

Clarification of C.2.9.2 - Risk Based Criteria for unannounced inspections

Date: August 10th, 2016

To: Conformity Verification Bodies (CVB) designated by the Canadian Food Inspection Agency (CFIA) and Certification Bodies (CB) accredited by the CFIA

Subject: Risk Based Criteria for unannounced inspections

This memo provides further clarification on the implementation of risk criteria used by the CBs when selecting operators for unannounced inspections.

Section C.2.9.2 of the Canada Organic Office (COO) Operating Manual specifies the requirements to be followed by the CBs when selecting the operators for unannounced inspections.

Unannounced inspections may be limited in scope and may cover only certain aspects of the operation. The operators chosen for unannounced inspections may be random, risk based, or as a result of a complaint or investigation. The CBs should apply a combination of all three above mentioned criteria when planning the unannounced inspections for each year.

Examples of criteria that may be considered by the CBs when developing risk based criteria for unannounced inspections include the following:

- Type of operator (producer, processor, packager, importer, distributor)
- New or experienced operator (categories for number of years' experience can be used)
- Size and complexity of operation (e.g. total area under production, complexity of value chain)
- Type and value of product (e.g. short supply, high price, susceptibility to disease or pests, ratio of price to quality)
- Number of parcels of land or animal units under transition
- Local geography (e.g. lay of land, buffer areas, water supply, presence of neighbours and types of neighbouring land uses, nearby spray operations)
- Only organic, split operation or parallel production
- Total quantity of products produced and/or processed
- Rapid increase in production versus stable production levels
- Compliance history (non-conformities in previous inspections)

- Complaints received
- Suspicion of fraud
- Quality of information (information supplied in certification process)
- Economic fraud risk (multiple contracted suppliers, group certification)
- Detection of chemical residues or signs of prohibited substances
- Irregularities in mass balance calculations and traceability records
- Number of new suppliers
- Number of changes to management team
- Change in ownership
- Brand names (number produced under the operation, processor not using own name)
- Higher risk animal production systems

The CBs should incorporate into their existing procedures a checklist of risk based criteria to be used in evaluating the risk to which the integrity of organic products can be compromised by December 31, 2016. The procedure should define the individual scores that are applied to each risk criteria. These are added to calculate a total score for each operator. Based on the scores, the CBs determine which operators are selected for unannounced inspections.

The CVBs will continue to verify the CBs compliance with section C 2.9 of the COO Operating Manual during the on-site audit, witness audit and verification audit.

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