



Canadian Food
Inspection Agency

Agence canadienne
d'inspection des aliments

Canadian Food Inspection Agency



Setting the stage for Alternative Service Delivery

NAPPO Annual Meeting

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Outline

- Definitions
- Role of ASDs in trade
- Benefits
- Elements of a successful ASD
- Existing ISPMs & RSPMs which include references to ASDs
- New CFIA policy on ASDs

A few proposed definitions

- **ASD** is the provision of public services through arrangements other than the traditional departmental structure (OAG)
- An **ASD arrangement** is one in which an **external party** delivers a program or service that directly pertains to the NPPO's mandate and that would otherwise be delivered by the NPPO.
- **External party:** Provincial, Territorial or Municipal governments in Canada, or private entities, including not-for-profit.

ASDs and their role in the global trade of plant products

- Facilitate the certification and shipment of plant products, esp. when there is harmonization or recognition of equivalent amongst trading partners (e.g. GCP)

Benefits (to NPPO and Regulated Parties)

- Leverages external expertise
- Timeliness
- Flexibility
- Increased collaboration
- Improved maintained sustainability
- Increased predictability
- Maintain the country's phytosanitary reputation
- Effective use of resources
- Consistent with government legislation and policies
- Maintain or improve accessibility to services and programs
- Measureable performance and improvement



Key to a successful ASD

- Meets its objectives relating to public purposes (i.e. public objectives)
 - should provide better service to the public, meet its public objectives without undue negative impacts, and do so in a cost-effective manner.
- Accountable
 - should ensure that adequate provision is made for accountability to the governmental authorities.
- Transparent
 - should ensure the availability of key information to the government and the public.
- Protects the public interest
 - the public objectives should be kept in focus through the service delivery arrangement.

Examples of Existing International and Regional Standards that Include References to ASDs

Relevant guidance from International Standards for Phytosanitary Measures (ISPMs)

- From the text of the IPPC:

Article V – Phytosanitary Certification

2. Each contracting party shall make arrangements for the issuance of phytosanitary certificates in conformity with the following provisions:

(a) Inspection and other related activities leading to issuance of phytosanitary certificates shall be carried out only by ***or under the authority*** of the official national plant protection organization. The issuance of phytosanitary certificates shall be carried out by public officers who are technically qualified and duly authorized by the official national plant protection organization to act on its behalf and under its control with such knowledge and information available to those officers that the authorities of importing contracting parties may accept the phytosanitary certificates with confidence as dependable documents.

Relevant guidance from International Standards for Phytosanitary Measures (ISPMs)

- ISPM 7 – Phytosanitary Certification Systems
 - Section 3.1:

« *Except for the issuance of phytosanitary certificates **non-governmental personnel may be authorized by the NPPO to perform specified certification functions.** (...) To ensure independence in their exercise of official functions, they should be subject to restrictions and obligations **equivalent to those for government officials** and have **no conflict of interest** (...) that may affect the outcome.* »

Relevant guidance from International Standards for Phytosanitary Measures (ISPMs)

- ISPM 5 – Glossary of phytosanitary terms
 - No specific definition, however, section 2.7 of Supplement 1: Guidelines on the interpretation and application of the concepts of “official control” and “not widely distributed”:

« *NPPO authority and involvement in official control;*

Official control should:

- *be established or recognized by the contracting party or the NPPO under appropriate legislative authority*
- ***be performed, managed, supervised or, at minimum, audited/reviewed by the NPPO***
- *have enforcement assured by the contracting party or the NPPO*
- *be modified, terminated or lose official recognition by the contracting party or the NPPO.*



Relevant guidance from International Standards for Phytosanitary Measures (ISPMs)


- ISPM 15 – Regulation of wood packaging material in international trade
 - Section 4.1:

NPPOs that authorize use of the [ISPM 15] mark have the responsibility for ensuring that all systems authorized and approved for implementation of this standard meet all necessary requirements described within the standard, and that wood packaging material (or wood that is to be made into wood packaging material) bearing the mark has been treated and/or manufactured in accordance with this standard.


The NPPO should supervise (or, as a minimum, audit or review) the application of the treatments, and authorize use of the mark and its application as appropriate.

Relevant guidance from International Standards for Phytosanitary Measures (ISPMs)

- ISPM 18 – Guidelines for the use of irradiation as a phytosanitary measure
 - Section 5: Approval of Facilities



Treatment facilities should (...) be subject to approval (qualification, certification or accreditation) by the NPPO in the country where the facility is located prior to applying phytosanitary treatments.



Relevant guidance from International Standards for Phytosanitary Measures (ISPMs)

- ISPM 20 – Guidelines for a phytosanitary import regulatory system
 - Section 5.1.7: Systems for authorization of non-NPPO personnel

NPPOs may authorize, under their control and responsibility, other government services, nongovernmental organizations, agencies or persons to act on their behalf for certain defined functions. In order to ensure that the requirements of the NPPO are met, operational procedures are required. In addition, procedures should be developed for the demonstration of competency and for audits, corrective actions, system review and withdrawal of authorization.



Relevant guidance from Regional Standards for Phytosanitary Measures (RSPMs)

- RSPM 28 – Authorization of Entities to Perform Phytosanitary Services
 - References throughout the standard, but more particularly the scope section:

*This standard describes the essential elements required for the authorization of entities by the [NPPO], including individuals, facilities, businesses, and other organizations **to perform specific phytosanitary services on behalf of the NPPO.***

Such entities may in turn authorize third parties to carry out certain phytosanitary services

Relevant guidance from Regional Standards for Phytosanitary Measures (RSPMs)

- RSPM No. 9 – The Authorization of Laboratories for Phytosanitary Testing
 - References throughout the standard, but more particularly the scope section:

This standard describes the criteria for the authorization of diagnostic laboratories to perform specific functions in support of phytosanitary testing. It also outlines the responsibilities of NPPOs in managing the authorization process.

CFIA's Alternative Service Delivery Policy (effective date: July 13, 2016)

- Background
 - CFIA delivers plant (and animal and food safety) programs and services but may also enter into alternative service delivery (ASD) arrangements to help deliver its mandate.
 - The CFIA has entered into ASD arrangements related to various regulated plant commodities for quite some time:
 - Canadian Nursery Certification Program (CNCP)*
 - Canadian Greenhouse Certification Program (CGCP now GCP)*
 - Canadian Heat Treatment Wood Products Certification Program (CHTWPCP)
 - Seed certification program with phyto component (e.g. crop inspection)
 - Need for a consistent approach to ASDs across the Programs (Plant, Animal, Food Safety).

CFIA's Alternative Service Delivery Policy

- Objectives of the policy are to promote:
 - a consistent Agency-wide approach to establishing and overseeing ASD arrangements;
 - rigorous analysis of proposed ASD arrangements prior to their establishment; and
 - effective oversight, review, evaluation and reporting of ASD arrangements.
- ASD arrangements include arrangements in which:
 - the CFIA collaborates with or authorizes an external party to deliver programs or services; or
 - the CFIA authorizes an external party to allow other parties to deliver programs or services.

CFIA's Alternative Service Delivery Policy

- ASD arrangements do **not** include:
 - Administrative arrangements
 - Services or programs which are outside the CFIA's mandate or legislated authority
 - Recurring and standardized research-based arrangements
 - Arrangements where the sole purpose is for an advisory body or committee to recommend actions for the Agency, based on findings from authorized verification, assessment or evaluation.

CFIA's Alternative Service Delivery Policy cont'd

- ASD arrangements **do not** include:
 - Equivalency arrangements with foreign countries
 - Arrangements the CFIA enters into with other federal government departments and agencies (for example, grain inspection activities conducted by the Canadian Grain Commission).

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