



CanadaGAP Auditor Training Course – Unit 6

Auditor's Responsibilities

1.0 Collecting information

The auditor is responsible for assessing the auditee's compliance with the requirements in the CanadaGAP manuals using the CanadaGAP audit checklist criteria. An audit report will be created for each audit and will be based on objective evidence gathered by the auditor through the examination of documented procedures and records, observations of activities and interviews of personnel.

a. Review of documents:

Documents may include the CanadaGAP manual, record keeping forms, written procedures and signage. They may be available in hardcopy or electronically. Sampling of documents is permissible as there is a limited amount of time for the audit; however, at least one example for each required form should be examined.

b. Observation/Verification of activities:

Physical verification by the auditor indicates that the stated practices, procedures and methods are utilized and followed as defined. Due to time constraints it will not be possible to look at every single record or detail. For example, a random selection of all the agricultural chemical applications for the year could be reviewed, not every single record. Or, if the auditee has many suppliers that provide letters of assurance, randomly pick two or three and ask for the letters. If they are missing, look further.

c. Questioning/Interviewing:

Most of the information will be obtained through interviewing of facility personnel. The auditor should determine compliance and its adequacy. Probing or open-ended questions rather than those that require simple yes or no answers should be utilized. Information obtained from interviews should be substantiated by evidence from documents and records and observations by the auditor.

Scores and comments are assumed to have been visually confirmed unless otherwise stated. Verbal confirmations by the auditee should be the exception to the rule and if auditing properly, these should be rarely used. If a verbal confirmation is accepted, then the auditor should write this in the comments on the question.

The auditor is the "eyes and ears" of the certification body, gathering and recording evidence for the certification body to determine whether the auditee meets the standard and will receive certification.

2.0 Audit Protocol

2.1 Before the Audit

The auditor should review the contract to conduct the audit as well as the previous audit report for that operation if available. (Note: No previous audits will be available in the first year.)

The auditor should prepare the audit documents:

- Audit plan
- Checklist – fill in as much of the audit checklist as possible (name, address, contact information, etc. then verify accuracy at the audit)

The auditor should prepare for the audit and ensure they have the most recent versions of the CanadaGAP audit checklist and are aware of the current updates to the manuals that the auditee should have. These will be available through CanadaGAP. Further information on CanadaGAP manual updates can also be found on the CanadaGAP website at www.canadagap.ca

2.2 Audit Plan

The audit plan should include the following:

- Audit Date (except for unannounced audits, when the date is known only 2-5 business days in advance)
- Audit Location
- Type of Audit/ Audit Scope
- Auditor Name

The Auditor will confirm the plan and communicate any changes with the auditee. The auditee should be formally notified about the audit anywhere from 3 weeks to 3 months prior to the audit, unless it's an unannounced audit.

The audit plan should be forwarded to the auditee in advance of the audit. In preparation for the audit, the audit plan could refer the auditee to the CanadaGAP web site (www.canadagap.ca) for a copy of the latest CanadaGAP Audit Checklist. The auditee's representatives who will be attending the opening meeting should also be discussed ahead of the audit.

When scheduling or confirming the audit, the following should be discussed with the auditee:

- The automatic fail items and where they can be found on the checklist
- Who you will need to meet with
- Gather any missing information about the operation: whether they are involved in production, packing, storage, what commodities will be audited, etc. This will help with scheduling
- Any biosecurity requirements, where to park etc.
- Anticipated length of time for the audit and time commitment required from the auditee

2.3 Audit Sequence

The typical sequence for the audit is:

- Arrival and Introduction
- Opening Meeting
- Data collection, Observations, Interviews
- Exit Meeting/ Presentation of draft report

2.3.1 Opening Meeting

During the opening meeting, the following topics should be covered.

- Introduction of the audit team
- Audit overview – purpose, scope, objectives and audit methods and procedures
- Automatic failure items and procedures if an autofail item is found
- Anticipated duration of the audit and projected time for closing meeting
- Visitor policies (footwear, hair, jewellery and safety procedures that the auditor must follow)
- Any changes to the checklist
- Requested attendance for closing meeting
- Invitation to the auditee to discuss any questions regarding the audit
- Explain that decisions on certification are made by the certification body, not the auditor
- The appeals process

2.3.2 Exit Meeting/ Post Audit Meeting

- Occurs at the end of the audit activities, prior to preparing the audit report.
- Is with management to present an overview of the audit observations.
- Is an opportunity to present preliminary audit results in a draft form to management and explain that the audit evidence collected was based on a sample of the information available.
- System issues are highlighted, rather than individual issues.
- Remind the auditee of the appeals process and complaint procedure.
- Fill out the executive summary page and review with the auditee.
- Any diverging opinions regarding the audit findings or conclusions between the auditor and the auditee should be discussed and, if possible resolved. If not resolved, this should be recorded.
- Review the corrective actions process if applicable.
- Explain that audit findings are subject to review by the certification body and that the final report will come from the certification body.
- Leave a mutually signed copy of the executive summary page with the auditee.

2.4 Automatic Failures

If any of the automatic fail items is observed:

- Score the audit as an automatic failure and describe the reason for the failure in the Executive Summary
- Continue the audit if the auditee wishes you to do so
- Otherwise, end the audit if the auditee prefers not to continue
- If the auditee wants you to abort the audit they will still be charged as agreed in the contract
- Note: the auditee cannot get certified if the audit is not completed in its entirety. An audit report should not be generated.

Note: See “Auditor Checklist - Points to Cover During Opening and Closing Meeting” found at the end of this document for a summary checklist of 2.3.1, 2.3.2 and 2.4 above.

2.5 Audit Report

This should include:

- Name of the organization that was audited

- Date(s) of the audit
- Time that the audit started and ended
- Audit Type/ Scope
- Summary of findings and final score
- Description of any corrective action requests issued (e.g., in the Executive Summary, in Auditor Observations)
- Individual requirement findings and scores
- Auditor's comments in sufficient detail to substantiate scores and enable the certification body to assess the auditee's compliance with the requirements

The audit report is finalized by the auditor and sent to the certification body within 10 business days of the date of the audit.

2.6 *Follow up*

After the audit, the auditor completes the audit report including the scoring section and sends the completed report to the certification body for review. The auditor does not make determinations on certification. The certification body will make decisions and determinations on certification after reviewing each audit report. It is important that the auditor collect and document enough evidence for the certification body to make a determination. The certification body may make adjustments after reviewing the audit report. For this reason, the auditor can review the auditee's preliminary score but cannot confirm the final result or certification at the time of the audit.

In some cases, there may be an opportunity for the auditee to address immediately during the audit an issue where points would normally be deducted. This will generally be a situation where there is a low food safety risk. If this is the case, allow the auditee to correct the problem during the audit and give them credit on their audit. If the auditee is missing some paperwork / records that can be retrieved within a short time delay, allow the auditee to obtain the missing documentation and provide to you by fax or email before signing off on the completed audit report. Otherwise, if documentation has not been kept as required or is not retrievable by the auditee, identify the non-conformance on the Executive Summary or within the checklist (i.e., deduct marks for the item and include comments).

If the issue during the audit involves any of the automatic failure items, then the auditee is NOT allowed to address the situation immediately. These situations usually have a high food safety risk and need to be treated accordingly to mitigate the risk. The auditee would autofail and you would score it accordingly, complete the Autofails page of the audit report and indicate the autofail in the Executive Summary.

If the auditee has passed the audit, no further follow-up is required. The auditor notes findings or recommended improvements. These are reviewed during future audits to determine the auditee's commitment to continuous improvement. It should also be noted that the auditee always has the option to implement corrective actions if he wants to increase his audit score. Some customers may require this; the auditee is responsible to know and meet his particular customer requirements. The corrective actions process would be initiated by the auditee.

If the auditee has failed the audit (i.e., scores below 85 per cent or autofails) the auditor will note autofails and other findings in the executive summary. The auditee will have an opportunity to implement corrective actions to achieve a passing score after the audit report is issued by the certification body. The follow-up on corrective actions must be initiated by the auditee [possibly in consultation with customer(s) if required to prioritize; otherwise, auditee refers to executive summary items for "Autofails or Other Findings"]. Autofail items must be addressed first. The auditee implements corrective actions then contacts the auditor, who reviews the evidence

provided. The auditee describes corrective actions on the *Corrective Actions Report* by completing columns 2, 3 and 4, provides supporting evidence and indicates date of implementation. The auditor reviews the corrective actions and supporting evidence, completes the information in the remaining columns and *adjustment to score* table on the *Corrective Actions Report* (recommendations relative to adjusting the score and closing the corrective actions requests), and sends the report to the certification body for review. Determinations on acceptable corrective actions and certification will be made by the certification body.

3.0 Biosecurity Policy

CanadaGAP Auditors are responsible for finding out and following any biosecurity policies and protocols in place at each auditee's operation. Ask the auditee for any protective equipment or supplies that must be worn during the audit (e.g., booties, gloves, smocks, etc.).

Biosecurity involves the protection of the biological health of the species of concern from potential harm caused by biological, chemical, physical hazards. This includes the health of both plants and animals and is designed to reduce the spread of plant and animal diseases that could be devastating to the agricultural community. These hazards can be crop pests, such as insects and diseases (e.g., plum pox in tree fruit) or animal diseases on mixed operations that have livestock (e.g., avian influenza in poultry). Described below are practices to prevent the transfer of biological hazards on, to, within and between agricultural operations in Canada.

The following procedures should be followed when visiting mixed farm operations (farms that have both horticultural crops and livestock):

When arriving on-site:

1. Park vehicle in appropriate areas, away from sources of contamination. Generally, an appropriate parking spot is:
 - Not adjacent to livestock housing facilities and animal traffic areas
 - Is not underneath ventilation exhaust and inlets
 - Has no visible contamination (such as manure on the ground)
 - Does not interfere with the conduct of business (ask the owner or manager)
2. Ask the owner/operator if there are any local biosecurity protocols that need to be followed. If the owner/operator is not present, confirm and respect any signs, posted protocols, and/or barriers at the facility.
3. Wear footwear that is clean of any visible contamination. If there is evidence of manure being recently applied to crop fields or if there is a likelihood of having to enter animal areas of the premises directly from the field, then boots should be washed between crop fields, within farms or when moving between farms.

The following procedures apply to all farm operations:

1. Wash hands or use a waterless hand sanitizer upon arrival.
2. If possible, try to avoid walking in fields or handling plants when they are wet.
3. Clothing, hair and equipment should be visually inspected when leaving the site to ensure that no insects or plant material have adhered to them.
4. When entering a greenhouse facility wear clean clothes and clean shoes.

5. When a known contagious disease or regulated crop pest is present:
 - a. If you have more than one visit and are aware of one or more sites having a known or suspected contagious disease or regulated pest, visit the site(s) with known or suspected contagious and regulated plant pest last.
 - b. If the contagious disease or regulated pest is soil-borne, boots must be cleaned with a disinfecting agent prior to leaving the site. Excessive organic matter should be removed from boots prior to disinfecting.

Auditor Checklist - Points to Cover During Opening and Closing Meeting

Opening Meeting

During the opening meeting, the following topics should be covered:

- Introduction of the audit team.
- Audit overview – purpose, scope, objectives and audit methods and procedures.
- Automatic failure items and procedures if an auto-fail item is found.
- Anticipated duration of the audit and projected time for closing meeting.
- Visitor policies (footwear, hair, jewellery and safety procedures that the auditor must follow).
- Any changes to the checklist.
- Requested attendance for closing meeting.
- Invitation to the auditee to discuss any questions regarding the audit.
- Explain that decisions on certification are made by the certification body, not the auditor.
- The appeals process.

Exit Meeting/Post Audit Meeting

Occurs at the end of the audit activities, prior to preparing the audit report, with management to present an overview of the audit observations. Diverging opinions regarding audit findings/conclusions should be discussed. If not resolved, these should be recorded.

The following should be covered:

- Explain that audit evidence collected was based on a sample of the information available.
- Review the executive summary page. Highlight system issues rather than individual issues.
- Explain the corrective actions process.
- Inform the auditee of the appeals process and complaints procedure.
- Leave a mutually signed copy of the executive summary page with the auditee.
- Explain that audit findings are subject to review by the certification body.
- Advise the auditee that the certification body will send them the final audit report directly within three weeks to one month and what to do if it takes longer than one month.
- Advise the auditee that audit certificates will be issued by the certification body and who to call with questions.

Automatic Failures

If any of the automatic fail items is observed:

- Score the audit as an automatic failure and describe the reason for the failure in the Executive Summary
- Continue the audit if the auditee wishes you to do so
- Otherwise, end the audit if the auditee prefers not to continue
- If the auditee wants you to abort the audit they will still be charged as agreed in the contract.
- Note: the auditee cannot get certified if the audit is not completed in its entirety. An audit report should not be generated.

Form 1.9 CanadaGAP Program Code of Ethics

CanadaGAP Food Safety Program

Policy: Conflict of Interest and Impartiality

BACKGROUND

Within this document, all references to the Program refer to the CanadaGAP Program. CanadaGAP is an operating name of *CanAgPlus*, a Canadian not-for-profit corporation.

This policy has been written to conform with the Global Food Safety Initiative (GFSI) requirements. It is also consistent with the Federal/Provincial/Territorial Food Safety Recognition Program's *Government Requirements for a Management Manual of a National Food Safety Program*. Both the Canadian government recognition requirements and the international standards (GFSI, ISO and others) require an organization managing a food safety certification scheme and any outsourced bodies to implement measures to deal with conflict of interest and threats to impartiality.

Food Safety Auditors: Are subject to the policies of the outsourced certification body and the CanadaGAP Program, and are prohibited from having consulted at an operation seeking CanadaGAP certification within two (2) years of undertaking an audit. This restriction applies equally to internal auditors (e.g., in the context of Group certification).

POLICY STATEMENT

1.1 Purpose and Scope

In order to maintain the integrity of the CanadaGAP Program, all work must be conducted with impartiality. This policy is designed to safeguard impartiality and to evaluate conflict of interest, and applies to areas of the CanadaGAP Program where impartiality needs to be maintained including internal affairs, program management, appeals and complaints, conformity assessment, internal audits and auditor training.

1.2 Definitions:

Impartiality - actual and perceived presence of objectivity.

Note 1: Objectivity means that conflicts of interest do not exist or are resolved so as not to adversely influence subsequent activities of the organization.

Note 2: Other terms that are useful in conveying the element of impartiality are: objectivity, independence, freedom from conflict of interests, freedom from bias, lack of prejudice, neutrality, fairness, open-mindedness, even-handedness, detachment, balance.

Consulting/Consultancy – providing directions and specific recommendations or advice on how to achieve compliance with the on-farm food safety requirements.

Examples of consulting include:

- Directly assisting a production unit in addressing corrective action requests, such as making specific recommendations.
- Coaching or advising a production unit on the implementation of their individual food safety program.
- Creating any missing documentation or procedures for a production unit.

Threats to impartiality include:

- Self-interest threats - threats that arise from a person or body acting in their own interest. A concern related to certification, as a threat to impartiality, is financial self-interest.
- Self-review threats - threats that arise from a person or body reviewing their own work.
- Familiarity (or trust) threats - threats that arise from a person or body being too familiar or trusting of another person instead of seeking audit evidence.
- Intimidation threats - threats that arise from a person or body having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.

In addition to the above, the following items are considered as threats to impartiality:

- Acceptance of any gift, payment, loan or other favours from customers, suppliers or competitors. This also applies to the person's immediate family.
- Auditing a production unit or an outsourced body in which the auditor has direct or indirect ownership, stands to gain or lose financially from the outcome of the audit, or has any immediate family relationship with the ownership or management.
- Accessing another person's personal information unless authorized to do so.
- Voting on actions to obtain personal advantage.
- Auditors making decisions on certification.

Activities that are not considered a threat to impartiality:

- Audit and certification activities including:
 - Information meetings with the client
 - Planning meetings with the client
 - Examination of client's documents
 - Auditing and follow-up of non-conformities
- Arranging and participating as a lecturer in training courses, provided that where these courses relate to food safety programs and auditing, they should confine themselves to the provision of generic information and advice that is freely available in the public domain (i.e. not provide company specific advice).
- Activities prior to the audit aimed solely at determining readiness for assessment, as long as such activities do not result in recommendations or advice.
- Identifying opportunities for improvements without offering specific solutions.
- Explaining audit findings and or clarifying requirements of the standard during an audit without providing consultancy.
- Providing food safety or regulatory references (e.g., referring the client to government bodies or websites for further information).
- Providing information or clarifying requirements of the standard prior to an audit or of a training course, so long as such activities do not result in recommendations or advice.
- The provision of agronomic advice not related to the CanadaGAP program.

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Personnel – all persons involved directly with the CanadaGAP Program, including those employed or engaged by CanAgPlus; the Board of Directors, Stakeholder Advisory Committee or other committee members; and those employed or engaged by outsourced certification bodies (e.g., third party auditors, persons involved with certification decision-making, etc.) or other outsourced bodies.

1.3 Requirements

Having relationships does not necessarily present a conflict of interest. However, if any relationship creates a risk to impartiality, the personnel or auditor shall report such risk to CanadaGAP (Executive Director or Chair of the Board of Directors of CanAgPlus), and/or to the outsourced certification body, document how s/he eliminates or minimizes such risk and shall be able to demonstrate this to interested parties. The demonstration shall cover all potential sources of conflict of interests that are identified, whether they arise from within or from the activities of other persons, bodies and organizations.

A relationship that threatens impartiality may be based on ownership, governance, management, personnel, shared resources, finances, contracts, consulting, marketing, etc.

Personnel and Auditors are required to disclose in writing, any situation known to them that may present them or the CanadaGAP Program with a conflict of interest. This information is used as input to identify threats to impartiality raised by the activities of the person, and the CanadaGAP Program shall not use such person unless they can demonstrate that there is no conflict of interest. Any potential conflict of interest situations will be reviewed by the Chair of the Board of Directors as required in conjunction with a committee of two or more Directors of CanAgPlus, to ensure appropriate actions are taken to mitigate the conflict.

Note: The auditing of an operation by a person who is known to have provided consultancy to that operation unit within the previous two years is considered a high threat to impartiality. Likewise, if a Group uses an internal auditor who has advised, consulted with or otherwise assisted the Group or its members within the previous two years, this is considered a high threat to impartiality.

Auditors and Personnel who could influence CanadaGAP Program activities shall act impartially and shall not allow commercial, financial or other pressures to compromise impartiality. Annually, all auditors or personnel, internal and external, must sign a copy of the CanadaGAP Program Code of Ethics and the Conflict of Interest Declaration [Annexes 1 and 2].

Auditors and other certification personnel will not be assigned to audit or make certification decisions on operations in which they have an immediate family relationship, financial interest or have provided consultancy on the unit's food safety program within the last two years. If it is found at a later date that work was mistakenly allocated to a person who meets these criteria, the details will be recorded and reported to the Chair of the Board of Directors as required in conjunction with a committee of two or more Directors of CanAgPlus, who will decide on corrective actions.

ANNEX 1

Code of Ethics for CanadaGAP Program Auditors and Personnel

The Auditor or CanadaGAP Program personnel, internal and external, agrees to:

- 1) Act solely in the best interest of the CanadaGAP Program, and its clients, in the performance of their duties;
- 2) Conduct themselves professionally, with truth, accuracy, fairness and responsibility;
- 3) Not misrepresent their qualifications, competence or experience, nor undertake assignments beyond their capabilities;
- 4) Treat in a confidential and private manner all information gained in relation to any of the organization's identified activities respecting organizations or individuals; unless authorized in writing to disclose such information by the organization, and the organization's client (when applicable), and will not discuss such information with anyone except those who have a need to know the information for legitimate purposes of CanadaGAP Program processes;
- 5) Treat in a confidential and private manner all information gained in relation to any of the above entities' activities wherein such information may include, inter alia:
 - any device, graphics, written material or other information in tangible or intangible form, clearly identified as "confidential", relating to the activities of the organization;
 - any device, graphics, written material or other information in tangible or intangible form, identifiable as private by the nature of its content and/or context;
- 6) Treat in a confidential and private manner all information which may be considered "confidential" when the prudent judgment of an organization could determine that such information is private and confidential to the organization, and recognize that the organization may receive information that is not identified clearly as confidential but which may be perceived as confidential;
- 7) Not intentionally communicate false or misleading information which may compromise the integrity of the CanadaGAP Program, its auditor training program, its certification processes or decisions therein or its government recognition or external benchmarking status;
- 8) Be able to act professionally under adverse pressure from their employer and organizations being audited;
- 9) Disclose all material facts known that, if not disclosed, may compromise the integrity of any audit or the CanadaGAP Program or reporting of activities;
- 10) Not represent conflicting or competing interests and will disclose to any client and the CanadaGAP Program any relationships that may influence judgment or that may be seen as a conflict of interest;
- 11) Not use information for personal gain or in any manner that would be contrary to the law or detrimental to the objectives of the CanadaGAP Program;

- 12) Not audit or participate in certification decision-making for an operation in which they have coached or advised on the implementation of a food safety program within a two-year time period, and not directly assist an operation in addressing corrective action requests;
- 13) To willingly participate in internal or third party assessments of their performance;
- 14) Not accept any inducement, gift, or other benefit that may impair or be presumed to impair professional judgment;
- 15) To perform all work with honesty and diligence, observe the law and not knowingly be party to any illegal activity;
- 16) Not act in any way that would prejudice the reputation of the CanadaGAP Program or the audit process and cooperate fully with any inquiry in the event of any alleged breach of this code.
- 17) Not use or attempt to exercise any real or perceived influence that those associated with the CanadaGAP Program may have, to intervene in matters related to CanadaGAP certification or individual audits. Committee and working group members, and others similarly connected to the program, acknowledge that they are in potential positions of influence. Areas in which impartiality must be maintained, and/or in which it is unacceptable to attempt to use one's influence to affect outcomes, include but are not limited to: certification status; auditor assignment; audit scheduling; audit results, auditor or certification body interpretation of CanadaGAP requirements, scoring and reporting; certification decisions; filing or resolving appeals, disputes, complaints; etc.

CONFIRMATION OF COMPLIANCE WITH CODE OF ETHICS:

Statement: "I will comply with the CanadaGAP Program Code of Ethics".

Name:

Signature:

Date:



ANNEX 2

**Conflict of Interest Declaration
for CanadaGAP Program Auditors & Personnel**

Pursuant to the Program Code of Ethics adopted by CanadaGAP, I hereby disclose the following interests (attach additional pages as required and indicate N/A/ in **each** question if it is Not Applicable):

Name any other horticultural boards or associations that I have association with:

The following is a list of all horticultural industry-related financial business interests, investments, shareholdings, etc. that I have:

The following are financial interests that are known to me of extended family members in the horticultural industry:

The following are businesses that I, or my family, have an ownership interest in, or am/are employed with, which I may conduct horticultural related business with during the course of the year. This includes business that I have advised or worked with in any manner. Describe the nature of the relationship and/or work done for the businesses identified below:

The following are businesses that I, or my family, have an ownership interest in, or am/are employed with, which I may conduct **CanadaGAP Program** related business with during the course of the year. This includes business that I have advised or worked with in any manner. Describe the nature of the relationship and/or work done for the businesses identified below:

I will take the following mitigation measures or actions to avoid threats to impartiality and conflict of interest:

Name:

Signature:

Date:



ANNEX 3

**Auditor Declaration of
Potential Conflict of Interest Related to Audit Assignment**

Pursuant to the Program Code of Ethics and Policy on Conflicts of Interest and Impartiality adopted by CanadaGAP, I hereby disclose the following potential conflict of interest with a client assigned to me for an audit:

Assigned Audit Client (Name of Operation): _____

Describe nature of potential conflict of interest (e.g., auditor is involved in production or handling of the same horticultural crops as the auditee; auditor provided consulting services to auditee within the last two years, etc.):

Name of Auditor: _____

Signature: _____

Date: _____

CERTIFICATION BODY USE:

Date received from auditor: _____

Is there a need to contact the client (e.g., if auditor is involved in production or handling of the same horticultural crops as the auditee)? Yes ___ No ___

CB representative who contacted the client: _____

Date client was contacted: _____

Does client accept the assigned auditor? Yes _____ No _____

If no, confirm that another auditor has been assigned to this audit: Yes _____

Date filed: _____

BUSINESS DAY

Food Problems Elude Private Inspectors

By MICHAEL MOSS and ANDREW MARTIN MARCH 5, 2009

When food industry giants like Kellogg want to ensure that American consumers are being protected from contaminated products, they rely on private inspectors like Eugene A. Hatfield. So last spring Mr. Hatfield headed to the Peanut Corporation of America plant in southwest Georgia to make sure its chopped nuts, paste and peanut butter were safe to use in things as diverse as granola bars and ice cream.

The peanut company, though, knew in advance that Mr. Hatfield was coming. He had less than a day to check the entire plant, which processed several million pounds of peanuts a month.

Mr. Hatfield, 66, an expert in fresh produce, was not aware that peanuts were readily susceptible to salmonella — which he was not required to test for anyway. And while Mr. Hatfield was inspecting the plant to reassure Kellogg and other food companies of its suitability as a supplier, the Peanut Corporation was paying for his efforts.

“The overall food safety level of this facility was considered to be: SUPERIOR,” he concluded in his March 27, 2008, report for his employer, the American Institute of Baking, which performs audits for major food companies. A copy of the audit was obtained by The New York Times.

Federal investigators later discovered that the dilapidated plant was ravaged by salmonella and had been shipping tainted peanuts and paste for at least nine months. But they were too late to prevent what has become one of the nation’s worst known outbreaks of food-borne disease in recent years, in which nine are believed to have died and an estimated 22,500 were sickened.

With government inspectors overwhelmed by the task of guarding the nation’s food supply, the job of monitoring food plants has in large part fallen to an army of private auditors like Mr. Hatfield. And the problems go well beyond peanuts.

An examination of the largest food poisoning outbreaks in recent years — in products as varied as spinach, pet food, and a children’s snack, Veggie Booty — show that auditors failed to detect problems at plants whose contaminated products later sickened consumers.

In one case involving hamburgers fed to schoolchildren, the Westland/Hallmark Meat Company in California passed 17 separate audits in 2007, records show. Then an undercover video made that year showed the plant’s workers using forklifts to force sickly cows into the slaughterhouse, which prompted a recall of 143 million pounds of beef in February 2008.

“The contributions of third-party audits to food safety is the same as the contribution of mail-order diploma mills to education,” said Mansour Samadpour, a Seattle consultant who has worked with companies nationwide to improve food safety.

Audits are not required by the government, but food companies are increasingly requiring suppliers to undergo them as a way to ensure safety and minimize liability. The rigor of audits varies widely and many companies choose the cheapest ones, which cost as little as \$1,000, in contrast to the \$8,000 the Food and Drug Administration spends to inspect a plant.

Typically, the private auditors inspect only manufacturing plants, not the suppliers that feed ingredients to those facilities. Nor do they commonly test the actual food products for pathogens, even though gleaming production lines can turn out poisoned fare.

As in the Georgia peanut case, auditors are also usually paid by the food plants they inspect, which some experts said could deter them from cracking down. Yet food companies often point to an auditor’s certificate as a seal of approval.

The baking institute, which is based in Manhattan, Kan., and is also known as AIB International, says it inspected more than 10,000 food production sites in 80 countries last year. James R. Munyon, its president and chief executive, said his group’s inspections were reliable and tough, no matter who pays for them, but he declined to elaborate on specific audits.

Kellogg officials declined to be interviewed for this article. The company has said it is reviewing its use of private audits, including those by the American Institute of Baking. Kellogg said it required the Peanut Corporation to provide it with annual audits of the Georgia facility. Kellogg has recalled more than a dozen products, including Keebler crackers and Famous Amos cookies.

The retail giant Costco, which had already limited the institute's audits to bakery vendors, has now told suppliers to stop using the group altogether.

Both the food industry and federal officials say they are aware of the problems with third-party audits. Nonetheless, the F.D.A. has proposed expanding the role of private auditors to inspect the more than 200,000 foreign facilities that ship food to the United States. The agency has proposed a voluntary certification program that would toughen audit standards and alert federal authorities of problems — an idea that has met stiff resistance from the food industry.

Food safety advocates say that audits can play a useful role in improving sanitation and catching problems. But in case after case, the audits have failed to prevent major outbreaks.

In 2007, Keystone Food Products, the Easton, Pa., plant that makes Veggie Booty, received an “excellent” rating from the American Institute of Baking. But the audit did not extend to ingredient suppliers, including a New Jersey company whose imported spices from China were tainted with salmonella.

As many as 2,000 people in 19 states were sickened, according to federal estimates. The incident prompted the New York company that sells the snack, Robert's American Gourmet, to add its own inspections and regularly test ingredients for contamination.

Even when audits do turn up problems, it is up to the discretion of food companies to fix them.

After Nebraska Beef was linked to an E. coli outbreak in 2006, officials from the United States Department of Agriculture found that the company had not carried out the recommendations of auditors who had identified numerous problems at the plant in the preceding months.

Nebraska Beef has disputed its culpability in the outbreak, which sickened at least 17 people. A company spokesman said Thursday that the problems identified in the audit had been corrected but could not provide documents to verify that claim.

Robert A. LaBudde, a food safety expert who has consulted with food companies for 30 years, said, “The only thing that matters is productivity.” He added that “you only get in trouble if someone in the media traces it back to you, and that's rare, like a meteor strike.”

Dr. LaBudde said a sausage plant hired him five years ago to determine the species of bacillus plaguing its meat. But the owner then refused to complete the testing. “I

called them ‘anthrax sausages,’ and said they could be killing older people in the state, and still they wouldn’t do it,” he said, declining to name the company.

There are more than 200 companies and numerous independent operators in private food inspection. Few have grown faster than the American Institute of Baking. In addition to the peanut factories, the organization’s 120 auditors handle clients who process meat, seafood, vegetables, spices, oils and dairy products.

The baking institute also sells educational services to food industry personnel; the Peanut Corporation of America said some of its employees attended the organization’s food safety training classes. Audits provide nearly half the income for the organization, according to tax filings and the organization’s Web site.

Mr. Munyon, the organization’s president, said its auditors were drawn from industry experts with vast experience in food safety. “AIB emphasizes the educational value of its inspection procedure to the management and employees of the facilities it provides services to,” he said.

Mr. Munyon acknowledged that auditors were allowed to solicit contracts from plants that they then audited, but said this posed no ethical issues because the auditors were on salary, not paid by commission. Mr. Hatfield first audited the Peanut Corporation plant in Georgia in 2007 after contacting the plant’s managers to solicit their business.

The American Institute of Baking’s dual role as an educator and inspector troubles some in the food industry, as does its expansion beyond baking audits. Before the salmonella outbreak, Costco had rebuffed repeated proposals by the organization to inspect all its food suppliers.

“The American Institute of Baking is bakery experts,” said R. Craig Wilson, the top food safety official at Costco. “But you stick them in a peanut butter plant or in a beef plant, they are stuffed.”

Costco, Kraft Foods and Darden Restaurants are among a group of food manufacturers and other companies that use detailed plans to prevent food safety hazards. They also supplement third-party audits with their own inspections and testing of ingredients and plant surfaces for microbes.

The American Institute of Baking was not alone in missing the trouble at the Peanut Corporation plant in Blakely, Ga. State inspectors also found only minor problems, while a federal team last month uncovered a number of alarming signs, as well as testing

records from the company itself that showed salmonella in its products as far back as June 2007. Federal health officials say there are now 677 officially reported cases of salmonella poisoning in the outbreak, which reflects only about 3 percent of the total number of people sickened.

But the baking institute's private audit of the peanut plant had particular heft in assuring food makers that the processed peanuts were safe. Plant workers, in interviews with The Times, also cited the audits' findings when asked why they did not pursue their own concerns about the plant.

Another audit of the peanut plant, by the Michigan-based NSF Cook & Thurber, raises further questions about the usefulness of private audits. That audit found nearly two dozen problems that it characterized as "minor," but it nonetheless gave the peanut plant an overall score of 91 out of 100.

NSF officials said that for their audits, this was a low score. But the company that paid for the audit, the insurance giant American International Group, then sold the peanut company insurance to cover the costs of recalling products, according to lawyers for the Peanut Corporation.

Mr. Hatfield, who audited the peanut plant for the American Institute of Baking, referred questions to the organization, which said he "is degreed in biology" and "trained to do the job." In auditing the Blakely plant last March, Mr. Hatfield became concerned about his ability to check the plant thoroughly and asked for more than the one day allotted, according to people familiar with the audit. The Peanut Corporation agreed to pay for the additional time, but only in future audits, according to those people.

Mr. Hatfield checked to see that the plant had a system in place to test its products for contamination, but the audit indicated that he did not ask to see any test results for salmonella and therefore did not know that the plant had found the bacteria.

"I never thought that this bacteria would survive in the peanut butter type environment," Mr. Hatfield wrote to a food safety expert on Jan. 20, after the deadly salmonella outbreak was made public, according to a copy of his e-mail message. "What the heck is going on??"

Correction: March 7, 2009

An article on Friday about the increasing use of private inspectors to monitor food manufacturers and their suppliers misidentified the operator of the plant that made Veggie Booty, a snack that was the source of a salmonella outbreak in 2007. It is Keystone Food Products of Easton, Pa. — not Keystone Foods, a different company based in West Conshohocken, Pa.

A version of this article appears in print on , on Page A1 of the New York edition with the headline: Food Safety Problems Elude Private Inspectors.

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