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to the House of Commons

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Chapter 4

Managing Risks to Canada's Plant Resources—
Canadian Food Inspection Agency

Office of the Auditor General of Canada

The December 2008 Report of the Auditor General of Canada comprises Matters of Special Importance—2008, Main Points—Chapters 1 to 8, Appendices, and eight chapters. The main table of contents for the Report is found at the end of this publication.

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Office of the Auditor General of Canada
240 Sparks Street, Stop 10-1
Ottawa, Ontario
K1A 0G6

Telephone: 613-952-0213, ext. 5000, or 1-888-761-5953
Fax: 613-943-5485
Hearing impaired only TTY: 613-954-8042
Email: distribution@oag-bvg.gc.ca

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Chapter

4

Managing Risks to Canada's Plant Resources

Canadian Food Inspection Agency

All of the audit work in this chapter was conducted in accordance with the standards for assurance engagements set by The Canadian Institute of Chartered Accountants. While the Office adopts these standards as the minimum requirement for our audits, we also draw upon the standards and practices of other disciplines.

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Managing Risks to Canada's Plant Resources

Canadian Food Inspection Agency

Main Points

What we examined

The mandate of the Canadian Food Inspection Agency (CFIA) is to safeguard Canada's food supply, protect animals and plants, and support trade and commerce. One of its responsibilities is to regulate imports of plants and plant products. This includes developing import policies and standards, issuing import permits, approving shipments for release, and carrying out import inspections. In the 2006–07 fiscal year, CFIA spent $65.2 million protecting Canada's crops and forests.

We examined whether the Agency adequately manages the risk that invasive alien plants, seeds, plant pests, and plant diseases could enter or become established in Canada. We looked at how the Agency sets and administers standards, conducts pest surveys and plant health risk assessments, and verifies that imports of plants and plant products meet Canadian requirements. Our audit focused on work done by CFIA staff at headquarters in Ottawa, at the three Import Service Centres (Vancouver, Toronto, and Montreal), and at inspection offices across the country.

Why it's important

Canada's plant resources are critical to the well-being of all Canadians. Invasive alien plants and plant pests can threaten biodiversity and the economy. Experts have concluded that invasive species are the second most serious threat to biodiversity after habitat loss. In their new habitat, invasive alien plants and plant pests may become new predators, competitors, parasites, or diseases and thus threaten domestic species and Canada's plant and plant product production. In 2005, this production was valued at approximately $100 billion.

There is a general consensus that it costs less to deal with invasive plants, pests, and diseases before they become established. In protecting Canada's plant resources, CFIA must manage the risks associated with changing environmental conditions, the growing globalization of trade, and the increasing diversity of plants and plant products being imported into Canada—currently estimated at around 84,000 shipments a year.

What we found

- The Agency supports its efforts with two key science-based activities—plant health risk assessments and pest surveys. The Agency has difficulty delivering timely assessments; there is a growing backlog of requests for risk assessments—42 at the time of our audit, more than can normally be completed in a year. The yearly pest survey plans of the Plant Health Surveillance Unit are not risk-based and focus almost exclusively on existing invasive plants, pests, and diseases rather than identifying potential new threats before they become established plant health emergencies.
- CFIA's national inspection targets for plant imports are interpreted and applied inconsistently across the country. High-risk imported commodities, which are subject to 100 percent inspection, are sometimes released for distribution without being inspected. Of the 27 approved import application packages we selected where inspection had been necessary, 10 were released for distribution without being inspected; in 6 other cases there was no record of having received the transaction in the inspection office. We were told that inspection of plant imports competes with pest surveys and export certification for inspectors' time and that exports are a higher priority.
- Plant protection programs are not adequately supported by information management and technology, resulting in the need for thousands of faxes sent internally across the Agency each year and the loss of documents. Further, there is no system for tracking imports, and decisions to approve or reject import application packages are based on manual reconciliation of information from a variety of paper and computer sources. There is no systematic mechanism for inspection offices to provide the Agency's Plant Health Division with inspection results, so the Division does not know if the inspection standards it sets are followed and are targeting the right commodities and importers. We first identified the lack of supporting information management in a 1996 audit of the Federal Plant Health Program and there has been little progress since then.
- Overall, the Plant Health Program lacks quality management processes in import-related activities key to keeping invasive alien species from entering and becoming established in Canada. As a result, management has no systematic way of knowing if its procedures are adequately designed and operating effectively. This compromises the Agency's ability to ensure that only shipments representing a low risk of contravening Canada's import requirements are approved for entry into the country. Further, these and other risk-mitigation problems we identified in many key

import-related activities in the Plant Health Program cut across the Agency's three main branches—Science, Policy and Programs, and Operations.

The Agency has responded. The Agency agrees with all of our recommendations. Its detailed responses follow each recommendation throughout the Chapter.

Introduction

4.1 The mandate of the Canadian Food Inspection Agency (CFIA) is to safeguard Canada's food supply, protect animals and plants, and support trade and commerce. This science-based regulatory agency is responsible for delivery of all federally mandated food inspection, plant protection, and animal health programs.

4.2 The Agency, which reports to the Minister of Agriculture and Agri-Food, employs over 6,000 people across Canada and is responsible for administering 13 federal statutes and related regulations. In the 2006–07 fiscal year, the Agency spent $65.2 million—11 percent of its total spending—to protect Canada's crops and forests.

4.3 The Agency's plant protection authority comes from the federal *Plant Protection Act*. Under the Act, the Agency develops and implements policies and programs to prevent and manage the introduction of invasive plants (weeds), pests, and diseases that pose a hazard to Canada's plant resources and the economy. The purpose of the Act is "to protect plant life and the agricultural and forestry sectors of the Canadian economy by preventing the importation, exportation and spread of pests and by controlling or eradicating pests in Canada."

4.4 The Agency is also responsible for Canada's obligations under the International Plant Protection Convention (IPPC). As Canada's National Plant Protection Organization (NPPO), the Agency's responsibilities include

- certifying that exports are free of invasive plants, pests, and diseases;
- inspecting imported plants and plant products; and
- carrying out pest surveys and plant health risk assessments.

4.5 The Agency is the contact point for the exchange of information connected with the implementation of the IPPC. As such, it is responsible for sharing information with other nations, such as the occurrence of incidents, outbreaks, and spread of plants, pests, and diseases.

Invasive Alien Species Strategy

4.6 In 2005, the federal government launched the Invasive Alien Species Strategy. The strategy is an $85-million action plan that covers five years (ending in 2010). Under the strategy, the Agency received $50 million to support its role in dealing with invasive alien plants, pests, and diseases.

4.7 The objectives of the strategy are consistent with those in the *Plant Protection Act*, which are to

- prevent harmful intentional and unintentional introductions of plants, pests, or diseases;
- detect and identify new invasive species, in a timely manner;
- respond rapidly to new invasive species; and
- manage established and spreading invasive species through eradication, containment, and control.

Carrying out the plant protection mandate

4.8 As it sets out in its risk profile, the Canadian Food Inspection Agency faces significant challenges in carrying out its plant protection mandate, including the following:

- responding in a timely fashion to an increase in global trade and changing environmental conditions that create different opportunities and threats;
- processing the increasingly diverse variety of plants and plant products being imported into Canada; and
- managing the increasing demands for import inspections, foreign country evaluations, and export certification.

4.9 The Agency

- regulates the import of a variety of plants and plant products, including grains and field crops, seeds, and forest and horticultural commodities;
- develops import policies and inspection standards;
- issues import permits;
- approves or rejects import shipments for release;
- carries out import inspections;

- conducts on-site verifications of certification systems in countries of origin;
- monitors pests and diseases; and
- certifies plants and plant products for export.

Asian Long Horned Beetle

Photo: K. R. Law, USDA APHIS PPQ, Bugwood.org

4.10 Since the Agency bills importers for its services every time they request approval to import a shipment into Canada, its financial system is able to provide an estimate of annual shipments. There are currently an estimated 84,000 shipments of regulated plants and plant products being imported into Canada.

Preventing entry of pests to protect the economy and environment

4.11 Invasive plants, pests, and diseases threaten both the economy and the environment. In their new ecosystems, invasive alien species may become new predators, competitors, parasites, and cross-breeders—any one or all of which can have an effect on native and domesticated plant resources. This effect can have a significant impact on the economy; for example, in 2005, the production value of Canada's forest and agricultural commodities was about $100 billion dollars.

Brown Spruce Long Horned Beetle

Photo: G. Smith, Canadian Forest Service, Bugwood.org

4.12 The impact of invasive plants, pests, and diseases on the environment is also significant. According to experts, invasive species are the second most serious threat to biodiversity after habitat loss. Their impact on native ecosystems, habitats, and species can be severe and often irreversible. Therefore, preventing invasive species from entering the country and detecting new species in a timely manner are critical to mitigate threats to Canada's export markets for its plant resources and to the environment.

4.13 By April 2008, the Agency had spent over $140 million to manage existing plant health **emergencies**; it is important to note that the efforts may continue for years. The Agency's management of established and spreading invasive plants, pests, and diseases involves surveys, research, inspections, and export certification to monitor, eradicate, contain, and control. There are costs that are not accounted for here, including loss of markets, reduced crop yields, losses in property value, and increased firefighting (Exhibit 4.1).

Emergency—According to the Canadian Food Inspection Agency, an emergency is "an abnormal situation which, to limit damage to persons, property or the environment, requires prompt action beyond normal procedures. Normally an emergency situation is one where the Agency must quickly deploy additional resources to mitigate potential impacts."

4.14 Early identification is important, because the consensus is that it costs much less to deal with a new invasive plant, pest, or disease before it becomes established.

4.15 The Agency does not have a role in all plant health incidents in Canada. For example, it does not regulate the current Mountain Pine Beetle infestation in British Columbia and Alberta, because this pest is native to Canada.

Exhibit 4.1 Existing plant health emergencies

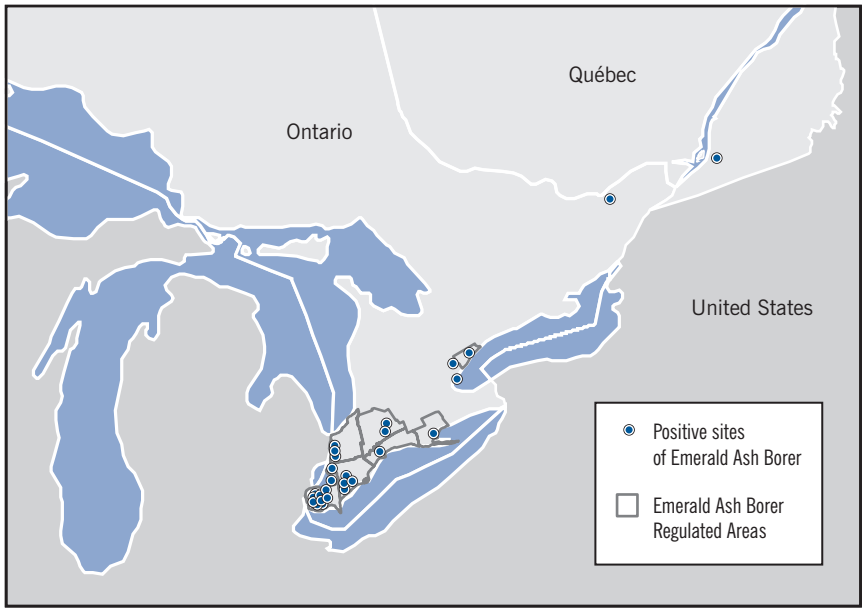
Plant pest emergency	Description and impact of pest or disease	Emergency location	Year detected
Asian Long Horned Beetle	A destructive pest of hardwoods, especially maples. It poses a threat to both maple syrup and hardwood lumber industries in Canada.	Toronto–Vaughn, Ontario	2003
Emerald Ash Borer	An insect that kills ash trees, which are important to the ecology and economy of eastern Canada (Exhibit 4.2)	Southwestern Ontario Toronto, Ontario Montérégie Region, Quebec Brampton, Ontario Oakville, Ontario Ottawa, Ontario	2002 2007 2008 2008 2008 2008
Brown Spruce Longhorn Beetle	A beetle that kills spruce trees. It is native to northern and central Europe and is a direct threat to North American forests and Canadian forest commodities.	Nova Scotia	1999
Potato Cyst Nematode	Two types of nematodes are the Golden Nematode and Pale Cyst Nematode. They reduce yields of potatoes and other host crops such as tomatoes and eggplants by up to 80 percent	Quebec Alberta	2006 2007
Sudden Oak Death (Phytophthora ramorum)	A fungus-like pathogen that causes a disease on a wide variety of nursery plants. It has also been associated with a disease of oak.	British Columbia Nurseries	2003
Potato Wart	This disease is caused by a soil-borne fungus that attacks the growing points on the potato plant, such as eyes and buds. It is found in Prince Edward Island. It reduces yield and makes potatoes unmarketable.	Prince Edward Island	2000
Plum Pox Virus	A serious plant disease infecting stone fruit species, including peaches, nectarines, plums, apricots, almonds, and ornamental trees and shrubs. It does not kill trees, but can drastically reduce yields.	Southern Ontario	2000

Source: Canadian Food Inspection Agency

Emerald Ash Borer

Photo: D. Cappaert, Michigan State University, Bugwood.org

Exhibit 4.2 **Emerald Ash Borer—Positive Sites Map**



Source: Canadian Food Inspection Agency

4.16 The Canada Border Services Agency (CBSA) is a key partner in protecting Canada's plant resources. While the Canadian Food Inspection Agency is responsible for administering and enforcing the *Plant Protection Act*, CBSA is responsible, under the *Canadian Food Inspection Agency Act*, for the initial inspection of imports at airports and Canadian border points.

Focus of the audit

4.17 The Canadian Food Inspection Agency carries out a number of functions under its Plant Health Program. In 2004, we audited the Agency's management of plants with novel traits. This audit focuses on CFIA's management of risks to Canada's plant resources.

4.18 We examined the Agency's activities to determine whether it uses a risk-based approach to prevent the entry of alien plants, pests, and diseases into Canada. We also examined how it collects information on new invasive alien plants, pests, and diseases before they become established, and how it uses performance information to improve its decision making and to manage risk.

4.19 The focus of our audit was on the Agency's plant protection mandate as it relates to imports.

4.20 More details on the audit objectives, scope, approach, and criteria are in **About the Audit** at the end of this chapter.

Observations and Recommendations

4.21 During this audit, we examined whether the Canadian Food Inspection Agency uses a risk-based approach to managing hazards to Canada's plant resource base. Risk management is a tool for priority setting and decision making and is an essential component of good management.

4.22 The Treasury Board of Canada Secretariat's *Integrated Risk Management Framework* outlines nine key elements of a risk-based approach in federal departments and agencies, including the following four:

- identifying risks,
- assessing their likelihood and potential impact on achieving objectives,
- ranking risks and developing techniques to control risks that have a high likelihood of occurring and high impact, and
- collecting results-based performance information to support program delivery and monitor risk management processes.

4.23 In 2007, CFIA updated its Agency-wide risk assessment. It considered animal and plant pest hazards together and identified ways to manage the risk that the Agency will fail to appropriately prevent, detect, contain, and mitigate a significant plant and animal disease. Its risk mitigation activities related to the Plant Health Program include import controls and inspections, surveillance activities to detect new and existing threats, communication between branches, and a partnership with the Canada Border Services Agency.

4.24 We looked at the following key areas, which the Canadian Food Inspection Agency uses to reduce the risk of an invasive alien plant, pest, or disease entering and becoming established in Canada:

- conducting pest risk assessments and pest surveys,
- approving and inspecting regulated plant imports, and
- working with the Canada Border Services Agency.

4.25 We found significant problems in many of the Agency's risk-mitigation activities and processes pertaining to imports. Many of the problems in the Plant Health Program cut across the Agency's three main branches: Science, Policy and Programs, and Operations. The underlying causes of the problems related to risk management are covered in detail in the last section of this chapter, Improving risk

management of the Plant Health Program as it relates to imports (page 23), along with our recommendations for improvement.

Assessing plant risks

Pest risk assessments meet expectations

4.26 The Plant Health Risk Assessment (PHRA) Unit in the Agency's Science Branch is responsible for completing pest risk assessments to determine

- whether certain commodities could carry invasive plants, pests, or diseases;
- whether those invasive plants, pests, or diseases could become established in Canada; and
- whether, once established, the invasive plants, pests, or diseases will damage the agriculture and forestry sectors of the economy and the environment.

4.27 Pest risk assessments represent scientific support for regulation, by the Plant Health Division, to prevent the entry of pests into the country or their spread if already present. We expected that individual pest risk assessments would be comprehensive, timely, and linked together to provide an overall assessment of pest **pathways**.

Pathway—Any means that allows the entry or spread of an invasive plant, pest, or disease, such as commodities and modes of transportation.

4.28 New pest risk assessments are triggered by requests from the Policy and Programs Branch. Triggers for requests may include the need for a response strategy to a newly identified pest or the need for a scientific analysis when an importer proposes a new type of import.

4.29 We found that the Agency's completed pest risk assessments are comprehensive and provide a risk-based scientific analysis of pathways for invasive plants, pests, or diseases. Assessments are frequently updated to reflect new information; some have been updated periodically for more than a decade.

A growing backlog of risk assessments reduces scientific support for risk management

4.30 We examined documents indicating the level of activity with respect to pest risk assessments and updates. We found that, as of 31 March 2008, there was a backlog of 42 requests for full pest risk assessments and 4 requests for updates—some dating back to as early as 1999. We also found that over the past two years, the completion rate has been about 63 percent.

4.31 Based on the level of activity in the past two years, the backlog is likely equivalent to what the PHRA Unit is able to produce in a year or more. Since there is no indication that the number of annual requests

will decrease in the near future, at current staff levels, we expect the backlog to continue. The backlog reduces the level of scientific support for the Agency's risk management efforts to prevent or mitigate damage to the agriculture and forestry sectors of the economy and to the environment. Moreover, our review of pertinent documentation indicates that the backlog is growing.

Conducting pest surveys

4.32 The Canadian Food Inspection Agency routinely conducts pest surveys in various regions of Canada, sometimes with other partners. The results of these surveys provide the Agency with valuable scientific data that it uses for regulatory decision making.

4.33 Pest surveys are conducted to

- determine whether existing plants, pests, or diseases have spread;
- detect new invasive plants, pests, or diseases;
- identify changes in survey results from one year to the next;
- support eradication or control programs;
- validate Canada's plant import requirements;
- support export certification requirements;
- inform plant policy decision making; and
- support bilateral trade negotiations.

4.34 Given the importance of pest surveys, we expected that the Agency would have a formal risk-based process to help prioritize its survey work. This would enable management to focus survey activities on the highest-risk invasive plants, pests, and diseases.

A formal risk-based process is needed to ensure that pest survey work is properly prioritized

4.35 The Agency's Plant Health Surveillance Unit is responsible for planning, coordinating, and administering the national pest survey program. The Unit also plays a lead role in designing new surveys, developing survey protocols, and refining ongoing techniques and tools as new methodologies develop. The actual survey work is done by the Agency's regional operations staff.

4.36 Plant pest surveys target existing and potential pests. Survey methodology determines

- the number of samples;
- the selection and number of sites;

- the frequency of sampling; and
- sampling procedures, which include "attractant trapping" (using traps or lures with natural or chemical scents), plant sampling, soil sampling, and visual inspection.

4.37 We reviewed the yearly survey plans and found that the Agency does not rank or prioritize its surveys according to risk. We further noted that survey plans do not provide a rationale for the proportion of surveys focused on existing pests versus those focused on new ones. We also found that operational pressures sometimes mean that pest survey protocols are scaled back compared with plans.

4.38 We are concerned that without a formal risk-based process to prioritize yearly survey work, there is no way for the Agency to ensure that its limited survey resources are used where they will have the greatest impact. We are also concerned that, if the Plant Health Surveillance Unit continues to try and accommodate all survey requests from plant health program staff, the overall quality of the surveys could be affected, since the protocols are altered according to available resources.

4.39 **New invasive plants, pests, and diseases.** Information gathered through pest surveys can be used to determine if new plants, pests, and diseases have entered Canada.

4.40 We found that only a small proportion of surveys are focused on detecting new invasive plants and plant pests on an annual basis. Agency officials told us that most surveys are undertaken to certify exports, that is, to provide scientific assurance that plants and plant products for export are free of certain pests or diseases.

4.41 Twenty-one of the twenty-five surveys planned for 2008 are for pests that already exist in Canada. Officials said the proportion of surveys focused on new plants (weeds), pests, and diseases has not changed significantly in the last five years. We are concerned that the relative lack of attention to surveys for new plants, pests, and diseases could limit the Agency's ability to deal effectively and economically with new invasive species, before they become established plant health emergencies.

4.42 **Quality of survey data.** Pest surveys provide information to support all of the Agency's regulatory plant health programs: import, export, and domestic. Reliable and accurate pest distribution data provides the basis for sound regulatory decisions. We expected the

Agency to verify and record the information derived from the pest surveys on invasive alien species.

4.43 We found that there is no formal Plant Health Program quality management system in place to

- monitor surveys,
- determine whether surveys are conducted according to established protocols, or
- verify the accuracy of the survey information collected.

4.44 Staff responsible for the design of pest surveys informed us that they have no direct management responsibility over the regional operations employees who carry out the surveys. Furthermore, we were told that the Plant Health Surveillance Unit does not compare the completed survey work with the work outlined in the plan. In the absence of clear oversight responsibility and performance information, those responsible for developing the surveys have no assurance that the surveys are carried out as planned.

4.45 **Recommendation.** The Canadian Food Inspection Agency should develop and implement a formal, risk-based approach to pest surveys. The approach should link identified risk of existing and potential pests and diseases with the priority of the survey. It should also ensure that the protocols for the conduct of pest surveys are followed and that survey data are accurate and reliable.

The Agency's response. The Agency agrees with this recommendation. The Agency will examine ways in which pest surveys can be prioritized in a more formal manner to better balance trade and commerce needs with the identification of new and existing pests and diseases. Currently, pest survey design and prioritization are based on comprehensive pest risk assessments. As well, the progress and outcomes of the surveys are monitored informally during the course of the survey season. The Agency will align the conduct of surveys under a broader quality management system for the Plant Health Program, which will better support accuracy and reliability of survey data.

Approving plant imports

4.46 In December 2003, the federal government created the Canada Border Services Agency (CBSA) to integrate the front-line border management and enforcement activities formerly performed by other organizations—including the Canadian Food Inspection Agency's program, Import Inspection at Ports of Entry.

4.47 When an importer or broker declares that a shipment contains plants or plant products that are regulated by CFIA, the CBSA will not allow the shipment into Canada without CFIA approval. The CBSA uses the CFIA import service centres to review import application packages submitted by importers or brokers. The three centres are located in Montreal (Eastern Region), Toronto (Central Region), and Vancouver (Western Region).

4.48 Approval at the centres is based on a document review. This review is conducted before the release of the goods in Canada. Currently, about 84,000 import application packages are reviewed in the three centres. Importers or brokers fax import application packages to an Import Service Centre, and the centre staff follow procedures to review the faxed documentation and assess the application packages for completeness and accuracy.

4.49 Decisions by import service centre staff to approve or reject import application packages are based on manual information reconciliations from a variety of paper and computer sources. Staff will then

- fax the approval or rejection back to the importer or broker;
- fax approved import application packages to a CFIA inspection office for follow-up, as required; and
- inform the CBSA of their decision.

4.50 Employees at import service centres face significant seasonal fluctuations in work volume, some technical complexities in their job requirements, and pressure to process import application packages quickly. They told us that if they fall behind, CFIA may be responsible for border delays.

Key controls are not adequate to verify that only low-risk shipments are approved

4.51 We expected the Canadian Food Inspection Agency to have procedures in place to ensure that only those shipments of imported plants and plant products that represent a low risk of contravening Canada's import requirements would be approved for entry.

4.52 The Agency has developed import operational procedures for Import Service Centres to guide staff in deciding to approve or reject an import application package.

4.53 One procedure requires that centre staff access the **Automated Import Reference System (AIRS)**. A very precise knowledge of a shipment is needed in order to prompt the system appropriately.

Automated Import Reference System (AIRS)—An internet-based Agency application that asks the user a series of questions about the origin, destination, end use, and miscellaneous qualifiers of the commodity to be imported. The system determines documentation requirements based on the user's answers to the questions.

Agency officials confirmed that the system is not designed well for plants and plant products, given that there is a risk that it could provide different information on the same commodity.

4.54 For example, depending on how information is input, the system could provide differing **phytosanitary certificate** requirements. Determining whether a phytosanitary certificate is required to import a particular commodity or determining the particular requirements are key reasons for centre staff to access the system.

Phytosanitary certificate—Issued by the exporting nation's plant health organization to certify/declare that a particular shipment meets Canadian standards.

4.55 The Agency accepts faxed copies of phytosanitary certificates and import permits in import application packages submitted by importers or brokers. As key controls, procedures call for centre staff to match faxed phytosanitary certificates to originals and to compare faxed **import permits** (or permit numbers quoted in the import application packages) to the Agency's **Import Permit System**.

Import permit—Official permission to import specific plants and plant products. Import permits are issued by the Agency's Import Unit in accordance with national policy guidelines, under provision of the *Plant Protection Act* and regulations.

Import Permit System (IPS)—An Agency system containing all import permits issued by the Agency. The system can be searched by importer and will provide the importer's permit history.

4.56 In the import application packages we reviewed, the faxed phytosanitary certificates were often illegible. Agency officials told us that, due to time constraints, the faxed certificates are rarely matched to the original certificates.

4.57 The Agency has no control measures to ensure that import permits and phytosanitary certificates are validated. We are concerned that failing to systematically check the validity of phytosanitary certificates and import permits increases the risks to Canada's plant resources. (See section entitled Improving risk management of the Plant Health Program as it relates to imports, page 23.)

Critical information is not communicated effectively within the Agency

4.58 One of the roles of the Policy and Programs Branch is to publish standards and alerts used by the Operations Branch, which includes Import Service Centres and inspection offices. Two forms of alert are the **Border Lookout** and the **Notice to Importer**.

Border Lookout—A system that Canada Border Services Agency uses to control products at the border and to inform the Canadian Food Inspection Agency of their arrival in Canada. It provides the information and direction required to reduce or manage imports with identified risks.

Notice to Importer—Document issued for commodities which require 100 percent inspection by the Canadian Food Inspection Agency.

4.59 Border lookouts can, for example, identify importers who are known for serious non-compliance in the past. We found that border lookouts are communicated effectively within the Agency.

4.60 We found that other critical information needed by operations is not communicated effectively. Notices to importers are similar in concept to border lookouts; that is, they generally identify high-risk commodities and high-risk exporting countries or regions. However, we found that the notices are not systematically communicated within the Agency. Even though the list of notices is not lengthy, rather than

having a complete, updated list that is periodically circulated, emails are sent out requesting that individual items be added to or removed from the list. The lists used by the Import Service Centres in mid-February 2008 were not identical. For example,

- the lists provided by the Central and Western centres included "all Barberry plants from all countries," while the list from the Eastern centre did not; and
- the lists provided by the Eastern and Western centres indicated that plants/nursery stock and bulbs imported from offshore required 100 percent inspection, while the list from the Central centre refered to all plants imported from offshore.

(See section entitled Improving risk management of the Plant Health Program as it relates to imports, page 23.)

There is no adequate quality assurance process to ensure that only low-risk shipments are approved for entry

4.61 We asked whether supervisors are required to review a sample of staff approvals of import application packages and document their review, if some type of audit is done later, or if there are any other formal procedures for reviewing the quality of centre staff decisions. Agency officials told us that none of these quality assurance measures currently exist for the Plant Health Program. We concluded that the Agency does not have an adequate quality assurance process to ensure that only low-risk plant imports are approved for entry into Canada.

Inspecting plant imports

4.62 Once an Import Service Centre employee approves a shipment for entry into Canada, the import application package is faxed back to the broker or importer as well as to the inspection office nearest to the shipment's destination.

4.63 If the employee determines that a shipment contains an item on the list of either border lookouts or notices to importers, procedures require that a "Notice to Importer" form be attached to the approved import application package. When such a form is attached, the importer is required to hold the shipment at the initial destination until it can be inspected by the Canadian Food Inspection Agency.

4.64 Where an imported plant or plant product shipment does not require a "Notice to Importer" form, area inspection offices select shipments for inspection and communicate this decision to importers.

4.65 Currently, about 84,000 shipments of regulated plants and plant products enter Canada. According to 2007–08 Agency information,

these shipments represent about 59 percent of the imports that fall under the Agency's jurisdiction; the remaining 41 percent are live animal and food imports. Given their numbers, inspection of all plant or plant product import shipments is neither practical nor cost-effective. Thus, we expected the Agency to use a risk-based approach to target shipments of imported plants and plant products for inspection at their point of destination.

Conducting sufficient import inspections is a challenge

4.66 Agency officials were unable to provide us with statistics on the volume of these imports or on inspection rates over the years. (From plant import invoices, it is estimated that 84,000 plant shipments came into Canada in the 2007–08 fiscal year.) However, they did tell us that imports have grown significantly, and that inspection of plant and plant product imports compete with other Agency inspections. In fact, some offices are responsible for inspections under a number of different Agency programs—for imports of other commodities and for export certifications—along with other work, including carrying out pest surveys.

4.67 The officials also told us that where there are competing demands, certifying exports is generally a higher priority than inspecting imports, so export shipments are not delayed. We were told that conducting enough import inspections is a challenge.

Poor communication leads to inconsistent inspection approaches

4.68 We found that the information that inspection offices need to prioritize their import inspection efforts was not always communicated effectively or understood consistently across the Agency.

4.69 The Plant Health Division publishes target inspection standards for medium-risk plants and plant products that are not subject to 100-percent inspection.

4.70 We learned that inspection standards are not interpreted consistently. For example, some inspection staff interpret "67-percent inspection" to mean that 67 percent of every shipment must be inspected, and others interpret it to mean that 67 percent of all shipments in a given year must be inspected. Officials of the Plant Health Division explained that a 67-percent inspection standard actually means a full inspection of two out of every three shipments.

4.71 When we asked staff in the three inspection offices—in Montreal, Toronto, and Vancouver—for the target inspection

standards they use, they provided us with versions from the 1997–98, 2006–07, and 2003–04 fiscal years, respectively. We found that the lists of inspection standards in the three documents can vary for a given commodity.

4.72 For example, for fresh fruit and vegetables, both Toronto's and Vancouver's lists call for 10-percent inspection, while Montreal's calls for 50–percent inspection. A few of the most notable differences are the standards applied to cut flowers (for example, chrysanthemums). Toronto's list calls for a 25-percent inspection standard, and Vancouver's list calls for a 5-percent inspection standard. However, instead of an inspection standard, Montreal's list calls for one visit to an import destination per month.

There is no national tracking system for imports of plants and plant products

4.73 Officials in Toronto and Vancouver explained to us how they attempted to develop local tracking systems in the absence of a national one. Operation of the Vancouver system was discontinued at the request of headquarters. The Toronto system is still in use, but Agency officials indicate that it is growing too large for the software that it runs on, so the database is becoming corrupted.

4.74 The absence of a national tracking system creates a number of problems:

- The Agency does not know the exact number of regulated shipments that are imported into Canada annually.
- Trace-backs (situations where the Agency becomes aware of a possible problem with a shipment and attempts to trace the destination of the shipment) must be done manually. For example, officials in a Toronto inspection office told us that a 2001 trace-back of chrysanthemums required the redeployment of five employees for five days to search paper records.
- Communication of information between Agency offices is not efficient. Currently, copies of import documentation for all approved shipments are faxed from the Agency's import service centres to its inspection offices. The high volume (thousands) of internal faxes creates a risk of missing documents.
- Actual inspection rates cannot be compared with target inspection standards in any systematic way to determine if actual coverage meets expectations. In other words, it is not possible to determine whether 50 percent or 10 percent of a specific commodity has been inspected.

- Inspection results are not tracked and cannot be captured in a form that would allow detailed analysis. Information available in the inspection offices is not provided to the Policy and Programs Branch in a systematic and regular manner. This means that the branch does not know if the inspection standards it sets are targeting the right commodities and importers, or if they are being properly followed, and as a result, the branch is not able to make timely and effective adjustments to its standards.

4.75 Because it does not have a national tracking system, the Agency lacks the performance information it needs to monitor and manage its Plant Health Program related to imports. (See section entitled Improving risk management of the Plant Health Program as it relates to imports, page 23.)

Missed inspections and lost information may present a serious concern

4.76 We selected 27 approved import application packages from February 2008 with a Notice to Importer (these packages require 100 percent inspection) and tracked them from the Import Service Centres to the relevant inspection offices to determine if all inspections were completed. We found that

- ten packages were released without inspection;
- in six cases, the inspection office nearest the destination had no record of having received the import application packages; and
- eleven packages were inspected in accordance with Agency requirements.

4.77 The results of our analysis of 27 cases cannot be extrapolated to all of the import application packages that the Agency approved. However, this analysis does indicate that, during a brief period, the Agency was not able to carry out necessary inspections of plant and plant product imports. These imports represent the highest risks to Canada's plant resources, as determined by the Policy and Programs Branch.

There is no quality assurance system to validate the effectiveness of a risk-based approach

4.78 We expected the Agency to draw random samples from imported plant and plant product shipments that are selected for inspection at their destination to

- assess compliance with import laws, regulations, and standards;

- assess the effectiveness of its import inspection practices; and
- improve future performance.

4.79 We were told by Agency officials that

- no such random sampling is carried out;
- no sampling plans are in place for random inspections of plants and plant products to validate that its risk-based approach is effective, that is, that only low-risk commodities are approved for import and distribution into Canada; and
- no other quality assurance system is in place for the Plant Health Program related to imports.

Working with the Canada Border Services Agency

4.80 In December 2003, the federal government created the Canada Border Services Agency (CBSA). One of its responsibilities is to enforce the provisions of the *Plant Protection Act* that relate to the delivery of passengers and initial import inspection services that are performed at airports and other Canadian border points.

4.81 We did not audit CBSA directly. Instead, we examined how the Canadian Food Inspection Agency ensures that the part of its mandate related to plant protection is being fulfilled by CBSA. The two agencies signed a Memorandum of Understanding (MOU) in January 2005, which sets out the following three key areas of interaction:

- CFIA is to provide technical assistance, since the food, plant, and animal inspection programs are science based.
- The agencies are to jointly determine training needs and requirements for CBSA employees.
- There is to be information exchange between CFIA and CBSA.

Direction and support is provided to the Canada Border Services Agency

4.82 The Canadian Food Inspection Agency's food, plant, and animal inspection programs are science based. In order to meet its responsibilities (as set out in the MOU) to provide technical assistance, we expected CFIA to provide CBSA with direction and support.

4.83 We found that when CBSA took over responsibility for the border, CFIA provided it with reference material and with information to help it assess border risks. In addition, CBSA officials routinely find undeclared products and unidentified plants, pests, and diseases; and

they need to consult CFIA officials for technical expertise. We found that CFIA responds to CBSA's requests for assistance.

Information requirements are not formally defined

4.84 **Training CBSA staff.** Since it is provided for in the Memorandum of Understanding (MOU) between the two agencies, we expected CFIA to be involved in the training of CBSA staff.

4.85 We found that while CFIA has been involved in training activities related to plant protection in a number of areas, its role has diminished over time. We found that, since CBSA assumed full responsibility for enforcing the *Plant Protection Act,* CFIA has not provided input into the training material that has been developed.

4.86 We expected CFIA to have requested information from CBSA on the training it provides to its Border Services officers. We found that, while CFIA has received some information, it did not request the information from CBSA. As a result, CFIA cannot determine if its plant protection mandate and CBSA training are aligned.

4.87 **Exchange of information.** The MOU provides for the exchange of information between CBSA and CFIA. Information on the results of CBSA inspections is important to both inform CFIA's internal operations and meet its international responsibilities. We expected CFIA to have developed a list of the performance information that it requires from CBSA and a strategy for obtaining that information in a regular and systematic way.

4.88 We found that CFIA receives reports on border lookouts, inspections at airports, and wood packaging. We were not able to find formal requests to CBSA from CFIA for the results of the inspections it undertakes of shipments that contain undeclared (smuggled) regulated plants and plant products or invasive plants, pests, or diseases.

4.89 Without this information, CFIA is limited in its ability to track

- which importers or exporters are involved and possibly non-compliant;
- what particular invasive plants, pests, or diseases are found at borders;
- what enforcement action has been taken; and
- whether there is a pattern of non-compliance.

4.90 This incomplete information also restricts CFIA's capacity to risk-manage imports, including taking appropriate phytosanitary actions in conjunction with the exporting countries.

4.91 **Recommendation.** To meet its plant protection mandate, the Canadian Food Inspection Agency, in collaboration with the Canada Border Services Agency, should formally define the performance information it requires from CBSA, and it should develop an action plan for obtaining and monitoring the required information.

The agencies' response. The Canadian Food Inspection Agency and the Canada Border Services Agency agree with this recommendation, as close cooperation between CFIA and CBSA is necessary for both agencies to fulfill their responsibilities under their respective mandates. CFIA will develop a protocol with CBSA that clearly outlines necessary information on the delivery of CFIA programs at border points. CFIA will then engage CBSA to develop an action plan to obtain the required information.

Improving risk management of the Plant Health Program as it relates to imports

4.92 We found a number of significant problems in many of the Agency's risk-mitigation activities and processes pertaining to the import component of the Plant Health Program that cut across the Agency's three main branches: Science, Policy and Programs, and Operations and affect its ability to protect Canada's plant resources. We consider the following four conditions to be underlying causes of the problems we identified in the Plant Health Program:

- There is a lack of appropriate coordination between branches, which contributes to issues in the Plant Health Program.
- The Plant Health Program does not have adequate quality management systems.
- There is a lack of information management and information technology support.
- Import volumes are increasing.

4.93 Our findings are not new to the Agency. In fall 2003, its own review of the key elements of Plant Health Program delivery identified problems similar to ours, including

- the need to identify survey priorities;
- the need to update the Automated Import Reference System (AIRS);
- poor review of documentation in import service centres;

- outdated procedure manuals for import inspections;
- limited and ineffective feedback, information sharing, and learning mechanisms between Policy and Programs and Operations branches; and
- a lack of formal oversight mechanisms, such as internal audit and a quality management system.

The lack of appropriate coordination between branches contributes to issues in the Plant Health Program

4.94 The vice-presidents at the Canadian Food Inspection Agency are each responsible for a functional area across the Agency. Plant Health is one of a number of major programs within the Agency. Three vice-presidents and their branches have particularly significant roles within the Plant Health Program:

- The Science Branch, under the Vice-President of Science, supports the Agency's plant health objectives through laboratory science, risk assessment, pest surveys, and research.
- The Policy and Programs Branch, under the Vice-President of Policy and Programs, develops plant health programs and policies and supports the operational delivery of the Plant Health Program.
- The Operations Branch, under the Vice-President of Operations, is the largest; it administers and enforces the Agency's plant protection acts and regulations—in 18 regions and 185 field offices across Canada.

4.95 We found that coordination between branches is lacking and that this contributes to overall issues within the Plant Health Program. For example, earlier we noted that communication of inspection standards from headquarters to regions is not done effectively. This involves communication between the Policy and Programs and Operations branches.

4.96 The magnitude of the issues noted in this audit suggests that the Agency needs a clear champion to head efforts to address these issues in a timely way.

The Plant Health Program does not have adequate quality management systems

4.97 A wide variety of symptoms—including poor communication, important decisions not being formally reviewed, and lost documents—point to an absence of quality management systems for

the Plant Health Program as an underlying cause of the issues with risk management.

4.98 As set out in the Agency's *Quality Management System Manual*, quality management systems provide management with assurance that systems are designed to work effectively and that they actually are working as intended. Currently, the Agency's management lacks this assurance for the Plant Health Program.

4.99 **Recommendation.** The Canadian Food Inspection Agency should implement quality management systems to provide management with assurance that the Plant Health Program, as it relates to imports, is designed to effectively manage risks to Canada's plant resources and that it operates as intended.

The Agency's response. The Agency agrees with this recommendation. CFIA will work toward implementing a broader quality management system within the Plant Health Program similar to those in place for other CFIA programs, which will better provide management with assurance that the import component of the Plant Health Program is designed and operates as intended. The quality management system and ongoing national training program will build upon the updated national policies and procedures as outlined in the *Plant Health Import Inspection Manual*.

There is a lack of information management and information technology support

4.100 We found that the thousands of faxes exchanged each year and problems with lost documents point to a lack of information management and information technology support for the program. There is considerable opportunity to improve operations and management information by using better technologies.

4.101 Plant Health Program officials indicate that they are currently working to see how technology might be used to better support the program in the future. While this is a positive development, information management issues have been known for many years; we raised these issues in our 1996 audit of the animal and plant health programs (Chapter 9, May 1996), when they were part of Agriculture and Agri-Food Canada.

4.102 We expected the Canadian Food Inspection Agency to have and to use performance information, which is an essential component of effective management, to support decision makers in the delivery of its Plant Health Program, as required under federal government policies. Weak information management and information technology means

that the Agency cannot collect and analyze information on how the program is performing or know whether it is achieving its objectives.

4.103 Recommendation. The Canadian Food Inspection Agency should complete its assessment of possible information management and information technology support for the Plant Health Program, and it should identify options for funding those needs.

The Agency's response. The Agency agrees with this recommendation. CFIA has successfully implemented a consistent approach to assess information management and information technology needs across the Agency. As part of the approach, CFIA is working toward identifying and meeting the business needs of the Plant Health Program as it relates to imports. The Agency will identify options for funding its overall information management and information technology priorities.

Import volumes are increasing

4.104 A final underlying cause of problems with the Plant Health Program is the lack of alignment between import volumes and available resources. The volume of imports that the Agency must review and inspect has increased significantly. In addition, the fact that inspectors are sometimes called on to inspect other commodities, to certify exports, and to conduct surveys makes it difficult to determine which resources are actually deployed to inspect imports of plants and plant products.

4.105 There is a belief among Agency officials that certifying exports is a high priority and uses a greater proportion of resources. Unfortunately, because it lacks good information systems, the Agency cannot readily capture trends in program demands and resources over the years.

4.106 The Agency needs to define service standards for its plant health regulatory activities and needs to determine the costs of meeting the standards. Ideally, for the import of plants and plant products, the standards should be defined in terms of its plant protection mandate, taking into account the level of risk Canada should accept as well as the associated costs.

4.107 Currently, the Plant Health Program draws its funding from the Agency's ongoing operational money, from the Invasive Alien Species Strategy, and from funds provided for specific existing plant health emergencies. The funding from the strategy is the largest, single influx of money that has gone into the program in more than two decades.

This funding has enabled the program to enhance core activities, including preventative measures, risk assessments, pest surveys, and inspections; it also enabled the addition of new initiatives. The Invasive Alien Species Strategy is a time-limited initiative, and it is scheduled to end in 2010.

4.108 When we examined the volume of regulated plant imports that may require inspection, we found that the volume had more than doubled between the 2000–01 and the 2007–08 fiscal years. The Agency is aware that it faces a significant challenge in managing the increasing demands for import inspections.

4.109 **Recommendation.** The Canadian Food Inspection Agency should define the required level of science, policy, and operations necessary to fulfill its plant protection mandate as it relates to imports. It should then determine the level of funding needed to carry out these responsibilities.

The Agency's response. The Agency agrees with this recommendation. As a party to the International Plant Protection Convention (IPPC), CFIA is recognized as a leader internationally for its standards, policies, regulations and initiatives, based on scientific risk assessments. Canada, similar to all countries, is affected by the increased complexity of plant pest risk pathways. CFIA recognizes the need to continuously review and assess its science, policy and operational requirements to update its approach underlying the Plant Health Program. A review is currently being conducted on the Invasive Alien Species (IAS) Program, which is a component of the Plant Health Program. The results of this review as well as other activities will identify the level of science, policy and operational activities and associated funding needs of the import component of the Plant Health Program.

The import component of the Plant Health Program needs to be assessed

4.110 Our audit identified problems in the Agency's risk-mitigation activities and processes that limit its ability to risk-manage imported hazards to Canada's plant resource base. Each recommendation is intended to address key underlying causes of our audit findings. Together, our findings lead us to conclude that CFIA should undertake a comprehensive assessment of the scope and delivery of the Plant Health Program as it relates to imports, in the context of new environmental and external realities.

Conclusion

4.111 The Canadian Food Inspection Agency faces a number of challenges in assessing the risks posed by invasive plants, pests, and diseases. The Plant Health Risk Assessment Unit has a growing backlog. Its current backlog is equivalent to what it is able to produce in a year. The yearly pest survey plans of the Plant Health Surveillance Unit are not risk-based and focus almost exclusively on existing invasive plants, pests, and diseases rather than identifying potential new threats before they become established plant health emergencies.

4.112 The Agency has procedures in place to guide the Import Service Centre staff who review import approval packages and inspection standards in place to guide inspectors. However, since there are no systematic quality assurance processes in the Plant Health Program pertaining to imports, the Agency does not know whether this guidance is followed, nor does it know what decisions employees make.

4.113 A fundamental component of risk management is continuous communication, which helps ensure that the activities of all staff are aligned with the objectives of the organization. The Agency's ability to demonstrate that it uses performance information in its decision making and in its risk management of plant resources is limited by inadequate communication and feedback between key Agency branches and a lack of information management and information technology capacity in the Plant Health Program related to imports.

4.114 The Canada Border Services Agency is one of the Canadian Food Inspection Agency's key partners in protecting Canada's plant resources. CFIA receives some information from CBSA on training and on results of inspections. However, CFIA has not formally defined the information it requires. Incomplete information reduces CFIA's ability to fully risk-manage imports, including taking appropriate phytosanitary actions against non-compliant importers or exporters.

4.115 Our audit findings are not new to the Canadian Food Inspection Agency. In fall 2003, it reviewed the key elements of delivery of the Plant Health Program, and it identified problems similar to ours.

4.116 Our overall conclusion is that the Agency lacks an effective, integrated risk-management approach to plant and plant product imports. We identified significant problems in the Agency's risk-mitigation activities and processes. The following contribute to the problems uncovered during the audit of the import component of the Plant Health Program:

- lack of adequate quality management systems;
- inadequate information management and technology—weak information management in the Plant Health Program is a long-standing deficiency highlighted in our May 1996 audit of the animal and plant health programs (Chapter 9) in Agriculture and Agri-Food Canada;
- lack of appropriate coordination between branches; and
- increasing import volumes.

About the Audit

Objectives

The following were the objectives of the audit:

- Determine whether the Canadian Food Inspection Agency can demonstrate that it uses an appropriate risk-based approach in activities designed to prevent the entry of invasive alien plants, pests, and diseases into Canada.
- Determine whether the Agency can demonstrate that it maintains and carries out a risk-based pest survey program to collect, confirm, and compile information on new invasive alien plants, pests, and diseases before they become established.
- Determine whether the Agency can demonstrate that it analyzes and uses performance information to improve its decision making and risk-management approach to protect plant resources.

Scope and approach

The Canadian Food Inspection Agency carries out a number of functions under its Plant Health Program. Our work focused on the Agency's management of the risk that invasive alien plants, pests, and diseases could enter or become established in Canada.

We examined how the Agency conducts pest risk assessments and pest surveys. We also examined how the Agency approves imports of plants and plant products and targets shipments for inspection. Our work focused on performance monitoring and management of the Agency's Plant Health Program as a whole.

The Canada Border Services Agency (CBSA) is a key partner in protecting Canada's plant resources. We did not audit CBSA directly. We examined the extent to which the Canadian Food Inspection Agency has assurance that the part of its mandate that requires it to protect Canada's plant resources is being fulfilled by CBSA.

Our audit covered work done by Canadian Food Inspection Agency staff at

- the Agency headquarters in Ottawa;
- the three import service centres (Vancouver, Toronto, and Montreal); and
- inspection offices across the country.

We collected evidence through

- interviews with key Agency personnel and external stakeholders;
- reviews of relevant documents and files; and
- site visits to observe operations at the Agency's three import service centres and at select regional offices.

We did not audit the Agency's approach to certifying that plants and plant product exports are free from disease and pests, nor did we audit the Agency's management and control of existing plant emergencies.

Criteria

Listed below are the criteria that were used to conduct this audit and their sources.

Criteria	Sources
The Agency has conducted an adequate pathway analysis and related risk assessments to prevent the introduction of invasive alien species in Canada.	• International Plant Protection Convention (1997), Article IV, Section 2 (f) • International Standards for Phytosanitary Measures, numbers 1 (2006), 2 (2007), and 20 (2004) • Proposed Action Plan for Invasive Alien Terrestrial Plants and Plant Pests, Phase 1 (2004), sections 4.3 and 4.4 • Action Plan for Invasive Alien Terrestrial Plants and Plant Pests, Phase 2—Proposed Implementation Plan (2005), sections 5.2, 7.1, and 7.2
The Agency approves only those shipments of imported plants and plant material for entry into the country that represent a low risk of contravention.	• International Plant Protection Convention (1997), Article IV, Section 2(g), and Article VII, Section 2(g) • International Standards for Phytosanitary Measures, numbers 1 (2006), 2 (2007), and 14 (2002) • Action Plan for Invasive Alien Terrestrial Plants and Plant Pests, Phase 2—Proposed Implementation Plan (2005), sections 5.1, 5.2, 7.1, and 7.2 • Treasury Board of Canada Secretariat, Integrated Risk Management Framework (2001) • Treasury Board of Canada Secretariat, Integrated Risk Management Implementation Guide (2004)
The Agency has appropriate risk-based processes in place to target shipments of imported plants and plant material for inspection at their point of destination.	• International Plant Protection Convention (1997), Article IV, Section 2(c), and Article VII, Section 2(g) • International Standards for Phytosanitary Measures, numbers 1 (2006), and 14 (2002) • Proposed Action Plan for Invasive Alien Terrestrial Plants and Plant Pests, Phase 1 (2004), sections 4.3 and 4.4
The Agency regularly draws random samples from imported plant and plant product shipments for inspection at destination and testing to assess compliance with import laws, regulations, and standards; to assess the effectiveness of its import inspection practices; and to improve future performance.	• International Standards for Phytosanitary Measures, Number 23 (2005) • Treasury Board of Canada Secretariat, Integrated Risk Management Framework (2001), Element 4 • Treasury Board of Canada Secretariat, Integrated Risk Management Implementation Guide (2004)
The Agency provides input into CBSA training materials related to secondary import inspections involving plants and plant products.	• International Standards for Phytosanitary Measures, Number 20 (2004) • Memorandum of Understanding between the Canada Border Services Agency and the Canadian Food Inspection Agency (2005), sections 4, 30, 31, and 32; Annex G, sections 3, 4, 5, and 6
The Agency provides technical assistance to CBSA to target secondary inspections.	• International Standards for Phytosanitary Measures, numbers 1 (2006), 20 (2004), and 23 (2005) • Memorandum of Understanding between the Canada Border Services Agency and the Canadian Food Inspection Agency (2005), Sections 24, and 28; Annex G, Section 5

Criteria	Sources
The Agency obtains accurate, complete and timely results-based performance information and analyses on CBSA's targeting and secondary inspection activities.	• International Standards for Phytosanitary Measures, Number 20 (2004) • Memorandum of Understanding between the Canada Border Services Agency and the Canadian Food Inspection Agency (2005), Annex H, sections 2, 3, and 4 • Treasury Board of Canada Secretriat, Policy on Information Management (2007), elements 5 and 6 • Treasury Board of Canada Secretariat, Policy Framework for Information and Technology (2007), Element 3
The Agency has a risk-based pest survey program in place to carry out surveys to detect and identify new invasive alien species before they become established.	• International Standards for Phytosanitary Measures, numbers 1 (2006), and 6 (1997) • Proposed Action Plan for Invasive Alien Terrestrial Plants and Plant Pests, Phase 1 (2004), Section 3.2.1 • Action Plan for Invasive Alien Terrestrial Plants and Plant Pests, Phase 2—Proposed Implementation Plan (2005), Section 4.2.2
The Agency verifies and records the information derived from the pest surveys on invasive alien species that it undertakes.	• International Standards for Phytosanitary Measures, Number 6 (1997)
The Agency records, analyzes, and uses performance information on all of its actions, results, and decisions concerning the Plant Health Program as a whole.	• International Standards for Phytosanitary Measures, Number 20 (2004) • Treasury Board of Canada Secretariat, Policy on Information Management (2007), elements 5 and 6 • Treasury Board of Canada Secretariat, Policy Framework for Information and Technology (2007), Element 3

Audit work completed

Audit work for this chapter was substantially completed on 25 April 2008.

Audit team

Assistant Auditor General: Neil Maxwell
Principal: Dale Shier
Director: Patricia Begin

Irene Andayo
Amanda Beath
Sebastien Bureau
Ian Campbell
Doreen Deveen
Marie-Paul Vincent
Annie Montmarquet

For information, please contact Communications at 613-995-3708 or 1-888-761-5953 (toll-free).

Appendix List of recommendations

The following is a list of recommendations found in Chapter 4. The number in front of the recommendation indicates the paragraph where it appears in the chapter. The numbers in parentheses indicate the paragraphs where the topic is discussed.

Recommendation	Response
Conducting pest surveys	
4.45 The Canadian Food Inspection Agency should develop and implement a formal, risk-based approach to pest surveys. The approach should link identified risk of existing and potential pests and diseases with the priority of the survey. It should also ensure that the protocols for the conduct of pest surveys are followed and that survey data are accurate and reliable. **(4.32–4.44)**	The Agency agrees with this recommendation. The Agency will examine ways in which pest surveys can be prioritized in a more formal manner to better balance trade and commerce needs with the identification of new and existing pests and diseases. Currently, pest survey design and prioritization are based on comprehensive pest risk assessments. As well, the progress and outcomes of the surveys are monitored informally during the course of the survey season. The Agency will align the conduct of surveys under a broader quality management system for the Plant Health Program, which will better support accuracy and reliability of survey data.
Working with the Canada Border Services Agency	
4.91 To meet its plant protection mandate, the Canadian Food Inspection Agency, in collaboration with the Canada Border Services Agency, should formally define the performance information it requires from CBSA, and it should develop an action plan for obtaining and monitoring the required information. **(4.80–4.90)**	The Canadian Food Inspection Agency and the Canada Border Services Agency agree with this recommendation, as close cooperation between CFIA and CBSA is necessary for both agencies to fulfill their responsibilities under their respective mandates. CFIA will develop a protocol with CBSA that clearly outlines necessary information on the delivery of CFIA programs at border points. CFIA will then engage CBSA to develop an action plan to obtain the required information.

Recommendation	Response
Improving risk management of the Plant Health Program as it relates to imports	
4.99 The Canadian Food Inspection Agency should implement quality management systems to provide management with assurance that the Plant Health Program, as it relates to imports, is designed to effectively manage risks to Canada's plant resources and that it operates as intended. **(4.97–4.98)**	The Agency agrees with this recommendation. CFIA will work toward implementing a broader quality management system within the Plant Health Program similar to those in place for other CFIA programs, which will better provide management with assurance that the import component of the Plant Health Program is designed and operates as intended. The quality management system and ongoing national training program will build upon the updated national policies and procedures as outlined in the *Plant Health Import Inspection Manual*.
4.103 The Canadian Food Inspection Agency should complete its assessment of possible information management and information technology support for the Plant Health Program, and it should identify options for funding those needs. **(4.100–4.102)**	The Agency agrees with this recommendation. CFIA has successfully implemented a consistent approach to assess information management and information technology needs across the Agency. As part of the approach, CFIA is working toward identifying and meeting the business needs of the Plant Health Program as it relates to imports. The Agency will identify options for funding its overall information management and information technology priorities.
4.109 The Canadian Food Inspection Agency should define the required level of science, policy, and operations necessary to fulfill its plant protection mandate as it relates to imports. It should then determine the level of funding needed to carry out these responsibilities. **(4.104–4.108)**	The Agency agrees with this recommendation. As a party to the International Plant Protection Convention (IPPC), CFIA is recognized as a leader internationally for its standards, policies, regulations and initiatives, based on scientific risk assessments. Canada, similar to all countries, is affected by the increased complexity of plant pest risk pathways. CFIA recognizes the need to continuously review and assess its science, policy and operational requirements to update its approach underlying the Plant Health Program. A review is currently being conducted on the Invasive Alien Species (IAS) Program, which is a component of the Plant Health Program. The results of this review as well as other activities will identify the level of science, policy and operational activities and associated funding needs of the import component of the Plant Health Program.

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