



## Frequently Asked Questions for Auditors

***Note: All of the questions found in Q1. below pertain to the CHC OFFS Audit Checklist Version 5.1 – Water (for Fluming and Cleaning) and Ice (refer to Sections 15 and 16), Question 3***

**Q1a. How is an auditor supposed to fill out the chart in the left hand column?**

- A. An auditor begins by determining which water uses a producer/packer has in their operation by either checking or not checking off the N/A box. Once this is done they will know which water uses require water tests. They need to then see the water tests results for these uses and check off the appropriate boxes to show if they were completed or not.

**Q1b. Does a producer/packer have to test EACH of their water uses individually?**

- A. No. Producers/packers must show that ALL of their water uses are **potable**. The only way to do this is to take a water sample test, but this doesn't mean they have to individually test all of them. How they choose to show this potability is up to them. Depending on the producer/packer's set-up, one sample could show potability for a number of uses. For example if a packer uses water from the SAME well for handwashing, cleaning of equipment and final rinse they may chose to test each of those individually OR they may only chose to test the final rinse water.

By testing only the final rinse water they can determine if the final rinse equipment is clean **AND** if the well supplying the handwashing water and water for cleaning of equipment is okay. In this case, the requirement for potable water could be met by testing only the final rinse equipment. Individual tests are another option and would accomplish the same thing.

If they take individual tests it will be easy to determine sources of contamination, but it won't be so easy if contamination is found in the final rinse water test. The producer/packer will have to do some investigatory work to determine where the contamination is (e.g., the well itself, the final rinse equipment).

**Q1c. When are the 2 samples required for water testing to be taken? Does it matter?**

- A. Yes it matters. The first sample is to be taken **prior to use** and the second sample **during the season**. “Prior to use” means BEFORE the water has come into contact with the product intended for sale (e.g., to packer, customer, etc.), is used to clean buildings, equipment and containers, and/or is used for handwashing. Producers/packers must ensure they have potable water before they use it or they are risking contamination of their product, hands, equipment, buildings and containers. The second test can be taken anytime during the season to ensure that contamination hasn’t occurred and that potability is being maintained. It is recommended that this is done again mid-season but the decision to take the sample will depend on length of season, deviations (e.g., risks to water sources, changes to the operation), practices used, etc.

**Q1d. Where are the water sample tests supposed to be taken from? Does it matter?**

- A. Yes it matters. Final rinse water must be taken from the final rinse equipment. This will determine if the rinse equipment is clean. Treated water needs to be taken from where it is being treated to ensure it is being treated appropriately. Water that is being stored (e.g., in a container, tank, cistern) needs to be taken from where it is being stored to ensure that it is clean. Water used for all other uses (e.g., to fill ponds, dump tanks, handwashing, etc.) can be taken from the point closest (generally a tap) to the source.

**Q1e. If a producer/packer has multiple packing lines each with a final rinse and only one well sourcing them all, do they need to test each packing line’s final rinse water?**

- A. Yes. The contamination might be in the final rinse equipment itself so each line needs to be tested.

**Q1f. What is a composite water sample? Are these allowed in the CanadaGAP program?**

- A. A composite water sample is ONE sample which is made by combining water samples from two or more sources/uses/locations. For example a packer uses 2 wells, one well is used for handwashing and the other well for filling his dumptank. Instead of taking 2 separate samples for each well he takes only ONE sample which is a mixture of water from both wells.

Yes, this is allowed. The way in which producers/packers choose to sample the water is up to them. As long as they are taking the appropriate number of samples, from the appropriate place, at the appropriate time, etc. the sampling method is up to them. It must be kept in mind though that if they receive a positive result they will not know which well (or both) has the problem, and will have to do more investigation and testing to determine the source of contamination.

**Q1g. A packer ONLY uses municipal water. Do they need to have any of their water tested?**

- A. It depends on their water uses and what they do to that water. If they use it for final rinse then yes it needs to be tested as the result is used to see if the equipment itself is clean. If they treat the water then they must test it to determine that the treatment is working. If they store that water they must test it to ensure that the storage vessel is not a source of contamination. Otherwise, no a test is unnecessary; it is assumed the municipality is doing its job providing potable water. If the municipality advises of an adverse water event, this is treated as a deviation and the producer/packer must take appropriate corrective action (e.g., use alternate source, treat water, testing, etc).

**Q1h. A packer uses water for handwashing BUT they also have hand sanitizer, do they need to test this water?**

- A. No. If hand sanitizer is used after handwashing then potable water is not required.

**Q1i. A processing potato producer/packer uses water to flume, wash and final rinse his potatoes. He also uses water to clean his packing line and for handwashing. Does he need to test all of these water uses?**

- A. No. Potable water is not required for any uses in a processing potato operation EXCEPT for handwashing. The only test he needs to do is of the water used for handwashing. If hand sanitizer is used after handwashing then potable water is not required. This means he would not have to do ANY water tests.

**Q1j. What does all of the yellow highlighting mean?**

- A. The yellow highlighting shows the water uses where if NO water tests for potability have been completed, the producer/packer will AUTOFAIL the audit.

**Q1k. How does the scoring chart work? Can part marks be given?**

- A. Both charts (one out of 10 points and the other out of 8 points) work the same way, except for the autofail as explained above in Q1j. Use the Yes/No guidance in the charts to determine the scoring.

**In the first chart (out of 10 points):**

The producer/packer must provide the auditor with results from **two** tests that show potability for each water use. Each test is worth 5 marks. The marks are not for how many uses/sources the operation has. For example if the producer/packer has 2 wells which would require 2 tests each, the tests are NOT worth 2.5 each. Instead, overall compliance with the requirement is

scored. Each well is considered in turn. If they have tested the first well twice at the appropriate times but they have not tested the second at all, they will AUTOFAIL because one of their water uses is not proven potable. They have not met the program requirement to show potability for all water uses.

If they had tested the first well twice at the appropriate times and only tested the second well prior to use, they would score 5/10. They would NOT get 7.5 points. The marks are allotted based on completing testing for ALL of the water uses. The scoring is determined by the tests not completed (unless of course they have all been done appropriately).

**In the second chart (out of 8 points):**

As in the first chart, the producer/packer must provide the auditor with results from **two** tests that show potability for each water use. Each test is worth 4 marks. If no testing at all has been done on one (or more) of the water uses, the score is 0. Follow the Yes/No guidance in the chart to determine the scoring.

**Q11. If a producer/packer has 5 packing lines each with a final rinse and only one well sourcing them all, will they still autofail if they only test 4 of the final rinse lines?**

- A. Yes. All 5 lines must show potability. If the 5<sup>th</sup> line is not tested the producer/packer will have no idea if that water is potable. The scoring is based on ALL water uses being successfully tested. The producer/packer didn't test one of them and that 5<sup>th</sup> line is used to determine the score – it is an AUTOFAIL.

**Q2. Each year does a producer/packer have to get/print off a NEW manual(s)?**

- A. No. The requirement (found in Section 24) is that a producer/packer ONLY needs to update the PAGES that have changed. These are available in the revisions documents at [www.canadagap.ca](http://www.canadagap.ca). Each year producers/packers may use the same manual (they need to review each section and add/delete/change items as necessary), adding and replacing any pages as needed to keep the version current, make their own updates to pages where something has changed in their operations, and sign the confirmation log at the bottom of each section to show that they are successfully completing the requirements within the program.

**Q3. If the requirements in the manual are not the same as federal/provincial/municipal/territorial regulations/legislation which are to be followed?**

- A. It depends. If the manual requirements are “more strict” than the manual must be followed. If the federal/provincial/municipal/territorial regulations/legislation are “more strict” than the regulations must be followed.

**Example 1:** The manual requires that water be potable according to Canadian Guidelines for Drinking Water Quality. The producer/packer must receive test results that show 0 Total Coliforms and 0 *E. coli*. Some provincial regulations allow potable water test results to be 10 Total Coliforms and 0 *E. coli*. The manual requirement is more strict; therefore, producers/packers must follow the requirement in the manual showing a result of 0 Total Coliforms and 0 *E. coli*. [In such cases producers/packers will need to let their lab know to quantify the actual results in the lab report (i.e., number of Total Coliforms and *E.coli* found).]

**Example 2:** The manual requires that agricultural chemical applicators are certified/licensed or are trained or supervised by a licensed person.

- a) The provincial regulations in Ontario ask that all agricultural chemical applicators are licensed/certified. The provincial regulation is more strict than the manual therefore Ontario applicators must follow the provincial regulation and be licensed/certified.
- b) The provincial regulations in Alberta are not the same as Ontario and there is no requirement for licensing/certifying/training or supervising of applicators. Therefore, these applicators must use the more strict requirement within the manual and chose one of the options as stated above.

#### **Q4a. What is the scope of the CanadaGAP program?**

- A. The CHC OFFS Manuals are intended for use by horticultural producers, storage intermediaries and packers in Canada. They cover the production, packing (including field packing and both on and off farm packinghouses) and storage of horticultural products. They do not cover re-packing activities.
- 1) Small Fruit OFFS Manual: covers field-grown berries (including berries grown in non-controlled environments, e.g., tunnels) for fresh market **and** for further processing.
  - 2) Potato OFFS Manual: covers field-grown potatoes for fresh market **and** for further processing.
  - 3) Combined Vegetable OFFS Manual: covers field-grown product for fresh market and only the production of sweet corn, beans and peas sent for further processing.
  - 4) Leafy Vegetable and Cruciferae OFFS Manual: covers field-grown product for fresh market and only the production of brussels sprouts, broccoli, cauliflower and cabbage sent for further processing.
  - 5) Tree and Vine Fruit OFFS Manual: covers orchard-grown fruit for fresh market

- 6) Greenhouse OFFS Manual: covers greenhouse-grown product for fresh market

**Q4b. What commodities does the CanadaGAP program cover?**

A. The ONLY commodities covered within each of the 6 manuals are:

- 1) **Small Fruit:** Strawberries, Raspberries, Blackberries, Blueberries (High Bush, Wild), Cranberries, Saskatoon Berries, Currants (Red, Black) and Other (Gooseberries, Elderberries, etc.).
- 2) **Potatoes**
- 3) **Combined vegetables:** Asparagus, Sweet Corn, Legumes (Beans and Peas), Bulb and Root Vegetables [Garlic, Beets, Carrots, Onions, Radish, Parsnips, Rutabaga, Turnips, Shallots and Other (Horseradish, Sweet Potatoes, etc.)] and Fruiting Vegetables (Peppers, Eggplant, Melons, Pumpkins, Squash, Cucumbers and Tomatoes)
- 4) **Leafy Vegetable and Cruciferae:** Leafy (Lettuce, Spinach, Edible Flowers, Mixed Greens, Baby Salad Greens, Asian Greens, Arugula, Green Onions, Leeks, Swiss Chard and Kale), Head [Broccoli, Cauliflower, Cabbage, Brussels Sprouts, Radicchio, Kohlrabi and Lettuce (Iceberg, Romaine, etc.)], Leaf of Root Crops (Belgian Endive, Dandelion Greens, Beet Greens, Turnip Greens and Corn Salad), Fresh Leafy Herbs (Parsley, Cilantro, Fresh Dill, etc.) and Petioles (Celery, Fennel, Rhubarb)
- 5) **Tree and Vine Fruit:** Pome Fruits (Apples, Pears, Quince), Stone Fruits [Peaches, Plums, Apricots, Nectarines, Cherries (Sour and Sweet), and Sea Buckthorn] and Vines (Grapes, Kiwi)
- 6) **Greenhouse:** Tomatoes, Cucumbers, Peppers, Eggplant, Leafy Greens, Fresh Herbs and Edible Flowers.

**Q4c. What if a producer grows a commodity (e.g., oranges, bananas) that is not listed above? Can they have that commodity certified by CanadaGAP?**

A. No. Only those commodities listed above can be CanadaGAP certified. The reason for this is that for each of the commodities covered within the scope of the CanadaGAP program, the practices used to grow them have been put through a HACCP analysis. This means that all of the hazards (biological, chemical and physical) that may be present in the production of the commodity have been considered and requirements (those within the manuals) have been put in place to reduce the risk at the farm level through good agricultural practices. The commodities that are not listed have not undergone this hazard analysis by CHC; thus there may be requirements that are missing, unnecessary or unknown based on the commodity.

**Q4d. If the scope of the CanadaGAP program only covers packing then what is the definition of repacking and who covers this?**

A. Re-packing would be defined as:

**Re-packing:** Removing market product from its market ready packaging materials\*\*, handling the product (e.g., sorting, grading, trimming, washing, fluming, etc.) and putting it into market ready packaging materials.

\*\* **Market ready packaging materials** are defined as:

Containers that **will go to food service, retail (including retail wholesaler/broker/distribution centre) or directly to the end consumer.** There are two types:

- 1) Market ready **PRIMARY** packaging materials that come into direct contact with product (e.g., boxes, bags, clam shells, crates, baskets, pints); and
- 2) Market ready **SECONDARY** packaging materials (e.g., masters) that may be reused and do not come into direct contact with product.

Re-packing is covered by:

The CPMA Repacking and Wholesale Standard (For more information refer to <http://cpma.ca/en/food-safety/repackingandwholesalefoodsafetyprogram.aspx>)

#### **Q5a. Who are packers allowed to get product from (suppliers)?**

- A. Section 19. Sorting, Grading and Packing sub-section 19.1 Purchasing and Receiving Harvested Product states “packer purchases harvested product from CanadaGAP-certified producers and requests a copy of the certificate or requests a letter of assurance from non-certified producers”.

#### **Q5b. What documentation does the packer need to get from their suppliers?**

- A. The program requires that the packer **ONLY** get from the producer either a copy of their CanadaGAP certificate or a letter of assurance (from non-certified producers). No other documents (e.g., producer manuals), records (e.g., agricultural chemical applications), certificates etc. are required *by the program*. This is the minimum. A packer must decide on his/her own if it is sufficient for their business. Based on their own assessment of risk or customer expectations, packers may decide to ask for more from their suppliers (e.g., additional records, certification to CanadaGAP as a base requirement, etc.), or along with a letter of assurance they may accept certificates from other food safety programs.

Although the auditor is not expected to audit on this point, it is worth remembering that the packer's customer(s) may be asking for more than the minimum required by the program. E.g., the packer's customer may require him to provide certificates from all of the farms or other suppliers from whom he sources product that is then sold to the customer. In all cases and especially when customer requirements exceed the minimum program

requirements, it is the responsibility of the packer to know his market and to put in place a supplier approval program that meets his customer requirements.

**Q5c. What does the letter of assurance need to say?**

- A. The definition of letter of assurance in the glossary is as follows: “a written statement from a supplier/dealer that the product he or she is selling was produced under specified conditions and steps were taken to reduce biological, chemical or physical contaminants in accordance with all applicable legislation”. The producer can use this statement, confirming the conditions under which product was produced (e.g., “produced in accordance with the requirements of the CanadaGAP manual, using practices that reduce the risk of biological, chemical and physical contamination”). The producer needs to sign the letter and understand that it is a legally binding declaration s/he is making to the packer.

**Q5d. Can packers receive imported harvested product from suppliers, pack it and still become CanadaGAP certified?**

- A. Yes. The minimum the packer would need is the letter of assurance (or the CanadaGAP certificate if the exporter was certified) from the producer. This is the current minimum requirement of the program; the packer always has the right to ask for more assurance from any of his suppliers including foreign producers. Based on the packer’s assessment of risk or customer expectations, the packer may ask for more from foreign suppliers (e.g., additional records, certification to CanadaGAP as a base requirement, etc.), or, along with a letter of assurance, the packer may require a certificate from another food safety program.



For more FAQs visit: [www.canadagap.ca](http://www.canadagap.ca)