



# CFIA oversight of authorized seed crop inspection (SWI 142.3.1)

This document describes the Canadian Food Inspection Agency's (CFIA) oversight of the inspection of pedigreed seed crops by Licensed Seed Crop Inspectors (LSCI) operating under the supervision of Authorized Seed Crop Inspection Services (ASCIS).

ASCIS and LSCI are private entities and individuals licensed by the CFIA to provide pedigreed seed crop inspection services. LSCI conduct the inspections and complete Seed Crop Inspection Reports which are verified by the ASCIS before being submitted to the Canadian Seed Growers' Association (CSGA) through the CSGA's SeedCert software package. The CSGA issues a crop certificate for the inspected seed crop based on the submitted Seed Crop Inspection Report.

The CFIA, as the authority for seed certification in Canada, is responsible for overseeing the ASCIS implementation of its quality management system (QMS) and the LSCI delivery of pedigreed seed crop inspection.

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## 1.0 Scope

This SWI details the procedures to be followed by the CFIA when overseeing LSCI and ASCIS activities.

## 2.0 Definitions, acronyms and references

For the purposes of this SWI, the definitions given in [Seed Program Regulatory Authority \(SPRA\) 101 Definitions, Acronyms, and References for the Seed Program](#) apply.

## 3.0 General requirements

An ASCIS is licensed based on the CFIA's determination that the QMS of the ASCIS has the capacity to consistently meet the quality objective of timely, accurate and unbiased inspections of pedigreed seed crops provided by LSCI under its supervision. The ASCIS demonstrates ongoing quality control during the initial and subsequent annual audits by the CFIA of the implementation of the QMS of the ASCIS.

The LSCI is licensed based on the CFIA's determination that the individual is competent to provide inspections of pedigreed seed crops of the crop kinds within the scope of the licence.

The LSCI must continue to demonstrate competence as verified by on-going oversight by the CFIA.

## **4.0 Licensing of Licensed Seed Crop Inspectors**

The candidate LSCI must submit a completed and signed licence application (Appendix D of [Quality System Procedure \(QSP\) 142.2 Licensing of Authorized Seed Crop Inspection Services and Licensed Seed Crop Inspectors](#)) to the Seed Section. The candidate LSCI is not required to be under the supervision of an ASCIS at the time of application but must establish this relationship before they will be able to submit Reports of Seed Crop Inspection to the CSGA.

The Seed Section will acknowledge receipt of the application and provide the applicant with information on the next available training sessions in their area.

### **4.1 LSCI training**

The CFIA may offer seed crop inspector training to candidate LSCI. The CFIA trainer is responsible for arranging theory training dates and locations. The Seed Section will email the CFIA trainer with a list of regional candidates who require training and will provide the trainer with the necessary training materials and references for each candidate.

Candidate LSCI must attend classroom training before they may attend practical training. Each candidate should be given at least 2 days (16 hours) of practical training, though more is recommended if possible.

Trainers may organize their own seed training plots and fields, and may choose to work with Agriculture and Agri-Food Canada or with private entities. Templates for agreements with external partners for training plots and fields may be obtained from the Seed Section. For 2021, Group 1 practical training will be organized and conducted by the ASCISs for their own inspectors.

Candidate LSCI will be trained according to the 6 Groups of crop kinds for which they may be licensed to inspect. These Groups are described in Section 5.1 of [Quality System Procedure \(QSP\) 142.2 Licensing of Authorized Seed Crop Inspection Services and Licensed Seed Crop Inspectors](#) and are based on crop groupings in the CSGA's [Canadian Regulations and Procedures for Pedigreed Seed Crop Production](#) (Circular 6).

Training on weed identification should be provided during the practical training. LSCI are required to know all Prohibited Noxious weeds. Trainers should focus on weeds that are found in their region, with the understanding that if candidates will be travelling to other regions to conduct inspections they will have to self-study on the weeds found in the other regions. Training on Prohibited Noxious Weeds occurs during classroom training. Training on weed identification can be done opportunistically, where weeds are identified as they are found during practical training, or specifically, where trainers may take the candidates to a weedy location (such as a weedy garden, fallow field, or ditch), or bring live or preserved examples of a range of common and uncommon weeds to the training session.

## **4.2 Evaluations of candidate LSCI**

The candidate LSCI must complete a written evaluation for each Group of crop kinds for which they are requesting licensing. The candidate LSCI is required to complete only 1 practical evaluation on only 1 crop kind in the Group for which they are seeking licensing.

Should the candidate fail to obtain a passing mark on either the written or practical evaluation, they may take the evaluation 1 additional time in the same year. If they fail the evaluation a second time, the candidate must repeat the practical or classroom training, depending on which evaluation they were not able to successfully complete, before they will be permitted to retake the evaluation(s).

If greater than 2 years has passed since the candidate completed the training (either classroom or practical) the candidate is required to re-take the corresponding training prior to attempting the evaluation.

### **4.2.1 Written evaluation**

An electronic version of the written evaluation will be supplied by the Seed Section to the local CFIA office where the evaluation will be completed. Copies of blank and completed evaluations must be controlled and may not be distributed outside of the CFIA. Candidates may not disclose the contents of the evaluation to others. The written evaluation is a 3-hour, open-book exam and must be invigilated by the CFIA. For 2022, the written evaluation will be conducted using an online software platform and candidates will receive an invitation by email.

Candidates are required to bring their own current copies of reference materials, which may be in either electronic or paper format. The candidate must obtain a mark of 80% or more to pass the evaluation.

Candidates will be required to declare in writing that they will not communicate with anyone by any means (including electronically) during the evaluation, except the invigilator.

The CFIA inspector conducting the training will mark the written evaluation and forward the candidate's marks to the Seed Section. After the marks have been submitted, the completed, marked evaluations along with a completed Record of Invigilation Form (Appendix VIII) are provided to the Seed Section by mail or by emailing a scanned copy. The Seed Section will inform the candidate of their mark.

If the candidate is not successful, it is their responsibility to contact their trainer to schedule a re-evaluation.

### **4.2.2 Practical evaluation**

The evaluator must be a CFIA official seed crop inspector who has previously participated in at least 3 evaluations as a co-evaluator. The evaluator will arrange a date and location with the candidate, allowing 3 hours for the practical evaluation. If possible, the field selected for the

evaluation should be a seed crop that has off-types, weeds, and/or other reportable issues. The candidate will have access to all documents normally available to seed crop inspectors during the performance of their duties. The evaluator records their observations on the Practical Evaluation Form for Private Crop Inspector Licensing.

Trainers may evaluate the candidate's ability to find the field as is typically done with CFIA inspectors during the practical evaluation, or they may set up a small pre-test wherein each candidate is given 1 field location to travel to on their own time. To prove the candidate has found the correct field, they should be asked to describe the size of the field and the type of crop that is being grown there. Trainers are advised to have a set of 2 to 4 different locations to allow for different assignments among the candidates. This test should be administered well in advance of the remainder of the evaluation to ensure there is adequate notification and time to complete it. Candidates should be advised to bring their results to the practical evaluation.

During the practical evaluation, trainers should be asking the candidate a range of hypothetical questions to evaluate the candidate's ability to accurately respond to situations not addressed by the evaluation site (for example, "What would you do if this was a field of barley and you noticed some smut?").

If there is time, it is highly recommended that the evaluator provide feedback to the candidate on areas where marks were deducted. This is best done immediately following the evaluation before the candidate and evaluator leave the field so that specific examples can be provided.

The candidate must obtain a mark of 80% or more on the practical evaluation. The evaluator will forward the candidate's marks to Seed Section by mail and by scanning and emailing the original evaluation.

If the candidate is not successful, it is their responsibility to contact their trainer to schedule a re-evaluation.

### **4.3 Licensing the LSCI**

Once the candidate has passed both the written and practical evaluations, the Seed Section issues a licence to the LSCI and notifies the LSCI, and the CSGA. See Appendix E of QSP 142.2 for an example of the LSCI licence. The name of the LSCI is added to the CFIA register of LSCI.

The licence authorizes the LSCI as a seed crop inspector for 1 or more of Groups 1, 2, 3, 4, 5, and 6 as described in Section 5.1 of QSP 142.2. The licensee is authorized to inspect pedigreed seed crops of any of the crop kinds and pedigreed classes within the scope of their licence for which they are competent.

Candidates who have passed both written evaluations for crop kinds in both Section 2 and Section 3 of Circular 6, but who have attended practical training for crop kinds in only 1 of Section 2 or Section 3 will be issued a licence for Group 1 (which covers crop kinds in both Section 2 and 3) and are permitted to inspect only the crop kinds in the Section of Circular 6 for which they received practical training. These candidates are required to attend practical training

in the remaining Section before the end of the seed crop inspection season. For instance, if a candidate attends practical training and passes both the written and practical evaluations for only Section 3 crops, but not Section 2 crops, they will be issued a licence for Group 1 and must attend practical training in a Section 2 crop before the end of the seed crop inspection season.

#### **4.4 Post-licensing training and support**

The availability of post-licensing training and support will vary by region and, when necessary, will be focused on ASCIS Lead Inspectors who can then distribute the information to the LSCI under their supervision. If there are updates to the training materials for LSCI, the Seed Section will distribute the updated materials to the Lead Inspector of each ASCIS.

This additional training may be attended by LSCI who are not Lead Inspectors, if space is available and if the trainer consents.

LSCI are required to attend any mandatory training that may be made available by the CFIA.

## **5.0 Licensing of Authorized Seed Crop Inspection Services**

### **5.1 Application**

The application package for an ASCIS licence must include a completed application form (see Appendices A and B of QSP 142.2) and a copy of the QMS manual of the ASCIS as well as any related procedures documents or forms referred to in the QMS manual.

The applicant ASCIS submits its licence application to the National Manager of the CFIA Seed Section via mail, fax or email to [SeedSemence@inspection.gc.ca](mailto:SeedSemence@inspection.gc.ca).

#### **5.1.1 Application review**

The application must be complete, signed and dated. If the application is incomplete, the Seed Section will contact the applicant to obtain the missing information.

#### **5.1.2 ASCIS Quality Management Systems (QMS) manual review**

The CFIA's ongoing oversight of the ASCIS assesses the ASCIS's ability to correctly implement its QMS. Therefore, it is essential that the initial review and assessment of the QMS be thorough and comprehensive.

**Note:** The reviewer must be an ASCIS auditor.

The QMS manual must describe the procedures followed by the ASCIS that result in the submission of unbiased, accurate, and comprehensive Reports of Seed Crop Inspection to the CSGA. Appendix I is a checklist for review of a QMS manual, which must be completed by the reviewer before the ASCIS can be licensed. This checklist is not static and updates will occur from time to time as required.

If the QMS manual does not satisfactorily meet all the criteria in the checklist, the reviewer contacts the applicant and requests revisions. As deficient sections are amended, the reviewer should update the checklist. The QMS manual is considered complete only when it meets all of the criteria described in the checklist. The final version of the QMS should indicate the date that it was accepted by the CFIA.

All documentation that is received or created by the reviewer during the manual review process, including forms and checklists, should be added to the CFIA electronic folder for that ASCIS.

In some situations, the QMS manual may encompass procedures un-related to seed crop inspection. In this case, the ASCIS need not provide the full manual, but must provide sufficient sections of the QMS manual to demonstrate that the ASCIS is able to meet the objective of delivering seed crop inspection services to the standards expected by the CFIA and the CSGA.

## **5.2 Recommendation for licensing the ASCIS**

When the reviewer is satisfied that the QMS manual meets the requirements of the program, the reviewer completes and signs the Summary of QMS Manual Review (Appendix II) and sends the form to the Seed Section.

## **5.3 Licensing the ASCIS**

The Seed Section will review the Summary of QMS Manual Review and issue the licence to the ASCIS. The name of the ASCIS will be added to the list of licensed ASCIS and the CFIA auditor and the CSGA will be notified.

The ASCIS must apply separately to the CSGA for eligibility to submit Reports of Seed Crop Inspection to the CSGA.

## **6.0 Ongoing CFIA oversight of LSCI**

The CFIA will oversee the activities of LSCI primarily through check inspections of seed crops inspected by the LSCI. In order to coordinate this oversight, the CFIA has designated Lead and Alternate Lead contacts in SeedCert for each CFIA district. These contacts will receive information during the seed crop inspection season on upcoming planned LSCI inspections in their area as well as when an LSCI will be inspecting a new crop kind or a new crop kind in a plot for the first time. These contacts are responsible for forwarding the information to the responsible CFIA check inspectors as soon as possible. These contacts may be changed by request to the Seed Section, who will forward the request to the CSGA and affected personnel. The planned inspections for each LSCI may also be viewed in SeedCert at any time.

The CFIA completes check inspections on all crop kinds inspected by LSCI. The majority of check inspections will be completed on crop kinds in Sections 2 and 3 of Circular 6 however some LSCI will have licence scopes which include other crop kinds. In these instances, these crop kinds are subject to check inspection at the designated check inspection frequency for the

LSCI (5%, 10% or 15%). LSCI are check inspected at a 20% frequency for Group 6 (Plot) inspections.

## **6.1 Check inspections**

Check inspections are conducted by CFIA seed crop inspectors.

Check inspections follow the standard procedures for inspection of that crop kind, including contacting the grower to inform them that their fields will be inspected and requesting information about pesticide applications on the field as appropriate.

If the check inspector communicates with the seed grower during the check inspection process, the check inspector should clearly communicate that they are there for the purpose of oversight of the LSCI and not to assess the field for certification status.

If the check inspection reveals that conditions exist that may make the seed crop ineligible for certification at the desired pedigreed status, the CFIA check inspector must indicate this on the CFIA Check Inspection Report. If the check inspection report is not submitted on the same day of the check and the inspection reveals conditions that may affect the certification, it must be flagged by completing the SeedCert form "Flag Check Inspection for CSGA Review".

The check inspection should be conducted 4 calendar days before or after the LSCI inspection so that field conditions remain essentially the same. In some circumstances the check inspector may perform the check inspection outside of this 4 day window. When the check inspection is outside of the 4 day window the check inspector should be able to demonstrate that field conditions have not changed significantly. When possible the CFIA check inspector can contact the seed grower to confirm that the seed crop has not been altered during the period between the LSCI inspection and the check inspection. The CFIA check inspector must submit their report in SeedCert within 2 business days of the check inspection.

The ASCIS should notify the CSGA of the schedule of its inspections 2 business days before the inspection so that check inspections can be scheduled appropriately.

When an LSCI inspects a crop kind for the first time (or a new crop kind in a plot), they must notify the CSGA by completing the notification form on SeedCert which will automatically notify the Lead and Alternate Lead CFIA contacts for the region in which the LSCI is operating. The contact forwards the information to the appropriate check inspector. If possible, the check inspector should conduct a check inspection on that field. If the check inspector notes that an LSCI has inspected a crop type for the first time ever (not just in the current inspection season) and has not notified the CSGA, they should note this in the Comments section of the check inspection checklist (Appendix IX).

If the check inspector requests information from the LSCI or ASCIS regarding pesticide application and does not receive a response within the check inspection timeframe, they should inform the CFIA auditor responsible for that ASCIS.

The check inspector can issue a non-conformance without visiting the field or completing a check inspection. For example, if a Seed Crop Inspection Report is submitted to CSGA for a seed crop not within the appropriate growth stage, before the crop was ready for inspection, or when varietal purity can no longer be assessed, a non-conformance could be issued without visiting the field. In these circumstances, the check inspector should complete a check inspection for this LSCI in this crop kind when the correct time for seed crop inspection arrives as this LSCI has demonstrated a lack of competency in this crop kind.

When CFIA has submitted varietal identification samples to the Seed Science Unit of the Ottawa Plant Laboratory - Fallowfield, CFIA may share these results with the lead inspector as appropriate. The results may be a factor in the assessment of a non-conformance to an LSCI. In these situations the results should be provided to the lead inspector for the LSCI.

## 6.2 Check inspection frequency

Check inspections are conducted at a frequency that is established by the auditor during the annual ASCIS audit. LSCI in their first year of licensing are subject to a Normal frequency.

**Table 1 Check inspection frequencies**

<b>Frequency</b>	<b>Check inspection rate</b>
Reduced	5%
Normal	10%
Tightened	15%

All LSCI are check inspected at a rate of 20% for their Group 6 (Plot) seed crop inspections.

As percentages are used to calculate the number of fields for check inspection, the resulting number is rounded up to the nearest whole number.

The check inspector should attempt to check inspect seed crops of each crop kind that the LSCI is inspecting and of as many varieties as possible for each LSCI. Check inspections are done on all crop kinds which the LSCI is inspecting, not just the Group 1 crop kinds. Priority should be given to conducting a check inspection on at least 1 of each LSCI's first 5 fields of the season.

If an LSCI conducts inspections for more than one ASCIS, check inspections should be chosen to reflect this, in a similar proportion if possible.

These check inspections are subject to CFIA fees charged to the ASCIS.

### **6.2.1 Additional check inspections**

The CFIA may wish to complete additional check inspections in the following circumstances:

- there are specific concerns regarding an LSCI (for example, newly licensed or poor performance history)
- there are specific concerns regarding an ASCIS, for which additional check inspections of the LSCI reporting through the ASCIS is a reasonable course of action
- the Seed Section requests check inspections be conducted on specific crop kinds or in specific geographic areas for additional oversight
- the minimum number of fields (5) required to maintain check inspector status cannot be met based on the required check inspection rates and field numbers

These additional check inspections are not subject to CFIA fees and should not be invoiced to the ASCIS.

### **6.2.2 Changes to the check inspection frequency**

As part of the annual audit of the ASCIS, the check inspection frequency for an LSCI may be adjusted by the auditor. The check inspection frequency may remain the same from year to year, or may be increased 1 level (for example, from normal to tightened) or decreased 1 level (for example, from normal to reduced), depending on the numbers and types of non-conformances assigned to that LSCI. Table 2 describes the criteria for changing the check inspection frequency level. Where multiple Minor or Major non-conformances of the same type are noted in the same season, they are considered as only 1 non-conformance. If a LSCI is working for more than 1 ASCIS, the number of non-conformances is calculated independently for each ASCIS for which the LSCI conducts inspections in the current crop season. The auditor will calculate the LSCI's frequency per ASCIS and follow the instructions to update the ASD-Auditors Calculation of Check Inspection Frequency (RDIMS #12518191 – internal access only) in the ASCIS Master folder (RDIMS #40907055 – internal access only). The LSCI's frequency for the following year can only be calculated by Seed Section once all the check inspection frequencies for each ASCIS are received as the highest check inspection frequency will be assigned to the LSCI for the following year. Therefore, an auditor may not be aware of a check inspection frequency from another ASCIS at the time of the audit and should communicate to the LSCI and ASCIS that this will be determined at a later date.

Check inspection frequencies are not changed during the season. However, unresolved Critical non-conformances can lead to the initiation of the licence revocation process during the seed crop inspection season.

In order for an LSCI to change to a lower check inspection rate, the LSCI must have completed at least 25 field inspections and have had at least 3 check inspections in a single crop inspection season.

**Table 2 Criteria for changing LSCI check inspection frequency level**

<b>Check inspection frequency change</b>	<b>Non-conformances in previous year</b>
Decrease from tightened to normal	4 or fewer Minor, and no Major or Critical
Decrease from normal to reduced	4 or fewer Minor, and no Major or Critical
Increase from reduced to normal	2 or more Major, or 1 or 2 Critical
Increase from normal to tightened	3 or more Major, or 1 or 2 Critical
Initiate revocation process	3 Critical

The ASCIS is ultimately responsible for the actions of the LSCI under its supervision and is required to provide re-training or other support to the LSCI to improve their delivery of seed crop inspections as necessary.

### **6.3 Comparison of check inspection reports and LSCI Reports of Seed Crop Inspection**

In order to track the results of check inspections, each check inspector must maintain their own version of the template check inspection tracking spreadsheet.

Reports of Seed Crop Inspection completed by the LSCI should be assessed by the check inspector for Critical non-conformances within 2 days of the most recent inspection conducted by either the check inspector or the LSCI. The check inspector will issue Corrective Action Requests (CARs) according to Section 8.0 for these critical non-conformances during the seed crop inspection season.

At the end of the seed crop inspection season, or as time permits, and prior to the annual audit of the ASCIS, the LSCI Seed Crop Inspection Report and the check inspection report must be compared using the Check inspection non-conformance checklist (Appendix IX) to identify any non-conformances. The check inspector should compare their check inspection Report against the LSCI Seed Crop Inspection Report submitted to the CSGA (after it has been reviewed by the Lead Inspector).

The LSCI's initial report must be created and submitted within 2 business days for approval by the ASCIS.

The assignment of a non-conformance may depend on the degree of visibility or localization of a problem in a seed crop field. There is a high probability that the travel pattern used by the check inspector during a field visit will differ from that of the LSCI being monitored.

The check inspector must record the results of the Report comparisons in their personal version of the check inspection template tracking sheet. The check inspector should carefully review the 'Instructions for Use' found on the first tab of the tracking sheet. Only the check inspector should have read/write privileges for their tracking sheet.

Once the check inspection results have been entered, the check inspector may generate a copy of the non-conformance checklist found in Appendix IX for each check inspection. This can be

done by using the 'Checklist' tab in the inspector's tracking spreadsheet. Each checklist should be saved to a new file or printed, scanned and saved in the CFIA electronic folder for the ASCIS.

Checklists and tracking sheets should be saved in the CFIA electronic folders for the ASCIS for which the LSCI check inspected.

## 6.4 LSCI non-conformances

Descriptions of Minor, Major, and Critical non-conformances of an LSCI are found in Table 3.

**Table 3 Types of LSCI con-conformances**

<b>Non-conformance</b>	<b>Description</b>
Minor	An activity that is not in conformity with an accepted pedigreed seed crop inspection procedure but will not or is unlikely to adversely affect the quality of the pedigreed seed crop inspection when isolated cases are found but that cumulatively may result in a consequential impact on the quality of the pedigreed seed crop inspection
Major	An activity that is not in conformity with an accepted pedigreed seed crop inspection procedure and may have or is likely to have an adverse impact on the quality of the pedigreed seed crop inspection
Critical	An activity that is not in conformity with an accepted pedigreed seed crop inspection procedure and will have an adverse impact on the quality of the pedigreed seed crop inspection

If the LSCI has numerous non-conformances assigned to them, the check inspector may recommend to the CFIA auditor that the LSCI receive re-training within the current seed crop season and additional support or oversight by the ASCIS.

Minor and Major non-conformances are communicated to the ASCIS. Critical non-conformances are communicated to both the LSCI and the ASCIS.

Critical non-conformances are issued regardless of the final pedigree status granted to the inspected crop. CFIA compares to the published CSGA standard including variants, but CSGA may use additional information to assess the report.

## 7.0 Ongoing ASCIS oversight by the CFIA

At the end of its first year of licensing, the ASCIS must be subject to a full audit by the CFIA auditor. In the years following the first audit, an auditor may conduct either a full or a partial audit, depending on the performance history of the ASCIS in the previous audit. The auditor conducts interviews with staff, reviews records and observes procedures.

**In a full audit**, the auditor reviews all components of the QMS using the audit checklist in Appendix III.

**In a partial audit**, the auditor must review at minimum:

- all criteria listed as 'required for partial audit' on the audit checklist
- half of the remaining optional criteria on the audit checklist (ensuring that all optional criteria are reviewed at least once every 2 years)
- the summary of non-conformances identified in check inspections of each LSCI reporting to the ASCIS during the current seed crop inspection season
- components of the ASCIS QMS where Major and Critical non-conformances were noted in the previous audit and addressed in CARs
- any outstanding CARs from the previous audit
- components of the QMS manual which have changed since the last audit or initial QMS manual review to ensure that they remain in conformance with CFIA guidelines
- training plans and records
- the ASCIS list of their LSCI and their licence scopes

In either case, the audit is conducted according to standard audit protocols using the checklist provided in Appendix III. If non-conformances are identified, CARs are issued. More information on CARs can be found in Section 8.0.

The audit is to be completed and the audit report received by Seed Section by December 15 of each year.

The final audit report package which is provided to the ASCIS should include:

- the summary report (Appendix VII)
- summary of LSCI non-conformances
- notification of LSCI check inspection frequency for next season
- CARs issued to ASCIS if non-conformances identified (Appendix VI)

If one or more of these documents has been provided during the course of the audit it is not necessary to provide it again.

The ASCIS list of LSCI must be submitted to the CFIA by June 15 of each year via the form in SeedCert.

## **7.1 Determining ASCIS audit scope**

The scope of the audit to be conducted is dependent on the number and type of non-conformances noted against the ASCIS in the previous audit, and should be determined based on the criteria in Table 4. The determination of audit scope should be made after the non-conformances from the previous audit and non-conformances assigned to the LSCI reporting to the ASCIS have been 'rolled up' according to Section 7.4.2 as much as possible.

**Table 4 Determining requirement for a full audit of an ASCIS**

<b>Audit conditions</b>	<b>Audit scope</b>
First year of licensing of the ASCIS	Full audit
2 or more Critical non-conformances in the last audit	Full audit

For the purposes of an audit of an ASCIS, there is no roll-up of Major or Minor non-conformances to assign a Critical non-conformance.

## **7.2 Creating a check inspection summary**

In preparation for the audit, the auditor must review the summary of the check inspections for each LSCI reporting to the ASCIS. Each year, the auditor must combine the check inspection data for the LSCI reporting to that ASCIS from each check inspector's tracking sheets (found in the electronic ASCIS folder) into 1 master tracking sheet that contains check inspection results for all LSCI reporting to that ASCIS. This master sheet should be saved in the ASCIS folder with the name of the ASCIS, and the year, in the title. From this master sheet, the auditor can generate a summary of check inspection results for each LSCI for the year using the 'Summary Data' tab, where each row summarizes the check inspection results for a single LSCI over the entire seed crop inspection season. When the summary is complete the auditor must provide a summary of the non-conformances to the ASCIS.

The auditor should provide this information to the ASCIS at the end of the season and not later than at the time of the annual audit. The auditor should review the summary of non-conformances and ensure that the descriptions are clear and consistent.

The auditor should also review the 'Additional comments' column in the 'Check Inspection Data' tab of the checklist as this data is not rolled up in the check inspection summary. Check inspectors may indicate non-conformances to be assigned to the ASCIS in this column and these should be addressed during the audit.

A copy of the summary audit report (Appendix VII) is provided to the ASCIS, and the Seed Section. The auditor keeps the original paper copy of audit checklist on file and saves a copy in the CFIA electronic folder for the ASCIS.

## **7.3 Assessing open ASCIS and LSCI CARs**

The auditor must review the non-conformances that were issued to each ASCIS and LSCI in the previous and current seed crop inspection seasons to determine whether they were closed by their resolution dates. Non-conformances that were previously issued to the ASCIS and its LSCI should be filed in the CFIA electronic folder for the ASCIS, and should be listed in the check inspection summary sheet for non-conformances issued to the LSCI.

Non-conformances issued to ASCIS that are not closed by their resolution dates may be addressed as escalating non-conformances, depending on their severity. Major non-conformances are to be escalated to Critical non-conformances if they have not been resolved by

their resolution date. Unresolved Minor non-conformances are escalated to Major non-conformances. Unresolved Critical non-conformances may not be escalated further, but may lead to revocation of the ASCIS or LSCI licence as per Section 11.0.

Non-conformances that are escalated are issued on new CARs, and should indicate in the comments section that the non-conformance has been escalated as the non-conformance was not closed by the resolution date. The file numbers of the original and new CARs should be cross-referenced on the forms.

## 7.4 ASCIS non-conformances

For an ASCIS, a non-conformance is a failure to follow the procedures of its QMS Manual or meet the standards in QSP 142.2 and the conditions in their ASCIS licence. Descriptions of Minor, Major, and Critical non-conformances of an ASCIS are found in Table 5.

**Table 5 Descriptions of ASCIS Minor, Major and Critical non-conformances**

<b>Non-conformance</b>	<b>Description</b>
<b>Minor</b>	A deviation from the QMS such that confidence in the conformance with the QMS is decreased. Minor non-conformances have no immediate or direct impact on the quality of the Report of Seed Crop Inspection.
<b>Major</b>	A significant deviation from the QMS such that conformance with the QMS is in doubt. Major non-conformances indicate a lack of control in the QMS and may negatively affect the quality of the Report of Seed Crop Inspection.
<b>Critical</b>	A deviation from the QMS such that conformance is absent.

CARs for Critical non-conformances must be issued immediately according to Section 8.0 and resolved as soon as possible. CARs for Major and Minor non-conformances must be issued during the current audit and resolved, at the latest, before the end of the next seed crop inspection season. It is the responsibility of the CFIA auditor to inform the check inspectors of the numbers and types of non-conformances identified in the audit that may affect the activities of the LSCI in the upcoming season.

### 7.4.1 Assigning LSCI non-conformances to the ASCIS

The ASCIS is responsible for resolving systemic problems that affect all LSCI under their supervision. Where the same non-conformances are noted in multiple LSCI at 1 ASCIS and the root cause can be ascribed to the actions of the ASCIS, a non-conformance is assigned to the ASCIS based on the conditions outlined in Table 6.

**Table 6 Conditions where LSCI non-conformances may be assigned to the ASCIS**

<b>Non-conformances assigned to LSCI reporting to an ASCIS</b>	<b>Non-conformance assigned to the ASCIS</b>
The same Critical non-conformance assigned to 2 or more LSCI or 10% of active LSCI, whichever is greater, reporting to that ASCIS	1 Critical
The same Major non-conformance assigned to more than 50% of LSCI reporting to that ASCIS	1 Major
The same Minor non-conformance assigned to 80% of LSCI reporting to that ASCIS	1 Minor

There are some types of non-conformances for which this table does not apply.

#### **7.4.2 Roll-up of multiple non-conformances assigned to the ASCIS**

Multiple non-conformances may indicate a trend in deficiencies that might have little significance when isolated cases are found but may be indicative of a systemic failure if they occur in significant numbers. If 3 Critical non-conformances are assigned to an ASCIS in a single audit, the auditor should inform Seed Section that they are initiating the process to revoke the ASCIS licence.

## **8.0 Corrective Action Requests (CARs)**

A CAR form documents non-conformances and communicates the non-conformances to the LSCI or ASCIS. The CAR includes a corrective action plan (CAP) developed by the ASCIS or LSCI, as appropriate, and accepted by the auditor that is intended to:

- correct the immediate problem (for example, make amendments to Reports of Seed Crop Inspection that had missing or incorrect data)
- identify and correct the root cause of the problem so that the problem does not occur again in the future (for example, forms were inadequate to record the data correctly)
- amend the procedures and/or the QMS manual to put in place the required changes to the procedures (for example, revise the forms)
- provide training or re-training as necessary to personnel responsible for the activity (for example, train on using the new forms)
- put in place check methods to determine if the amended procedure meets the objective of preventing the occurrence of the non-conformance (for example, review 10% of the new forms to verify that they are completed correctly)

The CAP resolution date should be reasonable, should occur as soon as possible and preferably before the end of the next seed crop inspection season.

If the resolution date for a non-conformance has not passed and if additional non-conformances of the same type are identified, the auditor or check inspector will not issue an additional CAR.

Each Critical non-conformance must be reported on a single, unique CAR so that follow-up actions can be more easily tracked.

Multiple Major and Minor non-conformances may be reported on a single CAR where each type of Major or Minor non-conformance is listed and described only once, but the number of occurrences of that non-conformance is noted on the CAR.

Appendix V contains the template for CARs assigned to the LSCI, and Appendix VI contains the template for CARs assigned to the ASCIS. CAR files are saved in the CFIA electronic folder for the ASCIS.

CARs should only be changed or deleted by the auditor and only if there is evidence to justify the change. If the ASCIS or LSCI provides sufficient evidence for withdrawal of the CAR, the auditor must indicate this in the notes section of the CAR form. The auditor must also ensure that the information in the check inspection tracking sheet is updated.

CARs can be closed if the LSCI or ASCIS has implemented their CAP but both resolved and unresolved non-conformances issued in the current seed crop inspection season will be considered when calculating the check inspection frequency or audit scope for the next seed crop inspection season.

If a CAR is closed and the non-conformance recurs, the closed CAR should be referenced on the new CAR to ensure that the CAP from the previous CAR is taken into consideration when developing the CAP for the new CAR.

## **8.1 CAR timelines**

When a Critical non-conformance is identified during the seed crop inspection season, the CAR must be signed by the check inspector or auditor and issued to the LSCI or ASCIS within 2 business days of the identification of the non-conformance. A Critical non-conformance may also be issued as part of an annual audit. CARs must be issued to the LSCI or ASCIS before the annual audit is closed.

Once the LSCI or ASCIS receives a Critical CAR, they must acknowledge its receipt within 2 business days. Acknowledgment of the CAR can occur either by the lead inspector or LSCI replying by e-mail that they have received the CAR or by signing the CAR form and returning it to the CFIA contact who issued the CAR. Within 3 days of receipt of a signed Critical CAR, a CAP must be developed by the LSCI or ASCIS, as appropriate (including a proposed resolution date) and agreed to by both the CFIA contact and the recipient before implementation of the CAP. Whenever possible, the CFIA check inspector will request that the ASCIS has the seed crop re-inspected as part of the corrective action plan. Within 24 hours of agreeing to the CAP, a completed CAR including the CAP must be provided by the recipient (either the LSCI or the ASCIS), to the check inspector, or auditor.

Although CARs must be issued before the audit is closed, the CAP requested during the audit can be developed following the audit as long as it is developed within 2 weeks of the issuance of the CAR.

If an ASCIS/LSCI wishes to appeal a non-conformance, they must complete the Request for Appeal of Non-conformance form. This dispute process is separate from the CAR process and the CAR with CAP process must continue even if a dispute is initiated.

## **8.2 CARs issued to LSCI**

If a Critical non-conformance is identified by the check inspector, the check inspector will issue a CAR to the LSCI within 2 business days of the identification of the non-conformance. A copy of the CAR will be sent to the Lead Inspector for the LSCI as well as the auditor of the ASCIS to which the LSCI reports. The Critical non-conformance is recorded in the check inspection tracking spreadsheet as is the file number for the CAR.

At the end of the seed crop inspection season, each check inspector will submit their check inspection tracking spreadsheet to the auditor responsible for the ASCIS to which the LSCI report, who will then create a summary of LSCI non-conformances as in Section 7.2 and provide a list of non-conformances that were identified for each LSCI by the check inspector(s). Each type of Minor and Major non-conformance should be described only once, but the frequency and description of each instance should be provided by including the sequence number of the field(s) where the non-conformance was identified as well as any comments from the check inspector.

The auditor should not issue CARs for non-conformances of the same type that are covered by an open CAR from the previous year.

## **8.3 CARs issued to ASCIS**

Although the auditor may issue CARs to the ASCIS during the seed crop inspection season, for example when non-conformances involving conflicts of interest or inappropriate refusals of inspections are identified, the majority of CARs will be issued to the ASCIS during the annual audit. If possible, CARs issued at the audit should be resolved during or immediately after the audit but it may not be possible to address all of the non-conformances or to confirm their resolution until the next seed crop inspection season is underway or even finished.

## **8.4 Closing CARs**

CARs remain open until they are closed by the check inspector or auditor when it is determined that the CAP was implemented as described. The check inspector or auditor does not consider the efficacy of the CAP when closing the CAR. However, the auditor or check inspector may issue another CAR if the same non-conformance continues to occur following the CAR resolution date. In this case, the auditor and/or check inspector should reference the original CAR on the second CAR. The CAR is considered closed when the auditor or check inspector initials the CAR's resolution date. Documentation of formal disagreements with CARs or non-conformances should be saved in the electronic folder for the ASCIS.

## **9.0 ASCIS or LSCI non-compliances**

A non-compliance is a failure to meet legislative, regulatory or legal obligations and is subject to a range of enforcement actions depending on the type of non-compliance. Note that non-compliances are not rated as Critical, Major, or Minor.

Following are examples of non-compliances:

- false or misleading information was provided in the ASCIS or LSCI licence application
- false or misleading information was provided to a CFIA inspector

When a non-compliance is identified during an audit, the auditor should note the non-compliance in the report and complete the remainder of the audit in the usual manner. The auditor should not take action on the non-compliance during the audit as they are on-site at the ASCIS for the purpose of conducting an audit and any other actions are out of scope during the time of the audit. After the audit, the auditor must notify a CFIA inspector of the non-compliance so that the inspector can initiate inspection and enforcement actions as appropriate.

If the auditor is also designated as an inspector, the auditor should complete the audit before acting on the non-compliance.

## **10.0 Annual renewal of an LSCI or ASCIS licence**

LSCI and ASCIS licences are renewed annually by the Seed Section. The renewal of the LSCI licence is not dependent on the renewal of the licence of the ASCIS to which the LSCI reports.

Licences are not renewed if:

- the licensee indicates they do not wish the licence to be renewed
- the licence revocation process has been initiated by a CFIA auditor or check inspector
- the licensee does not meet the conditions for renewal (for example, completion of 20 inspections in 2 years)
- the licensee has a critical CAR that was not closed by the resolution date

ASCIS licences are renewed based on the recommendation of the auditor following the annual audit using the Audit Summary Report found in Appendix VII. ASCIS licences are not renewed if:

- the ASCIS has assigned their licence to another entity
- the ASCIS does not have insurance
- the ASCIS has not paid their check inspection fees
- the ASCIS has not provided access to CFIA for audits
- the ASCIS has not provided a CAP for CARs assessed during their audit
- the licensee has a critical CAR that was not closed by the resolution date

- the ASCIS has not completed the renewal form and/or accepted the minimum number of inspections for the coming crop inspection season

If an ASCIS chooses to withdraw prior to the audit the auditor must complete the following steps:

- the LSCI summaries
- invoicing for Check Inspections
- the ASCIS audit summary with a statement indicating why the audit was not complete.

## **11.0 Revocation of an LSCI or ASCIS licence**

The Seed Section will notify the ASCIS or LSCI of the revocation of its licence by registered mail, and the CSGA, and CFIA auditor by electronic mail.

The grounds for revoking the licence must be documented and the records retained according to the CFIA's records retention policy.

If an ASCIS is no longer conducting inspections, an audit will be completed during the first year and the licence will be revoked the second year. In order to reinstate an ASCIS licence, the ASCIS must first re-apply for licensing.

Section 11.1 outlines the procedures for the revocation of an LSCI or ASCIS licence that should be followed by the CFIA auditor in charge of the ASCIS to which the LSCI reports. Throughout this process, the auditor should be available to the LSCI or ASCIS to respond to questions. The auditor should retain the records leading to the revocation of a licence for 7 years and make them available to the National Manager of Seed Section if the ASCIS or LSCI seeks re-licensing at a future date.

### **11.1 Procedures for the revocation of an LSCI or ASCIS licence**

The CFIA auditor must provide written notification by registered mail to the LSCI or ASCIS that they have unacknowledged, unresolved or 3 Critical non-conformances and that without resolution, these non-conformances may lead to the revocation of the LSCI or ASCIS licence. The auditor should include documentation to verify the non-conformances and CARs issued, dates, check inspection reports, etc.

The auditor gives the LSCI or ASCIS a date for follow up and records the contact date and content of the interaction in the LSCI or ASCIS file. If possible, the LSCI, ASCIS or their representative should sign and date the record. The auditor will send a copy to the Seed Section.

The auditor will then follow up on the agreed date by phone or in person. If the LSCI or ASCIS is working to resolve the issue, but it is not yet resolved, it is acceptable to extend the deadline for resolution and set a second date for follow up. The auditor should document the contact and date the record. If possible, the LSCI, ASCIS or their representative should sign and date the

record. If the deadline for resolution was extended, the auditor should follow up on the second date by phone or in person. It is not appropriate to extend the deadline more than once.

If no action has been taken, the auditor will send a written notice to the LSCI or ASCIS by registered mail indicating that their licence will be revoked by a set date if the CARs are not resolved by that time. A copy of the notice is sent to the Seed Section.

The auditor will follow up on the agreed date by phone or in person. If no action has been taken, or if actions are inadequate to resolve the CARs, then the auditor will inform the National Manager by email of the situation and recommend revocation of the LSCI or ASCIS licence. The auditor will attach copies of previous correspondence with the LSCI or ASCIS documenting that the above noted procedures have been followed.

The National Manager will then issue a notice of revocation of the licence to the LSCI or ASCIS by registered mail and the entity is no longer licensed.

## **12.0 Re-instatement of an LSCI or ASCIS licence**

In order to reinstate an LSCI or ASCIS licence, the LSCI or ASCIS must first re-apply for licensing.

The National Manager may consider the record of the LSCI or ASCIS for the period when they were licensed in making a decision whether to re-instate a previously revoked or lapsed licence.

**Note:** The licence scope of the re-instated licence will be determined on a case by case basis by the National Manager.

If more than 7 years have passed since the revocation of the licence, such that the documentation for the revocation is no longer available, the ASCIS or LSCI will be subject to the same level of oversight as would be given a new ASCIS or LSCI (for example, a full annual audit for the ASCIS and normal check inspection frequency for the LSCI).

If the re-instatement is for an LSCI licence that was revoked for outstanding Critical non-conformances, the candidate must re-train and pass all relevant evaluations. The LSCI, if licensed, will be subject to the normal check inspection frequency.

If the re-instatement is for an LSCI licence that was revoked for Critical non-conformances that are not outstanding, the candidate must pass all relevant evaluations. The LSCI, if licensed, will be subject to the normal check inspection frequency.

If the re-instatement is for a lapsed LSCI licence where there were no outstanding Critical non-conformances, and it has been less than 2 years since the LSCI last inspected a field, the licence may be reinstated without further requirements. If it has been more than 2 years since the LSCI last inspected a seed crop, the candidate LSCI must re-take the written and practical evaluations but is not required to repeat the training, though it is recommended. The LSCI, if licensed, will be subject to the normal check inspection frequency.

If the re-instatement is for an ASCIS licence with outstanding Critical non-conformances, the non-conformances must be resolved before the ASCIS licence can be re-issued. The re-instated ASCIS will be subject to a full annual audit in the first year after re-instatement.

If the re-instatement is for an ASCIS licence where there were no outstanding Critical non-conformances, the ASCIS must submit an updated QMS manual with their application for re-instatement. The re-instated ASCIS will be subject to a full annual audit in the first year after licensing.

## **13.0 Fees**

It is the responsibility of the ASCIS to charge fees to seed growers for seed crop inspection.

The CFIA will charge fees to the ASCIS for check inspections of their LSCI, based on the total number of check inspections completed for the LSCI for that ASCIS. The fees charged should not exceed the number of check inspections that would be required based on the check inspection frequency assigned to the LSCI. The CFIA maintains the authority to conduct additional check inspections over and above the assigned frequency, but no fees will be charged for these additional check inspections.

Check inspections are invoiced based on the [CFIA Fees Notice, Part 14, Table 1, Item 1](#). The invoice amount is a fixed fee based on 6 quarter hours per check inspection.

## Appendix 0 Work flow and forms

### LSCI - Pre-licensing

Action	Reference
Applicant submits application for LSCI licence which is reviewed by Seed Section	QSP 142.2 Appendix D
LSCI completes classroom and practical training and evaluations	QSP 142.2 Appendix E
Seed Section issues LSCI licence	Template in QSP 142.2

### LSCI - Post-licensing

Action	Reference
Check inspector conducts inspections of seed crops inspected by LSCI	QSP 142.2
Check inspector issues CARs to the LSCI for Critical non-conformances during the inspection season	SWI 142.3.1 Appendix V
Check inspector completes check inspection tracking sheet as time permits but before ASCIS annual audit	Each inspector must save their own copy of check inspection tracking sheet
Check inspector may complete and save a Seed Crop Inspection Report comparison report for each check inspection before ASCIS annual audit. This is optional.	SWI 142.3.1 Appendix IX (or using tracking sheet)

### ASCIS - Pre-licensing

Action	Reference
Applicant submits application for ASCIS licence which is reviewed by Seed Section	QSP 142.2 Appendix B
Reviewer reviews ASCIS QMS manual and completes checklist	SWI 142.3.1 Appendix I
Reviewer completes recommendation for ASCIS licensing and sends to seedsemenca@inspection.gc.ca	SWI 142.3.1 Appendix II
Seed Section issues ASCIS licence	Template in QSP 142.2 Appendix C

### ASCIS - Post-licensing

Action	Reference
Auditor creates summary of LSCI non-conformances using ASCIS check inspection tracking sheet and applies them to ASCIS as appropriate	SWI 142.3.1 Table 6
Auditor issues a list of LSCI Minor and Major non-conformances to the ASCIS	SWI 142.3.1 Appendix V
Auditor determines LSCI check inspection frequencies for following year	SWI 142.3.1 Table 2
Auditor visits ASCIS and assesses ASCIS using Audit Checklist	SWI 142.3.1 Appendix III
Auditor identifies non-conformances and issues CARs to ASCIS	SWI 142.3.1 Appendix VI
Auditor determines ASCIS audit scope for next year	SWI 142.3.1 Table 4
Auditor completes Report of ASCIS Audit for Seed Section and ASCIS	SWI 142.3.1 Appendix VII

# Appendix I Pre-licensing ASCIS Quality Management System manual review checklist

This checklist is to be completed during the pre-licensing ASCIS QMS manual review according to Section 5.1.2 of SWI 142.3.1. Each criterion is to be marked as Satisfactory (S) or Not Satisfactory (NS).

ASCIS Name
ASCIS Mailing Address
ASCIS Telephone
ASCIS Email
Name of ASCIS Quality Manager
ASCIS Quality Manager Email
ASCIS Quality Manager Telephone
Name of CFIA Auditor
CFIA Auditor Email
Date of Review

## 1.0 Quality Management System manual

No.	Reference	QMS Criteria	Review (S/NS)	Comments
1.0	QSP 142.2 Section 4.3 ASCIS Responsibilities	QMS manual exists		

## 2.0 General criteria – ASCIS and LSCI

No.	Reference	QMS Criteria	Review (S/NS)	Comments
2.1	ASCIS Licence QSP 142.2 Section 3.1	Manual states that ASCIS operates and accepts requests for inspection only within the geographic area for which it is licensed (unless permitted by the CFIA)		
2.2	ASCIS Licence	Manual states that ASCIS will accept the minimum number of inspections for their Region before refusing service to a seed grower. (Not applicable to non-3 <sup>rd</sup> party)		

No.	Reference	QMS Criteria	Review (S/NS)	Comments
2.2.1	QSP 142.2 Section 4.3  ASCIS Licence	Manual states that ASCIS is committing to pay fees owed to the CFIA for check inspections		
2.3	ASCIS Licence	Manual states that ASCIS will notify the CFIA if there are changes in the ownership, majority control, technical or financial competence, location of the workplace, or any other changes in its status		
2.4	ASCIS Licence	A procedure stating that the ASCIS is committing to maintain appropriate insurance coverage		
2.5	ASCIS Licence	Manual states that ASCIS will notify the CFIA of any proceedings for bankruptcy or insolvency brought by or against the ASCIS		
2.6	ASCIS Licence  LSCI Licence	A procedure stating that neither the ASCIS employees nor the LSCI represent themselves as agents, employees or partners of the CFIA		
2.7	ASCIS Licence  LSCI Licence	A procedure stating that neither the licence of the ASCIS nor the licence of the LSCI is assigned to another entity		
2.8	QSP 142.2 Section 4.3  ASCIS Licence  LSCI Licence	Manual has a procedure or method to identify conflict of interest with the ASCIS staff or LSCI, including how they handle conflict of interest when identified		
2.8.1	[Redacted]			
2.9	QSP 142.2 Section 4.3  ASCIS Licence  LSCI Licence	Manual states that ASCIS maintains the confidentiality of information on Reports of Seed Crop Inspection and other confidential information		

No.	Reference	QMS Criteria	Review (S/NS)	Comments
2.10	QSP 142.2 Section 4.3	Manual states that ASCIS will submit a list of their LSCI in SeedCert before June 15. The list identifies the Lead and Alternate Lead for each region in which the ASCIS operates.		
2.11	QSP 142.2 Section 4.3  ASCIS Licence	Manual states that ASCIS notifies CFIA and CSGA immediately via the ASCIS roster in SeedCert when their list of LSCI changes.		
2.12	QSP 142.2 Section 4.3	Manual states that the Lead Inspector/Alternate Lead is an LSCI that possesses, as a minimum, the Group 1 Scope.		

### 3.0 QMS manual

No.	Reference	QMS Criteria	Review (S/NS)	Comments
3.1	QSP 142.2 Appendix F QMS Manual	QMS manual includes current information on: <ul style="list-style-type: none"> <li>• mailing address</li> <li>• site location(s), if different from mailing address</li> <li>• phone number</li> <li>• email address and</li> <li>• website (if available)</li> </ul>		
3.2	QSP 142.2 Appendix F QMS Manual	QMS manual includes: <ul style="list-style-type: none"> <li>• organizational chart including reporting structure</li> <li>• list of employees currently filling those positions</li> <li>• name of Quality Manager</li> <li>• name of manager or owner with the ultimate responsibility for decisions at the ASCIS</li> </ul>		
3.3	QSP 142.2 Appendix F QMS Manual	QMS manual describes the roles and responsibilities of positions related to seed crop inspection		
3.4	[Redacted]			

No.	Reference	QMS Criteria	Review (S/NS)	Comments
3.5	QSP 142.2 Appendix F Section 3 QMS Manual	The final version of the QMS manual is approved by the QMS Manager		
3.6	QSP 142.2 Section 4.3	There is a procedure stating that the QMS Manager maintains the QMS manual, that procedures are up to date, and that obsolete documentation is removed from the system		
3.7	QSP 142.2 Appendix F Section 3 QMS Manual	The QMS includes provisions for regular and systematic review of the QMS		
3.8	QSP 142.2 Appendix F Section 3 QMS Manual	There is a procedure stating that amendments to the QMS are tracked.		
3.9	ASCIS Licence	Manual states that CFIA is notified when significant changes to the QMS are planned		
3.10	[Redacted]			
3.11	QSP 142.2 Appendix F Section 2 Management Responsibilities	A procedure exists to inform employees and LSCI to provide feedback to improve the QMS		
3.12	QSP 142.2 Appendix F Section 3 QMS Manual	Quality manual is complete, unambiguous and consistent		
3.13	QSP 142.2 Appendix F Section 3 QMS Manual	QMS manual pages are numbered x of y, and all articles are identified with unique alphanumeric sequences		

#### 4.0 Procedures

No.	Reference	QMS Criteria	Review (S/NS)	Comments
4.1	<p>QSP 142.2 Appendix F Section 3 QMS Manual</p> <p>QSP 142.2 Appendix F Section 4 Procedures</p> <p>Section 2 Management Responsibilities</p>	<p>There is a method for staff and LSCI to have access to the most recent versions of any internal, CFIA, or CSGA documents referenced in the QMS manual</p>		
4.2	[Redacted]			
4.3	<p>QSP 142.2 Appendix F Section 4 Procedures</p>	<p>Each procedure clearly indicates any form(s) required to be completed and maintained by that procedure</p>		
4.4	<p>QSP 142.2 Appendix F Section 4 Procedures</p>	<p>Procedure exists for managing requests for re-inspection</p>		
4.5	[Redacted]			
4.6	ASCIS Licence	<p>Manual states that the ASCIS is responsible to ensure that LSCI provides notice of their schedule prior to the inspection date and should be provided 2 days prior to inspections. Where 2 days is not possible, the notice should be entered prior to the inspection being conducted.</p>		
4.6.1	LSCI Licence ASCIS Licence	<p>Manual states that the actual date of inspection is reported by the end of the day on which the inspection is conducted.</p>		

No.	Reference	QMS Criteria	Review (S/NS)	Comments
4.7	QSP 142.2 Section 4.3	Manual states that seed crop inspections will be conducted at an appropriate growth stage		
4.8	ASCIS Licence	A method exists to inform the CFIA of the pest control product application schedule when requested by CFIA		
4.9	QSP 142.2 Section 4.3	Manual states that the reports of seed crop inspection will be reviewed prior to submission to the CSGA		
4.9.1	[Redacted]			
4.9.2	QSP 142.2 Section 4.3	Manual states that ASCIS approves the report of crop inspection within 2 business days from the inspection date		
4.10	ASCIS Licence  LSCI Licence	Manual states that the ASCIS and/or the LSCI reports to the CFIA the finding of a prohibited noxious weed within 48 hours of its observation during a seed crop inspection		
4.11	ASCIS Licence  LSCI Licence	Manual states that neither the ASCIS nor the LSCI communicate to the seed grower an opinion as to the decision of the CSGA with respect to the results of an inspection		

#### 5.0 Corrective Action Requests (CARs) issued by the CFIA

No.	Reference	QMS Criteria	Review (S/NS)	Comments
5.1	QSP 142.2 Appendix F Section 1	A procedure exists to respond to CARs issued by the CFIA to the ASCIS and Critical CARs issued to LSCI		
5.2	QSP 142.2 Appendix F Section 5 CARs	A procedure exists identifying a person who is assigned to coordinate follow-up activities for CARs		

No.	Reference	QMS Criteria	Review (S/NS)	Comments
5.3	[Redacted]			
5.4	QSP 142.2 Appendix F Section 5 CARs	A procedure exists that describes when a non-conformance is identified, a response should include a time period to resolve the issue, addresses the root cause and a verification action to be implemented		
5.5	QSP 142.2 Appendix F Section 5 CARs	A procedure exists to address cases where corrective action is not completed within the time frame		
5.6	QSP 142.2 Appendix F Section 5 CARs	A procedure is in place stating where appropriate, CARs lead to an amendment to the QMS to prevent similar non-conformances or non-compliances from occurring in the future		
5.7	QSP 142.2 Appendix F Section 5 CARs	A procedure exists to respond internally to non-conformances identified during the ASCIS review of the Seed Crop Inspection Report		

## 6.0 Records

No.	Reference	QMS Criteria	Review (S/NS)	Comments
6.1	QSP 142.2 Section 4.3 ASCIS Licence	Manual states that ASCIS retains records for minimum of 7 years		
6.2	QSP 142.2 Appendix F Section 6 Records	Manual states that records are stored in a manner that provides for their safekeeping and physical protection		
6.3	QSP 142.2 Appendix F Section 6 Records	Manual states that records are disposed of by a secure method and only by authorized persons		

No.	Reference	QMS Criteria	Review (S/NS)	Comments
6.4	QSP 142.2 Appendix F Section 6 Records  QSP 142.2 Appendix F Section 8 Training and Qualifications	A procedure exists stating the following records are maintained: <ul style="list-style-type: none"> <li>• revisions and amendments to the QMS manual and procedures</li> <li>• copies of ASCIS and LSCI licences</li> <li>• list of active LSCI</li> <li>• records of training and qualifications for staff and LSCI</li> <li>• CARs and follow-up actions and</li> <li>• any other document directly referenced in the QMS manual</li> </ul>		

### 7.0 Training and qualifications

No.	Reference	QMS Criteria	Review (S/NS)	Comments
7.1	QSP 142.2 Appendix F Section 8 Training and Qualifications	Procedure exists stating that the personnel have been trained and are competent in the activities for which they are responsible, including, but not limited to: <ul style="list-style-type: none"> <li>• Lead Inspector</li> <li>• Quality manager</li> <li>• Records clerk</li> <li>• LSCI-training records</li> </ul>		
7.2	QSP 142.2 Section 4.4 LSCI Responsibilities  LSCI Licence	Manual states that the LSCI will only inspect crop kinds for which they have been licensed and are competent		
7.3	QSP 142.2 Appendix F Section 8 Training and Qualifications	Methods or procedures exist to provide refresher training as required		
7.4	[Redacted]			

No.	Reference	QMS Criteria	Review (S/NS)	Comments
7.5	QSP 142.2 Appendix F Section 8 Training and Qualifications	Procedure exists stating new LSCI are supervised by an experienced Lead Inspector		
7.6	QSP 142.2 Appendix F Section 8 Training and Qualifications	Procedure exists for LSCI inspecting a new crop kind for the first time are supervised		
7.7	QSP 142.2 Appendix F Section 8 Training and Qualifications QSP 142.1 Section 4.4	Procedure exists to inform CFIA when an LSCI inspects a new crop kind for the first time (including a new crop kind in a plot)		

## 8.0 General conclusions

No.	Reference	QMS Criteria	Review (S/NS)	Comments
8.1	[Redacted]			

## Additional comments

## Appendix II Summary of ASCIS QMS manual review

ASCIS Name
ASCIS Mailing Address
ASCIS Telephone
ASCIS Email
Name of ASCIS Quality Manager
Email of ASCIS Quality Manager
Telephone of ASCIS Quality Manager
Name of CFIA Auditor
Email of CFIA Auditor
Date QMS manual received
Date QMS manual review complete
<b>Part reserved for CFIA use</b>
Version # of approved QMS manual
File #
Recommended for licensing: Yes/No
MRRS Code: 32a10.01
Time spent on activity
Comments

**CFIA Auditor**

\_\_\_\_\_  
 Name (Print)                      Signature                      Date

**ASCIS Quality Manager**

\_\_\_\_\_  
 Name (Print)                      Signature                      Date

## Appendix III ASCIS audit checklist

The checklist is used to document the assessment of:

- the ability of the ASCIS to implement its documented quality management system
- whether changes to the QMS manual meet the criteria in QSP 142.2

Non-conformances are recorded as Minor, Major or Critical.

ASCIS Name
ASCIS Mailing Address
ASCIS Telephone
ASCIS Email
Name of ASCIS Quality Manager
Telephone of ASCIS Quality Manager
Email of ASCIS Quality Manager
Name of CFIA Auditor
Email of CFIA Auditor
Date of Audit

### 1.0 Quality System

No.	Reference	QMS Criteria	Non-Conformance	Comments
1.0	QSP 142.2 Section 4.3 ASCIS Responsibilities	QMS manual exists	Critical	required for partial audit

### 2.0 General Criteria – ASCIS and LSCI

No.	Reference	QMS Criteria	Non-Conformance	Comments
2.1	ASCIS Licence QSP 142.2 Section 3.1	The ASCIS operated and accepted requests for inspection only within the geographic area for which it is licensed (unless permitted otherwise by the CFIA)	Critical	required for partial audit
2.2	ASCIS Licence	The ASCIS accepted the minimum number of inspections for their Region before refusing service to a seed grower (not applicable to non-3 <sup>rd</sup> party)	Critical	required for partial audit

No.	Reference	QMS Criteria	Non-Conformance	Comments
2.2.1	QSP 142.2 Section 4.3  ASCIS Licence	ASCIS paid fees owed to the CFIA for check inspections	Critical	required for partial audit
2.3	ASCIS Licence	The ASCIS notified the CFIA of changes in the ownership, majority control, technical or financial competence, location of the workplace or any other changes in its status	Major	required for partial audit
2.4	ASCIS Licence	The ASCIS maintained appropriate insurance coverage	Major	required for partial audit
2.5	ASCIS Licence	The ASCIS notified the CFIA of any proceedings for bankruptcy or insolvency brought by or against the ASCIS	Major	required for partial audit
2.6	ASCIS Licence  LSCI Licence	Neither the ASCIS employees nor the LSCI represented themselves as agents, employees or partners of the CFIA	Critical	required for partial audit
2.7	ASCIS Licence  LSCI Licence	Neither the licence of the ASCIS nor the licence of the LSCI was assigned to another entity	Critical	required for partial audit
2.8	QSP 142.2 Section 4.3  ASCIS Licence  LSCI Licence	The ASCIS has a procedure or a method to identify conflict of interest and took appropriate action when conflicts of interest were identified with the ASCIS staff or LSCI	Critical	required for partial audit
2.8.1	QSP 142.2 Sections 4.3 and 4.4  ASCIS Licence LSCI Licence	The LSCI and ASCIS were free of any conflict of interest with the seed growers or the seed crops which they inspected	Critical	required for partial audit

No.	Reference	QMS Criteria	Non-Conformance	Comments
2.9	QSP 142.2 Section 4.3 ASCIS Licence LSCI Licence	The ASCIS maintained the confidentiality of information on Reports of Seed Crop Inspection and other confidential information	Major	
2.10	QSP 142.2 Section 4.3	The ASCIS provided a list of their LSCI in SeedCert before June 15. The list identified the Lead and an Alternate Lead for each region in which the ASCIS operates.	Major	required for partial audit
2.11	QSP 142.2 Section 4.3 ASCIS Licence	The ASCIS notified the CFIA and CSGA immediately via the ASCIS roster in SeedCert when their list of LSCI changed.	Minor Major	required for partial audit
2.12	QSP 142.2 Section 4.3	The Lead Inspector/ Alternate Lead is an LSCI that possesses, as a minimum, the Group 1 Scope.	Major	required for partial audit

### 3.0 QMS Manual

No.	Reference	QMS Criteria	Non-Conformance	Comments
3.1	QSP 142.2 Appendix F QMS Manual	QMS manual includes current information on: <ul style="list-style-type: none"> <li>• mailing address</li> <li>• site location(s), if different from mailing address</li> <li>• phone number</li> <li>• email address and</li> <li>• website (if available)</li> </ul>	Minor	required for partial audit - changes only

No.	Reference	QMS Criteria	Non-Conformance	Comments
3.2	QSP 142.2 Appendix F QMS Manual	QMS manual includes: <ul style="list-style-type: none"> <li>organizational chart including reporting structure</li> <li>list of employees currently filling those positions</li> <li>name of QMS manager</li> <li>name of manager or owner with the ultimate responsibility for decisions at the ASCIS</li> </ul>	Minor	required for partial audit - changes only
3.3	QSP 142.2 Appendix F QMS Manual	QMS manual describes the roles and responsibilities of positions related to crop inspection	Minor	required for partial audit - changes only
3.4	[Redacted]			
3.5	QSP 142.2 Appendix F Section 3 - QMS Manual	The final version of the QMS manual was approved by the QMS Manager	Minor	
3.6	QSP 142.2 Section 4.3	The Quality Manager maintained the QMS manual and procedures up to date	Minor	
3.7	QSP 142.2 Appendix F Section 3 - QMS Manual	The QMS manual has been regularly reviewed	Major	
3.8	QSP 142.2 Appendix F Section 3 - QMS Manual	Amendments to the QMS documentation followed a procedure that tracks the changes	Minor	
3.9	ASCIS Licence	The CFIA was notified of significant changes to the QMS	Minor Major	
3.10	QSP 142.2 Appendix F Section 2 Management Responsibilities	Employees and LSCI were informed of changes to the QMS	Major	

No.	Reference	QMS Criteria	Non-Conformance	Comments
3.11	QSP 142.2 Appendix F Section 2 Management Responsibilities	The employees and LSCI were encouraged to provide input which contributes to the continual improvement of the QMS	Minor	
3.12	QSP 142.2 Appendix F Section 3 - QMS Manual	The QMS manual and related documentation is complete, unambiguous and consistent	Minor Major	
3.13	QSP 142.2 Appendix F Section 3 - QMS Manual	QMS manual pages are numbered x of y, and all articles are identified with unique alphanumeric sequences	Minor	

#### 4.0 Procedures

No.	Reference	QMS Criteria	Non-Conformance	Comments
4.1	QSP 142.2 Appendix F Section 3 - QMS Manual  QSP 142.2 Appendix F Section 4 Procedures  Section 2 Management Responsibilities	ASCIS Staff and LSCI have access to the most recent versions of any internal, CFIA, or CSGA documents referenced in the QMS manual	Minor Major	
4.2	QSP 142.2 Appendix F Section 3 - QMS Manual	Obsolete documentation was promptly removed from all points of use	Minor	
4.3	QSP 142.2 Appendix F Section 4 Procedures	Each procedure clearly indicates any form(s) required by that procedure. They are completed and maintained.	Minor Major	
4.4	QSP 142.2 Appendix F Section 4 Procedures	Requests for re-inspection were managed according to procedure	Minor	

No.	Reference	QMS Criteria	Non-Conformance	Comments
4.5	[Redacted]			
4.6	ASCIS Licence	LSCI provides notice of their schedule prior to the inspection date and should be provided 2 days prior to inspections. Where 2 days was not possible, the notice has been entered prior to the inspection being conducted.	Minor	required for partial audit
4.6.1	LSCI Licence ASCIS Licence	When seed crop inspections are conducted, the actual date of inspection is reported by the end of the day on which the inspection is conducted	Major	required for partial audit
4.7	QSP 142.2 Section 4.3	Seed crop inspections were conducted at an appropriate growth stage	Major	required for partial audit
4.8	ASCIS Licence	The ASCIS informed the CFIA of the pest control product application schedule when requested	Minor	
4.9	QSP 142.2 Section 4.3	Reports of Seed Crop Inspection were correctly reviewed prior to submission to the CSGA	Major	required for partial audit
4.9.1	QSP 142.2 Section 4.4	Report of crop inspection was created and submitted within 2 business days by the LSCI	Critical	required for partial audit
4.9.2	QSP 142.2 Section 4.3	ASCIS approved the report of crop inspection within 2 business days from the inspection date	Major	required for partial audit
4.10	ASCIS Licence LSCI Licence	The ASCIS and/or the LSCI report to the CFIA the finding of a prohibited noxious weed within 2 days of its observation in a seed crop inspection	Major	required for partial audit

No.	Reference	QMS Criteria	Non-Conformance	Comments
4.11	ASCIS Licence  LSCI Licence	Neither the ASCIS nor the LSCI communicated to the seed grower an opinion as to the decision of the CSGA with respect to the results of a seed crop inspection	Major Minor	required for partial audit

**5.0 Corrective Action Requests (CARs) issued by the CFIA**

No.	Reference	QMS Criteria	Non-Conformance	Comments
5.1	QSP 142.2 Section 4.3  QSP 142.2 Appendix F Section 5 CARs	The ASCIS responded to CARs issued by the CFIA to the ASCIS and Critical CARs issued to the LSCI according to procedure: <ul style="list-style-type: none"> <li>• follow-up activities were coordinated according to procedure</li> <li>• corrective actions addressed the immediate non-conformance or non-compliance and the root cause</li> <li>• a time period was agreed on for resolution</li> <li>• completion of the corrective action was verified</li> <li>• procedure was followed to address cases where corrective action is not completed within the time frame</li> <li>• where appropriate, CARs led to an amendment to the QMS to prevent similar non-conformances or non-compliances from occurring in the future</li> </ul>	Major  Minor	required for partial audit

## 6.0 Records

No.	Reference	QMS Criteria	Non-Conformance	Comments
6.1	QSP 142.2 Section 4.3  ASCIS Licence	ASCIS retains records for minimum of 7 years	Major	
6.2	QSP 142.2 Appendix F Section 6 Records	Records are stored in a manner that provides for their safekeeping and physical protection.	Minor Major Critical	
6.3	QSP 142.2 Appendix F Section 6 Records	Records were disposed of by a secure method and only by authorized persons	Minor	
6.4	QSP 142.2 Appendix F Section 6 Records  QSP 142.2 Appendix F Section 8 Training and Qualifications	Records include: <ul style="list-style-type: none"> <li>• revisions and amendments to the QMS manual and procedures</li> <li>• copies of ASCIS and LSCI licences</li> <li>• list of active LSCI</li> <li>• records of training and qualifications for staff and LSCI</li> <li>• CARs and follow-up actions</li> <li>• any other document directly referenced in the QMS manual</li> </ul>	Minor Major Critical	required for partial audit

## 7.0 Training and Qualifications

No.	Reference	QMS Criteria	Non-Conformance	Comments
7.1	QSP 142.2 Appendix F Section 8 Training and Qualifications	Personnel were trained and demonstrate competence in the activities for which they are responsible, including, but not limited to: <ul style="list-style-type: none"> <li>• Lead inspector</li> <li>• Quality Manager</li> <li>• Records clerk</li> <li>• LSCI</li> </ul>	Major	required for partial audit

No.	Reference	QMS Criteria	Non-Conformance	Comments
7.2	QSP 142.2 Section 4.4 LSCI Requirements  LSCI Licence	The LSCI only inspected crop kinds for which they are licensed and are competent	Critical	required for partial audit
7.3	QSP 142.2 Appendix F Section 8 Training and Qualifications	Procedures were followed to provide training as required	Minor	
7.4	[Redacted]			
7.5	QSP 142.2 Appendix F Section 8 Training and Qualifications	New LSCI were supervised by an experienced Lead Inspector	Major	
7.6	QSP 142.2 Appendix F Section 8 Training and Qualifications	LSCI inspecting a new crop kind for the first time were supervised	Major	required for partial audit
7.7	QSP 142.2 Appendix F Section 8 Training and Qualifications QSP 142.1 Section 4.4	The CFIA was informed when LSCI inspected a new crop type for the first time (including a new crop kind in a plot)	Minor	

## 8.0 General Conclusions

No.	Reference	QMS Criteria	Non-Conformance	Comments
8.1	QSP 142.2 Section 4.3	The ASCIS appropriately oversaw the activities of its LSCI	Minor Major Critical	required for partial audit
8.2	QSP 142.2 Section 4.3	The ASCIS offered reasonable cooperation for the CFIA audit of ASCIS and check inspections of its LSCI. Field maps were available.	Minor Major Critical	required for partial audit

No.	Reference	QMS Criteria	Non-Conformance	Comments
8.3	QSP 142.2 Section 4.3	QMS procedures were implemented correctly	Minor Major Critical	required for partial audit

### 9.0 LSCI Non-conformances assigned to the ASCIS

Non-conformances issued to ASCIS based on non-conformances issued to LSCI. Refer to the Check Inspection Tracking Sheet – Worksheet “ASCIS Rollups.” Detail each applicable non-conformance. Do not include LSCI non-conformances for Check Inspection Checklist items 3.4, 3.7, 7.2, 4.4, 11.1 to 11.7 and 13.1 to 13.5. These are already captured in the ASCIS Audit Checklist.

Item No. from LSCI Check Inspection Checklist	% LSCI with the non-conformance	Description	Minor Major Critical	Comments
				<i>(insert more rows as necessary)</i>

**Additional Comments (other observations, opportunities for improvements):**

## **Appendix IV Examples of the classification of non-conformances and non-compliances identified in an ASCIS audit**

[Redacted]

# Appendix V Corrective Action Request (CAR) form for LSCI

## CRITICAL CORRECTIVE ACTION REQUEST

Name of LSCI	LSCI #
LSCI Contact info (e-mail/phone number)	ASCIS
LSCI Signature	Date of Receipt

COMPLETED BY CFIA (within 2 days of last inspection)		COMPLETED BY LSCI (within 3 days of receipt)		COMPLETED BY CFIA (when non-conformance resolved)*	
Description of non-conformance (include number from checklist – Appendix IX)	Sequence number of Report(s)	Corrective Action Plan (CAP)	Proposed Resolution Date	Resolution Date	Check Inspector
<i>(insert more rows as necessary)</i>					
<b>Notes:</b>					

\* LSCI to send final version of CAR with completed CAP to ASCIS)

### Check Inspector

<b>Name:</b>	<b>Signature:</b>	<b>Inspector No.:</b>
<b>E-mail:</b>	<b>Phone number:</b>	<b>Date of issuance:</b>
<b>Original to LSCI:</b>	<b>Copy sent to Auditor immediately:</b>	<b>Copy sent to ASCIS (by Auditor):</b>
<b>Saved as file #:</b>	<b>Copy sent to the Lead Inspector immediately:</b>	

# Appendix VI Corrective Action Request (CAR) for ASCIS

## CORRECTIVE ACTION REQUEST

<b>Name of ASCIS:</b>	<b>ASCIS #:</b>
<b>Quality Manager Name</b>	<b>E-mail/phone number:</b>
<b>Quality Manager Signature:</b>	<b>Date of Receipt:</b>

TO BE COMPLETED BY CFIA			TO BE COMPLETED BY QUALITY MANAGER		TO BE COMPLETED BY CFIA (on resolution of non-conformance)	
Description of non-conformance (include number from checklist – Appendix III)	Reference	Level - Minor Major Critical	Corrective Action Plan (CAP)	Proposed Resolution Date	Resolution Date	Auditor Initials verifying resolution
<i>(insert more rows as necessary)</i>						
<b>Notes:</b>						

**Auditor:**

<b>Name:</b>	<b>Signature:</b>	<b>Inspector #:</b>
<b>E-mail:</b>	<b>Phone number:</b>	<b>Date of issuance:</b>
<b>Original sent to ASCIS:</b>		<b>Saved as file #</b>

## Appendix VII – Summary report of ASCIS audit

This form is prepared by CFIA auditor and provided to the audited ASCIS and Seed Section.

### Summary report of ASCIS audit

<b>Name of ASCIS</b>	
<b>Address of ASCIS</b>	
<b>Date of Audit</b>	
<b>Name of ASCIS Quality Manager</b>	
<b>Name(s) of other ASCIS personnel present at audit</b>	
<b>Name of CFIA auditor</b>	
<b>Name(s) of other CFIA personnel present at audit</b>	

### Audit Scope:

<b>Full</b>	
<b>Partial</b>	
<b>N/A Audit not complete – provide details</b>	
If Partial audit – specify all optional QMS criteria that were selected for the current audit	
If Partial audit – specify all optional QMS criteria to be selected for the next audit	

### Non-conformances

<b>Type of non-conformance</b>	<b># of Minor N/C</b>	<b># of Major N/C</b>	<b># of Critical N/C</b>
Non-conformances issued at previous audit and not resolved			
Non-conformances issued at current audit including LSCI non-conformances assigned to the ASCIS			
<b>Comments</b>			

**Summary audit observations – list key observations and comments**

Section	Scope	Comments
2	General Criteria	
3	QMS Manual	
4	Procedures	
5	Corrective Action Request(s) issued by CFIA	
6	Records	
7	Training and Qualifications	

**Additional comments and other observations**

Criteria	Yes	No
Licensee requests renewal		
ASCIS has assigned their licence to another entity (if yes, the licence cannot be renewed)		
ASCIS has insurance (if no, licence cannot be renewed)		
ASCIS has provided CFIA access for audits (if no, cannot be renewed)		
ASCIS has provided CAP for CARs from audit (if no, licence cannot be renewed)		
Does the ASCIS or any LSCI have any Critical CARs that have not been closed by their resolution date?		
CFIA auditor recommends ASCIS for renewal of their agreement		

Note: Seed Section will confirm that all fees owed to the CFIA have been paid prior to renewal of licence.

**Recommendation**

Recommendation for subsequent year audit scope	Partial <input type="checkbox"/>	Full <input type="checkbox"/>	N/A <input type="checkbox"/>
Name (print) of CFIA Auditor	Signature	Date	
Name (print) of ASCIS Quality Manager	Signature	Date	

**Appendix VIII Record of invigilation of a written evaluation**

Location: \_\_\_\_\_

Date and time of evaluation: \_\_\_\_\_

I, \_\_\_\_\_ (print name in block letters) hereby confirm that I invigilated when the candidate(s) listed below completed the written evaluation(s) for the following module(s):

Candidate Name (print)	Module Number

By signing this form, the undersigned confirms that he or she supervised the writing of the above evaluation(s) on the date indicated and that the administration of this evaluation was conducted in conformance with Seed Program QSP 142.2 Licensing of Authorized Seed Crop Inspection Services and Licensed Seed Crop Inspectors.

\_\_\_\_\_  
Signature of Invigilator

\_\_\_\_\_  
Date

## Appendix IX Checklist for the comparison of Check Inspector and LSCI Reports of Seed Crop Inspection

To be completed by CFIA Check Inspector. Check Inspector saves completed checklist into electronic folder for the ASCIS (use naming convention) and inputs results to a check inspection tracking sheet. S = Satisfactory; NS = Not-Satisfactory. If a non-conformance category is not applicable, mark as Satisfactory.

LSCI Name	
LSCI #	
LSCI Scope	
ASCIS Name	
Field Sequence #	
Plot? Yes	Plot? No

### 1.0 Seed tags

No.	Non-conformance	Level	S / NS	Comments
1.1	Failure to verify seed source (tags or crop certificate)	Minor		

### 2.0 Land use

No.	Non-conformance	Level	S / NS	Comments
2.1	Failure to verify previous land use	Minor		
2.2	Failure to verify previous land use for a sufficient number of years	Minor		

### 3.0 At the field

No.	Non-conformance	Level	S / NS	Comments
3.1	Failure to obtain and reference the description of the variety (DoV)	Major		
3.2	Inspect incorrect field	Critical		
3.3	Failure to correctly report land location	Minor		
3.4	Conducting inspection at inappropriate growth stage; off-types are somewhat visible although timing is not ideal	Major		
3.5	Conducting inspection at a growth stage where off-types are not visible	Critical		
3.6	Failure to report change in inspection acreage	Minor		

No.	Non-conformance	Level	S / NS	Comments
3.7	Conducting an inspection for which the inspector is not licensed <b>Note:</b> Check inspector must also assess any potential conflicts of interest and report these to seedsemenca@inspection.gc.ca	Critical		
3.8	Failure to correctly report impurities outside of counts (off-types, other crop kinds, weeds reported by count)	Major Minor		
3.9	Failure to separate 2 fields when it was required as per CSGA's field definition	Minor		

#### 4.0 Counts

No.	Non-conformance	Level	S / NS	Comments
4.1	Failure to report altered count area	Major		
4.2	Performing/reporting less than 6 counts or the required number of counts	Major		
4.3	Taking counts in a non-representative manner (clustering)	Major		
4.4	Performing inspection on incorrect plant population	Critical		

#### 5.0 Weeds

No.	Non-conformance	Level	S / NS	Comments
5.1	Failure to correctly identify and report weeds by frequency	Minor		
5.2	Inaccurate reporting of general weed condition	Minor		
5.3	Reporting weeds by count as weeds by frequency	Major		
5.4	Failure to identify and/or report a Prohibited Noxious weed in the field or 3 metres isolation	Critical		

#### 6.0 Plant disease

No.	Non-conformance	Level	S / NS	Comments
6.1	Failure to correctly report smut in barley crop	Minor		

## 7.0 Isolation

No.	Non-conformance	Level	S / NS	Comments
7.1	Failure to correctly rate the condition of the isolation (good vs. poor)	Major		
7.2	Failure to report what was found in the isolation distance for open pollinated crops	Major		

## 8.0 Off-types and variants

No.	Non-conformance	Level	S / NS	Comments
8.1	Identifying plant morphological deviations due to environmental factors as off-types or variants	Minor		
8.2	Failure to identify and/or quantify off-types and variants	Critical Major Minor		
8.3	Unclear reporting and/or description of off-types/variants	Minor		
8.4	Identifying off-types/variants using only 1 distinguishing characteristic – <b>for soybean, grass, or legume crops, or "tall" off-types and variants in any crop</b>	Minor		

## 9.0 Other crop kinds and weeds reported by count

No.	Non-Conformance	Level	S / NS	Comments
9.1	Failure to identify and/or quantify crops and/or weeds reported by count	Critical Major Minor		
9.2	Unclear reporting and/or description of crops and/or weeds reported by count	Minor		

## 10.0 Production methods

No.	Non-conformance	Level	S / NS	Comments
10.1	Failure to report problem areas (for example, lodging or flooding)	Minor		
10.2	Failure to report planting issues in hybrid crops (for example, mix-up of male and female lines)	Major		

**11.0 Reporting**

No.	Non-conformance	Level	S / NS	Comments
11.1	Providing inappropriate comments on Seed Crop Inspection Report	Minor		
11.2	Predicting CSGA decision verbally or on a Seed Crop Inspection Report	Major		
11.3	Information is not supplied in a meaningful, understandable manner	Minor		
11.4	Omissions on Seed Crop Inspection Report (for example, required comments)	Minor		
11.5	Failure to submit an inspection schedule to the CFIA	Minor		
11.6	Failure to notify the CFIA of inspections completed by the end of the day of the inspection(s)	Major		
11.7	Initial report must be created and submitted within 2 business days for approval by the ASCIS. Initial report not created after 5 business days.	Critical		

**12.0 Other non-conformances observed**

No.	Non-conformance	Level	S / NS	Comments
	<i>(insert more rows as necessary)</i>			

**Non-conformances observed at check inspection which are rolled up to the ASCIS**

<b>No.</b>	<b>Non-conformance</b>	<b>S = 0, NS = 1, N/A = 0</b>
13.1	An accurate map was supplied	
13.2	LSCI reported the actual date of inspection at the end of the day of the inspection(s)	
13.3	Pesticide application schedule provided by the ASCIS to the CFIA when requested by the CFIA	
13.4	ASCIS has notified the CFIA of a Prohibited Noxious Weed observed by the LSCI	
13.5	Final report (approved by ASCIS) approved within 2 business days – (ASCIS review date vs. actual date (business days only))	

**Total numbers of non-conformances observed**

	<b>Minor</b>	<b>Major</b>	<b>Critical</b>
<b>Total numbers of non-conformances observed</b>			

<b>CFIA Check Inspector Name</b>	
<b>Date</b>	
<b>MRRS Code</b>	
<b>Time Spent on Activity</b>	
<b>Signature</b>	