

Canadian Food Inspection Agency

Theme	Recommendation	Status
Resources	7. To accurately determine the demand on its inspection resources and the number of required inspectors, the Canadian Food Inspection Agency should retain third-party experts to conduct a resources audit. The experts should also recommend required changes and implementation strategies. The audit should include analysis as to how many plants an inspector should be responsible for and the appropriateness of rotation of inspectors.	
	8. The Canadian Food Inspection Agency should ensure that inspectors receive timely education and training specific to each function which they perform. This should be based on an assessment of the additional training required to address gaps in the knowledge and abilities of inspection staff. Inspectors should regularly receive a mandatory program on current trends in science and technology in the processing of food, including compliance and verification processes.	
	9. The Canadian Food Inspection Agency should equip its inspectors with modern technology (e.g. e-note pad) to increase their efficiency.	
	10. The Canadian Food Inspection Agency should amend its meat inspection system (CVS) to ensure: a) the appropriate human resources are available to respond to workload requirements; b) comprehensive training based on required competencies and skills; timely delivery of on-going training; c) supervision of inspection staff structured to encourage enterprise and accountability.	
	51. The Canadian Food Inspection Agency should ensure that the Office of Food Safety and Recall has dedicated resources to undertake all the CFIA activities concerning recalls. The Office of Food Safety and Recall should be identified as the CFIA's primary point of contact with Health Canada during a national foodborne emergency.	

Inspection Process	<p>15. The Canadian Food Inspection Agency, in conjunction with and in conformity to the proposed revisions to Health Canada's <i>Listeria</i> Policy, should strengthen its February 2009 <i>Listeria</i> controls found in the <i>Meat Hygiene Manual of Procedures</i> to focus on control measures for <i>Listeria</i> in ready-to-eat meat products, in addition to the current environmental and product testing:</p> <ul style="list-style-type: none">a. to ensure that any required testing is a verification step to confirm the effectiveness of the company's <i>Listeria</i> control program and not a control program in itself;b. by differentiating the testing requirements to reflect the risk associated with each product (i.e. more testing for high risk products and less for low risk ones);c. by requiring the testing of non-food contact surfaces in the processing environment;d. by establishing 'hold and test' product control requirements following positive test results for <i>Listeria</i> on food contact surfaces as follows:<ul style="list-style-type: none">i. several tests for <i>Listeria</i> on food contact surfaces should be conducted immediately on and around the area where positive results were found to determine:<ul style="list-style-type: none">▪ if there is persistent contamination, or▪ if the previous positives have already been dealt with using standard sanitation procedures;ii. if the follow-up tests are positive, then testing for <i>Listeria monocytogenes</i> must occur in products from the production line of concern¹. During this testing phase, all products produced on that line and day (i.e. between two complete sanitation shifts) should be withheld from the marketplace until the results are known;e. by further defining expectations of trend analysis to identify weaknesses in the company's control programs (including its HACCP plan) by determining if a pattern of contamination is emerging.	
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	16. The Canadian Food Inspection Agency should revise its monitoring programs (M-200 and M-205 plans), by tailoring the sampling frequencies to each plant based on risk factors including compliance history, product risks and target market (i.e. higher sampling frequency in some plants, lower in others.)	
	17. The Canadian Food Inspection Agency should review and update existing food safety programs, regulations and directives to best reflect current food safety practices.	
	18. The Canadian Food Inspection Agency should update its <i>Food Safety Enhancement Program Manual</i> to require food processors to include all standard operating procedures and good manufacturing practices in their food safety plan.	
	19. The Canadian Food Inspection Agency should ensure that the <i>Meat Hygiene Manual of Procedures</i> is updated whenever there is a significant change to the practices imposed on industry.	
	48. To ensure timely and consistent enforcement practices across the country, the Canadian Food Inspection Agency should review the interpretation and application of its rules and enabling legislation.	
Communications	20. The Canadian Food Inspection Agency should formally communicate its expectation that registered meat processors will bring all information with potential consequences for food safety to the attention of their assigned inspector in a timely manner.	
	26. Where human deaths or serious illnesses have occurred, the Canadian Food Inspection Agency should promptly disclose the results of its investigation of the implicated plant and the corrective actions taken, to the public and food safety partners.	

	31. The Canadian Food Inspection Agency should establish a formal protocol to ensure that timely and consistent information is provided to staff of the provincial/territorial or local public health organizations who are asked by the Agency to help it complete post-recall verification activities.	
	32. In providing information related to a given product recall to the distribution industry, including grocers, the Canadian Food Inspection Agency should use a standardized form (as suggested by the Canadian Council of Grocery Distributors).	
	38. The Canadian Food Inspection Agency and the Public Health Agency of Canada should enhance their public profile to increase awareness of their mandates.	
	47. As a regulatory agency, the Canadian Food Inspection Agency should create a formal and transparent consultation strategy which will define its required engagement with stakeholders.	
Governance	44. As soon as possible, the Canadian Food Inspection Agency, supported by independent experts, should initiate a comprehensive review of <ul style="list-style-type: none"> a. its organizational structure; b. the current delegation of responsibility and lines of accountability within the Agency; and c. its decision-making processes. 	
	49. The three main lines of business of the Canadian Food Inspection Agency, food safety, animal health, and plant health should be assisted by permanent expert advisory committees to guide their evolution.	
	50. The Office of Food Safety and Recall should report directly to the office of the President of the Canadian Food Inspection Agency.	

Recalls	29. Health Canada, the Canadian Food Inspection Agency and the Public Health Agency of Canada should review, update and publish the criteria for proceeding with a food recall to ensure that the weight of evidence takes into account epidemiological information, including suspected illnesses and deaths, geographic distribution, and food sample test results whether packages are opened or unopened.	
??	30. The Canadian Food Inspection Agency should encourage federally regulated meat processors to move beyond the minimum existing requirement for accessibility of distribution records to include electronic access in non-proprietary and unlocked formats to assist in potential product recalls.	