Discussion paper on the Integrated Agency Inspection Model (iAIM)
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Introduction

The CFIA develops regulations and delivers inspection and other services to:

- prevent and manage food safety risks,
- protect plant resources from invasive pests, diseases and plants,
- prevent and manage animal diseases, and
- contribute to consumer protection and to market access for Canada’s food, plants and animals.

The Agency developed an inspection approach that proposed a shift to a more consistent and risk-based approach to program delivery that could be applied to all regulated commodities. Initially focussing on food safety, the Improved Food Inspection Model was developed in consultation with the food sector and was posted in June 2013.

In keeping with the original vision of applying the inspection model across regulated commodities, and to provide industry with a more predictable, consistent and transparent inspection approach, the food inspection model document has been adjusted to integrate all CFIA inspection activities. The Integrated Agency Inspection Model document is being used to consult with Agency staff, and parties regulated under the Seeds Act, Fertilizer Act, Plant Breeders Rights, Plant Protection, Feeds Act and Health of Animals Acts, as well as those regulated under the Safe Food for Canadians Act.
Principles of the Integrated Agency Inspection Model

The Integrated Agency Inspection Model, like the Improved Food Inspection Model, is based on

- the premise that industry is responsible for its products and processes and must demonstrate ongoing compliance with legislative requirements;
- science, which will allow the Agency to better focus resources on areas of highest risk and non-compliance;

and supported by

- legislative authority for permissions (i.e., permit, authorization, certification or licence) and preventive control plans;
- information management/information technology solutions that will facilitate planning, reporting, and decision making;
- standard processes to help provide consistent inspection delivery and oversight;

and is

- flexible, to accommodate the complexity and size of an operation.
- aligned with international standards, such as those developed by Codex alimentarius, International Plant Protection Convention (IPPC) and the World Organisation for Animal Health (OIE)

The activities regulated under the Feeds, Seeds, Fertilizer Acts and some under the Health of Animals (e.g. veterinary biologics, hatcheries, artificial insemination/embryo centres) and Plant Protections Acts (nurseries, greenhouses and sawmills) lend themselves to an establishment-based inspection system, similar to most food commodities. Therefore the principle of requiring permission and a preventive control plan for activities regulated under these Acts is relatively straightforward.

Activities related to controlling plant pests and animal diseases, as regulated under the Plant Protection and Health of Animals Acts, are based on producers requesting permission from the CFIA to move regulated commodities into or out of the country or within the country to areas or establishments of differing disease/pest status. For the most part, primary producers of animals and plants who are not imposing additional risk by their activity will not be expected to get permission except when requesting movement of the nature indicated above.
How will the model change to reflect animal and plant inspection activities?

The integrated model has been expanded from food safety to human, animal and plant health and the protection of the environment.

The food model principles have been retained and adjustments made to accommodate the remaining regulated commodities including:

- highlighting the importance of import controls to prevent the introduction of plant pests and animal diseases in the CFIA oversight section;
- consideration that Canada’s plant pest and animal disease status affects the trading status of all commodities;
- recognition that there are human health risks in commodities that become food as part of the continuum; and
- the role of the Agency in granting permissions both in the form of a licence with a preventive control plan and animal and plant health permissions that do not include a preventive control plan for low frequency regulated activities.

What inspection activities will remain the same?

The integrated model includes a description of the Agency’s regulatory response in those situations in which the CFIA imposes controls due to a contamination event (e.g., food, feed) or an outbreak of a plant or animal pest or disease. The CFIA will continue to respond to these events, as well as events of non-compliance and complaints. The response approach will be standardized across business lines to facilitate the development of common processes, procedures, informatics support and expertise.

Surveillance will continue to be an important tool used by the Agency, not only to determine the effectiveness of industry control systems and the disease/pest status of the country, but to measure the effectiveness of various control measures both at the border and domestically.

Will there be a need for legislative change to implement the model?

The passage of the Safe Food for Canadians Act in 2012 and the resulting development of regulations across all food commodities that are expected to
be in place in 2015 will result in a consistent set of food regulations to underpin all aspects of the inspection model.

Legislation for the remaining programs contains varying powers enabling the implementation of the inspection model. The Agricultural Growth bill, which was tabled in Parliament on December 9, 2013, will facilitate modernizing plant and animal legislation. The CFIA has begun a systematic review of existing authorities to better align with the inspection model.

**How does the inspection model support the Agency's transformation agenda?**

The Agency has built a transformation agenda based on four pillars:

- stronger rules,
- more effective inspection,
- a commitment to service, and
- more information for consumers.

The Agency will take this opportunity to develop and define the policy, regulatory, administrative and technical infrastructure underlying an integrated inspection model.

**Consultation Plan**

The CFIA is seeking feedback on the integrated model from CFIA staff, bargaining agents, consumers, industry, federal, provincial and territorial government partners, academia as well as international partners (World Trade Organisation (WTO) notification). Consultation will take place from January through July 2014.

An email account is available to receive comments on the model during the consultation period: CFIA-modernisation-ACIA@inspection.gc.ca.

Once consultations close, the Integrated Agency Inspection Model will be finalized and posted along with a "What we heard" report, taking into consideration the input provided by stakeholders.
Conclusion

A strengthened single inspection delivery model, based on common inspection activities and standard processes, will be flexible across commodities and capable of recognizing and responding to emerging risks. It will provide a balance between traditional inspection and the verification of the effectiveness of industry control systems.

The expected outcomes of the single inspection model will include more predictability, consistency and transparency for regulated parties as well as administrative and operational efficiencies for the CFIA. This will support a strengthened food safety system, and improved plant, animal and environmental health.