

Proposed Communication, Engagement and Consultation Plan

Regulatory Cooperation Council Mutual Reliance of Food Testing Results Initiative

Background

Both Canada and the United States (U.S.) have highly successful, world class regulatory systems that have evolved independently at the same time as our economies have grown closer. This unique situation between Canada and the U.S. creates a significant opportunity for cooperation that will benefit both businesses and consumers. We can become more efficient and effective by streamlining and aligning standards and removing duplicative requirements such as independent approvals for the same products, re-inspections and requirements for unnecessary certification or verifications of products. The Regulatory Cooperation Council (RCC) work will focus on addressing these, thus making it easier for Canadian and American firms to do business on both sides of the border.

One of the areas addressed in the Joint Action Plan for the RCC is Food Safety including the Mutual Reliance of Food Testing Results (MR-FTR) initiative

Achieving mutual reliance will require a multi-prong approach under numerous initiatives (i.e. lab accreditation, principles of lab methodology, data sharing etc). A key foundation initiative is the development of jointly acceptable food safety laboratory accreditation criteria with a view to ensuring that testing conducted in one country would be acceptable to regulators in both countries. This will facilitate cross-utilization of laboratory results by industry and regulators while maintaining confidence that the test results provide reliable evidence that regulatory requirements have been met for food products within the mandates of Canadian Food Inspection Agency (CFIA), Health Canada (HC) and the United States Food and Drug Administration (FDA). This signifies that USDA regulated commodities such as meat and poultry are not part of this initiative.

The MR-FTR initiative is divided into two action items:

- Develop and implement Guiding Principles for mutual acceptance of laboratory accreditation;
- Establish a permanent mechanism to maintain mutual acceptance of laboratory accreditation.

A team composed of CFIA, HC and FDA staff (see Annex 1) has been put together to implement these action items.

Objectives of this Engagement Plan

Stakeholders' input was key in developing the Joint Action Plan, and the purpose of this document is to continue consulting and engaging stakeholders during the 18 months of the implementation of the RCC Joint Action Plan for the MR-FTR initiative.

The specific objectives are:

- To confirm understanding of the issues, including from perspective of a range of stakeholders
- To explain possible options to stakeholders and obtain their feedback on them
- To take into consideration the views of stakeholders and be transparent and accountable in the decision making process.
- To give stakeholders the opportunity to listen to one another's perspectives
- To build positive, collaborative relationships between CFIA, HC, FDA and their stakeholders
- To inform the updating of policies and procedures related to the MR-FTR in Canada and the U.S.

Stakeholders

CFIA, HC and FDA staff specialized in quality assurance, accreditation and international policy are considered as internal stakeholders and will be consulted.

This initiative will potentially affect a number of groups both in Canada and in the U.S. Therefore, external potential stakeholders belong to several categories:

- Accreditation bodies
- Laboratories and their associations
- Food industry, growers, traders and their associations
- Consumer groups
- Other governments (provinces, territories, states)
- Other organizations with an interest

The Canada and U.S. accreditation bodies will be engaged at a higher level as they have already mutual recognition agreement for accreditation through the International Laboratory Accreditation Cooperation (ILAC) and have therefore expertise/experience which will benefit this initiative.

The list of potential stakeholders can be found in Annex 2.

Consultation Process

Consultation will be conducted at each key step of this initiative and for its duration. The whole consultation process will be managed by the task team and as much as possible stakeholders from both U.S. and Canada will be consulted at the same time and on the same topic in order to be open and inclusive. While this consultation process is specific to the MR-FTR Initiative it will be coordinated with the broader stakeholder meetings organized by the RCC.

The team will undertake several modes of consultation at different stage in the project and with different stakeholders:

E-mail

Documents will be sent for information/ comments/ discussion and feedback in general to all identified stakeholders as they become available and identified stakeholders will be encouraged to disseminate these documents as they see appropriate.

Consultation session

A workshop may be held for the most critical step of this initiative, in parallel with an RCC stakeholders' meeting if possible. For reasons of economy and timeliness this consultation may be organised through a webinar or other similar tool.

Participation in events organized by stakeholders

Task team leads and/or members will attend relevant events organized by stakeholders in order to create and maintain two-way communication and to receive as much feedback as possible.

Web Consultations

Documents may also be posted on CFIA, HC, and/or FDA websites for information/ comments/ discussion and feedback from the general public. All identified relevant stakeholders will also be contacted at the time of the web posting, provided with the web links and invited to respond.

Report on Consultation

After each consultation step, a report on feedback received will be prepared.

Schedule

This calendar will be modified as needed as the project advances.

Activity	Timing (Tentative)
Create a Steering Committee	May 2012
Send the proposed Engagement Plan for information/comments	September 2012
Send Inventory of tools currently used by the US and Canada in regard to acceptable accreditation criteria <ul style="list-style-type: none">• Comment Period / Stakeholders propose solutions to fill the gaps between the two countries	September 2012 30 days
Post/Send: Gap analysis including proposal to fill the gaps Proposed Options for permanent mechanism	October 2012
Post/Send: Guiding principles to fill the gaps Final Options for permanent mechanism	January 2013
Post/Send draft Agreement on guiding principles and on a permanent mechanism <ul style="list-style-type: none">• Comment Period	April 2013 30 days
Post/Send final Agreement on guiding principles and on a permanent mechanism	Jun 2013

Annex 1: Mutual Reliance of Food Testing Results Initiative Team Members

Canadian Food Inspection Agency

Canada Lead: - Diane Allan, Executive Director, Food Safety Science Directorate

Team Members: - Corinne Pequignot, Director, Quality Assurance and Accreditation
- Shelagh McDonagh, National Manager, Quality Assurance and Accreditation
- Cheryl Gibbons, Senior Statistician, Science (Food Safety Division)

Health Canada

Canada Co-Lead: - Samuel Godefroy, Director General, Food Directorate

Team Members: - Barbara Lee, Director Health Products and Food Branch, (Bureau of Chemical Safety)
- Stan Bacler, Senior Science Advisor, Health Products and Food Branch, (Bureau of Chemical Safety)
- Maria Nazarowec-White, Associate Director, Health Products and Food Branch, (Bureau of Microbial Hazards)

Food and Drug Administration

US Lead: - Timothy McGrath, A/Director, Division of Field Science

Team Members: - Gorka Garcia-Malene, International Regulatory Policy Analyst

Annex 2: External Stakeholders List

This list is not limitative and can be modified as new stakeholders are identified or if contacted stakeholders asked to be remove from the list

Agricultural Alliance of New Brunswick	Canada
Agriculture Producers Association of Saskatchewan	Canada
Alberta Egg Producers	Canada
Alberta Food Processors Association	Canada
Association of Canadian Distillers	Canada
B.C. Seafood Alliance	Canada
Baking Association of Canada	Canada
BC Agricultural Council	Canada
BC Dairy Foundation	Canada
BC Food Processors Association	Canada
Brewers Association of Canada	Canada
Canada Grains Council	Canada
Canadian Agri-food Trade Alliance	Canada
Canadian Aquaculture Industry Alliance	Canada
Canadian Association for Laboratory Accreditation	Canada
Canadian Bottled Water Association	Canada
Canadian Consumer Speciality Products Association	Canada
Canadian Council of Independent Laboratories	Canada
Canadian Egg Marketing Agency	Canada
Canadian Federation of Independent Grocers	Canada
Canadian Food Exporters Association	Canada
Canadian Grains Commission	Canada
Canadian Health Food Association	Canada
Canadian Herb & Spice Coalition	Canada
Canadian Honey Council	Canada
Canadian Horticulture Council	Canada
Canadian Institute of Food Science and Technology	Canada
Canadian Manufacturers and Exporters	Canada
Canadian Mushroom Growers' Association	Canada
Canadian National Millers Association	Canada
Canadian Oilseeds Processors Association	Canada
Canadian Organic Growers Inc.	Canada
Canadian Partnership for Consumer Food Safety Education	Canada
Canadian Pasta Manufacturers Association	Canada
Canadian Produce Marketing Association	Canada
Canadian Society of Customs Brokers	Canada
Canadian Special Crops Association	Canada
Canadian Sugar Institute	Canada
Canadian Supply Chain Food Safety Coalition	Canada

Canadian Wheat Board	Canada
Canola Council of Canada	Canada
Club Export Agro-alimentaire du Québec	Canada
Coffee Association of Canada	Canada
Consumers Association of Canada	Canada
Dairy Producers Association of Canada	Canada
Edible Oil Foods Association of Canada	Canada
Egg Farmers of Canada	Canada
Egg Farmers of Ontario	Canada
Flax Council of Canada	Canada
Food and Consumer Products Manufacturers of Canada	Canada
Food Beverage Canada	Canada
Food Processors of Canada	Canada
Grain Growers of Canada	Canada
Guelph Food Technology Center	Canada
Malting Industry Association of Canada	Canada
New Brunswick Egg Producers	Canada
Newfoundland and Labrador Federation of Agriculture	Canada
Nova Scotia Federation of Agriculture	Canada
Nova Scotia Fish Packers Association	Canada
Ontario Federation of Agriculture	Canada
Packaging Association of Canada	Canada
Prince Edward Island Federation of Agriculture	Canada
Pulse Canada	Canada
Saskatchewan Egg Producers	Canada
Saskatchewan Food Processors Association	Canada
Saskatchewan Herb and Spice Association	Canada
Small Scale Food Processor Association-BC	Canada
Standards Council of Canada	Canada
Tea Association of Canada	Canada
Union des producteurs agricole	Canada
Wild Blueberry Association of North America	Canada
Pacific Northwest Economic Region	Canada/U.S.
ABC Research Laboratories	U.S.
AIHA Laboratory Accreditation Programs	U.S.
American Association for Laboratory Accreditation	U.S.
American Council of Independent Laboratories	U.S.
American Proficiency Institute	U.S.
ANSI-ASQ National Accreditation Board	U.S.
AOAC International	U.S.
Covance	U.S.
Eurofins	U.S.
NSF International	U.S.

SGS	U.S.
Silliker Global Certification Services	U.S.
Grocery Manufacturers Association (GMA)	U.S.
U.S. Chamber Of Commerce	U.S.