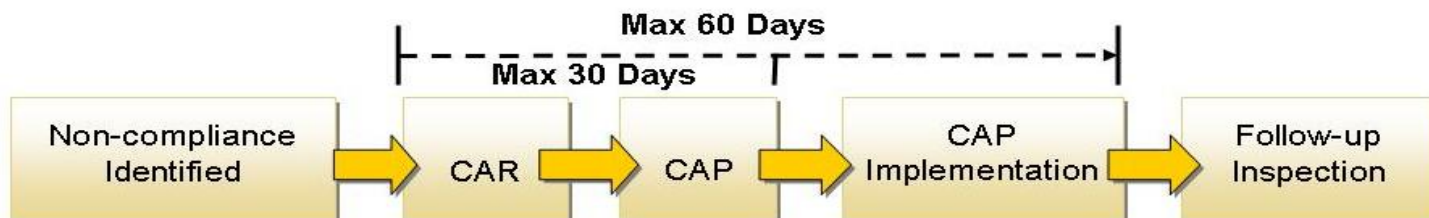


## **Industry Options for Responding to CARs Issued During CVS Inspections**

During the Compliance Verification System (CVS) industry workshops, participants were introduced to CFIA's new procedures for dealing with potential non-compliance identified during routine inspections. If an inspector assigns an unacceptable rating to any of the CVS tasks, the inspector issues a Corrective Action Request (CAR) to the facility. The CAR describes the non-compliance and requires the facility to provide a Corrective Action Plan (CAP) to address the non-compliance. The facility has two options. The facility can submit a CAP detailing how the non-compliance will be corrected and prevented from recurring. Or, the facility can submit a "Request for Review" if it believes it is in compliance with the regulations and therefore intends to dispute the CAR.

If the facility takes the first option, a verbal or written CAP must be communicated to the inspector within a maximum of 30 days of receiving the CAR, and the noncompliance must be corrected within 60 days of receiving the CAR. (Note: These timeframes can be reduced at the inspector's discretion based on the seriousness of the noncompliance.) Once the CAP is submitted, the inspector reviews it for acceptability within 5 working days. If accepted, the facility implements the CAP, then the inspector does a follow up inspection (see diagram) and closes the CAR.



The second option, Request for Review, is essentially an appeal mechanism that was not previously available to the industry. If the facility elects to dispute a CAR, it can submit to the inspector a written request to this effect within 10 working days of the CAR issuance. The request should also include the evidence supporting the appeal (e.g. validation data). The inspector forwards this request to the newly established Area CVS Coordinator, whose job it is to coordinate a review of, and response to, the request in a timely fashion. The inspector serves as the liaison and communicates the final decision to the facility. Review decisions are also communicated to all the Area CVS Coordinators to ensure that subsequent requests for review are handled in the same manner.

CFIA has indicated that Request for Review decisions can lead to updates to the CVS inspection form. ANAC encourages members to utilize the Request for Review option as they deem appropriate. Members are also encouraged to keep ANAC apprised of any submissions and the resulting review decision. This will allow the association to track the issues being raised by industry and follow up with CFIA on any needed changes to the CVS inspection form.

For more details on CVS inspections and the CAR process, you can download a copy of CFIA's [CVS Feed Inspection Procedural Manual](http://www.anac-anac.ca/eventspublications/cvs) on ANAC's website at [www.anac-anac.ca/eventspublications/cvs](http://www.anac-anac.ca/eventspublications/cvs). This document was distributed to participants at the CVS industry workshops.