TO: All Holders of the Facilities Inspection Manual

SUBJECT: Changes to Compliance Verification Policy

This Bulletin supersedes and replaces Bulletin numbers 21 and 23. Please remove these Bulletins from your manual.

This Bulletin is intended to guide inspectors and managers in the scheduling and planning of compliance verifications. The Compliance Verification Policy is adjusted, as indicated within this bulletin, to increase the frequency of CFIA contact with industry, to emphasise the significance of the QMP Reference Standard, and to support improved planning and delivery of the CFIA's Quality Management Program.

The following policy directives are in effect:

The compliance verification (CV) is the primary tool for verification of regulatory compliance at federally registered establishments. The CV assesses the QMP Plan implementation and effectiveness against the requirements set out in the QMP Reference Standard, and by association, the Fish Inspection Regulations.

Compliance verifications are conducted during an establishment's operating season according to the following schedule:

Newly Registered Establishments

1. For an establishment with a new certificate of registration, a CV should be scheduled directly following the issuance of the registration certificate. For new registrations, the scope of a CV should address all seven elements of the QMP Reference Standard.

Previously Registered Establishments

2. For an establishment with a pre-existing certificate of registration, the scope of a CV normally will address less than seven elements of the QMP Reference Standard. Exceptions to this may include a CV conducted at an establishment in a remote location or with a very short operating season, a CV conducted in response to a food

safety emergency, and/or when a wide-scale loss of QMP controls is suspect.

QMP with a HACCP Plan

3. For establishments with a HACCP Plan, a CV should be conducted at least once every four months of operation. For establishments operating less than four months per year, a CV should be conducted at least once per year. A 2-year planning cycle should be used and during this period all seven elements of the QMP Reference Standard must be verified at least once.

QMP without a HACCP Plan

4. For establishments without a HACCP Plan, a CV should be conducted at least once every six months of operation. For establishments operating less than six months per year, a CV should be conducted at least once per year. A 3-year planning cycle should be used and during this period all seven elements of the QMP Reference Standard must be verified at least once.

CV Scope

The CV team will develop the CV scope in consideration of all of the following objectives:

- to assess each of the seven elements of the QMP Reference Standard at least once over the appropriate two- or three-year cycles;
- to assess health and safety controls with priority;
- to verify the implementation and effectiveness of corrective action plans developed during previous compliance verifications;
- to assess an area of a suspect non-compliance based on establishment history or an emerging issue.

To assist the CV team in developing the scope of the CV, the Inspection Manager (or designate) should establish a target for total direct time to conduct a CV. The CV team should allocate approximately 30% of direct time to planning and preparation, 60% to execution, and 10% to meetings with industry and CAP assessment.

Closing the CV

The CV is closed when the corrective action plan (CAP) has been accepted by the CV team. The development and submission of an acceptable CAP should be a priority for the registered establishment personnel.

CAP

Normally, CFIA personnel will verify the implementation and effectiveness of the CAP at a subsequent CV. Objective evidence pertaining to CAP implementation and effectiveness can be gathered at any time following the acceptance of the CAP. However, if health, safety or product compliance is at issue, the CFIA personnel should schedule the CAP to be verified promptly after implementation. The objective evidence collected is applied to a subsequent CV.

Time Utilisation

Advance planning for CV scheduling, CV team assignments, and the development of a CV checklist is advantageous and appropriate.

- It is not necessary to perform a compliance verification over a continuous period of time; the CV may be planned to be performed in stages and in many cases this is recommended. For example, this would apply in the case of establishments which operate for pulse fisheries, with short operating seasons, or for those whose export certification requests require CFIA contact. For such cases and where possible, the CV scope and checklist should be prepared well in advance so that inspection personnel are ready to conduct CV activities whenever an opportunity arises.

- Efforts should be made to consolidate regulatory verification activities whenever possible. For example, CVs for establishments which require ICSSL certification inspections should be scheduled to be conducted within 120 days of the ICSSL expiry date. This would enable the CV results to be applied to the ICSSL facility inspection requirements.

CV Team

The size of the CV team may be related to the plant size and/or complexity of the QMP Plan. In general, better results may be obtained using a team size of two persons. However, a 1-person execution of the on-site component of the audit, is acceptable when a 2nd team member (such as a supervisor) participates through deliberations and /or discussion during the planning, execution and CAP assessment phases. As in larger teams, one member of the team should be a "team leader". Rotation of inspection staff auditing individual establishments is encouraged.

Richard Zurbrigg
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