

## Revisions to CanadaGAP Program Management Manual, Version 10.1 (2024)

Implementation date for CBs: April 1, 2024

Section #	Revision	Rationale
1.9.3.2 Internal Audit	<p>New paragraph:</p> <p><u>One of the components built into the 5 year timeframe is the Certification Body office audits. All Certification Bodies (including sub-contractors) shall be audited at least once within the 5 year timeframe. The scheduling of these audits shall be done using a risk-based approach. Risk factors may include but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <u>the number of auditors employed;</u></li> <li>• <u>number of certified companies;</u></li> <li>• <u>number of relevant complaints.</u></li> </ul>	Required addition to close out CAR from GFSI office visit in August 2023
1.6.3.1 Document Modifications	<p>New paragraph:</p> <p>When an externally requested modification is submitted to CanadaGAP by a program user on behalf of a particular commodity or group of users (e.g., an industry association or a cooperative representing producers of a specific crop or type of product), where the proposed modifications represent a request for exemption from specific technical requirements of the CanadaGAP Food Safety Manual, the proponent will be required to provide additional information by completing Form 2.1, Request for Exemption from CanadaGAP Program Requirements. The associated Form 2.1 will be attached to the relevant Form 1.1.</p>	A new Board policy (CAP-BP-21) has been adopted to establish a formal process for users (e.g., industry groups representing a particular commodity) to request exemptions from a specific technical requirement within the CanadaGAP Food Safety Manuals. See new Form 2.1 added to Component 2 of the management system.
Form 1.1	Added example of other document (Form 2.1) that may be attached	If relevant, the associated Form 2.1 would be attached to the Form 1.1
Form 2.1	<p>New form:</p> <p>Request for Exemption from CanadaGAP Program Requirements</p>	This submission form is being added as part of a new Board policy (CAP-BP-21) to establish a formal process for users (e.g., industry groups representing a particular commodity) to request exemptions from a specific technical requirement within the CanadaGAP Food Safety Manuals. Aligns with changes to Section 1.6.3.1. Document Modifications, and Form 1.1.
3.3.1.2 Program Auditor Requirements [preamble]	Reference to ISO/TS 22003 deleted	ISO/TS 22003 has been replaced by ISO/TS 22003-1 and ISO/TS 22003-2. Reference no longer necessary as existing text under 3.3.1.2 A. covers the relevant points.

<b>Section #</b>	<b>Revision</b>	<b>Rationale</b>
3.3.1.2 B. Program Auditor Requirements – Education, Work Experience and Training	Reference to ISO/TS 22003 replaced with new references to ISO/TS 22003-1 and ISO/TS 22003-2 as examples of basis for auditor training programs.	Revised to reflect relevant ISO technical standards that have replaced ISO/TS 22003.
3.3.1.2 Program Auditor Requirements	<p><b>G. Certification Body Notification to CanadaGAP</b></p> <p>a) Relative to the status of Program auditors, certification bodies must notify CanadaGAP of the following:</p> <ul style="list-style-type: none"> <li>i. when an auditor new to the certification body has completed the onboarding process. For the purposes of notification to CanadaGAP, the date of onboarding is typically the date on which the auditor has successfully completed the last witness audit required for qualification as a CanadaGAP auditor with the CB</li> <li>ii. when an auditor who has been approved for an expanded scope (e.g., repacking and wholesaling, GMS audits) has been onboarded to that new scope (e.g., has successfully completed their witness audit or first lead audit for the new scope)</li> <li>iii. when an auditor who has been conditionally approved by CanadaGAP satisfies the conditions (Note: details may first be requested by CanadaGAP relative to additional shadow or witness audits, or evidence of completion of additional training to satisfy conditions)</li> <li>iv. when an auditor informs the certification body of a change to their contact information (e.g., email address), their province or country of residence, or similar significant change</li> <li>v. when an auditor is no longer working for a certification body, or is on extended or indefinite leave as a Program auditor, whether as an employee or contractor, including instances where the CB elects to end an auditor’s contract</li> <li>vi. when the certification body decides to delay or not to proceed with onboarding an auditor that is <del>qualified</del>, approved or conditionally approved by CanadaGAP (e.g., when an auditor is qualified but not needed for an additional scope such as repacking and wholesaling or GMS audits, when an auditor does not perform satisfactorily on their witness audit and requires more training, etc.)</li> <li>vii. when there are other relevant changes to an auditor’s status of which CanadaGAP should be aware.</li> </ul>	New section added to clarify CB obligations with respect to informing CanadaGAP of changes to auditor status.

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	<p>b) Notification shall be sent by the certification body without delay to <a href="mailto:info@canadagap.ca">info@canadagap.ca</a></p>	
<p>3.3.1.4 Program Requirements for Persons involved in carrying out contract review</p>	<p>To be eligible to carry out contract review for the Program, a person must have:</p> <ul style="list-style-type: none"> <li>a) An understanding of the Program</li> <li>b) Completed a review of the Auditor Training Program. The certification body must provide written evidence to CanadaGAP that the persons involved in contract review have completed the required review of the auditor training program</li> <li>c) Successfully completed food safety training in:               <ul style="list-style-type: none"> <li>i. hazard analysis and critical control point (HACCP) principles, hazard assessment and hazard analysis, and</li> <li>ii. food safety management principles including prerequisite programmes (PRPs).</li> </ul> </li> <li>d) Successfully completed training in audit processes based on the guidance given in ISO 19011. NOTE: It is not mandatory for personnel carrying out contract review to have or to maintain audit experience.</li> </ul>	<p>Reference to ISO/TS 22003 removed. Text from obsolete ISO/TS 22003 has been deleted or in some cases incorporated as a CanadaGAP requirement.</p>
<p>3.3.1.4 e) Program Requirements for Persons involved in carrying out contract review</p>	<p>e) Knowledge and skills consistent with the applicable competency requirements set out in ISO/TS 22003-2 (Annex C, Table C.1), including:</p> <ul style="list-style-type: none"> <li>i. Knowledge related to the types of products or processes of a client sufficient to understand how such an organization can operate, and how the organization can apply the requirements of the standard/scheme or other relevant normative documents</li> <li>ii. Ability to communicate effectively to fulfil their function within the certification process</li> <li>iii. Ability to read and write to fulfil their function within the certification process</li> <li>iv. Ability to identify the auditor competencies required for categories and subcategories in accordance with Table A.1 [of ISO/TS 22003-2] and certification body procedures</li> <li>v. Ability to identify and to determine factors relevant to food chain categories (with reference to Table A.1) and to the organization, including:               <ul style="list-style-type: none"> <li>— PRPs;</li> <li>— food safety hazards;</li> <li>— statutory and regulatory requirements;</li> <li>— any specific seasonality factors related to the organization and its food category or products;</li> </ul> </li> </ul>	<p>New text. Reference has been updated to the new ISO/TS 22003-2 and applicable text was added.</p>

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	<ul style="list-style-type: none"> <li>— specific cultural and social customs related to the categories and geographic areas to be assessed;</li> <li>— specific factors required to audit the FSS, food product, process or service.</li> </ul> <p>vi. Ability to apply the application review requirements in this document [ISO/TS 22003-2], specific scheme rules and certification body procedures including:</p> <ul style="list-style-type: none"> <li>— categorizing the organization into food categories and subcategories, in accordance with Annex A [of ISO/TS 22003-2];</li> <li>— determining the complexity of the organization’s activities;</li> <li>— multisite sampling;</li> <li>— calculating audit duration.</li> </ul>	
3.3.2.4. Assignment of Auditors (Consecutive Audits at the same site)	To protect against threats to impartiality, the same auditor cannot be assigned to perform Program audits on-site at the same site for more than four (4) consecutive <b>years</b> . This restriction does not apply to the participation of a <b>new</b> auditor <b>candidate</b> in a shadow <b>audit</b> , or <b>of an approved auditor</b> witnessing a <b>new auditor-audits</b> , or to auditors reviewing self-declarations and self-assessments.	Changed “audits” to “years” to account for situations where a site has more than one audit per year. Some wording revised for clarity (no change to intended meaning).
3.3.3 Oversight of a Licensed Certification Body	c) As part of its ongoing overall monitoring of certification body and auditor performance, CanadaGAP will, at its own cost, conduct witness audits on auditors employed/ contracted by certification bodies, perform regular risk-based spot checks on audit reports ( <b>preferably from GFSI-recognized certification option audits</b> ), may accompany external audits by the accreditation body or other external assessors (e.g., CFIA as the recognition body, an external benchmarking entity, etc.), and may send a technical expert to accompany CanadaGAP’s internal audits of certification bodies.	Text added to clarify how CanadaGAP will sample audit reports for spot-checking.
3.3.5.4 Program Audit and Certification Process 3.3.5.4.1. Procedures	ii) g. A minimum surveillance activity of at least once each <b>calendar or crop</b> year, with the date of each surveillance activity occurring not more than 12 months from the date of the previous audit activity. In exceptional circumstances such as cases where, for valid reasons, initial certification audits did not take place at an optimal time (e.g., during harvest or packing), or with program participants who have multiple commodities <b>and/or activities</b> , it may not always be possible for the CB to schedule subsequent audits in a way that fulfills this requirement. In certain cases, an extension to the certificate validity period and/or adjustment to <b>the original certification cycle</b> may be required. Some flexibility and discretion <b>are</b> extended to CBs to address exceptional situations.	Editorial changes for clarity; words added for consistency with changes to Section 3.3.5.5.4

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3.3.5.4 Program Audit and Certification Process 3.3.5.4.1 Procedures	ii) o. <b>Addresses where audits occur:</b> i. The address(es) of <b>all</b> locations that are visited during the course of the audit <u>must</u> be identified within the audit report, on page 2 of the CanadaGAP Audit Checklist. <b>If more space is needed</b> , the addresses/locations <b>visited during the audit</b> can be included in the Executive Summary, <b>with a note on page 2 pointing to the Executive Summary for the information.</b>	Renumbered sub-elements within this clause and reworded point i. to clarify for auditors and CBs.
3.3.5.4.2 Audit Duration	a. .... A half-day audit ( <b>3.5 hours</b> ) is typical for a straightforward on-farm operation....  b. The minimum <del>of 3.5 hours</del> duration shall apply to the most simple circumstances...  c. Should the audit take less than <b>the minimum duration 3.5 hours</b> , the justification shall be noted on the audit report, and when feasible the auditor shall remain on-site to complete the audit report for the balance of the <b>audit time half day</b> billed to the program participant. <b>Should a Multi-site Management System audit take less than 3 hours, the justification for a shorter duration shall be noted on the audit report.</b>  <b>Some of the acceptable reasons for not meeting the minimum audit duration may include:</b> <ul style="list-style-type: none"> <li>• Operation has a limited scope (e.g., one or few crops, limited activities)</li> <li>• Operation has few locations (e.g., only one production site)</li> <li>• Operation has few employees</li> <li>• Operation has simple procedures (e.g., one piece of equipment)</li> <li>• Operation has well-organized documentation (e.g., readily available, simple SSOPs or record-keeping system, electronic records easy to access)</li> <li>• Operation has a very well-implemented and clear food safety program</li> <li>• Multi-site operation is very basic (e.g., only 2 sites that are in close proximity).</li> </ul> <b>This list is not exhaustive; additional reasons may be acceptable at the discretion of the Certification Body. CanadaGAP also spot checks reports to review rationales for shortened audit durations.</b>	Additions to this section required to close out CAR from GFSI office visit in August 2023

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3.3.5.4.3 Audit Scheduling a)	a. Audits must be scheduled to occur when relevant activities are underway – i.e., during harvest, product handling, packing season, shipping, storage period, etc. depending on the scope of the company’s certification. <b>The Certification Body must ensure that the audit is scheduled such that all components of the CanadaGAP audit checklist can be assessed by the auditor (e.g., ensure that shipping of product has started so that transportation can be evaluated).</b>	Addition required to close out CAR from GFSI office visit in August 2023.
3.3.5.4.3 Audit Scheduling  h) Unannounced Audits for CanadaGAP Certification Options C and D (GFSI-recognized)	ii) <i>Definition</i> : Unannounced audits occur when program participants are audited with no advance notice from the certification body or the auditor about the date or time of the audit. However, the certification body <del>or auditor</del> will contact the program participant ahead of time (i.e., early in the year) to: <ul style="list-style-type: none"> <li><b>ensure that the program participant has adequate information about the unannounced audit process (e.g., is directed to resources available on the CanadaGAP website about unannounced audits, such as brochures, PowerPoint slides, FAQs, blog post, relevant sections of the CanadaGAP Program Management Manual, etc.) and is aware of the program participant’s obligation to keep the certification body or auditor informed of any changes to timing of their crops/activities relevant to the audit scope.</b></li> </ul>	Removed “or auditor” as this communication is related to audit scoping and is typically carried out by CB personnel, not directly by the auditor. Revised wording still provides CBs with flexibility. Editorial correction – replaced “e.g.,” with “i.e.”  New bullet point (4 <sup>th</sup> ) added to clarify the CB’s responsibility to ensure program participants have an understanding of the unannounced audit process and their obligations.
3.3.5.4.6 Preparation of Audit Plan	c) The audit plan or schedule shall include at a minimum: (...) <del>xii. Auditee’s signature, where required.</del>	Deletion requested by certification bodies for administrative ease.
3.3.5.5.2 Certification Cycle and Audit Timing	b. i. No more than 12 months may elapse between audit activities (i.e., on-site audit or self-assessment review) by the Certification Body. Limited exceptions may be possible (i.e., up to <b>18</b> months between on-site audits for <b>complex operations with multiple commodities and/or activities</b> . Refer to Section 3.3.5.5.4, <i>Extension of Certificate Validity</i> .) b. ii. The CB must conduct at least one audit activity in each calendar year (2023, 2024, 2025, etc.) <b>or crop year, as applicable (e.g., the 2023 crop, the 2024 crop, the 2025 crop)</b> . b.iii. last sentence: “Justification for a second audit in the same calendar <b>or crop year (as applicable)</b> must be recorded by the CB on the corresponding audit report.” d. i. at least once in each calendar year <b>or crop year</b> (as applicable)	b. i. Revised extension period to a maximum of 6 months, allowing up to 18 months between audit activities in limited cases. Corresponding revisions made to Section 3.3.5.5.4, <i>Extension of Certificate Validity</i> . See rationale provided under Section 3.3.5.5.4 b. ii. Previous wording was not broad enough to describe all situations. b. iii. May be either the crop year or the calendar year, depending on the operation d. i. Revised for consistency with above
3.3.5.5.3 Date of Certification and Certificate Expiry Date	b. ii. <b>Complex operations with multiple commodities and/or activities Multi-commodity audits</b> may see certification decisions postponed after audits to correspond to certificate expiry date.	b. ii. Wording revised for clarity and consistency with changes to Sections 3.3.5.5.2

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	<p>e. Regardless of the certificate expiry date, the CB must ensure that audits/review of self-assessments take place within 12 months of the prior audit activity, and that at least one audit activity occurs in each calendar <b>or crop</b> year (as applicable). Limited exceptions may be possible (e.g., in justified cases where <b>complex operations with multiple commodities and/or activities an operation involved in multi-commodity production/packing/storage</b> may receive an extension of up to <b>six four</b> months in order to time a subsequent audit appropriately; multi-activity operations with a long storage and shipping season).</p>	<p>e. Revised for clarity and consistency with changes to Sections 3.3.5.5.2</p>
<p>3.3.5.5.4 Extension of Certificate Validity</p>	<p>a. The validity may be prolonged beyond the 12 months (for a maximum period of <b>4-6</b> months) only under the following conditions</p> <p><i>[Note: Similar changes have been made to related sections (e.g., 3.3.5.4.1, 3.3.5.4.5.1 a. and b., 3.3.5.5.2, 3.3.5.5.3). Where reference was previously made to 4-month extensions/16-month validity, those sections now refer to 6-month extensions/18-month validity.]</i></p>	<p>CBs are now permitted to grant extensions to certificates for up to 6 months (2 months longer than before) to address cases where there is a long period between activities relevant to the scope of certification (e.g., harvesting and loading out of storage crops).</p>
<p>3.3.5.5.7 Certificate of Conformity</p>	<p><b>n. 6. Address(es) will be the same as those listed on page 2 of the audit report: “Address(es) to be included on the certificate”.</b></p>	<p>Renumbering and addition to clarify for CBs</p>
<p>3.3.5.5.7 Certificate of Conformity</p>	<p><b>o. A statement providing clear indication of where the current validity of the certificate can be verified, such as ‘The current status of this certificate can be verified at [insert URL for certification body public registry]’. This wording must be approved in advance by CanadaGAP.</b></p> <p><b>p. Certification bodies are strongly encouraged to include the corresponding audit date(s) on the certificate, or in a document that accompanies the certificate, for transparency to other stakeholders (e.g., customers and buyers).</b></p>	<p><b>o.</b> New requirement to include information on each certificate as to where [URL] the current validity of the certificate can be checked.</p> <p><b>p.</b> To provide transparency to customers, government, etc. as to when the certified company last had an on-site audit.</p>
<p>3.3.5.7.2 Certification Body Review of Self-Declaration and Self-Assessment Checklists – Procedures</p>	<p>e. If the auditor/reviewer requires <b>further information or</b> clarification on an answer, <b>or finds inconsistencies between the responses on the self-assessment checklist and the operation’s previous practices, the auditor/reviewer is expected it is appropriate</b> to call or email the program participant to <b>obtain more information</b> to address any doubts or concerns.</p> <p><b>i. The auditor/reviewer must document in the Comments box whether a phone conversation or email exchange occurs with the program participant, including relevant details to help with the CB’s review of the self-assessment checklist.</b></p>	<p>e. Revisions made to provide clarification of the process and CanadaGAP expectations for review of self-assessments by the auditor/reviewer/CB</p>

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	<p>ii. If the auditor requests additional information to substantiate a program participant's response on the checklist, that information shall be noted in the Comments box.</p> <p>iii. If minor issues are noted with the self-assessment (e.g., a section of the checklist was filled out incorrectly or was missed), the auditor/reviewer notes those findings in the Comments box along with confirmation of having discussed those findings with the program participant.</p> <p>h. If raised, Corrective Actions Requests (CARs) are noted on the last page of the Self-Assessment checklist in the Comments box... . The auditor/reviewer makes recommendations <b>about closing CARs</b>; the decision rests with the Certification Body <b>to grant certification</b> <del>close CARs</del>.</p> <p>i. The idea is not to issue CARs for minor items. <del>Program participants have already been audited for their initial certification and found to be in conformance with the program.</del> Keep in mind that the program participant needed to achieve a passing score (not 100% compliance) on the audit to become certified in the first place. <b>However, the annual review of the Self-assessment checklist is the only opportunity for surveillance by the CB in a non-audit year.</b> The purpose of completing and reviewing the checklist is to ensure ongoing compliance with program requirements. The Self-Declaration <del>and Self-Assessment constitutes a surveillance activity to remind program participants they need to keep doing those practices.</del> It is also a sworn and legally binding statement that program participants are continuing to follow the required procedures.</p>	<p>h. Reworded to reflect the CAR process more accurately</p> <p>i. Reworded to strengthen understanding of the process and to clarify CanadaGAP expectations of both CBs and program participants.</p>
<p>3.3.5.9 Program Participant Changes to Certification Scope</p> <p>ii) Changes to Certification Option</p>	<p>j. <b>In special cases [e.g., where an operation cannot increase their audit score to 100% with corrective actions or a corrective action plan, and a change in certification options is acceptable to the operation's buyer(s) or customer(s)] following the audit, CanadaGAP will allow an operation to switch from a more stringent to a less stringent certification option (e.g., <del>switch down</del> upgrade from Option C to Option E or A1). <u>In such cases, it is not necessary for the certification body to perform a new audit. The certification body shall:</u></b></p> <p><b><u>i. Instruct the auditee to submit a Change of Status Form to CanadaGAP;</u></b></p> <p><b><u>ii. Instruct the auditee to indicate on the CAR Form that switching to a different certification option is the operation's corrective action in response to the applicable audit finding(s);</u></b></p>	<p>New clause makes provision for situations where an operation has flexibility in meeting their customer requirements, and can switch to a less stringent certification option as a way to address corrective action requests.</p> <p>Further details on how to manage the process were included to respond to CB request to clarify expectations of CBs in such cases.</p>



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	<p><u>iii. Instruct the auditee to address any remaining corrective action requests on the CAR Form;</u></p> <p><u>iv. If applicable, adjust the original audit report to remove scoring of elements that would no longer be included in the scope of certification (e.g., if switching from Option C or E to Option A1). Such adjustments would be needed to provide an accurate reflection of the auditee’s final audit score. The certification body shall send the auditee a copy of the revised audit report. The certification body shall retain copies of both the original audit report and the revised audit report.</u></p>	<p>Reference to new clause j. was also added in Section 3.3.5.9 ii) b.</p>
<p>3.3.5.10 Transfers between Certification Bodies</p> <p>ii) Restrictions on Certification Body Transfers</p>	<p>c. Since the program participant is new to the incoming CB, the client’s audit shall be scoped as a new client (i.e., all crops/activities or crop/activity combinations must be seen by the CB before they can be included on the certificate). Exceptions may be granted by CanadaGAP in specific cases; CBs should seek further guidance from CanadaGAP (e.g., for complex operations with multiple commodities and/or activities).</p> <p><del>Option A3 was a CanadaGAP certification option for Group certification that ceased being offered effective April 1, 2021. Any Option A3 CanadaGAP certificates issued to a group remain valid until their expiry date or until withdrawn by the certification body.</del></p>	<p>New text added to clarify expectations for CBs</p> <p>Previous text deleted because it has been several years since Option A3 was offered by CanadaGAP.</p>
<p>3.3.6.4 Certification Body Responsibilities in the event of a Food Safety Prosecution, Significant Regulatory Incident or Nonconformity, or Product Recall</p>	<p>a. CanadaGAP requires that Certification Bodies have in place an agreement with their clients that the Certification Body will be informed of any food safety prosecution, significant regulatory food safety incident (including investigation of a potential breach or deficiency) or nonconformity, or any product recall relating to food safety. Certification Bodies must have procedures in place to ensure integrity of certification after notification (e.g., refer to Section 3.3.6.1, General Information, where appropriate). The Certification Body must inform CanadaGAP of any significant food safety-related prosecution, regulatory incident or nonconformity, or product recall that is reported by their CanadaGAP clients.</p>	<p>Wording added to broaden the circumstances that must be reported to the CB.</p> <p>Last sentence revised to ensure CBs keep CanadaGAP informed of all such reports by program participants.</p>
<p>4.3.2.2 Train-the-Auditor-Trainer Program</p>	<p>CanadaGAP will deliver the Train-the-Auditor-Trainer program at a frequency determined by the Executive Director or designate, in an appropriate delivery platform (e.g., classroom setting, online/virtual setting) using the most recent version of the training materials and using a trainer approved by CanadaGAP specifically to deliver “Train-the-Auditor-Trainer” courses. Admittance to the course will be restricted to those who score 90% or higher on the Auditor Training course exam, and who meet the qualifications and requirements for</p>	<p>Last sentence added to clarify that internal auditors who have worked for a group under Option B are not automatically qualified to become auditor trainers. All TAT candidates must successfully undergo the CanadaGAP auditor approval process.</p>

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	Program auditors relative to background, education and experience, as set out in the applicable sub-sections of Section 3.3.1.2, Program Auditor Requirements <b>and whose credentials have been reviewed and approved by CanadaGAP.</b>	
4.3.3 Auditor Registration System	<b>d. CanadaGAP Auditor Refresher testing:</b> Trainees who successfully completed Auditor Training must maintain their knowledge of the CanadaGAP program by completing CanadaGAP auditor refresher testing at a frequency prescribed by CanadaGAP, typically every two <b>to three years.</b>	Addition reflects that the schedule is not set in stone but depends on availability of staff, CanadaGAP resource capacity and other demands.
4.3.3.3 Auditor Database	Details of auditor training candidates who qualify to be considered as CanadaGAP auditors will be maintained in an Auditor database in Microsoft Access to be deployed <b>in 2024.</b>	Revised “later in 2023” to “in 2024” as development of the database is behind schedule.