Canadian Grain Commission

Accreditation and Monitoring of Third Party Samplers and Sampling System Auditors

CGC GSS QSP 4.1.0

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Canadian Grain Commission
Process Verification and Accreditation
Industry Services
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Revision 2

Contents

Review

This Canadian Grain Commission (CGC) 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 procedure will be given a consecutive number and will be dated.

Please ensure that all revised pages are inserted, obsolete pages are 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
3			
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Distribution

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Accredited Service Providers	Master List at Process Verification and Accreditation Office

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

ISO International Standards Organization

PVA Process Verification and Accreditation

TEAC Technical Expert Advisory Committee

QMS Quality Management System

QSP Quality System Procedure

SOP Standard Operating Procedure

ACCREDITATION AND MONITORING THIRD PARTY SAMPLERS AND SAMPLING SYSTEM AUDITORS

1.0 INTRODUCTION

The successful delivery of the Accredited Container Sampler Program (ACSP) and the Certified Container Sampling Program (CCSP) is dependent on the professionalism, skills and abilities of CGC-accredited service providers (ASPs). The ASPs have assumed the role of primary contact with CGC clients; therefore, their credibility and competence reflects directly on the credibility of the CGC. The CGC must ensure, to the best of its ability, that audit and sampling services are being delivered uniformly across Canada at a level that is providing value and offering continuous improvement to CGC clients.

The CGC depends on its ASPs and the staff they employ to conduct audits and sampling services according to CGC written protocols. The ASP auditors must also report on the assessments they conduct in a manner acceptable to the CGC. Finally, the ASP staff must present themselves to CGC clients at all times as professional, competent and fair.

1.1 Scope

This CGC Quality System Procedure (QSP) outlines the procedures for ASPs to apply for accreditation for the CCSP and the ACSP. This QSP also outlines the protocols followed by the CGC to oversee and monitor ASPs who are accredited to provide auditing and/or sampling services for the CCSP and the ACSP. The procedure is designed to ensure that:

- ASP audits of sampling systems for the CCSP are conducted consistently;
- a high level of quality is maintained in the audit reports submitted by ASPs;
- accredited samplers conduct sampling activities consistently and in accordance to CGC PROC 3.0.1 – *CGC Sampling Methods and Procedures Guide;* and
- companies certified to the CCSP and/or using accredited samplers, and their buyers have confidence in the program.

1.2 References

CGC GSS STAN 3.0 – CGC Grain Sampling System Standard

CGC PROC 3.0.1 – CGC Sampling Methods and Procedures Guide

CGC ASP STAN 4.0 – General Requirement for Accredited Service Providers of Sampling Program Services

CGC Sampling Systems Handbook and Approval Guide

CGC GSS QSP 4.3.1 – Conducting an Audit of a Grain Sampling System

ISO 17021:2011 – Conformity assessment – Requirements for bodies providing audit and certification of management systems

ISO 17065:2012 – Conformity assessment- Requirements for bodies certifying products, processes and services

ISO 19011:2011 – Guidelines for auditing management systems.

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.

Accredited Service Provider (ASP) – an organization that has been assessed by the PVA against CGC ASP STAN 4.0 and has been determined to meet all the requirements of that standard.

ASP Auditor – an employee of an ASP who has met the auditor qualifications as specified in CGC ASP STAN 4.0.

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.

Designated Sampler – An employee of a grain company who has been trained and deemed competent by the company's "Certified Sampler" to follow the company's sampling procedures within their CGC-certified container sampling program (CCSP). The Designated Sampler must also be evaluated by a CGC-accredited accredited auditor during an on-site audit of the company's CCSP. During an on-site audit, the accredited auditor will verify that the designated sampler can correctly take samples, divide, and/or package samples (depending on the individual's assigned responsibilities) according to the company sampling procedures approved by the CGC as part of the company's CCSP.

Field Observation – an assessment of an ASP auditor or accredited sampler conducted by a CGC representative by observing the ASP auditor or accredited sampler conducting activities on behalf of the CGC.

2.0 APPLICATION STATUS AS AN ACCREDITED SERVICE PROVIDER

2.1 Application Process for the Accreditation of ASPs Providing Grain Sampling Services

The following process is followed when an ASP applies to provide grain sampling services for the ACSP:

1. The applicant accesses program information from the CGC web site or contacts the PVA to obtain copies of the following:

   - This quality system procedure – CGC QSP 4.1.0;
   - CGC GSS STAN 3.0 – CGC Grain Sampling System Standard;
   - CGC PROC 3.0.1 – Sampling Methods and Procedures Guide; and
   - CGC ASP STAN 4.0 – General Requirements for Accredited Service Providers of Sampling Program Services.

2. The applicant completes the application form and submits it, along with a copy of their ISO 17021:2011 or ISO 17065:2012 registration certificate, to the PVA. If the applicant is not accredited to ISO 17021:2011 or ISO 17065:2012, the PVA will perform an audit of the applicant's quality management system as outlined in section 2.3 of this QSP.

3. Training of the ASP samplers is scheduled and conducted by the CGC.

4. Once the applicant's QMS and personnel meet CGC Grain Sampling System requirements, an accreditation agreement is signed and an ASP Accreditation Licence Number assigned. The names of all ASPs are made available to all clients and displayed on the CGC web site.

5. ASP status is valid for three (3) years from the date that the accreditation certificate is issued, as long as the monitoring described below in Section 3 demonstrates ongoing compliance with this QSP.

2.2 Application Process for the Accreditation of ASPs Providing Grain Sampling System Auditing

The following process is followed when an organization applies to audit for the CCSP:

1. The applicant accesses program information from the CGC web site or contacts the PVA for information as follows:

   - This quality system procedure (CGC QSP 4.1.0);
   - CGC GSS STAN 3.0 – CGC Grain Sampling System;
   - CGC PROC 3.0.1 – Sampling Methods and Procedures Guide; and

- CGC ASP STAN 4.0 – General Requirements for Accredited Service Providers of Sampling Program Services.

2. The applicant completes the application form and submits it, along with a copy of their ISO 17021:2011 or ISO 17065:2012 registration certificate, to the PVA.
3. Training of the ASP auditors is scheduled and conducted by the CGC.
4. Once the applicant's QMS and personnel meet CGC Grain Sampling System requirements, an accreditation agreement is signed, and an ASP Accreditation Licence Number assigned. The names of all ASPs are made available to all clients and displayed on the CGC web site.
5. ASP status is valid for three (3) years from the date that the accreditation certificate is issued, as long as the monitoring described below in Section 3 demonstrates ongoing compliance with this QMS.

2.3 Assessment of Compliance with CGC ASP-STAN 4.0

If required, an audit will be conducted to determine compliance of an applicant's QMS to the requirements of CGC ASP STAN 4.0. Such an audit would be conducted in accordance with ISO 19011:2011 *Guidelines for auditing management systems*.

The focus of the audit is to determine that:

- the applicant's quality manual and associated procedures meet the requirements of CGC ASP-STAN 4.0; and
- the applicant's quality management system includes appropriate monitoring of its sampling staff.

Therefore, by means of interviews and examination of documents and records, the PVA auditor will obtain and document objective evidence to determine whether:

- the applicant's QMS documentation is accessible, of correct issue and available to staff;
- the procedures described in the organization's manual are being adhered to;
- the processes are being performed by competent personnel according to specifications stipulated in the relevant procedures, and; the personnel are competent in the tasks they are performing.

3.0 MONITORING OF CGC ACCREDITED SERVICE PROVIDERS

In order for CGC to maintain its high standards of customer service and program integrity, the following ASP auditor and sampler monitoring program is put in place once accreditation has been achieved:

1. Field observations of all ASP auditors at least once during the lifetime of the accreditation agreement.

2. Field observations of accredited samplers at a frequency commensurate with the risk associated with potential sampling errors, i.e. number of samples submitted, previous CARs, etc.
3. PVA Technical Reviews of all audit reports submitted by ASPs.
4. Client surveys conducted by the ASP to provide feedback to the CGC with respect to an auditor's or sampler's performance and presentation on site.
5. Investigations of client complaints.
6. Review of auditor files.
7. Auditor or sampler conference calls/webinars or training sessions.

3.1 Field Observations

The purpose of a field observation is to determine that the ASP auditors and accredited samplers are correctly applying the knowledge gained through the CGC ACSP and CCSP sampling and/or auditing training. ASP auditors need to demonstrate that they are following CGC audit procedures as described in CGC GSS QSP 4.3.1 *Conducting an Audit of a Grain Sampling System* and that they demonstrate the characteristics of auditors as set out in ISO 19011:2011 *Guidelines for auditing management systems*. Accredited samplers must demonstrate that they are following sampling procedures as described in CGC PROC 3.0.1 *Sampling Methods and Procedures Guide.*

All auditors will be observed conducting a sampling program audit during the life of the ASP accreditation (once every three years). All accredited samplers will be observed at least once followed by a monitoring program commensurate with the risk, i.e. number of samples submitted, previous CARS, etc. When possible, any auditors or accredited samplers new to the program will be observed conducting their first audit/on-site sampling.

During a field observation of an accredited auditor, the PVA auditor will concurrently conduct an assessment of the client's sampling system. This will determine if the ASP auditor is able to accurately assess whether the client is adhering to the requirements of CGC GSS STAN 3.0. Immediately after the audit, the CGC auditor will provide constructive feedback to the ASP auditor.

During a field observation of an accredited sampler, a CGC technical expert will assess the sampler's adherence to CGC PROC 3.0.1 using the Accredited Sampler Checklist (see Appendix I). Immediately after the sampling is complete, the CGC technical expert will provide constructive feedback to the sampler.

The PVA auditor or CGC technical expert will write a field observation report, including any CARs issued on the basis of the field observation, and provide a copy to the ASP management within twenty (20) working

days of the field observation. This report describes the adherence of the accredited sampler to the CGC PROC 3.0.1 or the ASP auditor to the CGC QSP 4.3.1. For an ASP auditor assessment, the results of the comparison between the PVA auditor's and the ASP auditor's assessment of the client's sampling system will be reported.

3.2 Technical Reviews of Audit Reports

All audit reports received by the PVA are reviewed according to CGC QSP 1.2.0 *Conducting Technical Reviews of Audit Reports Submitted by Accredited Service Providers*. This review is undertaken to ensure that all required signatures, pages, and appendices have been submitted; that all reports are submitted in a timely manner; and that the audit report follows the format specified in CGC GSS QSP 4.3.1 *Conducting an Audit of a Grain Sampling System*.

After reviewing the audit report, the PVA then ascertains that the auditor's recommendation on whether or not to certify the client's GSS is supported by documented evidence, and that the appropriate follow-up action has occurred when corrective action requests have been issued.

3.3 Client Surveys

The PVA will conduct client surveys periodically to solicit feedback on how ASPs conduct audits and/or sampling. These surveys may be conducted by telephone, in person or by mail.

3.4 Client Complaints

Client complaints of ASPs may be divided into two categories:

1. disagreement with the issuance of CARs by the ASP auditor; or
2. complaints regarding auditor or sampler behaviour or professionalism.

The PVA must receive a complaint **in writing** from a client before taking any action. The process for addressing complaints in the first category is detailed in section 5.4 in CGC GSS QSP 4.3.1 *Conducting an Audit of a Grain Sampling System*.

If a written complaint is received regarding an auditor's or sampler's behaviour, the PVA will immediately inform senior management of the ASP and raise a CAR. The management of the ASP will conduct an investigation without delay, in conjunction with the CGC, the auditor or sampler in question, and the client (if necessary).

Depending on the severity of the situation, or if the corrective and preventive action implemented as a result of the CAR issued is not sufficient to bring the situation under control, the auditor's accreditation

to conduct audits, or the sampler's accreditation to sample on behalf of the CGC, may be suspended.

Suspension will remain in effect until the complaint has been dealt with to the satisfaction of the PVA, the ASP, and the client. If the complaint is deemed to be beyond the control of the auditor/sampler, the suspension will be lifted. If it is found that the auditor/sampler was culpable in the situation, the person's accreditation may be cancelled, depending on the severity of the situation. Three suspensions of the same auditor or sampler will result in the issuance of a major non-conformance to the ASP.

3.5 Technical Expert Advisory Committee (TEAC) Annual Meetings

Annual meetings are held between the PVA, CGC technical experts, certified companies and the senior management of ASPs to review program requirements and potential issues. The purpose of these meetings is to:

- ensure the continued applicability of CGC GSS STAN 3.0, CGC ASP STAN 4.0 and other CGC sampling procedures;
- review trend analysis on CARs issued by CGC or ASP auditors, address technical concerns, and discuss changes and/or developments in the industry that may affect the sampling programs;
- provide feedback to ASP and industry members based on any field observations conducted, technical reviews of audit or sampling reports, client surveys and client complaints; and
- obtain feedback and suggestions on the program and supporting standards and audit procedures from ASP and industry members.

3.6 Auditor and Sampler Meetings

Within three months of the annual TEAC meeting, the PVA will schedule a meeting with accredited samplers and auditors to provide information on decisions that have been taken at that meeting.

As required, the meeting can also serve to provide reminders to accredited samplers and auditors of current standard and sampling requirements.

A record (e.g. minutes, webinar, audio recording) of the meeting will be available to all accredited samplers and auditors within 10 working days of the meeting.

3.7 Record Keeping

The PVA shall maintain information on ASPs, including ASP ownership, senior management personnel, management structure, approved auditors and samplers employed or contracted by the ASP, and evidence of auditor and sampler competency.

4.0 ASP RESPONSIBILITIES

4.1 ASP Management

ASP management shall notify the PVA of any changes to their approved auditors and accredited samplers and/or their competencies, management, ownership and managerial structure. If the changes result in a conflict of interest or other issues that would result in loss of integrity, the ASP must consult with the PVA to decide on appropriate action.

ASP management must ensure staff and contracted personnel meet all managerial, administrative, technical and auditing competencies required to fulfill the duties for their position within the organization. ASPs must maintain records of qualifications, training, experience, affiliations, professional status, competencies of staff and contracted personnel acting in managerial, administrative, technical, sampler or auditing roles within the organization.

4.2 ASP Auditors

ASP auditors must conduct the following activities according to the appropriate CGC procedures for companies applying for certification under the CCSP:

- review the client's quality manual and procedures;
- conduct an on-site assessment;
- observe the collection of samples by trained company staff;
- conduct any necessary follow-up activity; and
- write an audit report following the format specified in CGC QSP 4.3.1; and
- submit the report in a timely manner.

4.3 Accredited Samplers

Accredited samplers must conduct the following activities according to the appropriate CGC procedures for companies utilizing the sampler's services under the ACSP:

- conduct on-site sampling in accordance to CGC PROC 3.0.1; and
- complete all required records and submit the records and the sample in a timely manner.

4.4 Maintenance of Competency and Continuous Improvement

ASP personnel are expected to attend any additional training courses deemed necessary by the CGC.

4.5 Conflict of Interest

ASP auditors must adhere to the conflict of interest requirements as stipulated in the Accreditation Agreement between the PVA and the ASP Management.

5.0 SERVICE AGREEMENT

ASPs must read and sign their Accreditation Agreement with the CGC and conduct themselves accordingly.

6.0 SUSPENSION AND WITHDRAWAL OF ACCREDITATION

An ASP's accreditation will be suspended for one of the following reasons:

1. failure to pay accreditation fees, or
2. failure to close, in the agreed time period, any major CAR issued either to the ASP or one of its personnel by the PVA.

The PVA will notify the ASP in writing of its suspended status and the requirement for a follow-up visit within twenty (20) days to determine if corrective action is being taken. Following suspension, an ASP's accreditation will be withdrawn if, during the follow-up visit, the ASP does not demonstrate the implementation of corrective and preventive action plans for those problems that originally led to suspension.

6.1 Suspension of Individual Accredited Samplers or Auditors

The onus is on the ASP to verify that its personnel is conducting activities as described in its quality manual and in accordance with the procedures specified in CGC QSP 4.3.1 *Conducting an Audit of a Grain Sampling System* and/or CGC PROC 3.0.1 *Sampling Methods and Procedures Guide*. If a major CAR is issued to an ASP auditor or sampler, that person's accreditation to conduct audits on behalf of the CGC will be immediately suspended. Three suspensions of the same auditor or sampler or two suspensions of any auditors and/or samplers within a 12-month period will be taken as an indication that the ASP is incapable of providing the necessary assurances to the CGC that its quality system is effective. As a result, a major non-conformance will be issued to the ASP.

7.0 TERMS AND CONDITIONS OF WITHDRAWAL

If an ASP's accreditation is withdrawn, the organization shall immediately cease making reference to its CGC-accredited status in any promotional material, including its letterhead and business cards. In addition, all of the assessment records, documentation and property relating to the Accredited Container Sampler Program or the Certified Container Sampling Program must be returned, as stipulated in the Accredited Service Provider Agreement. If these items are not returned within thirty (30) days of the withdrawal of accreditation, a CGC representative will go to the service provider's office to

retrieve any Accredited Container Sampler Program or Certified Container Sampling Program property in person.

8.0 APPEAL PROCESS

A service provider that is denied accreditation or that has had its accreditation suspended or withdrawn may wish to launch an appeal. Appeals must be made in writing to the CGC within twenty (20) days of receiving the written notice of the denial, suspension, or withdrawal of accreditation.

If an appeal is made in writing within the required twenty (20) day period, the PVA will advise the ASP of this appeal process. The Accreditation Committee, made up of a minimum of two PVA staff, will review the appeal and determine if the original assessment report, recommendation, and accreditation decision was correct. If the decision is found lacking and the appeal appears valid, an on-site visit may be required to obtain additional facts. The committee shall determine a resolution and effect the required changes to satisfy the appeal.

If the Accreditation 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 and at least one other member that has knowledge of the affected organization and the CGC accreditation 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 organization.

The Manager, PVA will schedule a meeting and ensure that minutes are kept to document the committee's decision. The Appeals Committee shall review both the ASP's and the PVA's arguments, either through documentation and/or interviews. Upon their review, a decision will be made based on a majority vote and the ASP 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 ASP's file at the PVA office.

Any costs associated with travel incurred by either the Accreditation or the Appeals Committee will be charged to the service provider if the decision to deny or withdraw accreditation is upheld. If the decision is not upheld, those costs will be paid by the PVA.

Appendix I – Accredited Sampler Assessment Checklist

Audited ASP Company Name_____ Date _____

Accredited Sampler No. _____

Accredited Sampler Name _____

CGC Technical Expert Name_____

Observation	Compliance			Comments
	Yes	No	n/a	
1. Can the sampler identify what SOP is to be followed for the type of sampling at the facility?	☐	☐	☐	Ref. STAN 3.0 – Sec. 8.3
2. What is the scope of the sampler's sampling responsibilities?				Ref. STAN 3.0 – Sec. 8.3
• Taking primary/composite samples	☐	☐	☐	
• Dividing samples	☐	☐	☐	
• Packaging samples for submission	☐	☐	☐	
• Stream sampling using a hand scoop	☐	☐	☐	
• Overseeing an automatic sampler	☐	☐	☐	
• Static sampling from top of bags before stitching	☐	☐	☐	
• Probing bags or totes with a bag trier	☐	☐	☐	
Note: if you are unable to observe the sampler performing all functions within the sampler's scope, competency can be assessed through interviews and demonstration.				
Section I. Taking Samples				
3. Can the sampler identify the lot identification for (as applicable):				Ref. STAN 3.0 – Sec. 8.4
• Bags	☐	☐	☐	
• Totes	☐	☐	☐	
• Containers	☐	☐	☐	

Observation	Compliance			Comments
	Yes	No	n/a	
4. Does the sampler select (or know) the appropriate equipment for the sampling method to be used as specified in the SOP?	☐	☐	☐	Ref. STAN 3.0 – Sec. 8.3
5. What equipment did/does the sampler use, and was it used as specified in the SOP or can the sampler describe the correct use?				Ref. STAN 3.0 – Sec. 8.3
• Nobbe Trier	☐	☐	☐	
• Double Sleeve Trier	☐	☐	☐	
• Automatic Sampler	☐	☐	☐	
• Hand scoop	☐	☐	☐	
6. If samples are taken manually, does the sampler, or know to:				Ref. STAN 3.0 – Sec. 8.3
• Review of each primary sample taken?	☐	☐	☐	
• Combine primary samples into a composite sample in a separate container?	☐	☐	☐	
7. Does the sampler use (or know) the correct sampling intensity and frequency as defined in the SOP for the sampling method used?	☐	☐	☐	Ref. STAN 3.0 – Sec. 8.3
8. If an automatic sampler is used:				Ref. STAN 3.0 – Sec. 8.3 and 8.6
• Can the sampler identify the SOP or WI for using the automatic sampler?	☐	☐	☐	
• Can the sampler explain how to operate the sampler?	☐	☐	☐	
• Can the sampler or other staff produce the CGC letter approving the auto sampler and its installation?	☐	☐	☐	

Observation	Compliance			Comments
	Yes	No	n/a	
9. Can the sampler explain the procedure for: • Non uniform product observed during sampling? • Any unexpected foreign material present in sample?	☐ ☐	☐ ☐	☐ ☐	Ref. STAN 3.0 – Sec. 8.8
Section II. Handling the Sample				
10. Does the sampler maintain the integrity of the sample throughout the sampling process, or can the sampler explain how this is done?	☐	☐	☐	Ref. STAN 3.0 – Sec. 8.7
11. Does the sampler use approved reducing equipment and procedures, or know how to use the equipment?	☐	☐	☐	Ref. STAN 3.0 – Sec. 8.3
12. Does the sampler witness and record, or know how to record: • Seal numbers from each container as loaded? • Seal numbers from bins (if applicable)?	☐ ☐	☐ ☐	☐ ☐	Ref. STAN 3.0 – Sec. 8.4 & 8.7
13. Does the sampler seal the sample and enclose the appropriate sample request form and/or identification, or know how to do this?	☐	☐	☐	Ref. STAN 3.0 – Sec. 8.4