



Canadian Grain Commission

Certification and Registration of Grain Companies under the Certified Container Sampling Program and the Accredited Container Sampler Program

CGC GSS QSP 3.1.0

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Contents

Certification and Registration of Grain Companies under the Certified Container Sampling Program and the Accredited Container Sampler Program

Review	ii
Revision History	ii
Distribution	iii
Acronyms.....	iv
1.0 INTRODUCTION	1
1.1 Scope	1
1.2 References	1
1.3 Definitions.....	1
2.0 REGISTRATION OF FACILITIES FOR THE ACCREDITED CONTAINER SAMPLER PROGRAM	2
2.1 Registration Process	2
2.2 On-going Responsibilities	3
2.3 Registration Agreement	4
3.0 CERTIFICATION OF FACILITIES FOR THE CERTIFIED CONTAINER SAMPLING PROGRAM	4
3.1 Application Process.....	4
3.2 Certification.....	5
3.3 Certification Agreement	6
3.4 Monitoring.....	6
3.5 Deferral or Withdrawal of Certification	6
4.0 EXPIRATION	6
5.0 APPEAL PROCESS.....	7

Review

This Canadian Grain Commission Quality System Procedure (QSP) is subject to annual review. Revisions will be issued to ensure the QSP continues to meet current needs.

Revision History

Revisions to this QSP will be given a consecutive number and will be dated.

Please ensure that all revised pages are inserted, obsolete pages removed, and the record below is completed.

Revision No.	Revision Content and Pages	Entered by	Date
1	Initial Release	E. Bernardin	August 1, 2012
2	Documentation Updates	E. Bernardin	April 1, 2014
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Acronyms

ACSP	Accredited Container Sampler Program
ASP	Accredited Service Provider
CAR	Corrective Action Request
CCSP	Certified Container Sampling Program
CGC	Canadian Grain Commission
GSS	Grain Sampling System
PVA	Process Verification and Accreditation
QMS	Quality Management System
QSP	Quality System Procedure
SOP	Standard Operating Procedure

Certification and Registration of Grain Companies under the CCSP and ACSP

1.0 INTRODUCTION

1.1 Scope

This document outlines the application procedure, as well as activities related to the denial, suspension and withdrawal of services for companies seeking certification to the Certified Container Sampling Program (CCSP) and/or companies seeking registration to receive sampling services under the Accredited Container Sampler Program (ACSP).

Eligible applicants include those Canadian facilities involved in the processing and handling of grains. Samples collected under a Grain Sampling System (GSS) compliant with the Grain Sampling System Standard – CGC GSS STAN 3.0 either by the companies own staff (CCSP) or an accredited sampler (ACSP) can be submitted for grading and testing in support of subsequent certification of the lot of grain sampled.

1.2 References

- CGC GSS STAN 3.0 – CGC Grain Sampling System Standard
- CGC GSS QSP 4.3.1 – Conducting an Audit of a Grain Sampling System

1.3 Definitions

Accredited Sampler – an employee of a CGC-accredited third party sampling company who has been trained, evaluated and deemed competent by CGC to take official samples of container lots of grain on behalf of the CGC. Samples taken by these individuals can be submitted to the CGC for official inspection and official certification.

Audit Report – a report prepared by an auditor detailing the findings of his or her audit of a grain company's container sampling program.

Certification – formal assurance by the CGC that the company's Grain Sampling System meets the requirements of the Grain Sampling System Standard (CGC GSS STAN 3.0).

Certification Period – the three-year period for which a company's certification is valid, provided annual system audits indicate continued conformance with CGC GSS STAN 3.0.

Certified Sampler – An employee of a grain company, who has been trained, evaluated and deemed competent by CGC to oversee the

company's CGC-certified container sampling program (CCSP). A Certified Sampler's responsibilities may include training and overseeing "Designated Samplers" (see below) to take samples according to the sampling procedures approved by the CGC as part of the company's CCSP.

Document Review – an assessment of a company's quality manual, standard operating procedures, and other documentation to ascertain conformance with CGC GSS STAN 3.0.

Registration – Formal assurance that a facility receiving third party sampling services has the proper infrastructure to allow accredited samplers access to obtain a representative sample.

Site Assessment – an assessment conducted by a CGC employee of a grain facility to advise on, or approve, the sampling location, the sampling equipment and/or the installation of automatic sampling equipment. The assessment is conducted to ensure that the sampling location and equipment will allow for the collection of a representative sample.

Special Visit – an on-site assessment conducted by the ASP at the request of the CGC, or by the CGC in the case of an appeal process.

System Audit – a document review and complete on-site assessment conducted annually to ensure a company's sampling system continues to conform with CGC GSS STAN 3.0.

2.0 REGISTRATION OF FACILITIES FOR THE ACCREDITED CONTAINER SAMPLER PROGRAM

In order for a grain facility to become eligible to participate in the ACSP, the facility must first become registered by the CGC to receive ACSP services. The registration process ensures that facilities receiving third party sampling services have the proper infrastructure to allow accredited samplers access to obtain a representative sample.

2.1 Registration Process

Prior to becoming registered to receive ACSP services, a facility must complete the application form with the following information and submit it to the CGC:

- name and address of the company;
- description of the business activities; and
- types of transloading activities done on site.

The facility must also provide a plant schematic outlining the site(s) where the samples are to be taken.

After this information is received, the CGC will arrange an on-site visit of the facility to assess and confirm the sampling sites proposed in the plant schematic. Once the CGC is confident that the site is adequate to allow proper sampling procedures to occur, the facility will be registered for the ACSP.

If approved, a registration will entitle the company to receive third party sampling services from a list of accredited sampling service providers accredited by the Canadian Grain Commission.

Accredited third party sampling cannot commence until the CGC has approved the sampling site(s) at the registered facility.

2.2 On-going Responsibilities

Facilities that have been successful in obtaining registration for accredited sampling under the ACSP shall:

- Ensure that accredited samplers are not subjected to pressures which would adversely affect the quality of their work, independence of judgement, or maintenance of integrity of the samples and sealed lots;
- Ensure that third party samplers have access to product within the facility's processes that ensures that a representative sample can be taken;
- Maintain the integrity of the sampled lots and not remove seals or fastenings applied by an accredited sampler;
- Maintain records of grain lots from receiving to shipping, so the sample can be linked to a lot traceable to the shipper;
- Report to the CGC any changes to grain handling processes that may require a change in sampling location or processes, or any changes to the sampling location or processes, so the CGC can assess and approve the changes;
- Report to the CGC any non-conformances in the delivery of sampling services by accredited samplers; and
- Provide reasonable assistance to the CGC sampling technical experts during audits conducted at the facility to verify conformance with these ongoing responsibilities and the third party samplers' compliance with CGC GSS STAN 3.0. This includes allowing the CGC technical experts to examine records, observe sampling activities and interview facility staff.

Failure to comply with these ongoing requirements would result in the facility's deregistration from the ACSP and, as a result, they would no longer be able to obtain CGC official certification of grain lots.

2.3 Registration Agreement

After a site schematic has been submitted and the client's sampling location and processes have been approved by the CGC, the CGC prepares a registration agreement for the client's signature. This agreement outlines the scope of the company's registration and each party's responsibilities. Upon the signing and return of the Registration Agreement, the CGC advises the company, in writing, that it is registered and has the proper infrastructure to receive third party sampling services.

The company's registration remains in effect unless there are pertinent changes to the facility related to its sampling activities, i.e. changes to grain flow or sampling procedures. These changes will necessitate a subsequent on-site evaluation.

3.0 CERTIFICATION OF FACILITIES FOR THE CERTIFIED CONTAINER SAMPLING PROGRAM

3.1 Application Process

1. The applicant requests program information from the Process Verification and Accreditation Office (PVA), the CGC web site, or from an Accredited Service Provider (ASP) and obtains an application package for CCSP which includes:
 - the application form;
 - CGC GSS STAN 3.0 Grain Sampling System Standard; and
 - the list of ASPs providing sampling audit services.
2. The applicant contacts the PVA to arrange for a site assessment of their facility and proposed sampling location by the CGC to ensure that a representative sample can be taken. A second site evaluation may be required if extensive changes to the sampling equipment or facility are required. Once the sampling location and equipment have been approved, the CGC will issue a Letter of Approval for Conditionally Approved Automatic Samplers to the company, if required.
3. The applicant company develops and implements the sampling manual and sampling procedures as described in CGC GSS STAN 3.0 and CGC PROC 3.0.1. The sampling procedures are submitted to the CGC for review and approval.
4. An employee of the applicant company with sampling system responsibilities must be trained and certified by the CGC. This training is arranged through the PVA.
5. The applicant completes the application form and submits it to the PVA. If the applicant is from Western Canada, the PVA will confirm eligibility for services.

6. Once the appropriate documentation, process and controls are in place, the applicant must select an ASP from the list provided in the application package.
7. The ASP and the applicant enter into a service agreement that includes particulars related to the documentation review, pre-assessment (if necessary), implementation audit and annual system audits. The ASP advises the PVA of audit dates as they are scheduled.
8. Prior to going on site, the ASP conducts a document review of the applicant's written sampling manual and procedures. Corrective actions required related to the documentation are to be resolved prior to the ASP conducting the on-site audit.
9. The ASP conducts the on-site implementation audit of the applicant's sampling program as detailed in CGC QSP 4.3.1 and submits an audit report to the PVA.
10. The PVA establishes a Certification Committee composed of at least two PVA staff members.
11. The Certification Committee conducts a technical review of the audit report following the procedure detailed in CGC QSP 1.2.0.
12. Based on the results of the technical review, the PVA grants or denies certification according to this QSP.

3.2 Certification

If, as a result of an audit, the auditor determines that the company's GSS has been effectively implemented, a recommendation for certification shall be made.

If during an audit, a major non-conformance is found, the auditor will not recommend the client for certification until such time as corrective action has been taken.

The CGC establishes a Technical Review Committee composed of, at a minimum, two members of the PVA. The Technical Review Committee will conduct a review of the audit report following the procedure detailed in CGC QSP 1.2.0.

Based on the results of the technical review, the PVA will grant or deny certification according to this QSP.

If approved, a certification will entitle the company to collect its own samples for submission under the CCSP.

3.3 Certification Agreement

If the ASP and the Technical Review Committee's review of the audit report indicate that the client's GSS meets the requirements of CGC GSS STAN 3.0, the CGC will prepare a Certification Agreement for the client's signature. This agreement outlines each party's responsibilities, information on the use of certificates, and the appeal process. Upon the signing and return of the Certification Agreement, an authorized Certificate of Recognition is sent to the client with a copy to the ASP. The company's name is then posted on the CGC web site as having its GSS certified under the CCSP.

3.4 Monitoring

The PVA will monitor the continued compliance of certified companies through the annual system audit conducted by an ASP auditor. The PVA will advise the client of the anniversary date of certification at least 60 days before the end of the certification period. It is the responsibility of the client to ensure that a system audit is conducted within sixty (60) days of the end of the certification period. Exceptions must be approved by the PVA.

If the company does not schedule a system audit within sixty (60) days of the end of the certification period, the PVA will suspend the company's certification until such time that the audit has been conducted.

3.5 Deferral or Withdrawal of Certification

When a major non-conformance is identified during an audit, the client is notified. The client is required to submit its corrective action plan with respect to a major non-conformance to the auditor within five (5) working days of the audit. The company then has twenty (20) working days to correct the major non-conformance as outlined in the plan. The audit report will indicate that a major non-conformance was found and the corrective action plan approved by the auditor has been implemented. The auditor is responsible for verifying that the correction action has taken place and conveying that information, along with the supporting objective evidence, to the PVA. If the company fails to take corrective action within twenty (20) working days, the company's certification will be deferred or withdrawn.

4.0 EXPIRATION

The CGC will remind the company in writing of the expiration of the certification agreement six (6) months and one (1) month prior to the end of the certification period. If the company does not schedule a system audit within two months of the end of the certification agreement, the company's certification will be considered to have expired. The CGC will notify the

company that certification has expired, the company name will be removed from the CGC web site, and the company will be prohibited from representing itself as a CCSP-certified company.

5.0 APPEAL PROCESS

A company that is denied certification or registration, or that has had its certification withdrawn may wish to launch an appeal. Appeals must be made in writing to the PVA within twenty (20) days of receiving the written notice of the deferral, suspension or withdrawal of certification.

If an appeal is made in writing within the required twenty (20) day period, the PVA will advise the company of the appeal process. The Technical Review Committee will review the appeal and determine if the original audit report, recommendation, and certification decision was correct. If the decision is found lacking and the appeal appears valid, a special visit may be required to obtain additional facts. The Technical Review Committee shall determine a resolution and effect the required changes to satisfy the appeal.

If the Technical Review Committee feels that the initial recommendation was correct, an Appeals Committee will be established and chaired by the National Manager, PVA. The Appeals Committee will include the Director, Industry Services, CGC, and at least one other member who has knowledge of the affected client and of the program. Care will be taken to avoid any real or potential conflict of interest. Specifically, no member of the Appeals Committee will be a representative of a competing company.

The CGC will schedule a meeting and ensure that the meeting minutes document the Appeal Committee's decision. The Appeals Committee shall review both the client's and CGC's arguments, either through documentation and/or interviews. Upon their review, a decision will be made based on a majority vote and the client will be notified of the Appeals Committee's decision in writing. All decisions of the Appeals Committee will be final. Meeting minutes and/or correspondence will serve as records and will be maintained in the client's file by the CGC.

Any costs associated with travel incurred by the Appeals Committee will be charged to the company if the decision to deny or withdraw certification or registration is upheld. If the decision is not upheld, those costs will be paid by the PVA.