

Inspector Information Manual



Humane Farm Animal Care

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INTRODUCTION

This manual is intended as an informational manual for Humane Farm Animal Care (HFAC) inspectors to maximize consistency and quality of inspections conducted as part of the Certified Humane Raised and Handled® program. Included is a general overview of how HFAC administers the “Certified Humane” program, details of inspector responsibilities and inspection procedures, as well as samples and guidelines for required paperwork and submitted documentation following inspection.

As HFAC’s procedures and policies are based in part on concepts taken from the organic program, some of the material in this manual is modified from the IFOAM/IOIA International Organic Inspection Manual (2000), and attendance at IOIA Inspector Training Courses, which have provided valuable information and resources for developing training modules for inspectors. Portions of this manual are also taken from HFAC’s Policy Manual and the document will be updated and distributed as necessary to reflect changes and updates in HFAC policies.

For further information regarding the contents of this manual or any questions about HFAC inspection procedures, paperwork or policies, please contact:

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PART 1: DESCRIPTION OF THE ORGANIZATION

A. Mission Statement

The mission of Humane Farm Animal Care is to improve the welfare of farm animals by providing viable, credible, duly monitored standards for humane food production and assuring consumers that certified products meet these standards.

B. Statement of Scope

HFAC certifies single operations, Pooled Product Operations, Product Manufacturing Operations and Producer Groups that raise, handle, and/or process the following types of livestock:

- Beef cattle
- Dairy cows
- Pigs
- Sheep
- Broiler chickens
- Laying hens
- Turkeys
- Goats
- Young Dairy Beef

Legal Status and Ownership

HFAC is a 501(c) (3) non-profit corporation incorporated pursuant to the applicable provisions of the District of Columbia Nonprofit Corporation Act.

HFAC provides independent verification and certification that the care and handling of livestock and poultry meets the welfare standards set by HFAC. Operations certified by HFAC may identify products that meet these standards by using the Certified Humane Raised and Handled® label, which is a registered trademark owned by HFAC. The

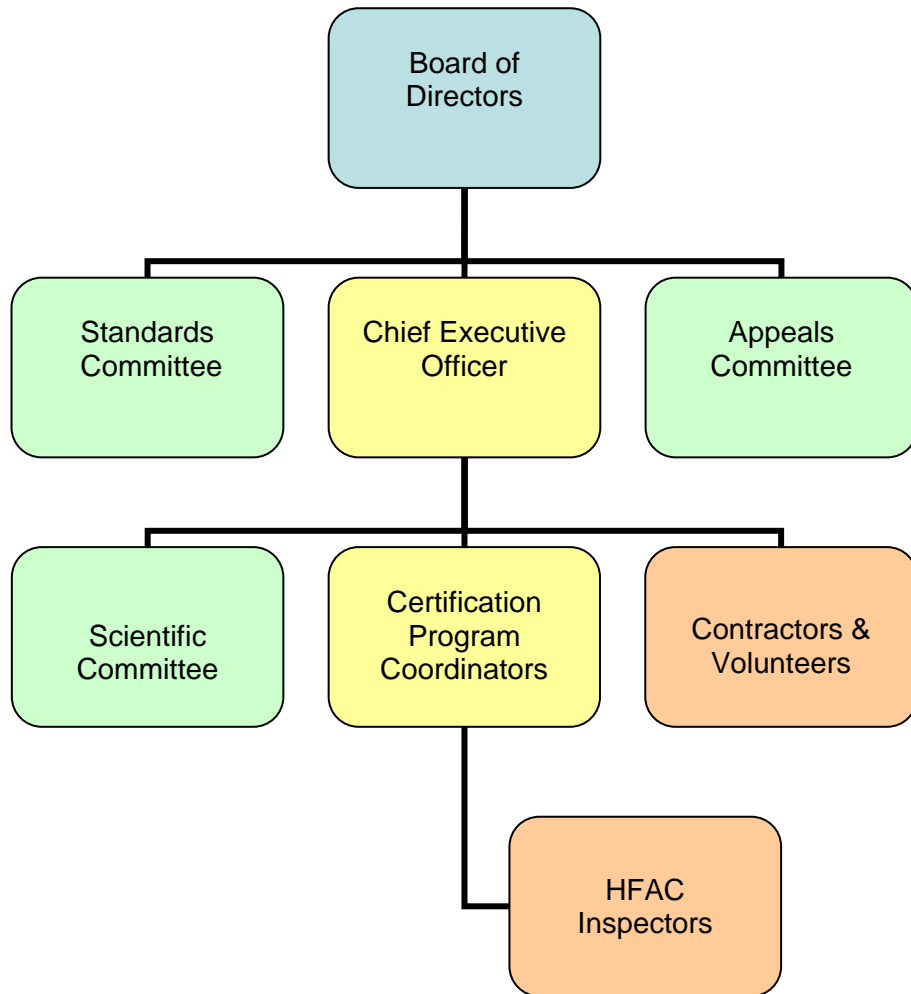
certification program is a voluntary, user-fee based service available to producers and processors of animals raised for food.

The charges for inspections are: \$600/day for farms and \$700/day for slaughter/processing. This means that if more than one farm or processing facility can be inspected in one day, the costs are divided to the farmers or processors. We do not charge additional fees for expenses. The inspections are heavily subsidized.

HFAC also charges a certification fee. The fees are as outlined in the Program/Policy Manual. The more animals on the program, the lower the fees since the objective is to have as many animals on the program as possible. For example, for laying hens, the fee is \$0.05/case of 30 dozen eggs. For milk, it is 1/12th of a cent per gallon.

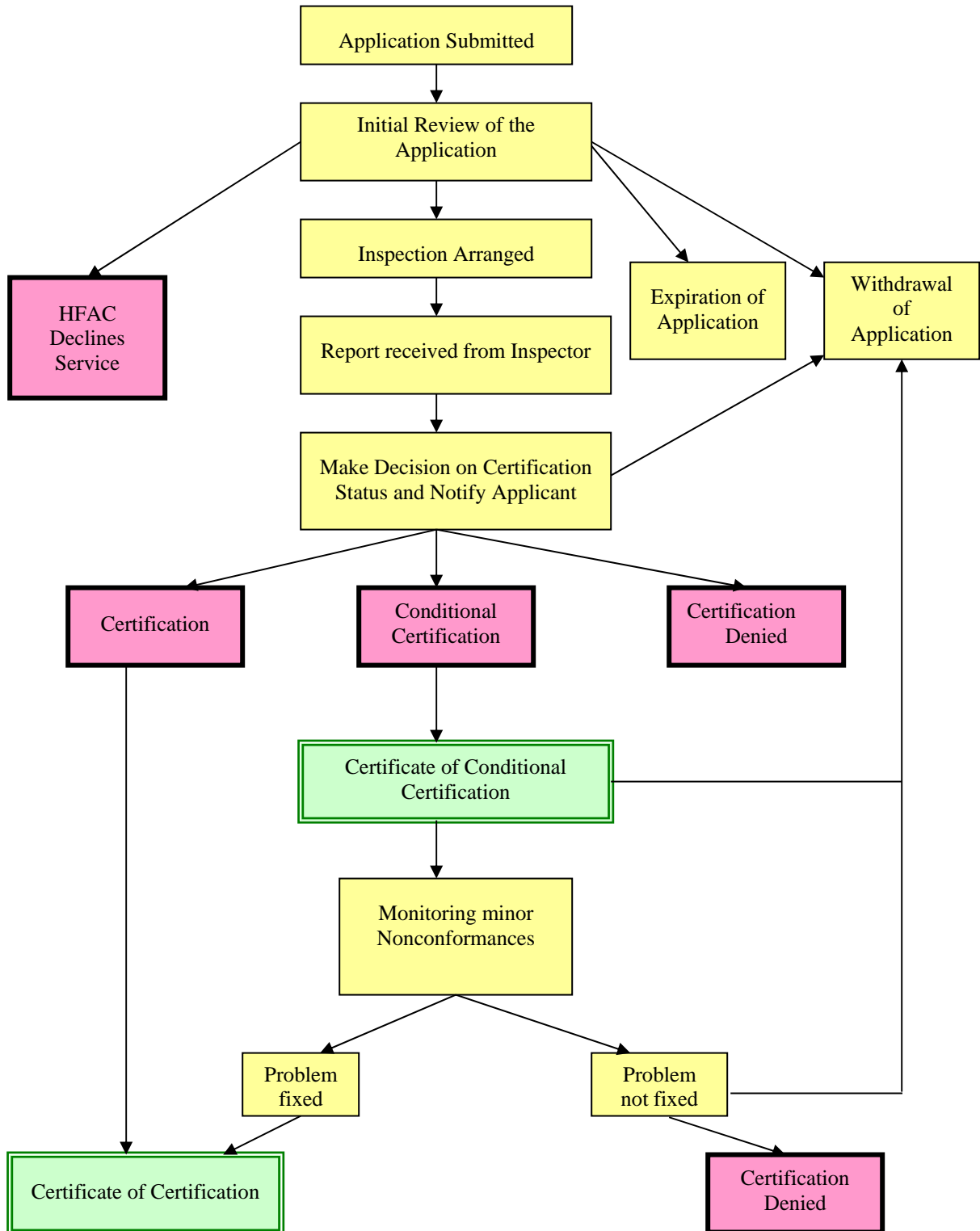
D. Organizational Chart

KEY TO CHART:
Blue = Board
Yellow = Staff
Green = Committees
Orange = Contractors



PART 2: THE CERTIFICATION PROCESS

A. CERTIFICATION FLOWCHART



B. CERTIFICATION OUTLINE

1. Application submitted

If operators feel that they qualify for certification, they complete the application. Single operators submit information on: their farm operations, management, record keeping, animal handling facilities, equipment, personnel training, animal health plans and other information required by HFAC. That application forms the “Farm Plan” and includes the **Animal Health Plan, Bio-security Policy, Nutrition Plan, Casualty Stock Management Policy, Disposal of Fallen Stock Policy, Cleaning and Disinfection Policy, Pest Control Policy, Farm Waste Management Policy, Emergency Action Plan, Stock Person Training Log.**

In addition, the farmer or Pooled Product Operator (PPO) or Product Manufacturing Operator (PMO) or Slaughter Plant, or Packing Plant must submit an additional application that we call *The Universal Application*. The reason for the *The Universal Application* was that for many operations (PMO, PPO, slaughter, packing) a lot of the information required is the same, and therefore an operation shouldn't have to complete many applications, just complete the sections of *The Universal Application* that apply to their operation.

There is also a separate application for Producer Groups.

2. HFAC Review

Once completed by the operator, the application is submitted to HFAC, along with the Universal Application for the processor. The Certification Program Coordinator (CPC) reviews the applications and conducts a preliminary assessment of the operation's ability to comply with the standards.

3. Inspector Assigned

If the operation has passed the initial review, then a qualified inspector is contacted to do the inspection. The Inspector will be chosen based on the regional location of the

inspection, the species expertise required, the training status of that Inspector and the availability of the inspection staff. Once the Inspector is confirmed, a letter is sent to the operation telling them who will be doing their inspection and that (name of inspector) will be contacting them shortly to arrange this.

When you contact the operator to arrange the inspections, it is not the operators option of how long the inspections should take place. Allow plenty of time to do a thorough inspection. If you are not sure how long this will take, contact the CPC's or ED to discuss prior year's inspections.

At that point, we submit information to the inspector.

It is helpful for the Certification Coordinators to know your preferences as to how you want the files sent to you, electronically, or paper in the mail, or a combination of both. Please let one of the Certification Coordinators know your preferences.

Each inspection packet will contain the applications, supporting documentation, on-farm Inspection checklists, Universal checklist and Exit Meeting Interview forms. There may also be special instructions or comments/concerns of the staff and any non-conformances from last year's inspection report. An inspector should never conduct an inspection unless authorized by HFAC

You must advise HFAC of the date(s) you are inspecting the operations you agreed to inspect. You can do this by email.

4. Inspection

The inspector should refer to the other sections of this manual for detailed discussions of inspection procedures. In brief, the inspector makes the appointment; conducts the inspection; assesses livestock, equipment, facilities, storage areas, etc., as applicable; completes necessary paperwork, gathers supporting documentation and conducts an exit meeting interview.

5. Inspector Call-in

According to HFAC policy, following the inspection, the inspector should call or email the CPC or if not available, the ED as soon as possible to give a preliminary report, confirm the inspection occurred and discuss any non-conformances.

6. Inspection Report

After the inspection, the inspector gathers any additional information and completes the inspection report and narrative, using the inspection report outline provided by HFAC. The inspector should refer to the other sections of this manual for detailed discussions of inspection report requirements. In short, the report should be clear and concise and should give an overall picture of the operation. The inspector summarizes nonconformance issues as well as highlighting the strengths of the operation.

The inspector submits the inspection checklists, exit meeting interviews and any/all supporting documentation to HFAC. The checklists need to be clear in order for HFAC to make a decision on certification. Visuals such as photos or diagrams of facilities are also helpful. The checklist is what is sent to the producer for the inspection report.

All inspection related documents should be submitted to HFAC along with expense claims **within 10 days of the inspection**. Inspectors should always keep copies of their reports for their own records. Please note: Reimbursement claims will not be processed until all necessary inspection paper work has been received by HFAC.

7. Making the Decision on Certification Status

HFAC evaluates each operation against all the standards related to the operation's scope. Information outside the scope of the standards shall not be considered when making the certification decision.

Decision Making Terminology

Minor Nonconformance: A single failure in following a procedure that, on its own, does not jeopardize the effectiveness of the producer's Quality System.

Major Nonconformance: A failure that jeopardizes the effectiveness of the producer's Quality System. This can include the absence of a required procedure, the total breakdown of a policy or procedure, or multiple occurrences of minor nonconformances in the same procedural area. Major nonconformances are noted by a grey highlight in the on farm Inspection Checklists.

Corrective Action: A procedure for resolving deviations from published policies and procedures.

In general, the Chief Executive Officer (CEO) makes decisions regarding certification status unless there is a conflict of interest, in which case, the responsibility passes to another HFAC staffer. The "decision" is made using the "Certification Decision Record." Each non conformance is entered and weighed against previous non conformances of the same type in other farms.

8. Post-inspection

The inspector is not necessarily notified of the decision. The inspector must not have a vested interest in the outcome of certification and is not the person who makes the certification decision. Once the inspector's report is turned in, the inspector's job is usually completed, unless further information is requested by HFAC. However, if the inspector later becomes aware of violations by the inspected party, the inspector should notify HFAC. If the inspector wants to discuss the results and the final decision, please contact the ED and the ED will be happy to have that discussion.

9. Notification of operator

Once the certification has been made, the producer is notified by HFAC. If certification is granted with conditions, the producer must implement the necessary changes within 30 days. HFAC requires verification of conformance through written statements, photographs, templates of forms or indicates that a follow-up inspection should be conducted prior to issuance of the certification certificate.

PART 3: INSPECTOR ROLES AND RESPONSIBILITIES

A. EXPECTATIONS OF HFAC

While conducting inspections, inspectors are representing Humane Farm Animal Care. As such, they are expected to support and encourage the development, implementation, and advancement of the mission of the organization, which is to improve the lives of farm animals for humane food production and assuring consumers that certified products meet these standards. They should have a sound working knowledge of the policies, regulations, and standards of HFAC. Inspectors should be sensitive to the social, political, and environmental variables of the region where inspecting. Inspectors should keep in mind that they are the eyes, ears and nose of Humane Farm Animal Care. At all times during the inspection, they should be thorough, courteous, knowledgeable, honest, and open-minded.

B. RELATIONSHIP BETWEEN HFAC AND THEIR INSPECTORS

1. Recruitment

Individuals interested in becoming an HFAC Inspector should contact HFAC by sending a resume or list of qualifications and a letter of interest. The ED will review each application and contact individuals about their qualifications. Qualified applicants must have training and education in Animal Science, Veterinary Science, or other relevant backgrounds. Qualified applicants will be interviewed by HFAC and, if suitable, will be asked to complete the HFAC training program.

2. Job Qualifications

a) Education or Formal Training:

- Minimal requirement: Bachelors Degree in Animal Science, Life Science or related field.
- Training and education in Animal Science, Veterinary Science, or other relevant backgrounds.
- Inspectors are required to attend training programs conducted by HFAC.

b) Experience:

- Inspectors must complete the required HFAC apprentice inspections.

c) Skills:

- Excellent written and oral communication skills.
- Physical abilities necessary for moving through fields, barns, and other livestock facilities.
- Ability to travel.

3. Training

Inspectors are required to attend training programs conducted by HFAC. Training programs cover assessment procedures and protocols and discuss the HFAC standards.

Each Inspector is required to participate in at least two apprentice inspections and then perform one witness audit with a senior inspector overseeing the inspection. The senior training inspector will provide HFAC with a written evaluation of all inspectors-in-training based on their performance as an apprentice and during the witness audit. Apprenticeships aide new inspectors by providing on-the-job training, one-on-one instruction, and guidance with personalized feedback.

Prior to the witness audit, the apprentice should have an excellent understanding of HFAC standards, the CH program inspection process, how to write comprehensive inspection reports and the certification processes, policies and paperwork.

It is imperative that inspectors are knowledgeable about the types of operations they are inspecting, and that they have a solid understanding of the standards and certification procedures. As mentioned previously, Inspectors will be chosen based on their species of expertise; however additional training may be necessary for HFAC Inspectors.

HFAC does not pay fees to trainees while they are doing their apprentice training and witness audits, but HFAC will pay the apprentice's expenses (travel expenses including: flights, bus, taxi, rental car, personal car mileage, parking, tolls, hotel costs, and meals.) All receipts must be sent to HFAC office in Herndon, VA and payment will be processed

within 30 days of receipt of the reimbursement request and all required inspection paperwork. .

4. Business Arrangements between Inspector and HFAC

Inspectors are required to sign a Confidentiality Agreement and a Declaration of Interest form prior to inspecting for HFAC. Inspectors must keep confidential all information related to inspection of farms/ranches on behalf of HFAC.

As part of the HFAC certification procedures, when the CPC contacts an Inspector to determine the Inspector's availability to perform the inspection, the Inspector should notify the CPC if they have a conflict of interest. If so, the CPC must find another Inspector for the job.

Inspectors are hired by HFAC as Independent Contractors and paid to conduct HFAC assessments for HFAC. Inspectors will be paid \$200 per day of inspections. If travel-only days of more than 5 hours are required before and/or after the day(s) of inspection, they will be compensated at \$200 per day of travel. If less than 5 hours, travel reimbursement will be at ½ or \$100.00. Inspectors will be reimbursed for travel expenses including; flights, bus, taxi, rental car, personal car mileage, parking, tolls, hotel costs, and meals. Inspectors must send receipts for expenses to the HFAC office in Herndon, Virginia, and payment will be processed within 30 days of receipt of the reimbursement request and all required inspection paperwork.

5. Inspector Evaluations

Inspectors will be evaluated by the ED after each audit and documentation will be kept on file. If an Applicant, Participant, or other party contacts HFAC with complaints or comments about an Inspector, the staff person handling the communication will also use the Inspector Performance Record to record the information.

Not less than once yearly, the ED reviews the completed Inspector Performance Record forms for each Inspector and communicates the findings on the Inspector's performance to the Inspector. If corrective actions are needed to improve the Inspector's performance,

the ED may suggest additional training, performance of additional inspections supervised by an experience Inspector, or other methods to correct the problem. The ED may terminate the Inspector's relationship with HFAC if needed.

C. OVERVIEW OF THE INSPECTOR'S ROLE

The job of the inspector is to *verify* information provided by the applicant and the certification body, *inspect* the premises, *evaluate* all information and observations, *inform* the applicant on conformance requirements, according to HFAC and *communicate* findings to HFAC.

1. Verification

Inspectors verify:

1. If information on the application is accurate (complete missing data if needed, with notation of date and indication that the changes were approved by operator, and return revised application to the office with the inspection report).
2. Products and/or process requested for certification are as stated on application.
3. Adequacy of audit trail/records.
4. The operation adheres to HFAC animal care standards.
5. Conformance with past conditions for certification.

2. Inspection

Inspectors:

1. Gather information from operator interview, observation (sight, smell, etc.), and review of documents.
2. Examine all relevant parts of the operation (livestock/processing areas, equipment, records, etc.).
3. Observe all personnel interactions with animals.
4. Complete inspection forms as required by HFAC.
5. Obtain signatures as needed.
6. Take good notes.

3. Evaluation

Inspectors evaluate:

1. Evidence concerning the operation's ability to conform with HFAC animal care standards
2. Operators understanding of standards and commitment of management.
3. Audit trail records and sample audit review to determine ability of operation to track products through production and handling and meet the standards.
4. Overall conformance with the standards, identifying specific areas of nonconformance.

4. Information

Inspectors inform operators on:

1. Humane Farm Animal Care standard requirements
2. HFAC policies and procedures.
3. Potential deficiencies and/or non-conforming processes in order for the operator to understand conditions needed to bring the operation into conformance with the standards.
4. Record keeping requirements.

Inspectors can be sources of information, but must not provide "advice".

1. Inspectors must maintain a clear separation between consultancy and inspection activities.
2. Inspectors can suggest reference books and resource organizations, but cannot discuss other operations they have inspected, specifically. Inspectors can say, "in other operations, they do XXX and it is better for XXX. "
3. Though inspectors may provide information, they must concentrate on issues related to the operation's ability to meet HFAC standards.
4. Operators are more willing to comply with a program they understand and perceive as helpful.

5. Communication

Inspectors communicate:

1. With HFAC prior to, during, (if needed), and after the inspection to answer questions and resolve unanticipated issues. Stay in close contact with HFAC as needed.
2. Whether or not additional information is required.
3. By submitting clear, thorough, and concise reports.
4. By submitting reports in a timely manner.
5. By including observations and evaluation (of the overall operation, operator's understanding of standards and commitment, audit trail review, etc.).
6. By including a clear summary of concerns. All concerns are to be referenced to applicable standards.
7. By providing well organized, relevant attachments.
8. If needed, by recommending a follow-up visit with a clear presentation of evidence to support the recommendation.

Inspectors can be “objective advocates,” without being judgmental.

1. Establish open communication and rapport with operators.
2. Listen carefully to the operator. Do not “tell” operators what they should be doing.
3. Explain the operator's point of view or perspective in the report, where applicable.
4. Do not report an operator's statement or opinion as “fact”, unless you have verified it.
5. Inspectors conduct exit interviews with operators to confirm the non-conformances they have found and to review issues of concern and allow the operator a chance to explain situation, remedy situation, or just be aware that it is a non-conformance. Do not leave the operation, go home and then realize you missed non-conformances that were not on the exit meeting report. The farmer will feel deceived. Do advise us of what those are.

6. Professionalism

Inspectors must be professional.

1. Be knowledgeable of the type of operation being inspected.
2. Be knowledgeable about the agricultural practices, climate, and culture of the area.
3. Be prepared. Review applications and have inspection papers well organized.
4. Dress appropriately, including items for biosecurity purposes, if necessary.
5. HFAC will provide you with 2 polo shirts with our logo on them, one short sleeved and one long sleeved to wear on your inspections.
6. Be punctual.
7. Organize inspection tools and materials so they are accessible.
8. Do not schedule too many inspections per day.
9. Avoid discussions about other certification bodies.
10. Avoid marketing discussions if operators ask where to sell their products.

7. Confidentiality

Inspectors must maintain confidentiality.

1. HFAC requires inspectors to sign confidentiality agreements
2. Practice confidentiality. Do not talk about the inspection with people other than the operator and HFAC staff.

Confidentiality is Critically Important at HFAC

Improper dissemination, disclosure, or unauthorized use of the Confidential Information could result in irreparable harm to both HFAC and its certification clients.

Disclosure, breach or misuse of confidential information may be subject to legal action. Upon termination of contractual relationships, inspectors agree to return all confidential information, together with all copies in their possession, custody, or control.

HFAC List of Information Available to the Public:

The following information is considered to be non-confidential and is provided to the public in the HFAC Policy Manual and on the Website

- Information about the authority under which the certification body operates;
- Documentation of the rules and procedure of the certification;
- Information about the evaluation process for each type of product certified;
- A description of the means of HFAC's financial support;
- Fee structure for certification;
- Rights and duties of applicants, including those related to use of the "Certified Humane" label;
- Information on complaints, appeals, and disputes process;
- List of all parties certified by HFAC;
- Names of staff, members of the Board of Directors, and HFAC Committees;
- The Standards and Policy Manuals;
- The certification status of any current or former HFAC-certified client; and

HFAC List of Confidential Information

The following information is considered to be confidential and not available to the public:

- Any recipe, formula, process, or equipment which is considered essential to the business of the certified party;
- Information, materials, documents, records, memoranda, lists, plans, discussions, actions, and projects marked as "Confidential" by HFAC personnel;
- All information related to the inspection and evaluation of parties applying to HFAC for certification;
- Meeting minutes and correspondence of staff, committees, and the Board;
- All application, inspection, and certification information, including related correspondence; with the exception of those items listed above as public;
- All financial information regarding HFAC, its employees and its clientele;
- Personnel files, including the staff, Board Members, Committee Members, contractors, and inspectors.
- Details of the accreditation of the HFAC certification program; and
- Other information as declared "confidential" by the client.

8. Freedom from Conflict of Interest

Inspectors must be impartial.

1. HFAC requires inspectors to complete and sign a conflict of interest form.
2. The inspector must not accept gifts from the inspected party.
3. Usually no more than 3 consecutive years inspecting the same operation.

D. INSPECTING TO THE STANDARD

Know the standards. Inspectors must be intimately familiar with the standards, policies and paperwork of HFAC. Every operation is unique, but the standards bring continuity to the inspection process.

The checklist supplied by HFAC includes a space for details of different aspects of the operation to be noted as well as verification of conformance for each standard. These sections should be filled out as fully as possible during the inspection to aid you when you are writing your final report.

Applicable laws. Inspectors must always keep in mind that they are conducting a Humane Farm Animal Care inspection. Inspectors are not conducting health and safety inspections, product quality assessments, environmental audits, or market research. There are times when health, safety or environmental issues directly relate to an operation's ability to comply with the animal care standards. In such instances, the relevant issues must be thoroughly documented and reported. If the animal care standards specify that certified operations must comply with all applicable laws, it is the inspector's responsibility to be aware of the applicable laws. Instances of non-compliance with applicable laws should be reported to HFAC, as with any standard violation.

The scope. Issues not addressed in the standards are outside the scope of the inspection. Each nonconformance must relate to a specific numbered standard.

Develop your style. As you gain experience, you develop your own style. You may find that conducting inspections in a certain order, such as beginning the inspection by reviewing the application with the operator, followed by the field or facility tour and site evaluation, and concluding with the review of records and exit interview, gives continuity and focus to the process. Other inspectors may begin with the field work and conclude with the paperwork. Sometimes circumstances dictate that the normal order of the inspection is reversed, due to impending rain, darkness or employee availability.

Use open-ended questions. Inspectors should ask open-ended questions, such as “What is your mastitis management program?” “How do you manage air quality/ammonia levels in the winter?”, rather than “yes or no” questions. Words have different meaning to different people, so ask questions more than one way. Be creative, patient, and respectful and give the operator a chance to talk. Do not make conclusions based on assumptions. Listen carefully, take good notes, and ask for clarification as needed

Be consistent. Regardless of style or the circumstances, you need to consistently gather the information necessary for HFAC to determine if the operation is in conformance with the standards. The only way that this can occur is for the inspector to “inspect to the standard.”

Do not interpret the standards. Some inspectors think they know what the standards mean and make the mistake of ignoring what the standards actually say. They may judge operations based on their own perceptions, and not “inspect to the standard.” Other inspectors may think they have memorized the standards, and do not need to carry them during inspections. As a result, they may “interpret” the standards from memory and may be less than accurate. **Such attitudes can lead to serious misunderstandings and justifiably result in a loss of inspection work. And more seriously, potential law suits for HFAC. If you have any questions about the meaning of a standard, please do not hesitate to contact the HFAC office for clarification.**

Know your biases. Everyone has biases. No one is perfectly objective. We all filter observations through our own perceptions. As inspectors, we need to recognize our

biases, and learn to set them aside. We also must understand our limitations, and develop skills to compensate for those limitations, so that we can be effective inspectors. By letting the standards “lead” the inspection, we can step back from our biases, and overcome some of our limitations, while gathering the comprehensive information needed to assess conformance.

Give clarifications. Inspectors must carry a copy of the HFAC standards during the inspection. Even though inspectors do not make final decisions as to the certification status of inspected operations, and do not give “advice”, they are often asked for clarifications of standards or allowed inputs during inspections. Some questions are straight forward and can be answered by the inspector, while other questions may not have easy answers, these should be directed to HFAC. In all instances, the inspector is well instructed to look up the answer in the standards, and share the answer with the operator.

Share your observations. In nearly every case, the inspector who finds and reports nonconformance should discuss the issues with the operator during the inspection or during the exit interview. This gives the operator an opportunity to understand the nonconformance, and to respond or clarify. There are rare exceptions, however, such as when an inspector has uncovered serious fraud or is concerned about personal safety, when it may be better to continue the investigation without sharing observations.

Inspect the system. Inspectors need to keep in mind that they are inspecting the production or processing system, not a particular product or type of products. The system needs to be validated as in conformance with the standards and able to maintain the integrity of humane products.

Document conformance. Inspectors need to document both the indicators of conformance and the indicators of nonconformance. Evidence presented to HFAC needs to be based on facts and inspector observations, not on assumptions, unsubstantiated operator statements, or hearsay.

PART 4: THE INSPECTION PROCESS

A. INSPECTING A LIVESTOCK OPERATION

1. Notifying the Inspector

The CPC reviews the list of HFAC Inspectors to identify an Inspector who:

- Is appropriately qualified to perform the tasks for the specific evaluation; and
- Has not been involved in, or been employed by a business or person involved in, the design, supply, installation or maintenance of products related to the operation to be inspected within 24 months of the inspection assignment

The inspector receives a request from HFAC, to conduct an inspection. The inspector must evaluate whether there is any conflict of interest (in which case, the inspector must refuse the assignment) and whether it can be conducted within the specified timeframe (taking into account the need for reports to be submitted within a timely manner).

To ensure that a comprehensive and correct evaluation is carried out, the personnel involved shall be provided with the information necessary for the Inspector to perform the inspection in a comprehensive and professional manner. The Inspector receives the following documents for each operation to be inspected:

- The operation's application form;
- Any supporting documents;
- Previous inspection reports, if applicable, as well as previous nonconformances;
- Checklists for the inspection; and
- Exit meeting report forms.

If, after receiving the inspection documents, the Inspector realizes that s/he has a conflict of interest with the operation, the Inspector must contact HFAC to be removed from that assessment and immediately return all documents related to the inspection to the HFAC office.

Where applicable, the inspector will also receive a set of special instructions from HFAC. These will include important information to refer to during the inspection. They may include clarifications of the standards, which have been misconstrued by previous inspectors, specific communications between the operator and HFAC prior to the inspection or any other pertinent information. As the program develops, certain standards may need to be revised or reworded. Until the changes are finalized and approved in the standards, inspectors should refer to special instructions for guidance on interpretation of standards mentioned.

2. Reviewing the Application

The inspector reviews all the information provided by HFAC, in order to familiarize themselves with the operation. If there are missing pieces of information or signatures required, make a note of these during the review. If it is an annual inspection, make note of any previous nonconformances. Taking pre-inspection notes is an excellent way to be organized and well-prepared.

3. Contacting the Applicant

After HFAC contacts the Inspector and asks them to conduct an inspection, the Inspector is to contact the Applicant within 5 business days in order to arrange for the inspection to take place within the time period required by HFAC. The inspector contacts the applicant by telephone (or whatever means necessary) to:

- Set the inspection date and time;
- Obtain directions, if necessary;
- Confirm any biosecurity requirements;
- Confirm that animals/birds will be present during the inspection;
- Confirm that necessary personnel will be present during the inspection; and
- Answer any questions the applicant may have regarding the inspection.

Contact HFAC and let them know the date the inspections are scheduled.

If the Inspector and Applicant are unable to set a mutually acceptable date and time with the required timeframe, the Inspector must immediately contact HFAC to advise so HFAC can re-assign the inspection.

4. Inspecting a Livestock Operation

At the inspection, the Inspector reviews the “Questionnaire” section of the Application, with each producer to verify that the document accurately reflects the operation’s management practices. The Inspector will also verify that identification information on the Application form is correct and up to date. The Inspector will note any changes or inaccuracies in his/her copy of the application and return that to HFAC with reports. During the tour of the facilities, the Inspector completes the Inspection Checklist, which verifies conformance with each of the HFAC Animal Care Standards for the species being inspected.

An outline for inspection protocol is as follows:

(allowing for changes to be made as the operation/inspection/climate/location requires)

1. Opening meeting:
 - a. Introduction of the Inspector and Operator’s staff;
 - b. Inspection schedule;
 - c. Inspection procedures.
2. Interview
 - a. Interview management to verify their knowledge of HFAC requirements and their roles and responsibilities within the program;
 - b. Verify that other employees in the system are aware of the program and their associated responsibilities.

Written documents and farm records are inspected next, including information provided by veterinarians, feed suppliers, and other parties who provide goods and services to the farm. The inspector also investigates the records used to document the types of products used in the management of the operation as well as the records used to trace animals.

3. Review written procedures with producer,
 - a. Application with Questionnaire and other management plans;
 - b. Records, and
 - c. Other supporting documents.
4. Review information on supporting businesses such as:
 - a. Veterinarians,
 - b. Feed suppliers, etc.
5. Verify adequacy of testing and procedures.
6. Establish positive traceability for:
 - a. Animals, and
 - b. Products.

A very important aspect of the inspection is observation of the procedures for managing and caring for stock in order to verify the level of the Operation's conformance with HFAC standards and policies. This includes investigation of items such as: animal nutrition, housing, sources of stock, systems for animal identification, husbandry practices, handling systems, stock condition, implementation of animal health plans, availability of emergency action plans, management of casualty animals, and the general environment of the operation.

7. If there were non-conformances from prior inspections, address those with the operator and note corrective actions taken to remedy the situation. If non-conformances have not been corrected please highlight this fact in the narrative.
8. Observe farm/ranch operations in process to ensure conformance with HFAC standards and policies: (all of which are in the application)
 - a. Nutrition details,

- b. Housing,
- c. Stock source
- d. Traceability (animal identification),
- e. Husbandry practices,
- f. Handling systems,
- g. Stock appearance,
- h. Animal health plans,
- i. Emergency action plans,
- j. Management of casualty animals, and
- k. The environment.

During the inspection, the inspector uses an inspection checklist to document observations and information about the farm's conformance with each of the HFAC standards. Nonconformances are indicated on the HFAC inspection checklist for each species.

Inspector documents each nonconformance,

The on-site inspection concludes with an Exit Interview between the Inspector and the farm manager(s). This meeting allows the Inspector to summarize the findings of the inspection and to provide the Operator with an overview of the nonconformances noted. It also provides an opportunity for the Operator to supply corrections, clarifications, or additional information. The Exit Meeting Report form should be utilized for this purpose.

- 9. Exit interview. Inspector conducts an exit interview with the operator to
 - a. Relay the findings of the inspection;
 - b. Inform the operator of any non-conformances noted during the inspection, by way of the Exit Meeting Report form. The form must be completed by the inspector prior to concluding the inspection and be signed by both the inspector and producer.

5. Post-Inspection

10. Inspector calls the CPC to:
 - a. To clarify any questions on standards or nonconformance issues.
 - b. To give a verbal report on the inspection.
11. Inspector writes up reports to include all topics in inspection report outline:
 - a. Owner/manager name,
 - b. Species inspected,
 - c. Date of inspection,
 - d. Scope and objectives of the inspection,
 - e. Judgment of the extent of conformance with HFAC standards,
 - f. Identification of reference documents,
 - g. Observation of non conformances, ensuring that ALL items marked as “no” on the checklist and itemized in the exit meeting report are fully explained and further detailed in the narrative.
12. Inspector mails originals to the HFAC office:
 - a. Inspection Report Outline – This is where the Inspector can make a recommendation as to whether he/she thinks the operation should be certified or not.
 - b. Completed Inspection Checklist,
 - c. Inspection Report,
 - d. Exit meeting report, and
 - e. Claim for expenses.
13. When an inspection report is received by the HFAC office, the CPC reviews it for clarity and completeness. If the report is incomplete or unclear, the CPC contacts the Inspector and asks the Inspector to redo the deficient sections. The Inspector will not receive extra payment for the time needed to correct the report unless the Inspector obtains prior approval for payment from the CPC. If the Inspection Report is complete, the CPC forwards the report to the CEO for a decision on the certification status of the operation.

6. The Inspection Report

The inspection report is the primary product the inspector presents to HFAC. It is essentially what the inspectors are getting paid for. The report should reflect your professionalism and, as such, it should be well written, complete, concise, accurate, understandable and organized. . It is imperative that the checklists and inspection reports contain sufficient descriptive information for HFAC to fully understand the operation inspected, in order to make a fully informed certification decision.

The inspection report should provide exact measurements rather than general terms such as “a few” or “enough.” Establish objectivity in your report by offering adequate proof to support any judgmental statements. If it is necessary to include an operator statement in the report, begin the sentence with a phrase such as “According to...”

Be sure to clearly define the limitations of your inspection. For example, if you did not view certain documents, if certain buildings were not populated at the time of your inspection, identify those in your report.

Inspection reports need to be comprehensive, but they should not contain a lot of detailed information that has no relevance for assessment of conformance with the standards. In addition, they should not contain redundant information: if the application form contains pertinent information, there is no need to repeat the information in the report. Such information should be verified as accurate, and then referenced in the report.

Address all issues of nonconformance from the previous year’s certification early in the report. Clearly document and explain indicators of conformance and infractions you observe. Nonconformances must be explained fully in the body of the report and then listed (as numbered standards) in the summary at the end.

If you submit photographs, clearly identify each photo with name of operator, date and what is depicted. Likewise, feed tags and other attachments should be clearly labeled.

Please note that the inspection checklist is constructed to verify conformance with HFAC standards. Standards which are answered “no” **MUST** be clarified with comments. Standards which are determined not applicable to the operation should be clarified, where possible, with comments.

B. INSPECTING A PROCESSING FACILITY

The inspection should follow the same outline as a farm operation inspection. Please note that slaughter and processing facilities are NOT certified, they are inspected in conjunction with the producer whose animal product is being certified. Only Product Manufacturing Operations, Pooled Product Operators and Individual Operators are certified. When inspecting a slaughter facility, the AMI checklist for livestock or the HFAC checklist (part of the chicken or turkey checklists) for poultry slaughter will be used. The Universal Application must also be used for animal handling and traceability. For packing and handling facilities, only the Universal Application is needed, modules 1 – 5. For a processing facility inspection, follow the outline above, substituting parts 5-7 with:

5. Verify adequacy of maintenance of
 - a. Equipment and
 - b. Facility.
6. Establish positive animal and product traceability.
7. Observe processing plant operations in process to ensure conformance with HFAC standards and policies.
 - a. On-site review of facility condition,
 - b. Appropriateness of handling systems for species,
 - c. Animal unloading at plant,
 - d. Stock source,
 - e. Traceability (animal identification),
 - f. Stock appearance,
 - g. Slaughter protocols,
 - h. Management of casualty animals, and

- i. Emergency action plans.

C. INSPECTING A PRODUCER GROUP

During the site visit, an HFAC inspector assesses both the production units and the effectiveness of the Internal Control System (ICS). The inspection of a Producer Group has three main components: Assessments done in the ICS office, assessments done in the field, and activities to conclude the inspection.

1) Conducting the Inspection

a) Assessments in the ICS Office

1. Evaluating the Internal Control System
 - a. Assess efforts to enforce producer's conformance with HFAC standards by reviewing the documentation of the oversight system and then performing reviews of files to verify that the documented systems are fully implemented (review documents for accuracy, completeness, and to identify areas of nonconformance that require further documentation.):
 - i. Have the operators been provided copies of the standards in a language or format they understand?
 - ii. ICS inspections
 1. Does the ICS use individual inspection reports to assess operator conformance?
 2. If not, how is conformance assessment documented?
 3. How often do official representatives of the control system visit each operation?
 4. What kinds of documents are generated to verify these visits?
 5. Are new operators inspected prior to being added to the Producer Group?
 - iii. Have all members signed a contract stating that they will comply with the HFAC standards and permit annual inspections?
 - iv. Are operators provided with assistance to comply with the standards?
 - v. What happens when non-conformance is suspected or detected?
 1. Are there records of the actions taken when non-conformance has been investigated?
 2. Does the control system have an official "sanctions" policy? If so, submit a copy to HFAC with the Inspection Report.

- b. Assess the ICS for fulfillment of other requirements:
 - i. Evaluate and describe the educational programs of the Producer Group
 - ii. Describe the control points of the overall operation where loss of integrity may occur. The inspector must report the preventative steps taken to protect products, and identify deficiencies where control points are not sufficiently addressed:
 - 1. Unclear registers of Group's members;
 - 2. Inclusion of new producers with no conversion or documentation;
- 2. Evaluating producer records
 - a. Identify cases of producer non-conformance
 - b. Identify problem areas/risk assessment
- 3. Receive a plan for field visits from HFAC who select the following operations for inspection:
 - a. some producers at random to get a general feeling of the ICS's effectiveness,
 - b. some farm re-inspection visits
 - c. some targeted problems/risk areas
 - d. at least one distant production site.

b) Assessments in the Field: Conduct the inspections identified during the planning phase

c) Concluding the Inspection

- 1. If discrepancies or non-conformances have been identified, the inspector analyzes the reason for the misinformation:
 - a. Did the same person conduct all the inspections?
 - b. Does the problem occur throughout the ICS or is it localized?
 - c. Can the problem be corrected through training?
- 2. Summarize non-conformances identified during the inspections.
- 3. Share conclusions drawn from the evaluation of the Producer Group with the management of the ICS.

2) The Inspection Report for a Producer Group

The Inspection Report for a Producer Group contains many of the same sections as a report used for a single operation. For Producer Groups, HFAC requires inclusion of

information describing the structure and assessing the function of the internal control system. The subjects to be covered in an Inspection Report for a Producer Group are¹:

1. General Information

- a. Name and address of Producer Group
- b. Name of the Manager of the ICS
- c. Species inspected
- d. Inspector's name
- e. Date of inspection
- f. Scope and objectives of the inspection

2. Description of the Producer Group

- a. Overview of the Producer Group
- b. Profile of the producers
- c. Production practices
- d. Producer lists
- e. List of all processing facilities, both on-farm and off-farm
- f. Farmer support system

3. The Internal Control System

- a. Description of project headquarters
 - i. Accessibility
 - ii. Organization
 - iii. ICS personnel
 - iv. Records maintained
 - v. Accuracy of information
 - vi. Conformance mechanisms, including:
 - 1. Audit trail information
 - 2. Monitoring and corrective actions
- b. The buying system arrangement
 - i. Product storage
 - ii. Handling procedures

¹ Based on IFOAM/IOIA International Organic Inspection Manual, compiled and edited by James A. Riddle and Joyce E. Ford, December, 2000.

- iii. Code numbering and product tracing
- c. Transportation systems

4. Field Visits

- a. Condition of production units
 - i. Inputs used
 - ii. Equipment used
 - iii. Split operations - production of non-certified products by Producer Group members
 - iv. Other control points
- b. Producer interviews
 - i. Education program – producer understanding of HFAC principles and standards
 - ii. Other considerations
- c. Inspector observations on field visits
- d. Risk assessment of field visits

5. Summary and Conclusions

- a. List of nonconformances
- b. Observations on weaknesses in the group's Quality System.
- c. Judgment of the extent of conformance with HFAC Procedures and Standards
- d. Inspector recommendation for certification status

Glossary of Abbreviations:

HFAC – Humane Farm Animal Care

PMO – Product Manufacturing Operation

PPO – Pooled Product Operation

CPC – Certification Program Coordinator

CEO – Chief Executive Officer

**In order to fulfill the mission of Humane Farm Animal Care:
Inspections conducted at every step of the production system from birth
through slaughter must be able to verify both:**

- 1) conformance with applicable HFAC standards, and**
- 2) traceability, segregation and integrity of certified product from the
farm to the consumer.**