

Canadian Food Inspection Agency

DRAFT COMPLIANCE PROMOTION STRATEGY

June 2014

Table of Contents

1	Introduction – Operating Context.....	1
2	Rationale for a Compliance Promotion Strategy.....	1
3	Roles and Responsibilities.....	2
3.1	Industry.....	2
3.2	Third Parties	3
3.3	Government.....	4
3.3.1	CFIA.....	4
3.3.1	Health Canada.....	5
3.3.2	Agriculture and Agri-Food Canada.....	5
3.3.3	Canada Border Services Agency	5
3.3.4	Provinces and Territories	6
3.4	Consumers	6
4	Overview of the Compliance Promotion Strategy.....	6
4.1	Compliance Education/Outreach.....	7
4.2	Collaboration on Tools & Training.....	9
4.3	Partnership in Compliance Monitoring.....	11
5	Next Steps	12
	Annex A - Principles.....	13
	Annex B – Compliance Promotion Initiatives.....	14

Compliance Promotion is any activity that informs, motivates and encourages compliance with the CFIA's regulatory requirements.

1 Introduction – Operating Context

Canada has generally enjoyed an enviable reputation for food safety, animal and plant health over the last half century. The globalization of trade, changes in the environment, and new emerging diseases are challenging the agriculture, forestry and agri-food sector's ability to adapt and retain its competitive advantage.

Rapid advances in processing and manufacturing technologies have resulted in significant increases in production speed, volume and diversity. In addition to developments on the innovation front, climate change and the increasing global movement of plants, animals and their products pose a serious challenge. International travel, trade and mass distribution networks mean that problems, when they do occur, can quickly become widespread. Incidents of foodborne illness and adulteration (e.g., melamine contamination), as well as Canada's experience with avian influenza and invasive alien species (e.g., Emerald Ash Borer) have shown that problems are not contained within national borders.

Regulators are being asked by stakeholders and the public to demonstrate that their oversight systems and approaches to promoting, verifying and enforcing compliance are effective. In addition, consumers are demanding more meaningful information about their food as well as animal health and plant health issues. Industry is responding by implementing a range of risk-mitigation measures to provide greater assurance that their products meet regulatory requirements.

2 Rationale for a Compliance Promotion Strategy

Targeted at stakeholders who must meet Canadian legislative requirements, the Canadian Food Inspection Agency (CFIA) developed an integrated compliance promotion strategy for several reasons. First, as outlined above, the CFIA's operating environment is evolving, which has led the Agency to undertake a **Transformation Agenda** involving major changes to food, animal and plant legislation. The CFIA is also changing how it regulates to make greater use of system-based regulation (e.g., requirement to have an internal risk management plan) and outcome-based regulation (e.g., greater emphasis on outcomes to be achieved, instead of focusing on processes or actions that regulated parties must take). As a modern regulator, the CFIA appreciates that promoting awareness and understanding of regulatory and program changes will be key in generating compliance. Therefore, the CFIA will continue to develop guidance documents that explain regulations in plain language, to the extent possible, as well as continue its extensive outreach campaign to reach affected parties.

Second, the CFIA recognizes that **small and medium-sized enterprises** (SMEs) can face human, financial, technical and time resource limitations that may affect their ability to achieve compliance. While larger businesses may employ specialized expertise to help them understand and comply with legislative requirements, small businesses generally rely on the information that is made available to them by the regulator or industry associations. The CFIA will work with industry and third parties to identify new regulated parties, develop the necessary compliance promotion tools and products to meet SME needs, and then determine key players that can help with outreach (e.g., other government extension services and small business associations).

The Agency has traditionally used a variety of approaches to help regulated parties comply, including manuals and guidance documents on its website, as well as outreach such as exhibits,

workshops and "industry days". However, to date the Agency's compliance promotion efforts have not been undertaken in a consistent fashion (e.g., varying formats and levels of technical detail) across commodities and programs. The CFIA intends to continue in its role as a modern regulator by **developing and delivering compliance promotion tools consistently**, and in a way which facilitates the achievement of desired regulatory outcomes. The CFIA will draw on internal management tools and practices (e.g., standardized template for guidance documents, process for review and update of documents, etc.) to promote consistent internal and external communication of compliance requirements.

The CFIA develops and enforces regulatory and program frameworks for domestically produced, imported and exported food, animals, plants, and their related products. These regulatory and program frameworks are risk-based and draw on the most current and relevant information to keep pace with a rapidly evolving, global environment. Drawing on the best practices of other governments, the CFIA will use compliance promotion as a **risk management tool** by integrating it into CFIA program design. As part of its annual program planning, the CFIA will review compliance outcomes and make appropriate adjustments where required (e.g., target additional communication efforts where there have been compliance issues), and will work with industry and third parties to determine how best to reach the target audience (e.g., importers, small and medium-sized enterprises, etc.).

3 Roles and Responsibilities

While the CFIA is launching this strategy, it is cognizant that compliance promotion must be a collaborative effort, with clearly delineated roles and responsibilities in order to fully realize its goals. Industry, third parties, regulators and consumers all play a part in securing compliance, and there are multiple opportunities to work collaboratively.

3.1 Industry

Businesses operating in and/or importing to Canada are responsible for producing animals, plants and products safely. Regulated parties must take it upon themselves to know, understand and be in compliance with all legislative and regulatory requirements, and to provide complete, accurate and timely information to the CFIA as required.

Being compliant affects more than product marketability and a company's bottom line. Industry compliance is also integral to the protection of the health and safety of Canadians, as well as Canada's animal and plant resource base. As such, compliance necessitates that industry takes ownership of its "safety culture" in recognition of the broader potential impacts.

Industry is responsible for monitoring and controlling their operations, correcting any deviations as they occur, and maintaining ongoing compliance. An effective risk management program depends on ongoing processes that involve all levels of an organization. It requires a philosophy of, and commitment to, developing, monitoring, verifying, and validating – all of which contribute to the process of continuous improvement. Businesses may consider a number of process control or quality management type systems (for example, third-party assurance systems such as the International Organization for Standardization and the Canadian Seed Institute) for their control program. In order to meet or exceed prescribed government outcomes, the risk management program should be tailored to the business' products and processes.

The importance of producing animal, plants and food safely must be prioritized and valued across all levels of the organization and reinforced through training. Business owners and management must ensure that employees are appropriately trained on the principles of product safety for food and pest/disease control for plant and animal health. This information should be revisited (e.g.,

through refresher courses) to address identified areas for improvement as needed (e.g., biosecurity, sanitation).

Since safety failures in any operations can affect the entire commodity group, there is growing industry recognition that safety is not a competitive advantage. Due to the collective wealth of knowledge available, individually or through their associations, industry can continue to show leadership by promoting best practices or through their own training practices for their staff and supply chain partners. Industry can provide peer support and guidance, as well as share knowledge and technical expertise with other businesses that may facilitate an improved understanding of their regulatory obligations. These activities help the sector as a whole both meet regulatory requirements and maintain consumer confidence.

3.2 Third Parties

Third parties currently contribute to an extensive array of compliance promotion functions in Canada as well as abroad. For instance, the private sector develops and administers private certification schemes - formal, documented safety systems that typically involve audits and certification (e.g., CanadaGAP; heated treated lumber). These schemes may be developed collectively by industry organizations, major retail chains or non-profit foundations (e.g., Global Food Safety Initiative). Where there is appropriate rigour and complementary public policy objectives, private certification schemes can serve as another driver for compliance, in addition to regulatory requirements.

Industry associations have expertise and knowledge in their fields to offer guidance, programs, training, and self-assessments to equip their members or sectors with the necessary tools to achieve compliance. They can create an enabling environment for cooperation among firms (e.g., peer support and diffusion of best practices) and enable more rapid innovation through cooperative research. Industry associations have developed and implemented national risk management systems (e.g., *Safe, Safer, Safest* – Chicken Farmers of Canada's On-Farm Food Safety Program), with support from federal, provincial and territorial (FPT) governments, in the area of food safety. In the area of plant and animal health, the CFIA develops national biosecurity standards, protocols and strategies in collaboration with producer organizations, provincial/territorial governments, and academia. There remain opportunities to leverage the leadership capacity and expertise of industry associations through partnerships (i.e. private sector or public/private) in order to prepare and deliver technical assistance.

Non-profit organizations have advanced innovative collaborative arrangements with corporate and other partners (e.g., FPT governments, school boards, hospitals, etc.), so as to improve understanding of select compliance issues. Working with corporate partners on issues that affect their business, as well as the non-profit organization's membership enables non-profit organizations to help companies understand and respond to the needs of consumers. By influencing business practices (e.g., through consultation sessions, product development initiatives, etc.), non-profit organizations can contribute to improved compliance outcomes. This is beneficial for all concerned, including the CFIA in its role as a regulator.

Academia, which includes universities, colleges, and technology centres, complements government and industry efforts to train staff and conduct research that advances knowledge in the area of safety and risk management for the agriculture and food sector. There are many examples of cooperative research underway in Canada between various Canadian and international industry, government and academic partners. As part of a larger animal disease surveillance partnership effort, the CFIA is working with the Public Health Agency of Canada, the University of Calgary, the United States Department of Agriculture and the United States Centers

for Disease Control and Prevention to extend human and veterinary diagnostic capability of Rift Valley fever in North America. In the area of plant health, the CFIA is working with the Canadian Forest Service, as well as other U.S. research institutions, to develop a low-cost device that will permit on-the-spot diagnosis of plant pests.

3.3 Government

Governments tailor their role in compliance promotion to fit their underlying policy objectives and regulatory program design. This may necessitate the use of different tools and approaches (e.g., raising awareness, sharing best practices, etc.). Regulators typically focus on clear and timely information sharing with some consideration as to how best they can coordinate and maximize the efforts of all stakeholders to improve compliance outcomes. The U.S. for example created alliances to develop training materials and provide technical assistance related to the *Food Safety Modernization Act*. In Canada, British Columbia developed an innovative collaborative arrangement with a small-scale food processing association to deliver education workshops and one-on-one consultations for eligible processors.

This strategy describes the proposed role of the CFIA, as well as the Agency's opportunity to collaborate with other governments (provincial and territorial) and other federal government departments on compliance promotion. It is recognized that there are other regulatory players in compliance promotion (e.g., foreign and municipal governments) with whom the Agency may also wish to explore collaboration opportunities in the future.

3.3.1 CFIA

The CFIA is responsible for administering and enforcing legislation pertaining to the safety and quality of food in Canada, and for supporting a sustainable plant and animal resource base. Compliance promotion provides a means for the CFIA to increase awareness and to enhance regulated parties' understanding of legislative requirements with the objective of improving compliance outcomes. CFIA compliance promotion efforts support the Agency's high-level goals:

- preventing and managing health risks;
- protecting plant resources from pests, diseases and invasive species;
- preventing and managing animal and zoonotic diseases;
- contributing to consumer protection; and
- contributing to market access for Canada's food, plants, and animals.

As a modern regulator, the CFIA is mindful that businesses operating in and/or importing to Canada should be able to rapidly find out what legislation applies to them and what is required in order to be compliant. As such, the Agency uses a variety of tools to promote compliance. Relying primarily on its website, which aims to help people find information quickly and easily, the CFIA posts regulatory requirements and supporting documents and tools to facilitate understanding (e.g., guidance documents and model systems). This supports a preventive approach to compliance by providing regulated parties with access to regulatory information in plain language. Where appropriate, the Agency also ensures embassies, Canadian postings abroad and international organizations are notified and made aware of Canadian regulatory requirements.

Because regulated parties require access to the most up-to-date information, the CFIA can continue to ensure a process is in place for regular and timely updates to regulatory requirements and supporting documents. In addition, the CFIA understands the importance of proactively engaging stakeholders regarding any proposed changes to regulations, policies, or programs. Promoting awareness of new requirements through targeted outreach and information channels can include activities such as:

- Engaging industry and industry associations, both formally and informally;
- Developing and distributing guidelines, codes of practice and policies;
- Preparing and sharing information (e.g., fact sheets, model systems, etc.); and
- Providing information through social media.

The CFIA can, as part of its annual work planning activities, analyze compliance data and trends to determine priority compliance promotion activities. Moving forward, the CFIA can engage industry and third parties to develop targeted strategies (e.g., information sharing/outreach) to address rates of and reasons for non-compliance on a sector specific basis. This can allow the CFIA and industry to work together to continually improve and better target compliance promotion activities.

In recognition of the vital role played by stakeholders and shared compliance promotion objectives, the CFIA can collaborate (where possible) on initiatives led by industry, academia, non-government associations, etc. (e.g., leveraging industry's technical expertise to share best practices for meeting regulatory requirements). The CFIA can also continue to leverage partnerships with other government departments and federal/provincial/territorial committees to deliver outreach and develop tools (e.g., national model regulations, codes and guidelines for use by governments and industry) to target stakeholders.

3.3.1 Health Canada

Responsible for setting food safety policy and standards, Health Canada facilitates compliance by clearly identifying legislative requirements (e.g., health and safety standards, Good Manufacturing Practices and other safety specifications) and ensuring information (e.g., guidance documents) and tools (e.g., checklists) are accessible. Through mechanisms such as sector consultations, industry and other stakeholders are encouraged to participate in the development of health and safety standards. Consumers are also encouraged to participate in maintaining their health and safety. Due to the public health mandate it shares with the CFIA, opportunities may exist to jointly promote compliance through information sharing, outreach and training where stakeholders are the same (e.g., food policy).

3.3.2 Agriculture and Agri-Food Canada

Agriculture and Agri-Food Canada (AAFC) provides leadership in the growth and development of the Canadian agriculture and agri-food sector. AAFC Research Centres and scientists stationed across Canada conduct a range of research which contributes to knowledge and the development of tools and processes that benefits the sector. Some of these activities fall within the scope of compliance promotion since they facilitate industry's ability to comply with regulatory requirements. Through current as well as past agricultural policy frameworks, AAFC has designed programs that make funding available at the federal, provincial and territorial levels to advance sector interests such as food safety systems, animal and plant health surveillance systems, and traceability systems. AAFC also supports stakeholder engagement through its Value Chain Round Tables. As with Health Canada, the CFIA can benefit from AAFC and other departments' engagement in compliance promotion where there is an overlap between stakeholders as well as shared goals.

3.3.3 Canada Border Services Agency

The Canada Border Services Agency (CBSA) ensures the security and prosperity of Canada by managing the access of people and goods to and from Canada. CBSA officers at Canada's ports of entry undertake activities to protect the safety of imported goods, including food. The CBSA promotes compliance with regulatory requirements governing the movement of commercial goods

into and from Canada by providing information and services for the business community. This includes providing access to resources such as web content, advance rulings, and a toll-free border information line. Opportunities may exist to leverage CBSA-established connections to the importer community and, in particular, to small and medium-sized enterprises.

3.3.4 Provinces and Territories

Provincial agriculture and health ministries have jurisdiction for businesses that trade solely within a province. As a result, many provincial/territorial governments have developed their own compliance promotion policies (e.g., British Columbia) and/or otherwise have offered expertise and tools to facilitate industry understanding of regulatory requirements (e.g., training and workshops). This presents an opportunity for the CFIA to collaborate where there is jurisdictional overlap, or to mobilize a whole-of-government approach to information-sharing and outreach.

3.4 Consumers

Consumers can play an important role in keeping Canada's food safe and in protecting animal and plant health by sharing their concerns and perspectives with the CFIA. When consumers report adverse reactions to a food product, other food-related concerns (e.g., fraud, labelling), or suspicions about the presence of an animal disease or a plant pest, the CFIA can work with industry to both resolve the problem more quickly and give early warning to other consumers. Over the longer-term, the CFIA can draw on this information to prioritize where more compliance promotion efforts are required.

Informed consumers and consumer organizations can also exert influence through their purchasing decisions and by building support and pressure for compliance. The fear of adverse publicity and potential loss of business creates a powerful incentive for compliance.

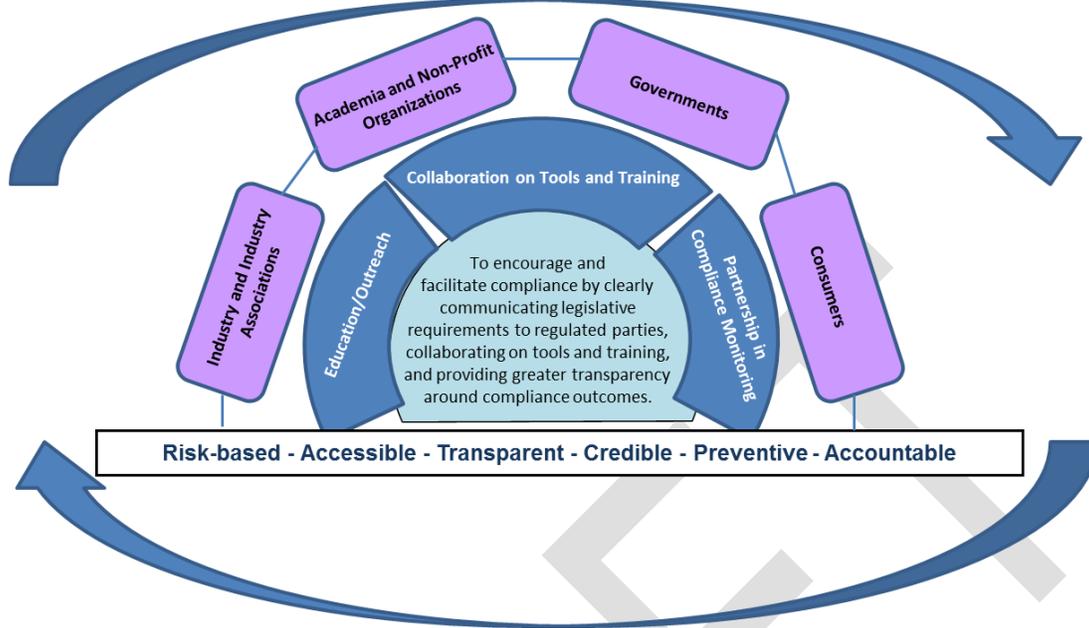
4 Overview of the Compliance Promotion Strategy

In June 2013, the CFIA published a discussion paper entitled "Compliance Promotion: Formalizing an Approach to Support Stakeholder Compliance" and initiated consultations on its proposed approach to compliance promotion. Over the fall 2013, the CFIA consulted internally and drew on comments from its ongoing stakeholder consultations to refine key elements of this strategy.

From a compliance promotion standpoint, the majority of regulated parties will comply with legislative and regulatory requirements if they understand the requirements. In keeping with this premise, the main objective of the CFIA's compliance promotion strategy is to increase awareness, improve understanding and foster continuous improvement. The CFIA proposes to achieve these objectives through the three pillars of the strategy:

- Education and Outreach (sharing information);
- Collaboration on Tools and Training (improving understanding); and
- Partnership in Compliance Monitoring (fostering continual improvement).

Chart 1: Visual of the Compliance Promotion Strategy



Education and outreach is one of the most fundamental and important roles of compliance promotion - to clearly communicate and share up-to-date information in plain language, where feasible. Activities under this pillar (see Annex B for complete list) include initiatives to strengthen internal rigour around producing plain language information and making it accessible and up-to-date.

The second pillar, Collaboration on Tools and Training, recognizes that information materials and outreach alone may not suffice, particularly for newly licensed SMEs. Interactive tools or third party assistance may be required to facilitate regulated parties' understanding of their obligations.

The third pillar, Partnership in Compliance Monitoring, lays the foundation for the CFIA to monitor compliance outcomes and develop a risk-based approach to compliance promotion. Supporting initiatives under this pillar provide a feedback loop to ensure that any gaps flagged by poor compliance results can be addressed by engaging stakeholders and developing meaningful and targeted sector strategies (e.g., modifying/revising information products).

Underpinning the strategy are six principles (see Annex A) which are intended to guide CFIA efforts in compliance promotion. These principles apply to all of the pillars and reflect the underlying CFIA commitment to enable regulated parties' understanding of their regulatory requirements, and to do so in a proactive and transparent manner.

4.1 Compliance Education/Outreach

Regulated parties have identified issues with the availability and technical nature of information on the CFIA website. A recent survey by the Canadian Federation of Independent Business (CFIB) similarly illustrated that agri-business owners would like CFIA information to be more readable and simple to understand. The CFIA is committed to clearly communicating regulatory requirements and to ensuring a process is in place to keep guidance-related information up-to-date. Therefore, as a first step, the CFIA has established a single repository for all of its guidance documents and other information required to comply with CFIA regulations. The CFIA will add other types of information such as a searchable knowledge base of frequently asked questions. It

will also take steps to make the information more interactive, easily accessible and navigable on the CFIA website.

In order to improve the consistency of information being shared, the CFIA has adopted a standardized template with a common look and feel for guidance documents. In anticipation of many new documents being created to accompany new food, plant or animal health legislation, the CFIA will require that these new posted documents meet plain language requirements and follow a new internal process prescribing regular review and update.

In addition to federal regulatory requirements, provinces and territories enact legislation governing their own jurisdictions. Regulated parties may have difficulty accessing and understanding the necessary requirements across jurisdictions. The CFIA and its federal, provincial and territorial counterparts will explore potential ways that federal and provincial/territorial regulatory information can be aggregated and made more accessible on the Web. This provides another avenue for stakeholders to access CFIA information, as well as assists regulated parties by housing all the necessary requirements in one place. Over the longer term, federal and provincial governments will examine opportunities to collaborate more closely to promote regulatory consistency between levels of government.

As noted, a particular small and medium-sized enterprise (SME) challenge is receiving the appropriate information in order to understand regulatory requirements. Reaching out and supporting individual SMEs is not easy given that many SMEs do not belong to associations or belong to associations with very limited resources. Companies consumed with the day-to-day activities of running a business on tight budgets and limited human resources may also be unaware of or unable to attend workshops or training in person. As a result, the CFIA will undertake a concerted effort to identify affected SMEs and to provide targeted information and outreach that will meet the needs of these new regulated parties. This will include leveraging extensions services (e.g., provinces and territories, academia, etc.) where feasible.

Spotlight 1 - Engagement on the Proposed *Safe Food for Canadians Act* Regulations

The CFIA has undertaken significant efforts to prepare for the coming into force of the proposed *Safe Food for Canadians Act* (SFCA) regulations. Consultations on SFCA regulations were officially launched at the CFIA Food Forum on June 4, 2013. Since then, 13 webinars have been held with over 1,200 stakeholders. The CFIA has also attended over 100 stakeholder events to discuss proposed SFCA regulatory requirements and corresponding impacts. While an estimated 50% of participants engaged to date have been small and medium-sized enterprises (SMEs), a large contingent across Canada needs to be informed of new regulatory requirements under the SFCA before the coming-into-force date of June 2015. The CFIA will need to build on its unprecedented outreach to date in an effort to reach more SMEs. This will include consideration of different stakeholder community requirements (e.g., access points, multi-linguistic, etc.).

One of the models for implementing broad-based changes and information sharing that the CFIA will look at relates to its own history working with national commodity groups and general farm organizations. This initiative, led by the Canadian On-Farm Food Safety Working Group, contributed to approximately 8000 to 10,000+ farms adopting food safety systems in Canada in the 1990s. The creation of a preventive controls alliance led by industry in collaboration with the CFIA, academia, and provinces/territories may be of benefit. Additional preventive controls resources and training may be of interest to many small and medium-sized Canadian businesses that will be developing plans for the first time.

4.2 Collaboration on Tools & Training

According to a 2013 CFIB survey, agri-businesses spent on average 222 hours a year in labour costs to comply with CFIA regulations, which is roughly 28 days per year. To take a specific example, previously a regulated party might need to review 1500 pages of CFIA labelling policy and guidance to inform their decision prior to the development and implementation of the CFIA's online self-assessment labelling tool in 2014.

The CFIA will collaborate with stakeholders to determine how the Agency and third parties can better present information so as to make it more accessible to users. For complex and technical subject areas, this pillar identifies strategies for tools and training (e.g., how to develop a preventive control plan) that reduce barriers related to technical understanding and time constraints. This will potentially reduce compliance costs to businesses by allowing them to achieve and maintain compliance as efficiently as possible.

Spotlight 2 - Development of Web-Based Tools

The CFIA has initiated work to develop web tools for CFIA staff, other government departments, industry and the public, including:

- CFIA-AIRS, the automated import reference system of the CFIA, which provides information on import requirements through a question and answer approach;
- Reference Database for Hazard Identification, which identifies hazards in all food products used as ingredients (e.g. milk, spice);
- Interactive web tools, which explain the beef processing and inspection process, as well as the food safety investigation and recall process; and
- Online self-assessment labelling tool, which walks users (e.g., producers, manufacturers and retailers) through a series of decisions to determine the information they need to create compliant labels.

Leveraging the experience gained through the development of the online labelling tool, the CFIA will seek input from stakeholders as to what other gaps remain, and/or where there is other complex information that would benefit from an interactive, user-oriented tool. One of the ideas under consideration is an interactive tool to determine whether a business needs to develop a preventive control plan or be licensed by the CFIA.

Consumers today are more sophisticated in their understanding of safety and quality issues, and they expect industry to take the necessary steps to protect public health. Many players in industry have responded by implementing a range of preventive safety systems (e.g., Good Management Practices) to provide greater assurance that their products meet safety requirements. Safety and risk management practices are increasingly regarded as non-competitive issues since an incident for one company can have far-reaching effects on the entire sector of the recalled product. Industry sharing of innovative best practices and model systems improves overall sector compliance outcomes and reinforces the foundation for consumer trust.

The challenge though is this information is available in a multitude of different places, which makes it difficult to access. The CFIA will work with provincial partners, industry, academia and non-governmental organizations to determine what best practices are available, and how the information will be made more accessible and searchable. Depending on the sector and/or commodity, it may be possible to collect all this information and host it on an industry association, academic institution or other not-for-profit website, wherever the best fit may be. The CFIA will explore using regulatory forums as a venue for industry leaders to share helpful ideas and

insights that would allow stakeholders to cost-effectively meet and surpass regulatory requirements.

Spotlight 3: Development of Model Systems

As one type of tool to support compliance with regulatory requirements, model systems are a form of written guidance (non-binding) which elaborate information on new or historically accepted practices and procedures that, when implemented, facilitate regulatory compliance for a specified process or activity (e.g. 'How to develop a sanitation program', 'How to conduct a shelf-life study'). The CFIA is developing and sharing an initial suite of model systems to help regulated parties develop preventive control plans. Industry associations, academia and/or other service providers (e.g. technology centers) may be able to support this initiative by (a) collaborating with the CFIA on the development of additional priority model systems in the short and medium term and/or (b) offering their expertise and knowledge to advise individual/establishments how model systems must be tailored to fit their particular business and/or product.

In addition to setting out best practices and identifying model systems, industry associations have been very active within Canada in establishing an infrastructure of national programs. These programs have the benefit of being tailored to meet the needs of specific business sectors, while facilitating compliance with government health and safety requirements. It is not clear whether these systems (e.g., national food safety commodity-based systems) would be in conformance with some of the CFIA's proposed new regulations. The CFIA will therefore proactively reach out to industry associations and facilitate efforts to determine whether current tools would be anticipated to meet new requirements, or whether any changes need to be made.

Training was the focus of many stakeholder comments during CFIA consultations in 2013. In particular, reassurance was sought that CFIA inspectors would be appropriately trained and that training would be offered to regulated parties as well. Training is instrumental to the successful delivery of compliance promotion since it enables safety culture and better risk management to be integrated into every-day routine.

Spotlight 4: Collaboration Opportunities in Training and Education

The CFIA has developed a curriculum framework for inspectors based on the International Food Protection Training Institute's (IFPTI) model. It includes food safety, plant and animal health courses and specialization opportunities. The framework approach to competency and standards-based training, development and career paths will also be applied to science and laboratory officials, program officers and corporate administrative support communities. This approach supports the CFIA's objectives to enhance the knowledge and skills of its staff.

Drawing on the CFIA's curriculum framework as a starting point, key stakeholders from industry, academia and FPT governments are leading a Canadian effort to operationalize national training and certification in support of a professional and competent workforce. This initiative is expected to increase the number and quality of courses available, establish professional designations, and increase overall interest and mobility in employment. The initial focus is food protection, but other elements, such as animal health and plant protection, will be added over time.

4.3 Partnership in Compliance Monitoring

Faced with a broad mandate - food safety, plant and animal health and a complex global environment, the CFIA must consider how it can improve the efficiency and effectiveness of its operations. Compliance efforts from promotion, through to verification and enforcement need to be carefully coordinated and planned to ensure resources are used effectively.

While the CFIA has always used a risk-based approach for its inspection activities, it has been decentralized and varied across commodities. In contrast, other inspection systems around the world, such as those implemented in the United States, Australia, and New Zealand are adopting risk-based approaches that compare risk across commodities. These integrated approaches are more successful in allocating resources to the most significant, highest priority areas.

To support a risk-based approach to compliance promotion, the CFIA will track, share (where appropriate) and leverage the outcomes of its compliance activities in a consistent and coherent manner. Information will be drawn from verification, history of compliance and enforcement data, as well as a review of complaints from the CFIA's Complaints and Appeals Office to determine where there might be information deficiencies, inconsistent procedures and/or opportunities for business function improvements. In addition, targeted performance measurements will be developed for all compliance promotion initiatives to evaluate their effectiveness on a regular basis.

Spotlight 5 – Partnerships to Improve Compliance Outcomes

The CFIA will examine how it engages and influences others in the regulatory environment and will draw on this network of potential support to focus attention on priority areas. This will allow the Agency to identify where additional education/outreach, tools or potential improvements in training are needed and to build this information into its annual priority setting and work planning for regulatory/program design. By engaging industry and third parties (associations and non-government organizations), the CFIA will leverage sector leadership and peer support to identify and implement potential solutions to common problems in a sector (e.g., biosecurity problems, lack of technical knowledge, etc.).

The CFIA proposes to engage the sector through existing industry meeting forums, such as the 11 national Value Chain Roundtables (VCRTs), which bring together key industry leaders from across the value chain – input suppliers, primary producers (farmers), processors, food service industries, retailers, distributors (e.g., brokers, importers) and associations – with federal and provincial government policy makers. Discussions of sector strengths and weaknesses could feed into VCRT recommendations for specific actions by regulated parties (e.g., mentoring by industry leaders), industry associations (e.g., sharing information) and the CFIA (e.g., clarifying guidance documents) to improve compliance.

In addition to monitoring and engagement, the CFIA will give consideration to how it can incent compliance by enhancing its openness and transparency with respect to its compliance activities and findings. The CFIA is accountable to the public, regulated parties and other partners for raising awareness and maintaining confidence in its compliance activities. From a compliance promotion perspective, the useful and timely disclosure of compliance monitoring and enforcement records provides a mechanism to discourage non-compliance through pressure from consumers and industry peers. Public disclosure acts as a lever to make compliance issues more important to regulated parties who are potentially concerned about their reputation.

For a number of years, the CFIA has published information on its website to provide Canadians with information they need to make informed decisions (e.g. recalls, allergy alerts, and enforcement data). The CFIA will continue taking steps to become more open and transparent with respect to its regulatory activities, for example by publishing food safety investigation reports and import surveys, as well as by reporting on data generated by the CFIA's Complaints and Appeals Office. As part of the strategy, the CFIA will explore how it can continue to improve its transparency of information to increase awareness for industry and consumers.

5 Next Steps

In the fall 2014, the CFIA will review all stakeholder input and develop a final draft of the strategy in 2015, which will be accompanied by a phased implementation plan to coincide with the coming into force of the new food regulations. Implementation will require a revamped approach to information sharing, the development of interactive tools and training, and the continuation of CFIA's work to track, share and monitor Agency efforts in promoting compliance. Beyond 2015, the strategy will guide the CFIA's implementation of its Transformation Agenda as well as those future endeavours proposing major changes to regulations, policies and programs.

This strategy will require collaboration amongst governments, industry, industry associations, academia, consumers, and non-governmental organizations to contribute to and foster compliance promotion. Everyone has an important role to play.

Annex A - Principles

- Risk-based
 - Elements are targeted to regulated parties based on residual risk (e.g., compliance history, commodity risk, control plans).
- Transparent
 - Regulated parties and consumers are provided with timely, accurate and objective information about CFIA regulatory programs and services, regulatory requirements, and the outcomes of its enforcement actions and decisions.
- Accessible
 - Regulated parties and consumers are able to easily interact with the Agency on-line or in person.
- Credible
 - Regulated parties and consumers receive information from the CFIA that is complete, consistent, up-to-date, easy to understand and reflects current science.
- Preventive
 - Elements are targeted to regulated parties and consumers based on analysis of needs through patterns, trends and stakeholder feedback.
- Accountable
 - Compliance promotion activities will be conducted in accordance with clearly defined roles and responsibilities and in a way which reinforces trust in the Agency by regulated parties, stakeholders and consumers.

Annex B – Compliance Promotion Initiatives

Compliance Education/Outreach

1. The CFIA will establish and maintain a single, trusted repository for all CFIA guidance documents and questions and answers that is interactive and available to both CFIA staff and external parties.
2. The CFIA will develop and implement a policy governing guidance materials, that will address:
 - plain language requirements;
 - “common look and feel”;
 - process for regular and timely updates.
3. The CFIA will explore with federal, provincial and territorial partners the potential for searchable platforms that will provide stakeholders with a single window for agri-food regulatory requirements that span jurisdictions.
4. The CFIA will conduct research to identify all regulated parties, to assess their information needs and to develop the most effective communications channels to reach them.
5. The CFIA will develop communications tools and undertake various outreach activities to create broad awareness among regulated parties of their responsibilities and obligations.
6. The CFIA will explore public-private partnerships (i.e., alliances) with academia, industry, government, and non-government organizations to enable targeted outreach. Preventive controls could be an initial focus of the group.

Collaboration on Tools and Training

7. Based on a review of the online labelling tool, the CFIA will consider other user-oriented applications (e.g., an interactive template that allows users to develop their own food safety preventive control plans).
8. The CFIA will work with industry, academia and other governments to leverage and make more accessible best practices.
9. The CFIA will leverage industry-developed food safety systems and associated infrastructure and tools, which facilitate industry compliance (e.g., model systems).
10. In support of Agency Transformation, the CFIA will develop a career-spanning learning framework for the CFIA in collaboration with industry, academia, and non-profit organizations.

Partnership in Compliance Monitoring

11. The CFIA will develop and implement an Agency-wide model that will provide an integrated picture of compliance outcomes. Based on data analysis and compliance trends, the CFIA will develop targeted strategies to improve compliance outcomes (e.g., education/outreach and interactive assistance) and engage industry and third parties as required.
12. In keeping with the CFIA’s Transparency Policy, the CFIA will continue to expand the reporting of compliance and enforcement activities.