D10. Deviation and Notification

What would you do if something went wrong?

Some producers may go a lifetime without needing to address a drug residue or a broken needle. Part of the design of the CQA® program, however, asks producers to think about what they would do if something did go wrong in their production unit. Throughout the On-Farm Quality Assessment Form, you will find the question "What would you do if something went wrong?" repeated.

To answer this question, producers must consider how they would address any of the identified hazards, if their protocols fail to prevent them. In HACCP plans, this is referred to as a *deviation*. The CQA® program also refers to actions that you take when something goes wrong as a deviation procedure. Though protocols are put in place to minimize the risk of the occurrence of a hazard, there is no guarantee that the hazard will never occur.

When developing your protocols, bear in mind that you are required to keep a record of any deviations. Whatever you do to address this thing that has gone wrong is referred to as a *corrective action*. No matter what words are used to describe it, the answer to "What would you do if something went wrong?" provides your farm with a plan to quickly address an issue (deviation) that could impact food safety and fix it (corrective action). Both deviations and corrective actions can be recorded in the record that relates to the deviation (Pen or Individual Treatment Record for deviations related to treatments, including broken needles; Feed Mixing and Sequencing Record for feed related deviations, etc.) or you may record them in a separate form that you have created specifically for deviations and corrective actions.

When considering how you will answer the question, "What would you do if something went wrong?", you must first consider your deviation procedure. What steps will you take to determine what it was that went wrong? How will you correct it? You must be prepared to address these issues before any affected animals leave your farm. You must also be prepared to address mistakes in the event that animals have already been shipped.

The CQA® program, and all other on-farm food safety programs in Canada, are based on the Food Safety Enhancement Program (FSEP) used by the Canadian Food Inspection Agency. FSEP is the program used by CFIA to assist food processing plants in the development of their own HACCP plans. Under FSEP, this section is referred to as "Recalls". In our industry, we refer to *notification* because it will probably not be possible to "recall" hogs once they have left the farm. As part of your corrective action, you must consider who you will talk to in order to solve a problem as well as who you will call to notify that animals may have been shipped with a violative residue or a broken needle.

In each case where this question appears, producers must first consider what could go wrong and then develop a contingency plan if that situation actually happened. Presented below are various points to consider when working on your contingency plans. This is not a comprehensive list, but is provided to assist in developing your protocols.

- What records would you keep?
  - Deviation records?
  - Corrective action records?
  - Communication records?

- What could go wrong in this situation?
  - Wrong feed to wrong animals?
  - Wrong medication to wrong animals? Incorrect dose?
  - Broken needle?
  - Loss of identification of treated pig?
  - Positive sulfamethazine test?
  - Shipment of a treated animal?
- What records would you examine?
  - Feed mixing and sequencing records?
  - Individual or Pen Treatment Records?
  - Incoming Treatment Records?
- How could you correct the situation?
  - Withdraw feed?
  - Identify animals? How?
- How would you determine the length of time that animals may need to be held back?
- How would you identify the affected animals?
  - Identify individuals? Pens? Rooms?
  - Tags? Livestock marker?
- Who would you call?
  - Provincial coordinator?
  - Veterinarian?
  - Feed mill?
  - Consultant?
  - Hog assembler?
  - Slaughter plant?
- Whenever you address a deviation, make a record of the error and how it was corrected in the Corrective Action Form or a similar form of your own design. Indicate in your protocols the location where this record is kept.