

Establishment Risk Allocation, Inspection Frequency and Rating

5.1.1.1 Risk Category Allocation to Export Processing Establishments

QCRS shall assign a risk category, of which there are three (low, medium and high), to each Export Establishment. The risk category shall be the risk associated to the prepared products at the establishment as shown in the Risk Selection Table (Table 1). Export establishments preparing different types of products such as a low, medium or high-risk food shall be inspected according to the product with the highest associated risk.

Note: The risk allocated to the food is related to the chance of the hazard occurring, types of hazards associated with the food and the potential severity of the hazards.

Table 1 – Risk Category Allocation Table for Fish and Fishery Products

Low Risk	Medium Risk	High Risk
Live fish, live crustaceans Dried shark fin, dried Fishery products from not histamine sensitive species	Frozen or chilled raw fish that is to be fully cooked before eating Frozen battered or breaded fish products Dried Fishery Products from Histamine sensitive species.	Histamine sensitive fish species (tuna, mackerel, anchovies, hliisa) and other frozen or chilled fish intended to be eaten raw. Chilled fish packaged in a vacuum or modified atmosphere packages. Frozen or chilled cooked fish, crustaceans and cephalopods not required to be re-heated by the consumer All bivalves Low acid, acidified or low acid aseptically packed canned foods.

Exceptions of Risk Category Allocation

Storage facilities operating within an approved establishment or independent storage facilities (e.g. refrigerated stores) shall be allocated a low risk category.

Surveillance Inspection Frequencies

Surveillance Inspection frequencies are shown in Table 2. Inspection frequencies shall not be exceeded but if they cannot be met priority shall be given to medium and high risk operations.

Table 2 – Processing Establishment Audit Frequency and Rating of Establishment

Establishment Rating	MI	SE	CR	Low Risk	Medium Risk	High Risk
(A) Excellent	0 - 3	0	0	6 monthly	6 monthly	6 monthly
(B) Good	4 - 5	1 - 2	0	6 monthly	4 monthly	3 monthly
(C) Average	6 ++	3 - 4	0	6 monthly	3 monthly	2 monthly
(D) Fail	N/A	5 ++	1	Re-inspect until non-conformances are corrected		

MI = Minor Non-conformance / SE = Serious Non-conformance / CR = Critical Non-conformance

See chapter 5.1.1.5 for definitions of MI, SE and CR.

Ratings Change and Frequency of Surveillance Inspection

When the rating of an establishment is changed:

- from (C) to (A) the next inspection shall occur at the frequency of a (B) establishment;
- from (C) to (B) the next inspection shall occur at the frequency of a (C) establishment
- from (D) to (C) or (B) the next Inspection shall occur at the frequency of a (C) establishment;
- from (D) to (A) the next Inspection shall occur at the frequency of a (B).
- any two consecutive similar ratings will result in that rating being the accepted inspection frequency.

Risk Category Allocation to Aquaculture farms and fishing vessels

Non-conformance Ratings

Critical Non-conformance (CR) is a situation where the establishment do not comply with the legal requirements in such a manner *that the food produced is unsafe or is a health hazard*.

In processing establishments, examples could include, severe breakdown in sanitation procedures, contamination of foods from waste, use of non-potable water (including ice or steam) or serious pest infestation, not adequate monitoring of a critical control point.

In aquaculture farms, examples could include, farm subject to intermittent pollution problems with limited control measures are applied, significant risks of contamination by biological, chemical or physical food safety hazards (industrial, urban, agriculture pollutions and livestock production); pond contaminated by toilets/septitanks, use of not allowed chemicals and veterinary medicines, wrong use of allowed medicines and lack of record keeping for use of medicines and chemicals.

A CR shall be requested to be appropriate addressed immediately or at least within maximum 2 days and, if it does not happen, it shall cause the establishment to stop processing until QCRS is satisfied that the cause of the CR no longer exists.

Serious Non-conformance (SE) is a situation where the establishment have a severe non-compliance from legal requirements in such a manner that, *if the situation is allowed to continue, may result* in unsafe products.

Examples could include, ineffective pest control, inadequate cleaning program, inaccurate calibration, and failure to label chemicals, inadequate trained staff or premises not in good repair. The SE shall be corrected by the operator quickly within an agreed short time frame (typically max. a week)

Minor Non-conformance (MI) is a situation where the establishment do not comply with the legal requirements, but which is not likely to reduce materially the establishment's ability to meet acceptable hygiene requirements.

Examples could include, equipment not meeting correct standard, temperature of water, minor sanitation or construction deficiencies. The non-conformance shall be corrected at a date agreed to by ICS Inspectors and the processing establishment operator.

Handling of CARs that are not adequately solved within agreed schedule

A Corrective Action Request that are not addressed appropriately within agreed time will be downgraded from Mi to Se non conformity or from Se to Cr non-conformity and the rating and inspection/audit frequency of the establishment may be changed accordingly (see table 2).