Communique

September 19, 2005

TO: Enhanced QMP Importers

SUBJECT: Chemistry Testing for Enhanced QMP Importers

As you are aware, CFIA Laboratories have been the principal providers of chemistry testing for QMP Importers since the inception of the program in 1998. As time has passed, this has become more challenging for the labs, given ever increasing workload demands. As a result, CFIA Laboratories will be phasing out all routine testing services to QMP Importers. It is expected, therefore, that the QMP Importers will have contracts in place with the appropriate private laboratories by December 31, 2005. QMP Importers will need to have their testing done by accredited third party laboratories in accordance with CFIA policy.

CFIA has established requirements for the acceptance of analytical results from third party laboratories. Such laboratories must be accredited to ISO/IEC 17025, *General Requirements for the Competence of Testing and Calibration Laboratories* or its replacement by the Standards Council of Canada (SCC). Acceptance of results is contingent on those routine tests and analytical matrices being included in the laboratory's current scope of accreditation. Scopes of accredited laboratories showing test names, matrices and methods of analysis may be found on the SCC website at http://palcan.scc.ca/SpecsSearch/GLSearchForm.do

In order to facilitate the transition to third party laboratories for QMP Importers, CFIA will do the following:

- prepare a list of current importer required tests with action levels, as applicable. This list will be provided to you within the next few weeks and will be updated as appropriate.
- if requested, provide methodology to third party laboratories for tests specific to fish products. Third party laboratories are not required to use CFIA methods but methods used must be fit for purpose and should meet or exceed the performance standards of CFIA methods.

It is the responsibility of the QMP Importer to contract an accredited third party laboratory which meets the CFIA requirements mentioned above. An appendix is attached which provides information to QMP Importers with respect to the responsibilities of third party laboratories accredited to ISO/IEC 17025. In addition, QMP Importers need to be aware of the following factors which could influence their choice of a laboratory:

- some third party laboratories may have the required tests in their scope of accreditation for another food product (meat, for example) but will ultimately need to have the specific tests of interest listed in their scope of accreditation for fish products. The CFIA may recognize third party laboratory results for the QMPI under specific conditions, if the private laboratory has applied for a scope extension and can meet methodology requirements. The CFIA will work on

a case by case basis with the SCC to determine where this is possible.

- some accredited third party laboratories which don't have the required tests in their scope of accreditation may be capable of conducting the required tests and would be prepared to have the test included in their scope of accreditation, if approached. QMP Importers should discuss their testing requirements with their laboratory of choice in the event that they may be interested in meeting the requirements to do this testing.

Suggestions for QMP Importers to consider in looking for a third party laboratory:

- approach the accredited laboratory that is currently providing their microbiological testing services. It is possible that they have capability for the required chemistry tests and may be interested in providing the testing services.
- use the Search option at the SCC website at http://palcan.scc.ca/SpecsSearch/GLSearchForm.do to find laboratories which may be able to meet the needs of the QMP importer. Laboratory scopes can be viewed or searches can be done on all accredited laboratories' scopes for a specific test by typing the test name into the "keywords" box.
- work with other QMP Importers in the same geographical location to prepare a consolidated "needs list" that could then be distributed to several labs for them to submit bids.

After December 31, 2005, CFIA will not conduct any routine product testing for the Enhanced QMP Importers, except as part of an audit process, as part of an investigation, or an illness complaint, or part of the CFIA's regulatory verification program.

Should you have any questions on information contained in this package, please contact:

Questions relating to laboratory requirements:	Questions related to the import program policy:
Science Branch, Ottawa Rose Medaglia National Manager, Laboratory Accreditation Programs ph: (613) 221-7075 e-mail: medagliar@inspection.gc.ca	Fish, Seafood and Production Division Alf Bungay National Manager, Inspection Systems and HACCP ph: (613) 221-7026 e-mail: abungay@inspection.gc.ca

Original signed by

Mary Ann Green
Director,
Fish, Seafood and Production Division

Original signed by Shane Renwick for

Liz Singh
National Director,
Laboratories Operations

Canada

Supplementary Information Regarding the Provision of Laboratory Services by Third Party Laboratories

*(This information is taken from the Standards Council of Canada's document CAN-P-4D, March 2000***)**

Background:

Accreditation by the SCC is the formal recognition of the competence of a laboratory to manage and perform specific tests or types of tests recognized and listed by the SCC. It is not a guarantee that test results will conform with standards or agreements between a testing laboratory and its clients. Business transactions between an accredited testing laboratory and its clients are legal matters between two parties.

To become accredited, laboratories must meet the general requirements outlined in the CAN-P-4D, which are those in the international standard, ISO/IEC 17025-1999, *General requirements for the competence of testing and calibration laboratories*. This will be verified by the Standards Council's accreditation process. In addition, laboratories must demonstrate competence to perform the specific tests or types of tests for which they wish to become accredited. Applicants must also agree to abide by the SCC conditions for accreditation found in associated documents used by the SCC's Program for the Accreditation of Laboratories - Canada (PALCAN). In addition there are a number of Program Specialty Areas (PSAs) which address specific accreditation requirements for specific testing areas. The Agriculture and Food Products PSA is specific to testing to meet the requirements of the Canadian Food Inspection Agency.

It is the responsibility of the laboratory to carry out its testing activities in such a way as to meet the requirements of ISO/IEC 17025 and to satisfy the needs of the client, the regulatory authorities or organizations providing recognition.

Selected Elements of ISO17025 that may be of Interest to QMP Importers:

The laboratory shall establish and maintain procedures for the review of requests, tenders, and contracts to ensure that the requirements, including the methods used, are adequately defined, documented, and understood; the laboratory has the capability and resources to meet the requirements; the appropriate test method is selected and capable of meeting the clients' requirements.

The review of laboratory capability may encompass results of earlier participation in interlaboratory comparisons or proficiency testing.

Any differences between the request or tender and the contract shall be resolved before any work commences. Each contract shall be acceptable to both the laboratory and the client.

The laboratory is responsible to the client for the subcontractor's work, except in the case where the client or regulatory authorities specify which subcontractor is to be used.

The laboratory shall afford clients cooperation to clarify the client's request and to monitor the laboratory's performance in relation to the work performed.

The laboratory should have a policy and procedure for the resolution of complaints received from

clients.
The laboratory shall have a policy and procedures that shall be implemented when any aspect of its testing or the results of this work do not conform to its own procedures or the agreed requirements of the client.
The laboratory shall use test methods, including methods for sampling, which meet the needs of the client and are appropriate for the tests it undertakes.
When the client does not specify the method to be used, the laboratory shall select appropriate methods that have been published. Laboratory-developed methods or methods adopted by the laboratory many also be used if they are appropriate for the intended use and if they are validated.
Validation is the confirmation by examination and the provision of objective evidence that the particular requirements for a specific intended use are fulfilled.
The client shall be informed as to the method chosen.
The laboratory shall inform the client when the method proposed by the client is considered to be inappropriate or out of date.
Testing laboratories shall have and shall apply procedures for estimating uncertainty of measurement.