Canadian Food Inspection Agency
Agence canadienne d'inspection des aliments

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MEAT HYGIENE DIRECTIVE

2010- 35

DIRECTIVE DE L'HYGIENE DES VIANDES

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SUBJECT: Chapter 18

Corrections have been made throughout the Chapter. Some of the highlighted changes are as follows:

- Guidance with regard to evaluation of management commitment by CFIA.
- Guidance for frequency of inspection visits.
- New "Forecasting" Activity is now part of the Verification Task Process Step 1 – Preparation. Once a month, a tour of the entire establishment must be conducted, and the HACCP Log Book Reviewed. The tour will enable the inspector to forecast and prioritize verification tasks to be performed during the upcoming month.
- New guidance related to CFIA Inspector facilities and/or stations.
- Guidance for identifying non-compliance related to open CAR's.
- Revised procedures for meeting with the Operator.
- Updated guidance for Acceptable Action Plans.
- Updated guidance for Follow Up.
- Update to HACCP System Design & Reassessment Tasks and related procedures

OBJET : Chapitre 18

Des corrections ont été faites partout dans le chapitre. Voici quelques-unes des modifications apportées :

- Renseignements sur l'évaluation par l'ACIA de l'engagement de la haute direction.
- Renseignements sur la fréquence des visites d'inspection.
- Une nouvelle activité de « prévision » fait maintenant partie de l'étape 1 – Préparation du processus lié aux tâches de vérification. Une fois par mois, un inspecteur devra visiter l'établissement au complet et examiner le registre du système HACCP. La visite lui permettra de prévoir les tâches de vérification à effectuer durant le prochain mois et de les classer par ordre de priorité.
- Nouvelles instructions concernant les installations et les postes de l'ACIA.
- Renseignements sur les situations de non-conformité reliées à des DACs en cours.
- Révision des procédures concernant la tenue de réunions avec l'exploitant.
- Mise à jour des instructions sur les plans d'action acceptables.
- Mise à jour des instructions sur le suivi.
- Mise à jour des tâches de réévaluation et de conception du système HACCP et des procédures connexes.

ENGLISH AND FRENCH VERSION

Please replace in your Manual of Procedures Chapter 18 with the attached pages.

VERSIONS ANGLAISE ET FRANÇAISE

Veuillez remplacer le chapitre 18 de votre Manuel des méthodes par les pages ci-jointes.

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Canada

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List of acronyms

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CFIA : Canadian Food Inspection Agency
CVS : Compliance Verification System
FSEP : Food Safety Enhancement Program
HACCP : Hazard Analysis Critical Control Point
QMS : Quality Management System
MIA : *Meat Inspection Act*
MIR : *Meat Inspection Regulations*
FDA : *Food and Drugs Act*
FDR : *Food and Drug Regulations*
CPLA : *Consumer Packaging and Labelling Act*
CPLR : *Consumer Packaging and Labelling Regulations*
HAA : *Health of Animals Act*
HAR : *Health of Animals Regulations*
MOP : Meat Hygiene Manual of Procedures
CCP : Critical Control Point
PC : Process Control
CAR : Inspection Report - Corrective Action Request
IMS : Issues Management System

Compliance Verification System

This chapter outlines the procedures governing the Compliance Verification System (CVS) to be conducted in all federally registered meat and poultry establishments.

18.1 Introduction

The CVS provides an efficient and uniform approach to verifying the compliance of registered establishments with regulations. The CVS includes verification tasks that are used by CFIA inspection staff to assess compliance with regulatory requirements. Each verification task includes detailed procedures for the inspection staff to follow when conducting verifications.

This chapter provides guidance regarding the verification task process as well as the reporting tools to be used in the implementation of CVS. These tools allow data to be captured and analysed for:

- patterns of compliance;
- indications of systemic problems;
- compliance with Canadian trading partner's regulations; and
- uniformity of program delivery.

The verification of industry's compliance to regulations includes more than the verification tasks outlined in this chapter. Other verification activities conducted by CFIA staff are import inspection (MOP Chapter 10), export verification (MOP Chapter 11), complaint investigation and recall (CFIA Food Emergency Response).

Follow-up after a food safety recall and after non-compliant situations identified through export verification and complaint investigations will result in the completion of the corresponding verification task.

Compliance is normally achieved through a co-operative approach between the operator and the inspection staff. This approach generally involves the operator correcting instances of non-compliance through the development and implementation of action plans. When this co-operative approach is not successful, or the operator is unwilling or unable to correct non-compliances, the CFIA pursues the enforcement options outlined in Chapter 14 of the MOP.

18.2 Roles and Responsibilities

18.2.1 Operator

The responsibilities of the operator are to:

- Produce safe, wholesome, properly labelled product in compliance with CFIA regulatory requirements i.e. applicable acts and regulations, Manual of Procedures, Meat Hygiene Directives, FSEP Manual and guidelines.
- Establish and maintain the HACCP system and HACCP records.
- Identify and correct deviations in a timely and appropriate manner.
- Develop and implement acceptable and effective action plans in response to non-compliances identified by the CFIA.
- Correct items requiring correction, as identified by the CFIA.
- Provide written programs and records, as requested by the CFIA.

Once per year, the Licence to Operate a registered establissment is renewed in accordance with the *Meat Inspection Regulations, 1990* Section 29 (4). At this time, the CFIA will evaluate the establishment senior management's commitment toward its HACCP system and other applicable regulations. The evaluation criteria will be provided in the form of a CVS Task.

Inspector generated corrective action requests, operator action plans, follow up documentation and records of any enforcement actions taken provide a history of compliance that must be considered when conducting the yearly evaluation of senior management commitment.

18.2.2 Inspector

The responsibilities of the CFIA inspector are to:

- Ensure all applicable verification tasks are assigned to the establishment as per section 18.6.
- Conduct verification tasks according to the national frequency.
- Take and document enforcement action(s) when necessary to protect public health, to protect consumers from fraud and to protect animal welfare or health as outlined in Chapter 14 of the MOP.
- Seek guidance and program clarification as required.
- Communicate verification task results to the operator by issuing Verification Reports and Inspection Report - Corrective Action Requests (CAR) as defined in section 18.7.4.
- Assess the operator's action plans submitted in response to CARs as per section 18.7.5.
- Follow-up on items requiring correction that were identified on the Verification Report as per section 18.7.6.
- Follow-up on operator's action plan implementation in response to CARs as per section 18.7.6.
- Follow the regulatory enforcement actions and procedures as detailed in Chapter 14 of the MOP.
- Maintain hard copy documentation on site as defined in section 18.7.7.
- Submit electronic information as defined in section 18.7.7.
- Complete a Verification Task Comments Submission Form whenever the need for a change to a verification task is identified (see section 18.5).
- Ensure that his or her copy of Chapter 18 of the MOP (including task procedures) is current by incorporating the latest directives.

18.2.3 Supervisor

The responsibilities of the Supervisor are to:

- Schedule inspectors to ensure that all establishments are visited at the prescribed frequency and tasks are assessed at the prescribed frequency.
- Complete Quality Management System (QMS) verification activities.

  - In slaughter establishments, QMS verification activities are the responsibilities of the Veterinarian in Charge and the Regional Veterinarian Officer.
  - In processing establishments, QMS verification activities are the responsibilities of the Complex Supervisor.
- Provide support to inspection staff in relation to program or policy clarifications.
  - Questions related to CVS and the verification tasks are forwarded to the Area CVS Coordinator.
  - Questions related to program or policy issues are forwarded to the Area Program network specialist.
- Select and conduct verification tasks according to the verification process as an inspector, when necessary.
  - Provide support to inspection staff in relation to situations of non compliance or enforcement.
  - Complete a Verification Task Comments Submission Form whenever the need for a change to a verification task is identified (see section 18.5).

18.2.4 Regional Veterinary Officer (RVO)

The responsibilities of the RVO are to:

- Provide supervisory and/or technical oversight at federally registered slaughter establishments.
- Complete Quality Management System (QMS) verification activities in slaughter establishments.
- Provide support to inspection staff in relation to program or policy clarifications.
- Provide support to inspection staff in relation to situations of non compliance or enforcement.
- Within CVS, whenever a "supervisory" responsibility exists, the RVO may fulfill that role as related to slaughter or veterinary specific activities.
  - This includes selecting and conducting verification tasks according to the verification process as an inspector, when necessary.

18.2.5 Area CVS Coordinator

The responsibilities of the Area CVS Coordinator are to:

- Support the delivery of CVS in their area.
- Respond to issues or questions concerning CVS and the verification tasks from area operations staff and management. If clarification is required, seek advice from the Area Program Network Specialists, the Area FSEP Coordinator and the National CVS Coordinator.
- Review with program staff proposed revisions, additions or deletions to the verification tasks received from inspectors and supervisors. Forward proposed revisions, additions or deletions to the National CVS Coordinator for review and acceptance.

18.2.6 Area FSEP Coordinator

The responsibilities of the Area FSEP Coordinator are to:

- Respond to FSEP issues or questions concerning verification tasks from the Area CVS Coordinator and Programs staff.
- Complete a Verification Task Comments Submission Form whenever the need for a change to a verification task is identified (see section 18.5). This form is forwarded to the Area CVS Coordinator for review and consideration.
- Participate, as required, in the completion of section 4 verification tasks.

18.2.7 Area Program Specialist and Regional Contacts

The responsibilities of the Area Program Network Specialist and Regional Contacts are to:

- Respond to meat program issues or questions related to verification tasks from the Area CVS Coordinator and operations staff.
- Provide support to the Area CVS Coordinator and operations staff as required.
- Complete a Verification Task Comments Submission Form whenever the need for change to a verification task is identified (see section 18.5).
- Participate, as required, in the completion of section 4 verification tasks.

18.2.8 National Program Chief

The responsibilities of the National Program Chief are to:

- Respond to issues or questions concerning verification tasks from the National CVS Coordinator and other Program network staff.
- Review proposed revisions, additions or deletions to the verification tasks received from Area Program Network staff. Forward proposed revisions to the National CVS Coordinator for review and acceptance.
- Propose revisions, additions or deletions to the verification tasks as required when amendments are made to the *Meat Inspection Act* (MIA), MIR, MOP, FSEP Manual and other applicable acts and regulations. Forward proposed revisions to the National CVS Coordinator for review and acceptance.
- Propose revisions, additions or deletions to the QMS verification criteria as required when amendments are made to the MIA, MIR, MOP, FSEP Manual and other applicable acts and regulations. Forward proposed revisions to the National CVS Coordinator for review and acceptance.
- Ensure that directives amending the MIA, MIR, MOP or FSEP Manual include the required changes to the verification tasks.
- Ensure that directives amending the MIA, MIR, MOP or FSEP Manual coincide with the release of any required changes to the QMS Criteria.

18.2.9 National CVS Coordinator

The responsibilities of the National CVS Coordinator are to:

- Respond to issues or questions concerning CVS and verification tasks from the Area CVS Coordinators or Program network staff or managers.
- Accept or suggest revisions to the verification tasks received from the Program Chiefs or Area CVS Coordinators.
- Accept or suggest revisions to the QMS verification criteria received from the Program Chiefs or Area CVS Coordinators.
- Review, in consultation with the National Program Chief, the national frequency for verification tasks at least annually and adjust as required.

18.2.10 Frequency of Verification Visit

The CFIA meat program requires an inspector to visit domestic processing establishments at least once per week.

- Inspectors, supervisors and managers must ensure that establishment visits occur at varied times and proportionately cover all approved shifts as indicated on the approved work shift agreement.
- Coverage must also be provided for establishments that submit a request and are approved to operate outside the approved work shift agreement.
- Certain verification activities will require the inspector to be present at the establishment during periods of non-production i.e. sanitation shifts, preoperational inspections etc.
- An inspector must visit storage establishments at least once every quarter.

Note: For establishments that export, importing countries may require specific inspection frequencies or activities. See Chapter 11 of the MOP for more information.

18.3 Verification of Compliance in Multi-Program Registered Establishments

This section is currently under development

18.4 Organization and Frequency of Verification Tasks

The verification tasks are organized into seven (7) sections and related sub-sections.

Section 1: Food Safety

- Sub-section 1: Specific Control Measures for Product Safety
- Sub-section 2: Prerequisite Programs
- Sub-section 3: Slaughter/Processing Requirements and Control Programs
- Sub-section 4: Food Safety Current Issues
- Sub-section 5: Process Controls

Section 2: Non Food Safety

- Sub-section 1: Labelling Practices
- Sub-section 2: CFIA Stations and Facilities
- Sub-section 4: Non Food Safety Current Issues

Section 3: Export

- Sub-section 1: Export United States
- Sub-section 2: Export Other Than United States
- Sub-section 3: Foreign Country Follow up Requirements
- Sub-section 4: Export Current Issues
- Sub-section 5: Export All Countries

Section 4: HACCP System Design and Reassessment

- Sub-section 1: HACCP System Design and Reassessment
- Sub-section 4: HACCP System Design Current Issues

Section 5: Animal Welfare and Animal Health

- Sub-section 1: Animal Welfare and Animal Health
- Sub-section 4: Animal Welfare and Animal Health Current Issues

Section 6: Program-Specific Verification Tasks (other than meat)

This section is currently under development

Section 7: CFIA sampling

- Sub-section 1: Operator Sampling
- Sub-section 2: Domestic CFIA Sampling
- Sub-section 3: Import CFIA Sampling
- Sub-section 4: Sampling Current Issues

Task Numbering

Each verification task is assigned a number. This number represents the section, sub-section, and sequential task number. The first part of the task number indicates the section, the second part indicates the sub-section, and the last part of the task number represents the sequential task number.

For example:

Task # 2.2.02 is in Section 2: Non Food Safety, Sub-section 2: CFIA Stations and Facilities, and is the second task in this sub-section.

Task #3.1.02 is in Section 3: Export, Sub-section 1: Export United States, and is the second task in this sub-section.

Each verification task is assigned a minimum frequency. These frequencies are determined considering the:

- impact on food safety;
- FSEP manual guidelines;
- type of control measures identified at the establishment;
- regulatory requirements;
- export requirements; and
- state of compliance of the industry as a whole.

The "Verification Task Procedures" provide the procedures for each verification task. Each verification task procedure includes the following information:

- section and sub-section;
- task number;
- task title that summarizes the task;
- minimum frequency;
- the date the task was last revised;
- references to the MIA, MIR and other applicable regulations; and
- the procedure to follow when completing each task to ensure the uniformity of application across the country; each verification task procedure includes:
  - the requirements being assessed by each task;
  - how the inspector must assess the operator's compliance to requirements; and
  - references to the MOP.

18.4.1 Section 1: Food Safety Tasks

Each of the following sub-sections includes verification tasks related to food safety.

- Sub-section 1: Specific Control Measures for Product Safety

The control measure verification tasks are designed to assess the implementation and effectiveness of the operator's HACCP system to meet regulatory requirements. The tasks include: reviewing the written procedure and the records, interviewing, and observing the procedures being implemented.

The tasks in this sub-section may include operator identified Critical Control Points (CCPs) or other specific control measures recognized by the CFIA. In the case where operator identified CCPs or other control measures are covered by another verification task in Food Safety sub-sections 2, 3 and 5, that CCP or control measure must be verified under that specific task instead of a sub-section task.

- Sub-section 2: Prerequisite Programs

The prerequisite verification tasks are designed to assess the implementation and effectiveness of the operator's prerequisite programs to meet regulatory requirements. The tasks include: reviewing the selected written prerequisite control program and records, interviewing, and observing the procedures being implemented.

- Sub-section 3: Slaughter/Processing Requirements and Control Programs

These verification tasks are designed to assess the implementation and effectiveness of the operator's control programs, as well as compliance with other regulatory requirements related to slaughter and processing operations. The tasks include: reviewing any written control programs, reviewing records, directly observing and interviewing to determine if the regulatory requirements are met and the control programs are implemented effectively, as described.

- Sub-section 4: Food Safety Current Issues

The food safety current issues verification tasks will be developed as required. Tasks may be developed in the following situations:

  - extraordinary requests from the President of the CFIA;
  - need for data collection on a specific subject of interest; and
  - survey to industry.

- Sub-section 5: Process Controls

These verification tasks are designed to assess the implementation and effectiveness of the operator's process controls. The tasks include: reviewing any written programs, reviewing records, conducting independent and correlation tests, directly observing and interviewing to determine if the regulatory requirements are met and the process controls are implemented effectively as described.

18.4.2 Section 2: Non Food Safety Tasks

The non food safety verification tasks are designed to assess compliance with regulatory requirements. The tasks include: reviewing any written programs, reviewing records, directly observing and interviewing to determine if the regulatory requirements are met and the written programs are implemented effectively as described.

Each of the following sub-sections includes verification tasks related to non food safety.

- Sub-section 1: Labelling Practices
- Sub-section 2: CFIA Stations and Facilities
- Sub-section 4: Non Food Safety Current Issues

18.4.3 Section 3: Export Tasks

The export verification tasks are designed to assess compliance with export requirements. The tasks include: directly observing if requirements are respected, reviewing any required written control programs, and reviewing records.

Each of the following sub-sections includes verification tasks related to export requirements.

- Sub-section 1: Export United States
- Sub-section 2: Export Other Than United States
- Sub-section 3: Foreign Country Follow Up Requirements

- Sub-section 4: Export Current Issues
- Sub-section 5: Export All Countries

18.4.4 Section 4: HACCP System Design and Reassessment Tasks

The HACCP System Design and Reassessment tasks are conducted by a CFIA team that is led by an FSEP Specialist Inspector. The team includes the responsible inspector, and if appropriate, a program specialist. An FSEP Specialist Inspector is an inspector who is mainly dedicated to conducting the HACCP System Design and Reassessment tasks and who has a good knowledge of FSEP and the meat program. A Program Specialist must be consulted when validation studies are assessed or when additional expertise is required.

These tasks are designed to assess if the operator's HACCP system:

- is designed to effectively control food safety hazards;
- meets the FSEP and program requirements; and
- is reassessed to ensure food safety hazards remain under control.

These tasks are performed once every two years and whenever the following situations occur:

- submission of new HACCP plans;
- follow-up after a food safety recall;
- failure to meet microbiological performance standards; and
- failure to meet CFIA pathogen control policy requirements.

The tasks might also be performed on special occasions when the integrity of the HACCP system is compromised and support from an FSEP specialist inspector is requested. The supervisor will notify the Area CVS Coordinator of the need for immediate support. The Area CVS Coordinator will contact the Area FSEP Coordinator to evaluate the situation and, when deemed appropriate, provide the necessary support to the inspector.

Each of the following sub-sections includes verification tasks related to HACCP System Design and Reassessment:

- Sub-section 1: HACCP System Design and reassessment
- Sub-section 4: HACCP System Design Current Issues

18.4.4.1 Submission of New HACCP Plans

When an establishment adds a new HACCP plan to its system, this must be communicated to the responsible inspector prior to the commencement of the new process. The CFIA may request a review of the new HACCP plan prior to the commencement of the new process. The supervisor or responsible inspector must notify the Area FSEP coordinator, as well as the Area CVS Coordinator, of the submission of a new HACCP plan. Task 4.1.01 must be carried out within 30 calendar days from the receipt of the new HACCP Plan. The new HACCP plan title must be recorded in box 14 of the verification worksheet CFIA/ACIA 5470 for tracking purpose.

18.4.4.2 Follow-up After a Food Safety Recall

The designated lead inspector must, as per the Food Emergency Response manual:

- monitor the recalling establishment's actions on recovery, control, correction and/or disposition of recalled product;
- monitor the corrective actions taken by the recalling establishment to eliminate the root cause of the deviation; and

- enter follow up reports into the Issues Management System (IMS) in a timely manner.

The responsible inspector is required to contact the Area CVS coordinator when the above activities are finalized. The Area CVS coordinator must contact the FSEP specialist inspector's supervisor. The section 4 verification tasks must be carried out at the recalling establishment within 30 calendar days of the initial recall. The purpose of the HACCP system design verification is to ensure that the recalling establishment has reassessed the HACCP System and made the appropriate changes to prevent the recurrence of the deviation. Additionally, CVS Section 1 task 1.2.34 associated with the implementation of the Recall program must be completed by the CFIA team in conjunction with the section 4 tasks by the CFIA team.

18.4.5 Section 5: Animal Welfare and Animal Health

The Animal Welfare and Animal Health verification tasks are designed to assess compliance with regulatory requirements. The tasks include: reviewing any written control programs, reviewing records, directly observing and interviewing to determine if the regulatory requirements are met and the control programs are implemented effectively as described.

Each of the following sub-sections includes verification tasks related to Animal Welfare and Animal Health.

- Sub-section 1: Animal Welfare and Animal Health
- Sub-section 4: Animal Welfare and Animal Health Current Issues

18.4.6 Section 6: Program-Specific Verification Tasks (other than meat)

This section is currently under development

18.4.7 Section 7: CFIA Sampling

This section incorporates both Operator sampling activities and CFIA sampling activities. Operator sampling activities are based on policy requirements. Tasks that verify export sampling requirements are located under Section 3: Export.

18.4.7.1 Operator Sampling

Operator sampling tasks focus on elements of prescribed sampling programs, including verifying written plans, sampling activities, frequencies and results. Operators are required to notify the CFIA of non-compliant product and environmental results.

Based on the task guidance, if a CAR is issued, follow up sampling may be required. Follow up samples and results received must be documented on the follow up section of the CAR. Follow up sampling results do not require additional CARs to be issued.

The only exception is in the case where an operator notifies the CFIA of a positive *Listeria* environmental sample result. The inspector will issue a CAR under Task 7.1.02. According to Chapter 5 of the MOP, the operator must then conduct product sampling. Should that product sample test positive, the CFIA will issue the operator another CAR under Task 7.1.04.

This ensures the positive **product** sample is differentiated from the **environmental** sample in CVS. The action plan submitted by the operator can be the same action plan for both CARs provided it meets the requirements of an acceptable action plan and addresses both non-compliances.

18.4.7.2 Domestic and Import CFIA Sampling

These tasks encompass the scheduled domestic and import sampling plans conducted by CFIA inspectors in the field. It should be noted that these sampling tasks differ from other CVS tasks. The task rating is determined by the analysis result and not by the information gathered. In addition, there are no criteria to

verify other than the the sample collection. Each task will contain a certain amount of follow up guidance; however, in each case, the MOP and current guidelines must always be consulted.

Domestic - Microbiological

In the case of domestic meat products sampled in accordance with the CFIA Microbiological Sampling Program, non-compliant or unsatisfactory product analysis results indicate that the operator does not meet the regulatory requirements related to the manufacturing of edible meat products.

Follow up samples that are related to an initial non-compliant or unsatisfactory result must be documented on the follow up section of the CAR. Non-compliant or unsatisfactory follow up sampling results do not require additional CARs to be issued.

The only exception is in the case where product samples are collected as a result of non-compliant environmental sampling results (Task 7.2.11). The product sample must be collected and documented on the verification worksheet under Task 7.2.01. If the product analysis result is non-compliant, another CAR is issued under Task 7.2.01.

This ensures the positive **product** sample is differentiated from the **environmental** sample in CVS. The action plan submitted by the operator can be the same action plan for both CARs provided it meets the requirements of an acceptable action plan and addresses both non-compliances.

Domestic - Chemical

These tasks are typically conducted at slaughter establishments. The tasks must be coded "C" when completed, regardless of the analysis result. Unsatisfactory results are generally not a result of non-compliance by the operator and therefore do not result in the issuance of a CAR.

Import - Microbiological and Chemical

These tasks assess the compliance of imported products with Canadian standards. These tasks are coded "C" when completed, regardless of the analysis result. Unsatisfactory results are not a result of non-compliance by an operator and therefore do not result in the issuance of a CAR.

18.5 Amendments to Verification Tasks

A Verification Task Comment Submission Form must be completed and submitted to the Area CVS Coordinator when verification task procedures need to be revised or when a new verification task is requested. Reasons for amendments may include: a change in regulatory requirements, a change in importing countries requirements, clarification of policy, or suggestions from inspectors or program specialists to amend or reword a task.

The Verification Task Comment Submission Form is available through Desktop E-Forms (See section 18.8 - List of forms). Instructions on how to complete the request are included with the form.

The request for amendments to verification tasks must:

- reflect the approach and style established for the tasks;
- support the common assessment for similar issues between groups/species; and
- include accurate references to the MOP and appropriate act and regulations.

Only requests submitted on the Verification Task Comment Submission Form will be considered. The form must follow the identified distribution path. At each step the form is reviewed and adjusted as required. The distribution path for the form is as follows:

- Forms initiated by Field staff are distributed from Field staff → Area CVS Coordinator → National CVS Coordinator.

- Forms initiated by Programs Network staff are distributed from Program Network Staff → National Program Chief → National CVS Coordinator.

At each step the form is reviewed and adjusted as required.

The Area CVS coordinator reviews the proposed revisions, additions or deletions to the verification tasks received from inspectors and supervisors with Area program specialists. The proposed revisions, additions or deletions are then forwarded to the National CVS Coordinator for review and acceptance.

Changes to the verification tasks will be made by the National CVS Coordinator in consultation with the National Program Chiefs. Changes that coincide with amendments to the MOP and/or Acts and Regulations will be communicated via MOP directives. Inspectors must update their Chapter 18 accordingly.

18.6 Assignment of Verification Tasks to Establishment

The inspector completes the Establishment Task Profile by selecting verification tasks that are applicable to the establishment. This information is entered into the CVS database by the Responsible Inspector.

The Establishment Task Profile template is available in the CVS application and will include all verification tasks that may be applicable to the Establishment.

The Establishment Task Profile is completed/reviewed by the inspector annually at the same time as the operator's licence is renewed. The Establishment Task Profile is also completed by the inspector when:

- a new establishment begins operation;
- operations change in an establishment;
- program requirements that impact the establishment change; and
- verification tasks that impact the establishment are amended.

The Establishment Task Profile must be approved by the Supervisor prior to inclusion in the CVS database.

The Task Tracking Table is used by inspection staff to track the delivery of the verification tasks at each establishment. The Task Tracking table includes:

- the establishment number;
- the task name;
- the task number;
- the task frequency; and
- the field to enter the applicable rating or code when each task is completed.

Note: Inspectors must ensure that in the case where operator identified CCPs or other control measures are covered by specific verification tasks, the related verification task is used to verify the process and not task 1.1.08 CCP (Generic) task.

18.7 Verification Task Process

There are seven steps to the verification task process:

- Step 1 - Preparation for the Verification
- Step 2 - Gather Information to Determine Compliance
- Step 3 - Assign Compliance Level

- Step 4 - Communicate Results and Action Required
- Step 5 - Asess Operator's Action Plan
- Step 6 - Follow-up
- Step 7 - File Maintenance

18.7.1 STEP 1 - Preparation for the Verification

This section is divided in three components:

- Preparation for conducting sections 1, 2, 3, 5 and 6 verification tasks by the inspector.
- Preparation for conducting section 4 verification tasks by a CFIA team.
- Preparation for conducting section 7 verification tasks by the inspector.

18.7.1.1 Preparation for Conducting Sections 1, 2, 3, 5 and 6 Verification Tasks

An integral part of CVS Task preparation includes the inspector's responsibility for being aware of current conditions, processes and areas of concern in the establishment. An inspector must conduct a tour of the entire establishment once a month to forecast and prioritize verification tasks that will be performed during the upcoming month(s).

Note: In storages, the establishment tour is conducted once per quarter.

As part of the tour, the inspectors will review the operator's HACCP Log Book for updates or changes to the HACCP System that have a significant impact on food safety (e.g. new CCP, new allergen ingredient, new equipment etc.). Log book updates or changes may influence the prioritization of verification tasks. If significant changes are made to the HACCP system, the inspector must contact the Area CVS Coordinator to consult. The Area CVS Coordinator may determine that the HACCP System Design and Reassessment task must be conducted in the case of the operator's proposed amendments.

Inspectors will document the tour by entering the applicable code on the verification worksheet and must also record the conclusion (tasks to be considered when planning upcoming inspection activities) in the "Activities conducted to assess compliance" box.

Prior to conducting a verification task, the inspector:

- Determines which verification task to perform by:
    - Considering items of concern identified during their tour through the establishment or during other CFIA verification activities;
    - Identifying tasks from the Task Tracking Table that are due to be completed according to the frequency;
    - Identifying products that are not produced frequently but are being produced and selecting the task which addresses these products or the processes associated with these products;
    - Reviewing the Verification Worksheet for the last time this task was completed to determine what was assessed during the preceding verification; and
    - Ensuring that the selection of processes, rooms, areas and equipment is varied throughout the establishment.

- Identifies written programs and records to be requested from the operator.

- Obtains written programs and records required to perform the verification task. This information may be requested from the operator in advance.

18.7.1.2 Preparation for Conducting Section 4 Verification Tasks

Development of a Scope for the Verification

The verification scope should at least include a review of:

- senior management letter of commitment;
- HACCP system performance reporting;
- reassessment procedures;
- one (1) HACCP plan; and
- six (6) prerequisite programs sub-elements.

Selection of HACCP Plan(s) and Prerequisite Programs to be Verified

The selection will be based on CFIA compliance documentation and situations that have occurred at the establishment that should have resulted in an update and/or a reassessment of parts of the HACCP system.

The CFIA team must review 6 -12 months of CFIA compliance documentation. The types of data that should be reviewed are:

- plant compliance history (CAR) including operator's corrective action plans;
- consumer complaints investigated by the CFIA;
- CFIA sample results including operator's corrective action plans when unsatisfactory results were obtained;
- detention and other enforcement issues or actions; and
- new regulatory requirements related to food safety.

The CFIA team must then interview the appropriate establishment representative(s) and review the establishment's log book to determine whether any of the following situations have occurred:

- new product;
- new product line that can potentially cause cross-contamination;
- new ingredient or incoming material that come in contact with the product or are used for preparing the product;
- new ingredient or product that contains allergen;
- new process step;
- new technology or piece of equipment that impacts on the level of a hazard (i.e. eliminate, reduce or increases the level of biological, chemical or physical hazards);
- potential of cross-contamination due to new/ongoing construction or change in the product flow and or employee traffic patterns;
- new control measure for an identified hazard;
- change made in product description (shelf life, labelling instruction, finished product distribution, etc.);
- change made in product formulation;
- change made in processing methods that required new training and new control measures;
- change made in production volume that impact on the product flow, sanitation schedule, employee training, etc.;
- change made in sanitation/cleaning procedures (i.e. decrease or increase of time, temperature, chemical strength during CIP operations);
- change made in the application of current control measure at a CCP (e.g. change in critical limit);
- change made in the application of a current control measure at a prerequisite program bullet;
- emergence of a previously unidentified hazard;
- company's unsatisfactory lab results;
- consumer or client complaints related to food safety; and

- food safety recall.

Task 4101 - HACCP Plan

If there is CFIA compliance documentation, or changes as outlined in the list of triggers above which affect a HACCP plan, add the HACCP plan to the scope of the verification and perform the task. The review of one (1) HACCP plan should allow for the determination of effectiveness of the operator's HACCP system design and reassessment procedures, as well as effectiveness of implementation.

If there is CFIA compliance documentation, or if there are changes which trigger the review of CCP(s) and/or PC(s) included in other HACCP plan(s), add the CCP(s) and/or PC(s) to the scope of the verification.

If there is no CFIA compliance documentation or there are no changes which affect a HACCP plan, select one HACCP plan. Priority must be given to selection of a HACCP Plan that presents a higher risk to human health if control is not maintained.

Selection of Prerequisite Program Sub-elements

If there is CFIA compliance documentation, or if there are changes as outlined in the list of triggers above which affect one or more prerequisite program sub-elements, include the corresponding prerequisite program sub-elements in the verification scope.

If there are less than 6 prerequisite program sub-elements included in the scope, select additional sub-elements to reach a total of six sub elements.

Note: Prerequisite program sub-elements have been grouped according to their impact on food safety (see Table 1), with Group 1 having the most impact and Group 3 having the least. Priority must be given to the selection of sub-elements in group 1. Different sub-elements than those selected during previous verification should be selected.

Table 1. Grouping of Prerequisite Program Sub-elements

Group 1	Group 2	Group 3
Premises: A 4.1 Water/Steam/Ice **Transportation, Purchasing, Receiving, Shipping and Storage:** B 2.1 Purchasing/Receiving/Shipping B 2.2 Storage **Equipment:** C 1.2 Equipment Maintenance and Calibration **Personnel:** D 2.1 General Food Hygiene Program **Sanitation and Pest Control:** E 1.1 Sanitation Program **Allergen Control Program:** G.1.1 Allergen Control Program **Recall:** F.1.2 Product Coding and Labelling	**Premises:** A 2.1 Building design, Construction and Maintenance A 2.2 Lighting A 2.3 Ventilation A 2.4 Waste and inedible disposal A.3.2 Hand washing Stations & Sanitizing Installations **Transportation, Purchasing, Receiving, Shipping, and Storage:** B 1.1 Food Carriers **Equipment:** C 1.1 Design and Installation **Personnel:** D 1.1 General Food Hygiene Training Program D.1.2 Technical Training **Sanitation and Pest Control:** E 2.1 Pest Control Program	**Premises:** A 1.1 Outside Property A 3.1 Employees' Facilities **Recall:** F 1.1 Recall Plan

Development of a Scope When New HACCP Plans are Submitted

In case of submission of new HACCP plans, the scope will be limited to the HACCP plan(s) submitted.

The CFIA team will perform task 4101 - HACCP Plan.

Development of a Scope When Follow-up is Required After a Food Safety Recall

In case of a follow-up after a food safety recall, the FSEP Specialist Inspector will determine which section(s) of the HACCP system must have resulted in a reassessment by the operator by:

- considering the findings of the CFIA Lead Investigator on the IMS;
- discussing the recall with Program Specialists, the responsible inspector and any other CFIA personnel who may have been involved in, or have knowledge of the recall; and
- reviewing any action plans submitted to the CFIA by the establishment.

The scope must be limited to those HACCP plan(s)/CCP(s)/prerequisite program(s) that the company was required to reassess and update as a result of the recall. The Recall program must be included in the scope of the verification to determine its effectiveness. CVS task 1.2.34, associated with the implementation of the recall program, has to be completed by the CFIA team in conjunction with section 4.

Opening Meeting with the Operator Representative(s)

During the opening meeting, the FSEP specialist inspector:

- introduces the members of the CFIA team to the operator representative(s);
- explains the purpose of the assessment of the HACCP system design and reassessment procedures and how it differs from the day-to-day verification that is done by the inspector;
- finalizes the verification scope;
- obtains the applicable company's written prerequisite programs, HACCP plans and other related documentation; and
- confirms the expected duration of the verification according to the scope.

18.7.1.3 Preparation for Conducting Section 7 Verification Tasks

Inspectors must ensure that they have the necessary supplies, equipment and related training to collect the sample. Establishment processing schedules must also be considered to ensure that samples are collected as close to scheduled dates as possible. In every case, the current sampling guidelines and applicable MOP sections are consulted.

18.7.2 STEP 2 - Gather Information to Determine Compliance

18.7.2.1 Gathering Information to Determine Compliance

The "Verification Task Procedures" detail how to gather information to determine compliance for each task.

The tasks permit a thorough, in-depth evaluation of the operator's compliance to regulations, including implementation of their HACCP system within a limited time frame.

Inspectors are to seek guidance and program clarifications as required.

Using the task procedure, inspectors will collect information by:

- observing procedures being implemented, using the written program as a reference (e.g. watching employees at work, watching employees taking measurements);
- inspecting (e.g. evaluating equipment cleaning or building maintenance);
- interviewing designated employees using the written program as a reference; and
- reviewing documentation (e.g. HACCP system written programs and records).

When using the operator's written program as a reference, the inspector should be concerned with the following:

Note: The operator's written program can be any document that the operator uses to record an instruction, process or procedure. For example, it could be Standard Operating Procedures (SOPs), Facility Manuals, Training Material, Prerequisite Programs, HACCP Plans, etc.

1. written program(s) that do not meet regulatory requirements;
2. incomplete finding(s) that affect the integrity and effectiveness of the operator's written program; and
3. incomplete finding(s) which results in situations in which potential hazards are not controlled.

The situations listed above are considered deviations that affect the integrity of the HACCP System. Therefore, the inspector must rate the associated task "U" and issue a CAR. The inspector can always ask for support from the FSEP Specialist before rating the task "U" or prior to the follow-up of the action plan. The inspector must not wait for the Section 4 Verification Tasks to resolve the problem.

If the integrity of the entire HACCP system is compromised, the inspector must contact the Area CVS coordinator, who will evaluate the situation and provide the necessary support to the inspector.

Inspectors are to review the operator's written program and records at the establishment. Inspectors may obtain photocopies of these documents when they have reasonable grounds to believe that the documents are directly related to non-compliance with the MIA, MIR or other applicable legislation.

Records will be examined for completeness and accuracy. It is not necessary to examine all the documentation that is available; a sample of the records produced since the last verification shall be taken for review. If any significant deviations or problems are encountered, the inspector must expand the record review to determine the extent of the problem.

If the inspector encounters a situation where the operator is unwilling or unable to take action to protect public health, protect consumers from fraud or protect animal welfare or health, the inspector must initiate actions to control the situation (see MOP Chapter 14).

18.7.2.2 Unscheduled Verification Findings (Stumble On)

When conducting a task or other inspection activity, if the inspector identifies a deficiency that is not related to the current verification activity (a stumble on), the following actions must be initiated:

- The inspector verbally notifies the operator of the deficiency.

- The inspector is responsible for taking enforcement action(s) when necessary to protect public health, to protect consumers from fraud and to protect animal welfare or health.

- If the deficiency requires that the CFIA take immediate enforcement action(s), the inspector adds the verification task related to the deficiency to the scope of the current verification activity and completes only the applicable sections of the task related to the deficiency, including record review.

Note: The entire task must be conducted at the required frequency during subsequent visits to the establishment.

- If the deficiency does not require that the CFIA take immediate enforcement action(s), the inspector considers selecting the task related to the deficiency at a subsequent visit to the establishment.

When a stumble on finding is identified during the HACCP System Design and Reassessment tasks, the following actions should be initiated:

- The FSEP specialist inspector verbally notifies the operator of the deficiency.

- If the deficiency does not require that the CFIA take immediate enforcement action(s), the FSEP specialist inspector considers whether the task related to the deficiency should be conducted by the responsible inspector at a subsequent visit to the establishment. If so, the responsible inspector or the FSEP Specialist inspector must note on the verification worksheet CFIA/ACIA 5470 in the "Activities conducted to assess compliance" section that this task must be completed at a subsequent visit.

- If the deficiency requires that the CFIA take immediate enforcement action(s), the team adds the operator's written program related to the deficiency to the scope of the verification. The team must assess whether the written program is designed to effectively control the hazard.
  - If the written program is not designed to control the hazard, the HACCP system design task is assigned a compliance rating of 'U' and a Corrective Action Request (CAR) is issued.
  - If the written program is designed to control the hazard but was not implemented correctly, a Corrective Action Request (CAR) must be issued by the inspector under the verification task related to the deficiency.

18.7.2.3 Identifying Non-compliance That is Related to an Open CAR

This situation may occur as a "stumble on" or during completion of a scheduled verification task. In either situation, the inspector must consider:

- Is there an immediate food safety risk?
- Has the operator attempted to correct the problem and is he or she in control of the situation?

Ultimately, the inspector must judge whether this situation demonstrates a loss of control by the operator.

If the operator is not in control, the inspector:

- Takes immediate enforcement action, as necessary, i.e. holds product or stops the process until control is restored by the operator;
- Documents these actions/activities on the follow up section of the CAR. This will serve as information gathered to support the decision as to whether or not to close the CAR when the date for completion of corrective measures arrives;
- Informs the operator immediately that this information will be documented on the CAR and will be considered to determine whether the CAR can be closed or not.
- Enters a "U" on the worksheet and notes the original CAR number in Box 15 (items requiring correction) of the worksheet where the task was being conducted as per the prescribed frequency. A new CAR is not generated. However, it may be necessary for the operator to amend his or her action plan. This will be discussed during the meeting with the operator. This information gathered will support the decision as to whether or not to close the CAR when the date for completion of corrective measures arrives.

If the operator is in control, the inspector:

- May note the information on the follow up section of the open CAR. This will serve as information gathered to support the decision as to whether or not to close the CAR when the date for completion of corrective measures arrives.
- Enters an "A" on the worksheet where the task was being conducted as per the prescribed frequency.

Note: In slaughter establishments, the Veterinarian in Charge is responsible for reviewing and signing the CAR.

18.7.2.4 Recording Information Gathered to Determine Compliance

The information gathered is recorded by the inspector/FSEP specialist inspector on two worksheets:

- The Verification Worksheet (see 18.7.2.5); and
- The HACCP System Design Verification Worksheet (see 18.7.2.6)

Notes made on the verification worksheets must be clear and concise and must accurately reflect the conditions observed or an answer to a question. As the completed worksheets are part of the CVS file, subjective comments, personal opinions, etc. are inappropriate.

The verification worksheets are available through Desktop eForms (See section 18.8 - List of Forms). Detailed instructions are included with each worksheet and are available in two formats: as pop-up help (where help appears when you place the cursor over a field) and as a printable instruction page.

18.7.2.5 Verification Worksheet

The Verification Worksheet is completed by the inspector and is used to record:

- establishment information and proof of daily presence for United States eligible establishments;
- verification task performed or applicable code for activities performed in lieu of a verification task;
- activities conducted to assess compliance;
- level of compliance (rating) or code assigned to each task; and
- items requiring correction.

The Worksheet is completed each time the inspector or the CFIA team visits the establishment to do a verification task or a verification activity.

Note: For section 4 tasks, the inspector will not be required to describe the activities conducted to assess compliance on the verification worksheet as this information will be recorded on the HACCP System Design Verification Worksheet. If a section 4 task is assigned an unacceptable level of compliance, the appropriate field of the Verification Worksheet will be completed to make reference to the CAR number.

If the inspector visits a stand alone processing establishment for reasons other than doing a verification task, the reason for the visit must be recorded on the Verification Worksheet. In situations where the inspector's home office is at an establishment, each visit must be documented on the Worksheet. Specific instructions and codes for other activities are included on the Verification Worksheet. The Worksheet is for use by the inspector only and not for presentation to the operator. Information related to items requiring correction will automatically populate the Verification Report which is then presented to the operator.

The following is a list of codes that are used when completing the Verification Worksheet.

Verification Task Codes

E The inspector is unable to complete a task according to the prescribed frequency because the establishment/process was not operating. The inspector only assigns this code to the task when the frequency for the task has expired.

I The inspector is unable to complete a task according to the prescribed frequency for a reason other than the establishment/process was not operating. The inspector only assigns this code to the task when the frequency for the task has expired.

P Task started but not completed (rating is pending).This code is used when an Inspector begins a task and is unable to complete it during that visit. It is also used when a sample is submitted to a Lab and results are pending. When the results of the sample are received the inspector would make a new entry and apply the appropriate rating.

C Task was completed and rating is not required. This code is used when a task does not require a rating and applies to some current issue tasks that are in the form of a survey and certain sampling tasks such as import samples where a rating does not apply.

Activity Codes

9000 Other inspection duties: sampling, consultation with operator, returned/rejected loads, consumer complaint follow up, recall
9001 Import or export activities: export certification, import reinspection, returned/rejected import loads.
9002 Administration: emails, filing, expenses, month end report
9003 Follow-up on CARs and items requiring corrections
9005 Supervisory visit
9006 Establishment closed for the week
9010 Monthly tour of establishment by inspector

18.7.2.6 HACCP System Design Verification Worksheet

The HACCP System Design Verification Worksheet is used by the FSEP specialist inspector to record items requiring correction identified during the completion of the HACCP System Design Verification Tasks. The Worksheet may only be used by the FSEP specialist inspector and must not be presented to the operator. Information related to items requiring corrections that are entered on the Worksheet will automatically populate the HACCP System Design Verification Report, which is then presented to the operator.

Note: When the HACCP System Design Verification Tasks are completed at an establishment, both the HACCP System Design Verification Worksheet *AND* the Verification Worksheet must be completed.

18.7.3 STEP 3 - Assign Compliance Level

Each task is assigned a level of compliance and rated accordingly. Based on the information gathered during the completion of a verification task, inspectors assign one of the following levels of compliance:

Acceptable level of compliance (task rated "A")
Unacceptable level of compliance (task rated "U")

18.7.3.1 Acceptable Level of Compliance (A)

The level of compliance is **acceptable** when the information gathered demonstrates:

- There are no deviations that :
  - could cause or have caused product contamination or adulteration;
  - affect the integrity of the HACCP system or other control programs;
  - represent fraud;
  - affect animal welfare or health; and
  - contravene requirements related to CFIA Inspector facilities and/or stations.

- There are no deviations to applicable export requirements

The inspector may identify minor items that have no impact on food safety and/or do not compromise the intent of applicable legislation. In this case, the level of compliance is still considered Acceptable and the task is rated "A".

Documentation of these items is required if there is an added value (this means that the inspector determines that a follow-up is required and that keeping track of these items will demonstrate trends of non-compliance). These items are documented on the verification worksheet and presented to the operator in the Verification Report.

18.7.3.2 Unacceptable Level of Compliance (U)

The level of compliance is **unacceptable** when the information gathered demonstrates:

- there are deviations to the applicable regulatory requirements or HACCP system that:
  - could cause or have caused product contamination or adulteration;
  - affect the integrity of the HACCP system or other control programs;
  - represent fraud;
  - affect animal welfare or health; and
  - contravene requirements related to CFIA Inspector facilities and/or stations.

- deviations to applicable export requirements.

Whenever a verification task is rated as "U"*, a CAR must be issued as per section 18.7.4.3.

*When non-compliance that is related to an open CAR is identified, see section 18.7.2.3.

18.7.3.3 Guidance for Assigning a Level of Compliance

Inspectors must assess all of the information gathered prior to assigning a compliance level to a task. Every situation has to be assessed based on the context and using professional judgment to make compliance determinations.

What is meant by "deviations that could cause product contamination or adulteration"?

The operator's HACCP system failed to identify and/or control a biological, chemical or physical hazard in a product or in an environment which may compromise the safety of the product being produced. For example:

- employees in contact with product are not adhering to hygienic practices;
- not doing a full clean up after processing products that contain allergens;
- not controlling condensation on overhead structures in a processing area;
- cross-contamination of raw and cooked products;
- allowing inedible material to come in direct or indirect contact with edible product;
- not controlling evisceration accidents resulting in contamination of equipment, employees and/or area;
- floors and walls that cannot be adequately cleaned due to overcrowded conditions;
- lighting that is not adequate to enable establishment employees to determine whether a substance on product is fecal material;
- temperature abuse of product which could allow an increased bacterial load;
- thermal process critical limit not met and no action taken by the operator; and
- improperly labelling allergens.

What is meant by "product adulteration"?

As per the definition of "adulterated" in section 2(1) of the MIR:

"adulterated" means, in respect of a meat product intended for sale, use or consumption as an edible meat product in Canada,

(a) containing or having been treated with
(i) a pesticide, heavy metal, industrial pollutant, drug, medicament or any other substance in an amount that exceeds the maximum level of use prescribed by the Food and Drug Regulations,
(ii) an ingredient, a food additive or any source of ionizing radiation not permitted by or in an amount in excess of limits prescribed by these Regulations or by the Food and Drug Regulations,
(iii) any poison, decomposed substance or visible contamination, or
(iv) any pathogenic microorganism in excess of levels published in the Manual of Procedures.

What is meant by "compromises the integrity of the HACCP system"?

Deviations from the design or the implementation of the HACCP system that result in situations in which identified hazards are not controlled. For example:

- The operator is not performing the monitoring and/or verification procedures at the frequencies specified in the CCP or prerequisite program, which results in a loss of control over the identified hazard.
- The operator is not conducting the monitoring and/or deviation procedures as specified in the CCP, which results in a loss of control over the identified hazards.
- The operator is following his or her written HACCP system, but it is not effective and it does not meet the regulatory requirements.

- The operator is producing new products and the HACCP system has not been reassessed, which results in situations in which hazards are not controlled.

What is meant by "compromises the integrity of other control programs"?

Deviations from the design or the implementation of a control program required as per the Meat Hygiene Manual of Procedures, which results in situations in which potential hazards are not controlled or in which consumers are deceived with regards to the quality of a food product. For example:

- The operator is not following its Boneless Meat written program, resulting in a loss of control over the quality of the food product.
- The operator is not following the Modernized Poultry Inspection Program (MPIP) presentation control program, resulting in situations in which potential hazards are not controlled.

What is meant by "fraud"?

Violation of regulations, resulting in situations in which consumers are deceived as to the nature, origin, quality or quantity of a food product. For example:

- false labelling information;
- AA meat packaged in boxes labelled AAA; and
- pork and beef sausages labelled as all beef sausages.

What is meant by "affects animal welfare"?

Violation of regulations which result in:

- inhumane treatment of animals during the transport of animals to the establishment;
- inhumane treatment of animals in the yard/barn; and
- inhumane stunning or bleeding of animals.

What is meant by "affects animal health"?

Related to ante-mortem inspection:

- failure to segregate animals exhibiting signs of foreign animal disease (FAD) - for example in hogs, vesicular lesions on the snout; and
- failure to train plant staff to perform ante-mortem inspection or screening for possible FAD or zoonosis.

Related to livestock traceability:

- failure to record and report any identification or tag numbers or animals coming through the premise;
- failure to keep records or respond to deviations in livestock identification and/or Poultry Flock Sheets; and
- failure to identify and keep records for vehicles used to transport animals.

Related to specified risk material (SRM):

- failure to implement an effective program to exclude SRM from animal feeds, pet foods and fertilizers.

Related to biosecurity:

- failure to ensure that poultry crates and transport vehicles are free of visible organic matter when leaving the establishment; and
- failure to maintain a foreign animal disease contingency plan

Related to special situation disease control or depopulation:

- failure to comply with regulations when slaughtering animals under special order or licence (e.g. cervid slaughter, animals designated by animal health as "of concern", Tuberculosis (TB) reactors); and
- failure to identify those animals transported under permit or special animal health circumstance.

What is meant by "contravenes requirements related to CFIA Inspector facilities and/or stations"?

Deviations that result in:

- occupational Safety and Health of inspectors being compromised;
- ergonomic considerations being compromised;
- impeded and unsafe access to travel from inspection stations to other areas of the establishment; and
- failure to provide amenities as prescribed by the *Meat Inspection Regulations, 1990* and detailed in the Meat Hygiene Manual of Procedures.

18.7.4 STEP 4 - Communicate Results and Action Required

Results of the verification tasks are communicated to the operator through three documents:

- the Verification Report (see 18.7.4.1);
- the HACCP System Design Verification Report (see 18.7.4.2); and
- the Inspection Report - Corrective Action Request (CAR) (see 18.7.4.3).

Note: For the purpose of this chapter, the Inspection Report - Corrective Action Request will be referred to as a CAR.

These reports are available through Desktop eForms (See section 18.8 - List of forms). Detailed instructions are included with each form and are available in two formats: as pop-up help (where help appears when you place the cursor over a field) and as a printable instruction page.

These documents are presented to the operator in accordance with the following guidance:

- meetings with the operator (see 18.7.4.5); and
- HACCP System Design closing meetings (see 18.7.4.6).

18.7.4.1 Verification Report

The Verification Report is used to communicate any items requiring correction by the operator, as identified during the completion of the verification tasks (other than those deviations recorded on a CAR). All information that appears on the Verification Report is automatically populated from the data entered by the inspector on the Verification Worksheet.

The Verification Report must be issued to operators once per week if there are items identified for correction. At a minimum, the verification report must be issued at least once per month, even if no deficiencies have been identified.

The Verification Report is issued at least quarterly at storage establishments.

18.7.4.2 HACCP System Design Verification Report

The HACCP System Design Verification Report is used to communicate any deficiencies that were identified during the completion of the HACCP System Design and Reassessment Verification Tasks.

All information that appears on the HACCP System Design Verification Report is automatically populated from the data entered by the inspector on the HACCP System Design Verification Worksheet.

18.7.4.3 Inspection Report - Corrective Action Request (CAR)

A CAR is issued to an operator by CFIA inspectors whenever a verification task is assigned an unacceptable level of compliance. The CAR identifies the non-compliance and requires the operator to implement corrective measures by:

- providing an acceptable action plan by a specified date; and
- effectively implementing the corrective and preventative measures as described in the action plan by a specified date.

The CAR also describes the information gathered during the follow-up inspection conducted after the date for completion of corrective measures specified on the CAR.

When non-compliance is identified, the inspector must prioritize his or her activities to ensure that immediate inspectional control is initiated and actions are taken, where appropriate. It is the responsibility of the operator to implement temporary measures as necessary in order to meet the regulatory requirements prior to continuing the process/activity. The operator must then investigate the cause of the deviation and apply corrective actions to bring the control measure, CCP, prerequisite program or other regulatory requirement under control. These corrective actions must be implemented immediately (prior to action plan submission or request for a CAR review).

The inspector verbally informs the operator of his/her intention to issue a CAR as soon as the non-compliance is identified. The inspector must endeavour to issue the CAR on the same day that the operator is verbally notified or the next day.

The date specified by the inspector for completion of corrective measures must reflect the seriousness of the non-compliance. The maximum timelines for submission of an action plan and completion of corrective measures are only intended as a guide. In cases where food safety is compromised, a shorter timeline must be specified.

Note: In slaughter establishments, the Veterinarian in Charge is responsible to review and sign the CAR.

18.7.4.4 Guidance for the Description of the Non-compliance

The non-compliance must be described in clear, factual and concise terms. The description of the non-compliance includes two components:

Component 1:

The first shaded box in each task contains a statement. This statement describes what is being assessed when conducting the task. When non-compliance is identified, the statement is not being achieved. Consequently, the negative form of the statement is used as Component 1.

For example: In any sub-section 1 control measure task, "The operator meets the regulatory requirements related to effectively implementing a HACCP Plan" is what is being assessed. If an Inspection Report -CAR must be issued under this task, Component 1 would state: "The operator **does not** meet the regulatory requirements related to effectively implementing a HACCP Plan"

Component 2:

Describe the deficiency in clear and factual terms that:

- accurately reflect the deficiency identified;

- do not offer solutions or opinions; and
- are related to the task.

The description of deficiencies must:

- **Include what was observed, measured or obtained** through interviews, as they relate to the deficiency. Include where and when deficiencies were noted as well as the name or title of anyone interviewed.

  Such as, "May 10, 2007 10:45 am observed in the cutting room."

- **If deficiencies were noted during the record review**, include a summary of the review related to the deficiency. Include the name and date of the records reviewed and the deficiency noted.

  Such as, "Reviewed the Cooking Reports for June 2007 and deviations were identified on June 5th, 6th, and 7th but the deviation procedures were not implemented …"

- **If deficiencies were noted during the written program review**, include the name of the written program reviewed and the deficiencies noted.

  Such as, "HACCP plan X, CCP2B: Monitoring procedures do not meet FSEP Manual requirements. No frequency identified."

- **If the operator took control of product(s)**, include a summary of the control.

- **If the CFIA took action to control a product or thing**, include a summary of the action. This action includes the application of a held tag, seizure and detention of a meat product or thing, the refusal to certify a product for export or the initiation of a mandatory recall.

- **If there is a recently closed CAR related to this task with the same cause of the deviation**, link this CAR to the closed CAR by referencing the number of the closed CAR on the new CAR and stating what corrective actions were implemented on the closed CAR, and stating that these actions were ineffective. The inspector should only link CARs when they were issued for the same task and the non-compliances are from the same cause.

Note: The purpose of linking CARs is to provide notification to the operator that the previous actions were ineffective, or were not implemented in a way that is preventing the non-compliance from recurring, and that a similar action plan will not be accepted for this CAR.

18.7.4.5 Meeting with the Operator

The inspector will meet with the operator at least once a week to discuss findings and any CARs and/or the Verification Report. This meeting must occur at least quarterly in storage establishments. During meetings with the operator, the inspector must communicate in a clear professional manner. The operator may also want to share information or concerns at this time.

In addition, the inspector and operator should discuss pertinent issues such as new policy changes, planned changes at the establishment, etc. Periodically, or at least once a month, the inspector must ask the operator if any new CCPs have been developed and implemented.

If a CAR was issued to the operator, the inspector:

- discusses the non-compliance with the operator and clarifies any concerns or questions that the operator may have regarding the description of the non-compliance;

- informs the operator that the non-compliance described in the CAR requires implementation of corrective measures which include: submission of a written acceptable action plan and the effective implementation of the corrective and preventative measures described in the acceptable action plan;

- requests an acceptable action plan from the operator to respond to the non-compliance described in the CAR. Informs the operator that the action plan:
  - must include items described in section 18.7.5.1 of this chapter; and
  - must be fully implemented by the date specified by the inspector. The date specified by the inspector should reflect the seriousness of the non-compliance. The maximum time for completion of corrective measures is 60 calendar days from the date the CAR is issued.

- specifies a date the operator is required to submit an acceptable action plan. The date specified by the inspector should reflect the seriousness of the non-compliance. The maximum time for an action plan to be submitted is 14 calendar days from the date the CAR is issued;

  Note: Some tasks have prescribed timelines for action plan submissions (e.g. 7.2.02 and 7.2.11).

- informs the operator that the action plan will be reviewed by the CFIA for acceptance and that a failure to develop an acceptable action plan by the date specified on the CAR may result in the initiation of the process to suspend the operator's licence to operate pursuant to ss.29.2(1) of the *Meat Inspection Regulations, 1990;*

- informs the operator that the CFIA will conduct a follow-up inspection after the date specified for the completion of corrective measures. The follow-up inspection is to verify that the action plan was implemented as written and to verify the effectiveness of the implementation in correcting and preventing the reoccurrence of the non-compliance.

- Informs the operator that a failure to implement corrective measures in relation to the non-compliance noted by the date specified in the CAR may result in the initiation of the process to suspend the operator's licence to operate pursuant to ss.29.2(1) of the *Meat Inspection Regulations, 1990*;

- obtains the operator representative's signature on the CAR to indicate they were notified of the non-compliance(s) and they agree to provide an acceptable action plan and correct the deficiencies;

  If the operator refuses to sign the CAR, the inspector:

  - notes in the Description of Non-Compliance section of the CAR that the operator refused to sign the CAR, and that a copy was left with the operator representative, specifying his or her name and title.
  - informs the operator that they must follow Chapter 18.7.4.8 if he or she wishes to request a review of the CAR; and
  - informs the operator that he or she is required to correct any immediate food safety deficiencies described on the CAR while the CAR is subject to the review process.

  If the operator refuses to correct the immediate food safety deficiencies described on the CAR, the inspector must take enforcement action as necessary and document the actions taken on the follow-up section of the CAR.

- provides the operator representative with a copy of the CAR.

If a Verification Report is issued to the operator (at least once per month in processing and slaughter establishments or at least once per quarter in Storage establishments), the inspector:

- discusses the items requiring correction listed on the Verification Report and the developing trends of non-compliance that those items indicate;

- informs the operator that items requiring correction listed on the Verification Report require correction within 30 calendar days of the date that the verification report was issued and that a failure to correct these deviations may result in the issuance of a CAR;

- informs the operator that 30 calendar days after the date the verification report was issued, the CFIA will follow up to verify the items requiring correction have been corrected;

- obtains the operator representative's signature on the Verification Report to indicate that he or she was notified of the items requiring correction and that he or she agrees to correct these items within 30 calendar days of the date the verification report was issued. If the operator fails to sign the report, the inspector notes on the report that the operator refused to sign the report and that a copy was left with operator representative, (name) and (title). The items still require correction and the inspector follows-up after 30 days; and

- provides the operator representative with a copy of the Verification Report.

18.7.4.6 HACCP System Design Closing Meeting

The CFIA team responsible for verifying the design and reassessment of the operator's HACCP system conducts a closing meeting with the operator's representative.

The closing meeting is held after the team has:

- completed the applicable HACCP system design tasks;
- completed the HACCP System Design Worksheet;
- completed any CARs , if necessary; and
- printed the HACCP System Design Report and any CARs , if necessary.

During the closing meeting with the operator, the FSEP Specialist inspector:

- communicates with the operator in a clear and professional manner;

- presents the operator with the HACCP System Design Verification Report and CAR(s);

- discusses the non-compliance(s) with the operator and clarifies concerns or questions that the operator may have regarding the description of non-compliance;

- informs the operator that the non-compliance described in the CAR requires implementation of corrective measures which include: the submission of a written acceptable action plan and the effective implementation of the corrective actions and preventative measures described in the acceptable action plan;

- requests an acceptable action plan from the operator to respond to the non-compliance described in the CAR and informs the operator that the action plan:
  - must include items described in section 18.7.5.1 of this chapter; and
  - must be fully implemented by the date specified by the inspector. The timelines specified by the inspector should reflect the seriousness of the non-compliance and the time required to correct the non compliant section of the HACCP system. Due to the nature of HACCP System Design Tasks, CARs generated as a result may require a specified timeline for the completion of corrective measures that is over 60 days;

- specifies a date the operator is required to submit an acceptable action plan. The timelines specified by the inspector should reflect the seriousness of the non-compliance. The maximum time for an action plan to be submitted is 14 calendar days;

- informs the operator that the action plan will be reviewed for acceptance and that a failure to develop an acceptable action plan by the date specified on the CAR may result in the initiation of the process to suspend the operator's licence to operate pursuant to section 29.2(1) of the *Meat Inspection Regulations, 1990*;

- informs the operator that CFIA will conduct a follow-up inspection after the date specified for completion of corrective measures. The follow-up inspection is to verify the action plan was implemented as written and to verify the effectiveness of the implementation in correcting and preventing the reoccurrence of the non-compliance.

- informs the operator that a failure to implement corrective measures in relation to the non-compliance noted by the date specified in the CAR may result in the initiation of the process to suspend the operator's licence to operate pursuant to section 29.2(1) of the *Meat Inspection Regulations, 1990*; and

  If the operator refuses to sign the CAR, the inspector:

  - notes in the Description of Non-Compliance section of the CAR that the operator refused to sign the CAR, and that a copy was left with the operator representative, specifying his or her name and title;
  - informs the operator that he or she must follow section 18.7.4.7 if they wish to request a review of the CAR; and
  - informs the operator that he or she is required to correct any immediate food safety deficiencies described on the CAR while the CAR is subject to the review process.

  Note: If the operator refuses to correct the immediate food safety deficiencies described on the CAR, the inspector must take enforcement action as necessary and document the actions taken on the follow-up section of the CAR.

- provides the operator's representative with a copy of the CAR and the HACCP System Design Verification Report.

18.7.4.7 Request for Review of a CAR

An operator may request a review of a CAR before the date specified for the submission of an action plan. The operator must submit the reason for the request, in writing, to the Area CVS Coordinator. The operator is required to correct any immediate food safety deficiencies described on the CAR while a CAR is subjected to the review process. If the operator refuses to correct the immediate food safety issues described on the CAR, the inspector must take enforcement actions.

When a request for review is submitted prior to the date for submission of an acceptable action plan, the operator will not be required to submit an action plan until the review results have been communicated to the operator and CFIA staff.

The Area CVS coordinator is responsible for:

- reviewing the request submitted by the operator;
- advising the responsible inspector and supervisor of the request;
- seeking expertise from programs or the National CVS Coordinator where necessary;
- seeking clarification or information from the operator; and
- making a final decision regarding the request.

A written decision is returned to the operator and a copy is sent to the responsible inspector, supervisor and the Area Meat Programs Manager.

In the follow-up section of the CAR, the inspector will describe any decision taken by the CFIA with respect to the review process. The CFIA written decision must be attached to the CAR.

If the CAR is upheld, the Area CVS Coordinator will assign a new due date for the submission of an acceptable action plan and/or completion of corrective measures, if deemed appropriate. The operator must submit the action plan by the date specified.

If the CAR is overturned, the CAR will be cancelled (closed). The inspector must note in the follow up section of the CAR that the CAR was overturned as a result of a review by the CVS Area Coordinator.

18.7.5 STEP 5 - Assessment of the Operator's Action Plan

The operator must submit an acceptable action plan to the CFIA on the date specified when the CAR was issued.

The inspector who issued the CAR is responsible for reviewing all written action plans submitted by the operator in response to the CAR within seven calendar days from the date the action plan was submitted by the operator. The date on which the inspector completes the review of the action plan must be entered in the follow up section of CAR.

If the inspector is unable to review these action plans within the seven days, the inspector makes arrangements with the supervisor to assign this work to another inspector. The inspectors seek support from Supervisors, FSEP or Program Specialists if needed.

18.7.5.1 Acceptable Action Plan

During the course of reviewing an action plan, the responsible inspector must ensure that the criteria described below are met.

It is important to ensure that all immediate and short term actions taken in relation to affected or potentially affected product are described to the inspector's satisfaction.

It is normal for inspectors to question the root cause of a deviation, or perhaps the validity of corrective and preventative measures. These concerns should be discussed with the establishment representative in a professional manner. Please note that "concerns" are not concrete facts and do not offer sufficient justification to consider the action plan unacceptable.

Any concerns or doubts as to the effectiveness of the action plan will be confirmed by observable or measurable facts during the follow-up inspection. At this time, the inspector will have concrete information to support additional enforcement actions, if necessary.

An acceptable action plan must include:

Component 1 - Description of the Problem

The objective is to accurately describe the problem, which will assist to identify the:

- action to be taken on affected or potentially affected product, other things or animals;
- immediate measures necessary to restore control of the deviation; and
- root cause(s).

Establishments must collect information to find out the exact problem. One situation of non-compliance is typically the result of multiple problems or causes.

- What is the non-compliance?
- Did the problem affect product?

- Where is the problem located?
- How widespread is this problem?
- Does the deficiency affect other areas of the facility or HACCP system?
- When did the problem occur?
- Who is involved in this problem?
- Is this the first time the problem occurred?

Written Action Plan:

- Describe the problem as it relates to the non-compliance noted on the CAR.

Component 2 - Person(s) Responsible for Measures

The objective is to determine the people who have the knowledge, time, authority and competence to correct the non-compliance.

Written Action Plan:

- Identify the name or title of person(s) responsible for the immediate/short term and preventative measures.

Component 3 - Description of Immediate/Short Term Measures

The objectives are to:

- control affected product or other thing(s); and
- take immediate measures to restore control over the deviation so that food products are produced and/or animals are handled according to legislative requirements

Written Action Plan:

- Describe the measures taken with respect to affected or potentially affected product, animals or other thing(s).
- Describe the results of the completed assessment to determine if other products, animals or other things were implicated.
- Describe the food safety assessment performed or to be performed on the affected or potentially affected product, including any disposition of product.
- Describe the immediate/short term measures taken to restore control over the deviation until permanent/preventative measures are planned and implemented.
- Describe the procedure to verify the effectiveness of immediate/short term measures taken.

Note: Depending on the non-compliance, immediate measures may not be required.

Component 4 - Identification of Root Cause(s)

The objective is to identify the root cause(s) so establishments can form appropriate and comprehensive corrective measures that will prevent the reocurrence of the deviation.

Start with the problem description:

- Why has the CFIA found the deviation and not the establishment?
- Identify all potential causes (environment, equipment, personnel, training, written programs, etc.).
- Some causes have already been corrected by immediate measures.
- Identify the root cause(s).

Written Action Plan:

- Describe root cause(s).

Component 5 - Description of Preventative Measures

The objective is to identify and implement corrective measures to eliminate the root cause(s) and prevent recurrence of the deviation.

Written Action Plan:

- Describe the preventative measures.
- Establish a date for the completion of each of the planned preventative measures.

Component 6 - Description of Activities Planned to Verify the Effectiveness of Preventative Measures

The objective is to provide feedback as to whether or not further adjustment is necessary.

The assessment is the application of temporary procedures, tests or other evaluations to determine the effectiveness of the measures taken to correct the problem.

Examples :

- On-site assessment of corrective measures taken.
- Ensuring that staff members are adhering to new procedures/instructions by observing and interviewing them.
- Temporarily increasing sampling.
- Temporarily increasing monitoring procedures.

If the problem is not resolved:

- Additional corrective measures are required.

Written Action Plan:

- Describe the activities planned to verify the effectiveness of preventative measures.
- Establish a date for completion.

18.7.5.2 Notice of Unacceptable Action Plan

When the action plan is first submitted, the inspector must discern if critical components of the plan are missing or if there are only minor details missing that need clarification. The inspector should work with the operator to clarify any minor details that are missing.

If this approach fails, or if critical components are missing, the inspector will issue the Notice of Unacceptable Action Plan to specify which part of the action plan is incomplete or unacceptable. The inspector must specify a date for submission of the amended action plan on the notice. The date specified on the Notice of an Unacceptable Action Plan must respect the initial date for submission of an acceptable action plan specified on the CAR. In other words, the turn-around time for amending and re-submitting an action plan must be quick, but reasonable, and is at the discretion of the inspector.

If the amended action plan still does not contain all the components, or if the operator is unwilling to submit an acceptable action plan by the specified date, the inspector records the following information in the follow-up inspection part of the CAR:

- A Notice of an Unacceptable Action Plan was issued on (date) and not all reasons identified on the notice have been addressed by the operator;

The inspector will then follow up on the specified date for the completion of corrective measures. The information gathered during the follow up will determine whether the CAR can be closed or not.

The Notice of an Unacceptable Action Plan is available through Desktop eForms (See section 18.8 - List of forms). Detailed instructions are included with each form and are available in two formats: as pop-up help (where help appears when you place the cursor over a field) and as a printable instruction page.

18.7.5.3 Action Plan Extensions

The CFIA may grant an extension to the specified date for completion of the action plan under the following circumstances:

- Food safety is not compromised.
- The operator will not meet the specified date for completion of corrective actions due to reasons beyond his or her control.
- The operator submits a written request for an extension before the specified date for completion of the action plan.
- The written request includes the reason for the extension request and the proposed new completion date.

Note: The operator must meet all criteria in order to qualify for an extension to the completion date.

If an action plan extension is requested by the operator, the inspector must attach the written request to the CAR and record the following information in the Follow-up page of the CAR:

- if the extension was accepted or not by the CFIA;
- the reasons for the refusal; and
- the new specified date the operator has committed to completion of the action plan.

The inspector must provide the operator's representative with a copy of the Follow-up page of the CAR.

18.7.6 STEP 6 - Follow-Up

Inspectors follow up on:

- items requiring correction listed on the Verification Report; and
- non-compliance identified on the CAR.

18.7.6.1 Follow-Up on Items Requiring Correction Listed on the Verification Report

The inspector who issued the Verification Report is responsible for following up on the resolution of the items requiring correction that are identified on the Verification Report. If the inspector who issued the report is unable to complete the follow-up, the inspector makes arrangements with the supervisor to assign this work to another inspector.

When the verification report is issued, the operator has 30 calendar days to correct the item. The inspector may follow up at any time during that period, if the operator has corrected an item. After the 30 day period for correction is over, the inspector must ensure they complete follow up for every item within the next 30 calendar days. During the follow-up the inspector determines if the items were resolved by the operator.

To conduct the follow-up on items requiring correction listed on the Verification Report, the inspector:

- asks the operator what actions they took to resolve the items;
- verifies that these actions were taken by the operator by observing, inspecting, interviewing or reviewing records; and
- verifies that these actions were sufficiently effective to correct the items.

The inspector will document what activities were conducted to follow up on the Verification Report. If it is determined that the item(s) requiring correction were resolved by the operator, the inspector conducting the follow up will choose the appropriate entry from the results field on the report and enter his or her name and the date of the follow up.

If the inspector determines that the item(s) requiring correction were not adequately resolved by the operator, the inspector conducting the follow up will choose the appropriate entry from the results field on the report and enter his or her name and the date of the follow up. The related task will be completed at a subsequent visit to the establishment. If at that time a similar non-compliance is identified, then a CAR may be issued.

18.7.6.2 Follow-Up on Non-compliance Identified on the CAR

The inspector who issued the CAR is responsible for following up on the resolution of the non-compliance identified on the CAR within 30 calendar days of the specified date of the completion of the action plan. The FSEP specialist inspector issues and follows up on CARs related to the HACCP system design tasks within 30 calendar days of the specified date of the completion of the action plan. If the inspector is unable to complete the follow-up inspection within the 30 days, the inspector makes arrangements with the supervisor to assign this work to another inspector. The inspector may follow up at any time before the date specified for completion of corrective measures to determine if the operator is implementing the action plan as written.

In order to conduct a follow-up inspection on the non-compliance identified on the CAR and determine if the CAR can be closed, the inspector evaluates the following items:

- The acceptability of the product disposition:
  - by reviewing and evaluating any records generated by the food safety assessment and product disposition.

- The corrective actions taken to eliminate the cause:
  - by observing conditions at the establishment;
  - by reviewing any records generated by the corrective actions;
  - by reviewing any written programs amended as a result of the corrective actions;
  - by interviewing any affected personnel;
  - by ensuring that the actions and timelines defined in the action plan were respected; and
  - by reviewing any records generated by the verification of the effectiveness of the corrective actions.

The inspector records the information gathered during the follow-up inspection on the follow-up page of the CAR. The information must include:

- the date the follow-up inspection was conducted;
- any disposition of product, if applicable;
- the name and date of any records reviewed;
- the name and date of any amended written programs reviewed;
- the name or title of anyone interviewed; and
- any conditions observed at the establishment.

If the inspector determines that the action plan was implemented as written and that the corrective and preventative measures were effective in preventing the recurrence of the deviation, the inspector completes

the appropriate fields of the CAR and the CAR is closed. A copy of the closed CAR is provided to the operator.

If the inspector determines that the situation of non-compliance has not been corrected, the inspector records the information gathered that supports the decision for refusing to close the CAR in the follow-up section of the CAR and the CAR remains open. A copy of the follow-up section of the CAR is provided to the operator. The inspector initiates enforcement actions as per Chapter 14 of the MOP.

18.7.7 STEP 7 - File Maintenance

Hard copies of the following documents are to be maintained by the inspector at the establishment.

Document	How long to retain the hard copy of each document
Establishment Task Profile	2 years
Task Tracking Table	2 years
Verification Worksheet	2 years
HACCP System Design Worksheet	2 years
Verification Report (with original signatures)	10 years
HACCP System Design Verification Report (with original signatures)	10 years
CAR including any Notice of Unacceptable Action Plan (with original signatures)	10 years

An electronic copy of the following documents is to be emailed to the CVS Collector. Data from these documents is entered into the CVS database.

Document	When to email the document
Verification Worksheet	Verification worksheets must be submitted no later than 1 week after the date of completion. The only exception is storages, where the worksheet may be submitted quarterly.
CAR including any Notice of Unacceptable Action Plan	When the CAR is first issued and once the CAR is closed

18.8 List of Forms

The table below lists all forms used during the completion and maintenance of verification tasks. Industry representatives can have access to the official documents described by this table through their local inspector/veterinarian or the Area CVS Coordinator.

Name of Form	Use	Platform	Form #
Establishment Task Profile	Used by the inspector to assign verification tasks to an establishment.	CVS Online Application	Not applicable
HACCP System Design Verification Report	Presented to the operator to communicate any items requiring correction related to a CAR.	Desktop eForms	CFIA/ACIA 5522

Name of Form	Use	Platform	Form #
HACCP System Design Worksheet	Used by inspection staff to record any items requiring correction and any incomplete written program(s) identified during the completion of the HACCP System Design Verification Tasks. Populates the information that appears on the HACCP System Design Verification Report.	Desktop eForms	CFIA/ACIA 5522
Inspection Report - Corrective Action Request (CAR)	Issued to the operator each time a task is assigned an Unacceptable level of compliance.	Desktop eForms	CFIA/ACIA 5472
Notice of an Unacceptable Action Plan	Issued as a notice to the operator when an Action Plan is not acceptable.	Desktop eForms	CFIA/ACIA 5472
Task Tracking Table	Used by inspection staff in each establishment to track completion of the verification tasks.	Excel	Not applicable
Verification Task Procedures	Provides detailed procedures on how to perform each verification task.	PDF	Not applicable
Verification Task Comment Submission Form	Used to submit proposals to create a new task or change the content or wording of an existing task.	Desktop eForms	CFIA/ACIA 5523
Verification Worksheet	Used by the inspection staff to track verification results and daily presence and populates the information that appears on the Verification Report	Desktop eForms	CFIA/ACIA 5470
Verification Report	Presented to the operator to communicate non-compliances not noted on a CAR.	Desktop eForms	CFIA/ACIA 5470