



# Canadian On-Farm Food Safety Working Group Groupe de travail du Programme canadien de salubrité des aliments à la ferme

## Meeting Report - February/March 2005

The Canadian On-Farm Food Safety Working (COFFS) Working Group met in Ottawa on 28<sup>th</sup> February and 1<sup>st</sup> March 2005. This report highlights the matters discussed, key issues and the directions taken during the Working Group meeting.

### Official Recognition

Germain Brazeau (CFIA - On-Farm Food Safety Recognition Program) and COFFS Working Group representatives on the FPT subcommittee on on-farm food safety reported on the development status of the “government requirements for a management manual of a national on-farm food safety program”. The subcommittee had met on February 23<sup>rd</sup> and 24<sup>th</sup>, in Winnipeg. At that meeting considerable progress was made. In particular:

**Program Rating Scheme:** Building on the work of its task group on frequency (reported August 2004) and its task group on risk (reported February 2005), the subcommittee reached agreement on a rating scheme for national on-farm food safety programs. This scheme takes into account both the complexity of the on-farm program (i.e. the presence of only GPPs or the presence of GPPs and CCPs) and the impact of the failure of the program at the farm level. This latter factor incorporates HACCP principle 3 (intended use) and has three categories of product: processed; semi-processed; and ready to eat. A scoring scheme, based on a matrix, determines the rating of the program (Levels I, II and III). National programs will be permitted to differentiate farms based on these levels (e.g. potatoes for processing versus fresh potatoes or cow-calf versus feedlot).

	2	2	4	6
Y	1	1	2	3
		1	2	3
		X		

X x Y	Level Cycle
6	I
3 or 4	II
1 or 2	III

Note: Y = Complexity of the on-farm program at the farm level  
X = Impact of failure at the farm to the intended end use

**On-farm Audit Frequency:** In parallel with the program rating scheme, the subcommittee agreed on minimum audit frequencies for each level. Four types of oversight will be permitted and have been defined: full audits (F), partial audits (P), record reviews [R] and producer (supplier) declarations [S]. Audits (full or partial) involve on-farm visits and combine document review with observations and other types of evaluation. Record reviews, which can in some circumstances be substituted for full

or partial audits, involve an off-farm review of a sample of records related to the program's requirements. Self or producer declarations will require the submission of a first party audit (self assessment) along with the annual signed declaration. All certification schemes must begin with an initial full audit to determine if the farm operation is in compliance with the program's requirements.

The minimum requirements for each level over the maximum farm registration period of eight (8) years are as follows:

Level I	<b>FPPPFPPP</b>	
Level II	<b>FPSPSPSP</b>	
Level III	<b>FSPSSSSS</b>	(Note: Within Level III the partial audit is assigned randomly so it will fall in any year after the initial full audit).

National programs will be permitted to have multiple levels. For example, cow-calf operations and feed lots or potatoes for processing and fresh potatoes may be classified differently based on intended use and the presence or absence of CCPs. At the farm level, within each program, the level of oversight required will be the highest based on the products produced. For example, a farm producing both potatoes for processing and fresh potatoes would be rated as a Level II, while one producing only for processing would be rated at Level I (based on the current draft of that program).

**GAP Analysis - Checklist and Pilot Project:** The draft of the checklist to be used by CFIA reviewers for the analysis of gaps between an national producer organization's (NPO's) management system documentation and the government requirements had been circulated following the October 2004 meeting. Comments submitted by NPO's and governments were reviewed in detail and the checklist was modified at the Winnipeg meeting. The new draft will be used in the pilot project, scheduled for spring 2005. The specific timing of the pilot is dependent upon the submission by an NPO of its materials. At the Working Group meeting, several organizations indicated that they were drafting their materials and would be interested in the pilot group.

**New Working Group on 3<sup>rd</sup> Party Audit:** As a final item related to recognition, the COFFS Working Group named its representative (Walter Debicki, CEMA) to a new subcommittee working group which will review the options for the CFIA accreditation of 3<sup>rd</sup> party auditors of national programs. This working group is slated to report to the fall meeting of the subcommittee and present costed options for consideration.

### **On-Farm Food Safety Auditors**

The task group on auditors submitted two documents for review by the Working Group. These were a draft code of ethics and a draft bio-security code. Both were discussed and several amendments were made. The documents will now be circulated to all NPO's for consideration as the basis for commodity-specific codes. The Working Group is promoting a consistent approach to facilitate both external reviews and ease of adoption by multi-commodity auditors. However, national programs may adapt the proposed codes to their specific needs. In the case of the biosecurity code, individual

farms will have specific requirements and auditors will be required to meet these during the course of their work.

The Working Group was also informed by broker handing its group plan for errors and omissions insurance for on-farm food safety auditors that due to the lack of demand for the insurance, the insurer would be terminating the group plan. However, there were assurances that the insurer was prepared to offer the coverage on an individual basis. Unfortunately, this is likely to cost significantly more than under the group plan. The auditors in the group plan had been provided with sixty (60) days advance notice and they and NPO's have been advised of the steps to be taken to obtain individual coverage. The Working Group agreed to monitor the situation over the coming year. Insurance coverage is a government requirement for national programs seeking official recognition.

The matter of auditor certification was also discussed. The Working Group took note of several initiatives and developments including the work in ISO concerning certification of ISO 22000 auditors, the recent merger of RAB (the American auditor certification body) and QSA (its Australian counterpart) and the formation of an alliance between the new organization (RABQSA Int'l) and their Canadian counterpart (the National Quality Institute). This new formation will start to offer food safety auditor certification in Canada sometime in 2005. RABQSA has also been contracted by the Australian government to develop a new food safety auditor certification scheme. The Working Group agreed to consider this matter in more detail at its next meeting.

### **Task Group on Research**

The report from the January meeting of the task group was considered. The proposals for activity had been included in the Working Group's funding application for 2005/6 and that application will not be dealt with until late March. The recommendations relating to benchmarking research were reviewed. It was agreed that action would not be taken until a further discussion, likely at the next meeting. It was also agreed that a discussion of longer-term research issues related to food safety would be scheduled for then. NPO's will develop their lists, based on Form 9 and other sources, and bring these to the session. One objective the discussion will be to determine if there are topics in common or related. It was noted that Agriculture and Agri-Food Canada is developing an on-farm food safety research program and had requested during the research task group session that it be provided with suggestions for projects. It was agreed that the Working Group will not be submitting projects for consideration. This is the responsibility of the NPO's. However, it was agreed that providing a forum for discussion was consistent with the Working Group's mandate.

### **Task Group on Communication and Promotion**

The report from this task group's meeting (also in January) was considered. It was reported as well that the Working Group's request to have some of the proposed activities included in an amended 2004/5 workplan had been turned down by the Canadian Food Safety & Quality Program, which had recommended that they be included in the 2005/6 funding application. That application had been amended accordingly. If the funding is approved, then the Working Group will move quickly to establish the intranet, revise the website and finalize development of the promotional materials.

## **Canadian Animal Health Coalition**

The executive director of the Coalition, Matt Taylor, made a presentation about the Coalition's past accomplishments and its proposed activities, particularly in the area of crisis management. The Working Group noted that there is considerable overlap in this and other areas, where closer relations between it and the Coalition would both eliminate duplication and foster integration. The Coalition has extended an invitation to the Working Group to make a presentation on its activities, past and future, at an upcoming board meeting and this was accepted. Other topics discussed included: bio-security needs, certification issues, animal care program development, etc.. The Coalition and the Working Group share many members and a common approach, in that each provides a forum for collaborative action and a mechanism for the development of common tools.

## **Canadian Food Safety & Quality Program**

### **Systems Development Component**

The delivery of this program by CFA and AAFC was discussed. Concern was expressed about the linkage between the expert review element, which is still sometimes required by the review committee and CFIA technical review. It was agreed that a letter would be written to AAFC on this matter.

### **Producer Implementation Program**

Wendy Hiller and Randy Bismonte (AAFC) briefed the Working Group on the status of this program and reviewed in detail the application form. This form is being piloted with the Canadian Quality Milk program and the Verified Beef Production program. It is in effect a work in progress. NPO's were encouraged to establish contact with AAFC as soon as possible and to work with officials as they develop their applications. As the implementation approach is likely to vary considerably from one on-farm food safety program to another, the application form has been designed accordingly. However, this also means that it does not provide a lot of specific direction.

The program is accessible only to national programs that have completed the technical review stage of the recognition process and NPO's will be expected to commit to moving forward with the other steps in that process in order to obtain implementation funds. Applications can be developed and submitted prior to technical review but they will not be approved until it is completed.

There have been no changes to the funding parameters, each farm operation is entitled up to \$100 for awareness sessions (no more than \$50 per commodity) and \$750 for either on-farm technical assistance or eligible equipment purchases (not installation). The latter are a taxable benefit. AAFC is still developing the producer declaration form that NPO's will be required to use. No further consideration has been given to the Working Group's request that partial funding of a first certification audit be made an eligible expenditure.

Officials also advised the Working Group that while multi-year applications are encouraged and will be considered, all approvals will be for at most twelve months of activity. The Working Group requested clarification if approvals will be on a fiscal year

basis (April to March) or on a twelve month basis from the approval date. Concerns were expressed that departmental decision-making will need to be timely if programs in mid-stream are not to be interrupted. The Working Group will be following up on this matter.

## **Collaborative Implementation**

The Working Group had an in depth exchange on opportunities for collaboration in the implementation of national programs with a sharing of experiences by those well into the process and the raising of needs for those just beginning. A number of suggestions were made, including: holding joint awareness sessions for producers; sharing experienced trainers across commodities and regions; holding sessions across the country with a team of experienced trainers and implementation project administrators; assembling a registry of expertise; greater involvement by the colleges and universities; more extension by the Working Group amongst students in the colleges and university programs; and, linkages with other training groups or bodies (e.g. Canadian Farm Business Management Council).

## **Emerging Issues**

The Working Group reviewed a number of matters on its emerging issues list, including: the proposed Canada Health Protection Act and its impact on farmers and on-farm programs; the Veterinary Drug Directorate consultations on imported drugs; the proposed meat inspection regulations under the newly proclaimed Ontario Food Safety and Quality Act; the CFIA consultations on method of production labelling claims; and, the status of ISO 22000.

## **COFFS Working Group Projects**

Updates were provided on the several projects including:

- the producer risk management project application to AAFC - still under discussion;
- the national on-farm food safety auditor training module - new sessions scheduled for
  - April 18 - 22 - Surrey, BC
  - May 2-6 - Saskatoon, SK
  - May 16 - 20 - Fredericton, NB
- the IT showcase of off-the-shelf software for auditors and certification administration - four presentations scheduled for March 15<sup>th</sup> and 16<sup>th</sup>;
- the costing study update - postponed to the 2005/6 workplan;
- the English version of the web-based introductory course on on-farm food safety - contracted to Lakeland College in Alberta and scheduled for completion by March 31<sup>st</sup>; and,
- the National Certification Body project - funding extended to June 30<sup>th</sup> and a meeting of interested NPO's to be scheduled for April.

**Prepared 10 March 2005**

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