal information such as names, addresses, or quota numbers.

#### **COST**

The proposed approach is anticipated to have little to no impact on resources. This enhanced MoR does not necessitate the creation of any new documentation/procedures. Any records selected for review would come from the NIO's existing OFFSP.

#### **COMMENT PERIOD**

The CFIA invites stakeholder feedback and questions until June 30<sup>th</sup>, 2023 via the [CFIA.FSRP-PRSA.ACIA@inspection.gc.ca](mailto:CFIA.FSRP-PRSA.ACIA@inspection.gc.ca) account. The Agency will consider extensions as necessary, as this time of the year can be challenging for various reasons.

**ANNEX 1** (taken from the Government Requirements for a Management Manual, 2008):

### **1. General Management System Component Requirements**

Organization, responsibility and authority  
Provision of resources  
Documentation development and maintenance  
Management review  
Internal audits  
Corrective and preventive action  
Complaints  
Document and record control  
Outsourcing  
Conflict of interest and impartiality  
Confidentiality  
Training/education/communication plan

### **2. Technical Component Requirements**

Preparation of technical documents  
Producer manual distribution  
National producer organization assistance with production unit implementation of the HACCP-based program  
Training/education/communication plan

### **3. Conformance Component Requirements**

Creation and maintenance of an auditor pool  
Assigning on-farm food safety auditors  
Application for initial assessment audit  
Planning and conduct of audits  
Production unit record retention  
Food safety checklists  
Procedure for handling non-conformances  
Making recommendations on acknowledgements of conformance  
Considering recommendations and decision on granting, suspension and removal  
Complaints and appeals on audit findings, auditors and methods for appeal  
Issuing acknowledgement of conformance  
List of production units on the program  
Monitoring of conformity  
Interim audits  
Triggered audits (if any)  
Reassessment audits  
Training/education/communication plan

### **4. Auditor Training Component Requirements**

Generic on-farm food safety auditor training course content  
Commodity-specific on-farm food safety auditor training course content  
Additional on-farm food safety auditor training

Delivery of on-farm food safety auditor training courses (generic and commodity specific)  
Evaluation of auditor training courses (when necessary)  
Training/education/communication plan

## **ANNEX 2**

### **Example**

Selection of two elements from the NIO's management system manual:

- a) e.g. Initial assessment audit (initial on-farm audit)

Randomly select three provinces from the NIO's list of provinces that have been audited since the last 20 month (i.e. last MoR)

Within each of the three provinces, randomly select one farm that has been registered within the last five years

- b) e.g. Training of the on-farm food safety auditor

Within each of the three provinces, select a number of auditors from the list of qualified auditors.

Note: The documents, records or procedures associated with the selected elements will be requested.