

**CAFIA comments on the English version of the Draft Report of the mission
DG(SANCO)/2013-6856**

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5.3.1 Development of the programme of official controls

CAFIA

Planning

Strategic management meetings, involving the Departmental Heads at Central level and the Regional Directors are held regularly and contribute to the establishment of the annual control programme, which is based on the rolling three-year MANCP. At Central level, the "Plan of Centrally Managed Inspections" and the "Programme of Audits of FBOs" are established annually. ~~These include the topics (between 15 and 25), the recommended controls to be carried out and the number of samples to be taken, and are binding on all Regional Inspectorates.~~ The plans of centrally managed actions comprise thematic inspections as well as annual inspections (15 – 25 inspections in total), and the number of taken samples. These inspections are binding for the given Inspectorates. The recommended inspections are not binding. The Regional Directors in turn establish their own plans and identify the control targets, based on these plans. The IT System is programmed to signal when an FBO is to be controlled. A degree of flexibility is built into the programme to allow for *ad hoc* controls. The CA cited the example of the methanol scare in September 2012, when control resources had to be diverted to deal with this emergency situation.

The ~~Methodology and~~ Control Unit (MCU), within the CLCD at Central level, plays an important role at all stages of the control cycle. It is staffed by technical experts in the fields covered. It develops procedures and provides guidance, including specific methodological guidelines for each topic. The Regional Inspectorates participate actively in the development of these procedures, to ensure that they are practical and fit for purpose. MCU analyses all control reports containing non-compliances and this review feeds back into the planning process.

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5.3.1 Development of the programme of official controls

Conclusions

Each CA has established quantitative targets for control programmes and documented procedures for control activities, with SVA and CAFIA both operating under QMS certification and PHPPS operating in accordance with extensive written operating procedures. These provide a good basis for verifying compliance with planned arrangements. Quality objectives are, in most cases, broad, with few measurable indicators which ~~do not provide~~ provide sufficient support for verifying the achievement of qualitative objectives (i.e. effectiveness of controls). IT Systems have been designed to support verification activities and have the capacity to provide the information necessary for verification of effectiveness.

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We are the opinion that this is a typing error.

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5.3.2 Implementation of the programme of official controls

CAFIA

~~The Heads of the Regional Inspectorates allocate~~ The Head of respective unit sets the control work to the individual inspectors for the coming two-week period.

In cases of non-compliance, the inspector submits the report to ~~the Quality Manager his superordinate~~ and liaises with ~~line-management him~~ to ensure that the correct remedial action is being recommended. CAFIA's procedures, specifically the Code of Control Activities, cover such situations, including those where a follow-up control visit is necessary. In other cases, the FBO notifies the inspector when the required action has been taken. If it is discovered that the required action has not been taken, the inspector contacts the Legal Department, which itself monitors such cases through the IT System, to take further measures, as appropriate. The Director takes the final decision on sanctions, in consultation with the Legal Department. The inspector submits a summary of the control results to his/her line manager at the end of the inspection period. A meeting is held with all inspectors at the end of the period, to review findings and allocate work for the upcoming period. A demonstration of the reporting and follow-up process in the IT system was witnessed by the audit team and copies of sample control files were checked to confirm that the process worked as described.

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5.3.3 Monitoring performance

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IT systems

The data entered into the CAFIA IT System by inspectors carrying out controls is to be checked by line management at different levels and frequencies. All staff have access to the system. ~~The Head of the Regional Inspectorate is responsible for supervising staff and verifying their work, through desk and database checks and on-site supervision. The Regional Head of Unit verifies the inspection reports to ensure the objective has been achieved and that the procedures have been followed.~~ The Head of the Control Department of the Regional Inspectorate verifies inspection reports to ensure that goals were achieved and procedures have been followed. The Regional Head of the Control Unit on regional level is responsible for supervising subordinate staff and verifying their work through desk and database checks, and on-site supervision.

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5.3.3 Monitoring performance

CAFIA

IT systems

A management meeting of Heads of CLCD, Quality Unit and the Heads of Control Departments of the Regional Inspectorates is held every two months to review progress in implementing the control programmes. An annual management meeting is held to review the quantitative and qualitative outcome of all CAFIA activities, as measured against the targets set. The minutes of all meetings are available to all staff on the intranet.

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5.3.3 Monitoring performance

CAFIA

Audit

Within CAFIA there are 14 trained internal auditors – employees both of Regional Inspectorates and the Headquarters as well. ~~There are 14 trained internal auditors, spread throughout the Regions. Departmental Heads at Central level also have audit expertise.~~ An audit plan covering 15-20 audits per year is approved by central management. Reports are submitted to the QMS manager, who is responsible for oversight of recommendations and follow up. Internal audits of control processes of CAFIA QMS, including verification/supervision, are carried out annually and cover the CCA and selected Regional Inspectorates. This accounts for some 80% of all audits. According to the CA, no serious findings have been made since 2005.

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