

Summary of Key Changes to CanadaGAP Program Management Manual (v9.2)



EFFECTIVE DATE OF CHANGES: April 1, 2022

Section	Modification	Rationale
Throughout Management Manual	GLOBALG.A.P. references have been removed throughout the document as they are obsolete.	GLOBALG.A.P. has revised all their materials. We no longer cross-reference as CanadaGAP is not seeking GLOBALG.A.P. benchmarking.
Component 1	A number of additions were required by CFIA to comply with the 40-month maintenance of recognition process (4 ANRs/CARs related to internal audits, management review process, and contents of Form 1.3)	Required to maintain Canadian Government Recognition
Section 2.4	Additional information was included to explain CanadaGAP's role relative to producer training. (ANR/CAR raised by CFIA during 40-month maintenance of recognition process)	Required to maintain Canadian Government Recognition
Section 3.3.1.2	<ul style="list-style-type: none"> Program Auditor Requirements have been updated to include information about GFSI Professional Recognition Bodies. A two-stream approach to auditor qualification was developed (for GFSI and non-GFSI certification audits) Details about scoping were added to similar requirements for CB personnel doing technical reviews, witness and shadow audits Section was fully reorganized to make it easier to find information. 	<p>To reflect upcoming GFSI changes on PRBs</p> <p>To improve CBs' ability to recruit and qualify auditors</p> <p>To streamline and consolidate the content for document users</p>
Throughout Component 3	Numerous changes have been made throughout the Management Manual to reflect the addition of two new CanadaGAP certification options, E and F (non-GFSI-recognized). Modified sections include: 3.3.5.2 Scope of Certification 3.3.5.3 Multi-site Certification 3.3.5.4 Program Audit and Certification Process 3.3.5.4.3 Audit Scheduling	Addition of new certification options, E and F

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	3.3.5.4.5 Multi-Commodity and Multi-Activity Sites of Production, Storage, Packing, Repacking, Wholesaling and Brokerage 3.3.5.6 Corrective Action Requests Follow-up 3.3.5.8 Certification Options <ul style="list-style-type: none"> • <u>Options C and D are GFSI-recognized.</u> • <u>Options E and F are not GFSI-recognized.</u> • <u>Individual operations involved in Production, Packing, or Storage can choose to be certified under Option C or E. Operations are strongly advised to confirm their customer requirements prior to seeking certification.</u> • <u>Individual repacking and wholesaling operations can choose to be certified under Option D or Option F. Operations are strongly advised to confirm their customer requirements prior to seeking certification.</u> • <u>Brokerage operations have only one CanadaGAP certification option available: Option F.</u> 	
Appendix III.3	New Appendix III.3 provides a chart comparing all certification options.	For clarity and transparency
Section 3.3.5.4 Program Audit and Certification Process	3.3.5.4.1 Procedures – h) Clarified criteria for CB undertaking a triggered audit: <ul style="list-style-type: none"> • Changes to the location of the site(s) included in the certification; 	In response to a CB question, replaced “address” with “location” to clarify the intent. The location of the certified site(s) is the important element, not the company or contact person’s mailing address.
Section 3.3.5.4.3 Audit Scheduling	For operations certified for both Production and Packing: b) iv.b. For Option C operations, or for group members under Option B: The audit must be timed such that harvesting and packing are both occurring during the audit. When that is not possible, or in the case of complex operations, more than one audit per year is required so that both production and packing can be observed in real time. Refer to Section 3.3.5.4.5 for further guidance on multi-commodity situations.	Revised to meet GFSI benchmarking requirements (ref. GFSI office visit Oct 21/21 CAR clause 5.2)

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Section 3.3.5.4.5 Multi-Commodity and Multi-Activity Sites of Production, Storage, Packing, Repacking, Wholesaling and Brokerage	<p>Per above requirement, a new section was added: 3.3.5.4.5.2 For Options B, C and D (GFSI-recognized)</p> <p><i>In summary:</i> GFSI requires that an audit be completed annually on each GFSI-recognized scope. Therefore, for operations whose certification scope includes both “Production and Packing”, more than one audit may be required in a given year, to ensure that the auditor can observe activities related to both scopes (Production AND Packing).</p> <p><i>[New section is too long to include in its entirety; please refer to tracked changes in Management Manual for full information.]</i></p>	<p>To satisfy GFSI benchmarking requirements (ref. GFSI office visit CAR clause 5.2 October 21/21)</p> <p>Applies only to GFSI-recognized certification options</p>
Section 3.3.5.4.3 Audit Scheduling	<p>Addition to Unannounced Audits (GFSI-recognized) UA Option 1 h) vi. d. iii. The client is permitted to request a maximum of five (5) blackout dates, when the auditor would not be able to perform an audit at the operation. Blackout dates are in addition to days when the operation would normally be closed (e.g., public holidays). The client must identify the blackout dates and communicate them to the CB at least eight (8) weeks in advance. The number and dates of the blackout period must be mutually agreed between the client and the certification body. A lesser number of blackout dates would be expected for a very short period of activity within the operation (e.g., if cherry harvest only takes two weeks), whereas five blackout dates could be acceptable when activities occur over a longer period.</p>	<p>Blackout period introduced to help ease challenges encountered with logistics of completing audits in 2021. Requested by CBs and approved by GFSI Feb 2/22</p>
Section 3.3.5.4.3 Audit Scheduling	<p>Added to Unannounced Audits (GFSI-recognized) h) xvii. For operations certified under Option C that have both “Production and Packing” in their certification scope and require more than one audit in a given year, it is acceptable for only one of the audits to be performed unannounced that year, at the</p>	<p>To meet new GFSI requirement, clarified how unannounced audits would work for these operations</p>

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	<p>discretion of the certification body. A separate audit checklist must be completed for each of the audits. The report from each audit must specify whether the audit was unannounced.</p>	
<p>Section 3.3.5.5.3 Date of Certification and Certificate Expiry Date</p>	<p>f. <u>For Option C operations and group members certified under Option B who may need more than one audit in a given year, the certification decision should be made at the following time:</u></p> <ul style="list-style-type: none"> i. <u>For clients new to the CanadaGAP program, a certificate may be issued after the initial audit, but only for the first activity observed (e.g., “Production of Asparagus”). Once an audit has occurred on the second activity (e.g., packing of apples), the certificate can be updated be reissued to include both scopes (e.g., “Production of Asparagus and Packing of Apples”).</u> ii. <u>For recertification of an existing program participant, the CB shall issue a new certificate covering both scopes once the audit of the first activity has been successfully completed. Using the previous example, if the first audit of the year occurred during production of asparagus, subsequent to the first audit the client’s new certificate could be issued for the full scope of “Production of Asparagus and Packing of Apples”. Later in the year the audit on packing of apples would occur. If the audit was completed successfully, the certificate already issued for both scopes would remain in place. If a positive decision on certification did not follow the audit on the second activity, depending on the nature of the problem, the scope of certification could be reduced, or the certificate could be suspended or withdrawn by the CB.</u> 	<p>Added to meet new GFSI requirement, clarified how certification decisions and issuance of certificates would work for these operations</p>

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Section 3.3.5.5.7 Certificate of Conformity	c. Scope of Certification relative to activities and crops/commodities/products included and Certification Option (Refer to <i>Section 3.3.5.2, Scope of Certification</i>). <u>Certificates must indicate whether or not the certification option is GFSI-recognized. Options B, C, and D are GFSI-recognized. Options A1, A2, E and F are not.</u>	For transparency to customers
Section 3.3.5.5.7 Certificate of Conformity	New clause : o. <u>Each certificate must be issued only to one operating/company name, with the exception of an operation/company who holds a certificate with additional “trademark or doing business as (dba)” names included on the certificate.</u>	Change in CanadaGAP policy to streamline management of certificates and realign with original program objectives of one certificate per company
Section 3.3.5.6 Corrective Action Requests Follow-up	3.3.5.6.1 For all Certification Options d. Certification for brokers no longer falls under Option D; it is only available through Option F New section 3.3.5.6.5 added for certification options E and F, which have CAR follow-up process similar to Options C and D	Changes made to cover new certification options E and F
Section 3.3.11 Data Management System	Changes reflect some new data elements that CanadaGAP is required to provide to GFSI	CanadaGAP must upload data to new GFSI certificate database
Section 3.3.11 Data Management System	Removed field from database: Name of customer(s) if available	Optional info usually not provided by the applicant and difficult to collect
Appendix III.1 Group Certification: OPTION B	5.2.3 External Producer or Site Audits by the Certification Body n) Audit Timing c) For complex operations, <u>In addition to the requirements of the current section 5.2.3 of Appendix III.1:</u>	Additions made to meet GFSI benchmarking requirements (ref. GFSI office visit CAR clause 5.2 Oct 21/21)

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	<p><u>i. Refer also to applicable requirements in Component 3, further guidance is available in Section 3.3.5.4.5.2.</u></p> <p><u>ii. Group members who have both Production and Packing within their scope of operations may be subject to more than one audit by the certification body to observe activities for both scopes (production AND packing) every year. See below Section 5.2.3 n) “Audit Timing”.</u></p>	
<p>Appendix III.1 Group Certification: OPTION B</p>	<p>5.2.3 External Producer or Site Audits by the Certification Body o) v. Unannounced audits:</p> <p><u>i. For unannounced audits of group members who have both “Production and Packing” in their certification scope: If more than one audit is required in a given year, it is acceptable for only one of the audits to be performed unannounced that year, at the discretion of the certification body. A separate audit checklist must be completed for each of the audits. The report from each audit must specify whether the audit was unannounced.</u></p>	<p>New GFSI requirement from office visit CAR. Clarifies how unannounced audit requirements should be applied</p>
<p>Appendix III.2 Guidance for Certification Bodies Scoping for Multi- commodity and Multi- activity Operations</p>	<p>IMPORTANT NOTE added to Appendix III.2 <u>For Option C individual operations and Option B group members whose scope of certification includes both “Production and Packing” activities:</u></p> <p><u>• While parts of Appendix III.2 below may continue to serve as a useful guide for scoping audits for complex operations, including Option C-certified companies and group members certified under Option B, the GFSI requirements and the corresponding CanadaGAP rules described in Section 3.3.5.4.5 of the CanadaGAP Program Management Manual supersede any guidance contained below in Appendix III.2.</u></p>	<p>To clarify that new GFSI benchmarking requirements (ref. GFSI office visit CAR clause 5.2 October 12/21) supersede general guidance to CBs on scoping audits complex operations</p>

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Appendix III.2 Guidance for Certification Bodies Scoping for Multi- commodity and Multi- activity Operations	Various changes made to Appendix III.2 to better reflect new GFSI requirement and clarify expectations for CBs. Refer to tracked changes in the document for full information.	Consistent with new GFSI requirement from office visit CAR.
Section 4.3.2.1 Auditor Training Program	Minor updates to wording in Component 4 (e.g., deleting “classroom” because training is being held virtually; clarifying that letters aren’t sent to communicate grades but rather emails)	To accurately reflect current procedure
Section 4.3.2.2 Train-the-Auditor- Trainer Program	Re-testing of qualified trainers by CanadaGAP will be required every five ^{three} years to ensure that trainers are maintaining current knowledge of Program requirements	Starting in 2022, eligibility period has been extended since updates to the program are less frequent than in the past and the trainer pool is stable. Furthermore, to maintain their credentials, approved trainers must complete annual refresher training with their CB as well as biannual CanadaGAP refresher testing.
Section 4.3.3 Auditor Registration System	Some revisions made to update the information captured in the Auditor Training Registry Form 4.1]	To accurately reflect current procedure