CANADAGAP[1] PROGRAM MANAGEMENT MANUAL

COMPONENT 3:
Conformity Assessment System[2]

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[1] *CanadaGAP is an operating name of CanAgPlus, a Canadian not-for-profit (Corporation Number 822397-1)*

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Component 3 – Conformity Assessment System

3.1 Purpose and Scope

The purpose and scope of this section is to establish:

- The requirements for the selection and licensing of certification bodies;
- The on-going operational requirements to be included in the licensing agreement/contract;
- The procedures for monitoring licensed certification bodies;
- The procedures for suspending or terminating agreements/contracts with licensed certification bodies;
- The requirements under which an operation involved in production, packing, storage, repacking, brokerage and wholesaling can be granted and can maintain certification for being in compliance with the Program; and,
- The procedures for the training, education or communication required by this component.

3.2 Roles and Responsibilities

The Board of Directors is responsible for:

- Approving the licensing, suspension or termination of all certification bodies under the Program.

The Executive Director is responsible for:

- Reviewing, on behalf of the Board, all licensing agreements/contracts with certification bodies providing audit and certification services under the Program;
- Signing all licensing agreements/contracts with certification bodies;
- Signing suspension or termination notices for licensed certification bodies;
- Managing the oversight of certification bodies, including:
    - Reviewing applications from certification bodies to enter into a licensing agreement/contract with CanAgPlus to provide audit and certification services under the Program;
    - Preparing licensing agreements/contracts;
    - Monitoring the performance of licensed certification bodies;
    - Including licensed certification bodies in annual internal audits;
    - Monitoring the implementation of any corrective actions required of a licensed certification body;
    - Initiating procedures to suspend or terminate a licensing agreement/contract with a certification body;
    - Collating and analyzing the information reported by licensed certification bodies and presenting this information to the Board of Directors; and
    - Reviewing and compiling reports from a certification body’s database of audit results.

A Licensed Certification Body is responsible for:

- Entering into a licensing agreement/contract with CanAgPlus to provide audit and certification services under the Program;
- Ensuring that adequate numbers of personnel are engaged, who have the competence requirements to meet all management, administrative, technical and auditing functions within the organization;

- Obtaining and maintaining accreditation for the Program under ISO/IEC 17065 from an accreditation body that is a member of the International Accreditation Forum (IAF), or the Global Accreditation Cooperation Incorporated, **and** for meeting all additional requirements that may be required by an external benchmarking program (e.g., Global Food Safety Initiative benchmarking requirements). For further information about accreditation requirements, refer to Section 3.3.1.5 *Licensing Process*.
- Making publicly available the limits and scope of the accreditation, including pertinent information about suspension or withdrawal of accreditation for ISO/IEC 17065 and/or the Program;
- Informing CanadaGAP directly and without delay of any change to the certification body's accreditation status (e.g., suspension, withdrawal);
- Ensuring that its personnel involved in Program audits and certification activities meet the Program requirements, including but not limited to recruiting, training and supervising all personnel in the performance of Program activities;
- Providing impartial audit and certification services to applicants under the Program;
- Adhering to all roles, responsibilities and requirements assigned to Licensed Certification Bodies in the Program Management Manual;
- Providing data to CanadaGAP about Program audits, certifications, non-conformances and other matters as specified in the licensing agreement/contract;
- Making available at all times to CanadaGAP the following: (1) evaluation procedures and certification processes in relation to the CanadaGAP program; and (2) details of complaints, appeals and disputes procedures;
- Participating in the oversight process established under the licensing agreement/ contract, including an annual review and/or internal audit by CanadaGAP;
- Conducting an annual management review relative to the Program;
- Providing technical assistance as requested to the Board of Directors or Technical Advisory Committee;
- Affording such accommodation and co-operation to CanadaGAP, the CFIA and the 3rd Party Auditing Organization and/or the external benchmarking body as is necessary to enable the verification of the fulfillment of the requirements of any recognition or benchmarking scheme (refer to *Component 5*);
- Notifying CanadaGAP of changes to ownership, management personnel and management structure or constitution, in a timely manner. Where CanadaGAP is aware of any possible conflict or problems, which could result in bringing the Program or an external benchmarking scheme (e.g., GFSI) into disrepute, CanadaGAP and the Certification Body shall agree on appropriate action.
- Reporting to CanadaGAP any activity that could potentially threaten the reputation of the program, the CB and/or GFSI. Such reporting shall include, in accordance with Section 3.3.6.4, any recall notice issued by a regulatory authority that cites a confirmed outbreak, illness, hospitalization or fatality associated with a product that is produced, handled or brokered by a CanadaGAP-certified company. Additionally, CBs shall report to CanadaGAP any fraudulent activity that comes to their attention (e.g., falsification of documents such as a CanadaGAP certificate or audit report; fraudulent activity by CB personnel, etc.). Reporting shall occur without delay (i.e., within 48 hours of the information coming to the CB's attention);
- Remitting applicable fees to CanAgPlus in a timely manner, i.e. within 60 days of invoice date (e.g., licensing fees);
- As authorized by CanadaGAP, serve as (or with a partner organization) a training provider for Program Auditor Training courses;

- Operating an effective and fully implemented quality system. The quality system shall be fully documented and used by all relevant Certification Body staff. Within the Certification Body there shall be a designated member of staff responsible for the quality system's development, implementation and maintenance. The designated employee will have a reporting role to the organization's executive and shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.
  The required quality system shall be fully documented within a quality manual, which in turn will contain all necessary procedures for compliance.

A Program food safety auditor is responsible for:

- Possessing the basic qualifications and training required for a food safety auditor as set out in *Section 3.3.1.2, Program Auditor Requirements*;
- Successfully completing the Auditor Training Program;
- Conducting impartial audits of an applicant's production, packing, storage, repacking, brokerage and wholesaling business against the requirements of the Program;
- Participating in witness audits, internal and external, as required;
- Maintaining current competencies and participating in ongoing evaluation as required by CanadaGAP and the certification body.

An Applicant for certification to the Program is responsible for:

- Implementing and maintaining a food safety program;
- Defining the scope of its application for certification;
- Entering into a service agreement/contract with a licensed certification body;
- Maintaining records of its food safety system for at least three months prior to the date of the initial audit;
- Participating in the audit process;
- Undertaking any required corrective actions;
- Identifying to the certification body any substantive changes in their operations that could impact on food safety;
- Continuing to meet the certification requirements throughout the certification period;
- Adhering to the Program rules for proper usage of logo(s);
- Agreeing to abide by all terms and conditions relative to participation in the Program, as set out in the enrolment form and as may be subject to change from time to time;
- Maintaining certification during the period of participation in the CanadaGAP program, including but not limited to submitting documents as required to maintain certification (e.g., self-declaration and self-assessment checklist) and scheduling re-certification audits before the certificate expires;
- Communicating all changes to certification status, scope, contact information, etc. in writing to CanadaGAP;
- Payment upon enrolment and annually thereafter for the term of the certification or recertification the Annual Program Fee to CanadaGAP; and,
- Payment of the audit fees (including auditor travel costs).

3.3 Description of Activities

3.3.1 Licensing of Certification Bodies

To provide certification services for the Program, certification bodies must be licensed by CanadaGAP.

3.3.1.1 Certification Body Requirements

To be licensed to provide Program audit and certification services a certification body must:

i) Be accredited by an Accreditation Body that is a member of the International Accreditation Forum (IAF), or the Global Accreditation Cooperation Incorporated, in compliance with ISO/IEC 17065, **and** meet all additional requirements that may be required by an external benchmarking program (e.g., Global Food Safety Initiative benchmarking requirements). For further information about accreditation requirements, refer to Section 3.3.1.5 *Licensing Process*.
ii) Apply to CanadaGAP to become a licensed certification body under the Program;
iii) Establish a pool of auditors who meet the Program auditor requirements. Prior to witnessing and deploying any new auditor, the certification body must provide copies to CanadaGAP of relevant auditor qualification documents (e.g., curriculum vitae, education transcripts, training certificates, etc.) and a signed Conflict of Interest declaration, for CanadaGAP review and approval. Approval must be obtained in writing from CanadaGAP. When auditor information is updated the certification body must provide pertinent details and associated documentation to CanadaGAP;
iv) Ensure that its certification personnel who carry out contract review and make decisions on Program certifications meet the Program requirements;
v) Have entered into a preliminary licensing agreement/contract with CanadaGAP for the purposes of providing audit and certification activities..

3.3.1.2 Program Auditor Requirements

To be eligible to be a Program auditor, a person must:

i. meet all applicable requirements contained in Section 3.3.1.2, which include those set out in ISO 19011;
ii. be approved by CanadaGAP for all relevant qualifications prior to the CB performing one or more (as needed for experience) on-site witness audits with the approved auditor. CanadaGAP will review the documentation that certification bodies are required to submit for each auditor (e.g., curriculum vitae, education transcripts, training certificates, etc.) and will communicate final approval of Program auditors to the certification body, in writing;
iii. complete any CB-specific training for auditors; and
iv. at the request of the CB, who informs CanadaGAP that the auditor is being brought on board, be formally registered by CanadaGAP as a Program auditor, which will be the final step in the process of becoming an active auditor.

A. Personal Attributes

i. Auditors should possess personal attributes to enable them to act in accordance with the principles of auditing.

ii. An auditor should be:

- Ethical, i.e. fair, truthful, sincere, honest and discreet;
- Open-minded, i.e. willing to consider alternative ideas or points of view;
- Diplomatic, i.e. tactful in dealing with people;
- Observant, i.e. actively aware of physical surroundings and activities;
- Perceptive, i.e. instinctive, aware of and able to understand situations;

- Versatile, i.e. adjusts readily to different situations;
- Tenacious, i.e. persistent, focused on achieving objectives;
- Decisive, i.e. reaches timely conclusions based on logical reasoning and analysis;
- Self-reliant, i.e. acts and functions independently while interacting effectively with others; and,
- Integrity: i.e. aware of need for confidentiality and observes professional code of conduct.

B. Education, Work Experience and Training

i. **Education/Background.** All Program Auditors must have:

<table>
<tr><th></th><th>To audit CanadaGAP certification options that are not GFSI-recognized (e.g., Option A1, A2, E, F)</th><th>To audit CanadaGAP certification options that are GFSI-recognized (i.e., Options B, C, D)</th><th>To audit CanadaGAP certification options B, C, D when GFSI-recognized PRBs begin operating</th></tr>
<tr><td>a)</td><td colspan="3">Work experience in fresh fruit and vegetable farming and handling (note: must include some on-farm experience)</td></tr>
<tr><td>b)</td><td colspan="3">Successfully completed all prerequisites of the CanadaGAP Auditor Training program, including completion of the pre-course assignment</td></tr>
<tr><td>c)</td><td colspan="3">Successfully completed the CanadaGAP Auditor Training course, with a passing grade of 80%</td></tr>
<tr><td>d)</td><td>Two (2) years post-secondary education, preferably in an agricultural/crop, food related or bio-science based discipline</td><td>Two (2) years post-secondary education in an agricultural / crop based discipline or, as a minimum, successful completion of a food related or bio-science higher education program;</td><td rowspan="5">Registration with a GFSI-recognized Professional Recognition Body (PRB) of the auditor’s choosing</td></tr>
<tr><td>e)</td><td colspan="2">Including the produce-related work experience required above in B.i. a), at least 2 years full-time work in a dedicated food safety role in food production or manufacturing, retailing, inspection or enforcement, preferably in the fruit and vegetable industry</td></tr>
<tr><td>f)</td><td colspan="2">If CanadaGAP is in doubt about the candidate’s two years’ of food safety experience, CanadaGAP may request the applicant to provide further information supporting their food safety background/knowledge and may also request that the candidate complete the General Competency Exam. Successful completion of the General Competency Exam is not an automatic substitute for the two years of food safety experience.</td></tr>
<tr><td>g)</td><td colspan="2">Successfully completed a training course in HACCP based on the principles of Codex Alimentarius, of minimum 2 days’ duration, with an examination at the end. Auditors must</td></tr>
</table>

	demonstrate competence in the understanding and application of HACCP principles. Auditors must provide detailed information about the content of the course to the certification body, to be submitted by the certification body for review and approval by CanadaGAP when onboarding a new auditor to ensure requirements are met. An email will be sent to the certification body by CanadaGAP to acknowledge receipt of the information, and indicating whether the auditor's training program meets requirements. Also acceptable for CanadaGAP auditors is successful completion of the CanadaGAP Auditor Training "Introduction to HACCP" unit including the exam.	
h)	Successfully completed recognized training in auditing techniques based on quality management systems (QMS) or food safety management systems (FSMS) – duration 1 week/40 hours with an examination at the end. Content must cover concepts related to professional conduct and conflict management; communicating and interacting with clients; personal safety; general auditing principles and auditor skills. Auditors must provide detailed information about the content of the course to the certification body, to be submitted by the certification body for review and approval by CanadaGAP when onboarding a new auditor to ensure requirements are met. An email will be sent to the certification body by CanadaGAP to acknowledge receipt of the information, and indicating whether the auditor's training program meets requirements. Examples of the principles to be covered in training: for QMS (ISO 19011 and ISO 9001); for FSMS (ISO 19011 and ISO 22003-1 or ISO 22003-2). A number of the total 40 hours can be derived from successful completion of scheme-specific auditor training (e.g., 10 hours for the CanadaGAP Auditor Training course).	
i)	Successfully completed two shadow audits (i.e., following a more experienced auditor and having an opportunity to ask questions and receive clarification, guidance, interpretation or other forms of coaching from the more experienced auditor, who must be approved by CanadaGAP as per *Section 3.3.1.3.2*). Qualifying auditors may be required by the Certification Body to cover their costs to participate in the shadow audit; the certification body will advise of the anticipated costs prior to the candidate agreeing to seek qualification.	
j)	Successfully completed one witness audit (i.e., performing an audit under the supervision of a qualified, experienced auditor and/or program expert). Witness audits shall be carried out only after the certification body has received approval from CanadaGAP that the auditor meets all other qualification requirements (e.g., training, education, work experience, etc.). The witness audit must occur after the shadow audits. Costs for the qualifying auditor as well as the supervising auditor/program expert will be borne by the Certification Body. If a program expert is used, CanadaGAP must approve a competent person. The supervising auditor must be a lead auditor and/or identified with substantiating evidence as a qualified witness auditor by the Certification Body, and must be approved by CanadaGAP as per Section 3.3.1.3.2.	

k)	Successfully completed the auditor training program established by the certification body, including initial and ongoing training to assess knowledge and skills related to applicable laws and regulations, specific audit techniques and specific knowledge of fresh fruit and vegetable production and handling, assessment of the auditor's ability to apply knowledge and skills, and a documented sign off of the satisfactory completion of the training programme by the appointed competent supervisor.

ii. **Extension of scope**

a. All approved Program auditors are considered qualified to audit the following CanadaGAP scopes:
- Production
- Packing
- Storage
- Brokerage.

b. The CanadaGAP scopes listed below correspond as follows to the GFSI scopes for which CanadaGAP is GFSI-recognized:

CanadaGAP certification scope (by activity)	***GFSI scope***
● Production ● Production-related sub-scopes such as "Harvesting" ● Storage (including standalone operations storing harvested product)	BI (Farming of Plants)
● Packing ● Packing-related sub-scopes such as "Icing", "Sorting and Grading", etc. ● Repacking ● Wholesaling	BIII (Pre-process Handling of Plants)
● Brokerage	Not GFSI-recognized

c. With respect to the scopes identified above in Section 3.3.1.2 B. ii) d., Certification Bodies shall have a structure in place requiring that in order to extend scope, an auditor must undergo a programme of training in the new sector, must conduct supervised audits over three (3) audits, including one witness audit against the new scope, and must be assessed and signed off as competent by the Certification Body to conduct audits in the new sector. CanadaGAP must also be informed by the Certification Body in advance of the scope extension.

d. **Repacking and Wholesaling auditors**: CanadaGAP auditors conducting repacking and wholesaling audits must have successfully completed the module for Repacking and Wholesaling within the CanadaGAP auditor training course, including the exam. Passing grade is 70%. For already qualified CanadaGAP auditors who wish to add this scope to their training, contact the Certification Body and the CanadaGAP office regarding training. Any auditor who will be performing Repacking and Wholesaling audits first needs to complete a witness audit at a Repacking and Wholesaling operation, prior to auditing such operations on their own. This witness audit is additional to the witness

audit requirement in Section 3.3.1.2 B i) j. The witness auditor must have previously completed five (5) Repacking or Wholesaling audits on their own to qualify as a witness auditor.

iii. **Group Management System Auditors** (CanadaGAP Certification Option B) must meet the following requirements (or equivalent):

a. At least a post high school diploma or equivalent (minimum course duration of 2 years) in a discipline related to crop production.

b. Practical auditing experience of minimum 10 days in management systems (e.g., ISO 9000, ISO 14000, ISO 22000, OSHAS 18000), BRC, IFS, GLOBALG.A.P. Option 2 or 4 audits, producer group audits of organic growers or others). This does not include witnessing or shadowing others' audits, but includes being witnessed or shadowed as auditor-in-training.

c. **Successful completion** of a Lead Assessor training course based on ISO 19011 principles that must have a minimum duration of 37 hours, and must be externally recognized by the industry. The certificate must specify the course content and duration. Successful completion must be indicated on the certificate.

d. Lead Assessor training course must cover: applicable standards on quality auditing, auditing techniques, focus of the audits (psychological aspects and communication) and reporting, and it must also include a practical case study.

e. Successful completion of one (1) shadow audit and one (1) witness audit on a producer group, by an already qualified group auditor. CanadaGAP must approve all other credentials before the potential auditor can complete a witness audit.

iv. **Other Skills.** All Program Auditors should demonstrate:

a. Competence in interacting effectively with producers and producer organizations;

b. Excellent written and verbal communication skills;

c. "Working language" skills in the corresponding working language (English/French), including locally used specialist terminology in the working language;

d. Proficiency in software applications (e.g., MS Word, MS Excel).

v. **Auditor Approval by CanadaGAP**

a. Auditor approval by CanadaGAP is specific to a given certification body. Therefore, even if an auditor is already approved and is working as a CanadaGAP auditor for one certification body, CanadaGAP must also approve the on-boarding of a previously approved auditor who wishes to work for another certification body. The onboarding CB must complete one (1) witness audit per scope for the newly onboarded auditor (i.e., regular CanadaGAP audit, plus Repacking and Wholesaling audit if applicable). Exceptions may be granted by CanadaGAP on a case-by-case basis. CanadaGAP approval may also be contingent upon the CB completing additional witness and/or shadow audits for the newly onboarded auditor.

b. In the case of a previously approved CanadaGAP auditor who has taken a hiatus from auditing and let their credentials lapse (e.g., has not completed the minimum number of audits during the previous year, or has not successfully completed refresher training, testing or calibration) and who is brought back on board by any CanadaGAP-licensed CB, the following requirements apply:

i) The candidate must complete:
- One (1) witness audit per scope (e.g., regular CanadaGAP audit, plus Repacking and Wholesaling audit if applicable)
- Two (2) shadow audits (any scope).

ii) In addition, if the candidate has not kept up with CanadaGAP auditor refresher training or assessments during the hiatus, the following requirements also apply:
- Complete relevant CanadaGAP auditor refresher training/assessment
- Complete CB-specific calibration or other refresher training (e.g., missed content from annual calibration sessions; alternative refresher training may be required depending on timing of the auditor's departure and return)
- Repeat CanadaGAP auditor training (i.e., CanadaGAP Auditor Training course, and if applicable Repacking and Wholesaling unit)
- Successfully recomplete relevant exams (i.e., CanadaGAP Auditor Training course final exam, and if applicable Repacking and Wholesaling exam).

iii) Exceptions to the above requirements may be granted by CanadaGAP on a case-by-case basis.

Note: Federal/provincial/territorial/municipal regulations may apply in some jurisdictions. For example, Quebec requires on-farm food safety auditors to be professional agronomists and/or supervised by a professional agronomist.

vi. **Equivalent Qualifications**: Except in the case of auditors who are required to be registered with a GFSI-recognized Professional Recognition Body (PRB), certification bodies may consider equivalency of a candidate's education, work experience or training as meeting CanadaGAP auditor requirements on a case-by-case basis. Assessment of equivalency should be undertaken by the CB only at the auditor qualifying/on-boarding stage, once the candidate has successfully completed all pre-requisite and CanadaGAP auditor training. Determinations of equivalency are subject to review and approval by CanadaGAP as per Section 3.3.1.2 B. v).

vii. **Co-auditing**: The CB may request specific permission from CanadaGAP to assign two auditors to a single audit on a case-by-case basis to train a less experienced auditor alongside a more experienced auditor using a tag team approach. This approach is not considered equivalent to nor a substitute for the required shadow and witness audits necessary to qualify a new CanadaGAP auditor, as set out in Section 3.3.1.2 B.i. i) and j). When such cases are permitted by CanadaGAP:
   a. the more experienced auditor remains the lead auditor during the audit and is responsible to supervise the work of the less experienced auditor;
   b. within the audit plan, the program participant is informed that two auditors will be assigned to the audit;
   c. the CB shall not increase audit fees to program participants who have been assigned two auditors for the purposes of training a less experienced auditor.

Rather, the additional cost of sending a second auditor (e.g., auditor time, travel expenses) shall be covered by the CB as an investment in auditor training.

C. Audit Experience and Auditing Skills Assessment

At minimum, certification bodies must assess auditor performance during the auditor's first three (3) CanadaGAP audits, including at least one (1) witness audit, in accordance with the Certification Body's written programme and **as a pre-requisite** to meeting applicable requirements of the Program. For auditors approved to audit GFSI-recognized CanadaGAP certification options, the initial three (3) CanadaGAP audits used to assess the auditor's performance must be against a GFSI-recognized certification option (i.e., CanadaGAP certification option B, C, or D).

Other than for Option D and F audits, auditors should have experience in **on-farm** food safety auditing (preferable).

D. Competencies

Auditors must be able to demonstrate the following competencies through a combination of education, work experience, training and audit experience.

i. General auditing competencies

a. Audit principles, procedures and techniques to enable the auditor to apply those appropriate to different audits and to ensure that audits are conducted in a consistent and systematic manner.
   - To apply audit principles, procedures and techniques;
   - To plan and organize the work effectively;
   - To conduct the audit within the agreed time schedule;
   - To prioritize and focus on matters of significance;
   - To collect information through effective interviewing, listening, observing and reviewing documents, records and data;
   - To understand the appropriateness and consequences of using sampling techniques for auditing;
   - To verify the accuracy of collected information;
   - To confirm the sufficiency and appropriateness of audit evidence to support audit findings and conclusions;
   - To assess those factors that can affect the reliability of the audit findings and conclusions;
   - To use work documents to record audit activities;
   - To prepare audit reports;
   - To maintain the confidentiality and security of information; and
   - To communicate effectively, either through personal linguistic skills or through an interpreter.

b. Management system and reference documents: to enable the auditor to comprehend the scope of the audit and apply audit criteria. Knowledge and skills in this area shall cover:
   - The application of management systems to different organizations;
   - Interaction between the components of the management system;

- Food safety management system standards, applicable procedures or other management system documents used as audit criteria;
- The ability to recognize differences between, and the priority of, the reference documents;
- The ability to apply the reference documents to different audit situations; and,
- Information systems and technology for authorization, security, distribution and control of documents, data and records.

c. Organizational situations: to enable the auditor to comprehend the organization's operational context.
   - Organizational size, structure, functions and relationships;
   - General business processes and related terminology; and,
   - Cultural and social customs of the auditee.

d. Applicable laws, regulations and other requirements relevant to the discipline to enable the auditor to work within, and be aware of, the requirements that apply to the organization being audited.
   - Local, regional and national codes, laws and regulations;
   - Contracts and agreements;
   - International treaties and conventions; and,
   - Other requirements to which the organization subscribes.

ii. Food safety competencies

a. Current principles of HACCP
b. Relevant pre-requisite programs
c. Identification of food safety hazards
d. Methodologies used for determination, implementation and management of control measures (pre-requisite programs, operational pre-requisite programs and CCPs) and the ability to assess the effectiveness of selected control measures
e. Corrective actions to be taken with regards to food safety matters
f. Assessment of potential food safety hazards linked to the fresh produce sector
g. Evaluation of the relevance of the applicable pre-requisite programs, including establishing or selecting an appropriate evaluation method or guide for these pre-requisite programs
h. Products, processes and practices of the fresh produce sector
i. CanadaGAP management system requirements
j. CanadaGAP standards
k. Laws and regulations relevant to food safety in order to be able to conduct an effective audit of the food safety system. The Certification Body is responsible for providing appropriate training, ongoing updates and support with respect to any applicable legislation, according to each jurisdiction in which services are delivered.

E. Maintenance of competencies

i. Professional development

Auditors must demonstrate continued professional development which may be achieved through additional work experience, training, private study, coaching, attendance at meetings, seminars and conferences or other related activities as required by the licensed certification body.

Auditors must comply with continuing education provisions as set out below:

- Maintain working knowledge of food safety and industry related matters and the Program;
- Attend training courses and seminars, as applicable, including **mandatory** calibration and refresher training offered by the Certification Body and/or CanadaGAP;
- Attend annual calibration and any other mandatory auditor training/refresher sessions offered by ALL certification bodies with whom the auditor is contracted;
- Complete specific continuing education requirements, as determined through assessments and monitoring by the certification body(ies);
- For auditors who are required to be registered with a GFSI-recognized Professional Recognition Body (PRB), maintain registration with the PRB on an ongoing basis.

The auditor must keep up to date with category best practice, food safety and technological developments and have access to and be able to apply relevant laws and regulations, and the certification body must maintain written records of all relevant training undertaken.

ii. Auditing

For auditors approved to conduct audits for GFSI-recognized certification options: To maintain category and scheme knowledge, auditors must complete at least five (5) on-site audits per year at five (5) different organizations (clients) participating in GFSI-recognized CanadaGAP certification options.

For auditors approved to conduct audits for non-GFSI recognized certification options: To maintain category and scheme knowledge, auditors must complete at least five (5) on-site audits per year at five (5) different organizations (clients) participating in ANY CanadaGAP certification options.

iii. Ongoing Monitoring

a. On-going monitoring and evaluation of Auditor by the certification bodies must include:
   - Participation in random evaluation process, to help determine auditor compliance and consistency of results, to potentially include:
     - Witness audits; (note: CanadaGAP does not allow CBs to conduct remote witness audits to evaluate competence of auditors against the CanadaGAP standard)
     - Review of auditor's scoring/audit results;
     - Participation in, at a minimum, one additional witness audit within a three-year period. This does not include witness audits completed specifically to meet requirements for scope extensions (such as for Repacking and Wholesaling and GMS). In those cases, the certification body must still do a witness audit at a regular CanadaGAP audit within the three-year period; and,
     - Scheduled performance review once every four years to determine if auditor meets current auditing requirements; re-evaluation to comprise of program participant feedback, results of witness audits and applicable courses attended;
     - Annually, participation in group exercises/calibration/refresher training session(s) organized by the CB that meet the requirements below in b).

b. **Annual CB calibration sessions:** It is mandatory that CB calibration sessions contain the following elements:
    - **All** auditors present must be engaged by the CB facilitator in interactive exercises or other activities to promote engagement and participation (e.g., answering questions, sharing experiences, etc.)
    - For virtual sessions:
        - To promote auditor engagement, it is recommended that CBs encourage participants to keep their cameras on.
        - Engagement may occur within the chat function, but it is recommended that CBs also encourage oral participation.
        - Auditors must attend at least 75% of the time allotted for the session.
    - CBs must include CanadaGAP in advance planning of calibration sessions to ensure that a CanadaGAP representative is available to attend on the proposed date, and that the various CB sessions are not scheduled at conflicting times.
    - Annually, CBs must cover the following mandatory topics during each calibration session:
        - CanadaGAP Food Safety Manual(s) and audit checklist revisions
        - Management Manual revisions (those applicable to auditors)
        - Calibration items/list provided to CBs based on CanadaGAP spot check results, witness audits, etc.
        - Role of consultants during an audit (refer to Section 3.3.5.4.1 s)
        - Unannounced audit requirements. This review must remind auditors of CanadaGAP rules for unannounced audits, as well as expectations for communication with clients and with CBs in connection with unannounced audits.
        - Instructions within the audit plan regarding audit scope (i.e., crops/activities that must be observed during the audit)
        - Reminder for auditors who are auditing complex operations to:

            (i) audit only the crop/activity combinations that are within the scope of the audit (e.g., if the scope is ‘Packing of carrots’, do not audit any Production-related records or processes for carrots, such as agricultural chemical application, harvested product packaging materials, etc.);

            (ii) not score questions on the audit checklist that are not relevant to the scoped crop/activity combinations that are being audited (e.g., mark questions that are not within scope as N/A)

            (iii) ensure that comments in the audit report are very clear with regards to which commodity/activity an observation or finding applies (e.g., if auditing packing of both carrots and onions, be clear about which commodity and activity a particular comment refers to).

c. **CanadaGAP Auditor Monitoring Program**: To maintain registration as a Program auditor, on-going monitoring and evaluation by CanadaGAP will be required of auditors, consisting of but not limited to:
    - Witness audits (i.e., CanadaGAP program personnel accompanying auditors during on-site audits, as detailed in the technical procedure document TP-05-WA)

- CanadaGAP spot checking audit reports
- Ongoing training (e.g., webinars, conference calls, training notes, etc.)
- At regular intervals, **compulsory** participation in refresher training (e.g., webinars, conference calls) for Program auditors as offered by CanadaGAP; and
- Successful completion of applicable refresher tests or exams. Failure on the tests or exams will result in a series of escalating consequences: 1) communication of the results to the auditor and the certification body and one opportunity to rewrite the refresher test/exam; 2) failing that, communication to the auditor and certification body and a requirement to retake the CanadaGAP auditor training course including successfully passing the exam, 3) failing that, communication of the results to the auditor and the certification body with an indication by CanadaGAP that the auditor/personnel is not considered to be maintaining his or her competency relative to the Program; and an opportunity to provide an action plan to CanadaGAP; 4) failing that, denial of auditor re-registration by CanadaGAP and a request to the certification body to remove the auditor from the Program auditor pool or to reassign personnel to non-Program related activities. Refer to Section 4.3.3 d) for more information about CanadaGAP refresher testing of auditors.

These requirements also apply to persons involved in certification decisions and scoping of Program audits.

F. Certification Body Requirements relative to Personnel Records

a) Licensed certification bodies will require all personnel (e.g., auditors, staff, employees, contractors, etc.) involved with the certification process to sign a contract or agreement which clearly commits them to:

I. Complying with the rules of the organization, with particular reference to confidentiality and independence from commercial, financial or personal interests, or other pressures that may compromise impartiality.
II. Declaring any issues in relation to personal conflicts of interest.
The certification body shall clearly document and make known to its personnel all requirements of ISO/IEC 17065 related to personnel. This shall include systems and procedures to ensure that auditors conducting assessments meet the capabilities described in ISO/IEC 17065.

b) Licensed certification bodies will hold and maintain records regarding qualifications, training and experience of all personnel involved in the certification process. All records shall be dated. The information shall include as a minimum:

I. Name and address of trainees
II. Affiliation to the Certification Body and position held
III. Educational qualifications and professional status
IV. Experience and training in the relevant fields of competence in relation to CanadaGAP requirements
V. Details of performance appraisal(s).

c) The Certification Body shall maintain up to date personnel records, including relevant qualifications, training, experience, affiliations, professional status, competence and any relevant consultancy services that may have been provided. This includes management and administrative personnel, in addition to those performing certification, technical and auditing activities. The Certification Body shall be mindful of and act upon any issues relating to conflict of interest that may affect personnel performance or impartiality.

d) Upon request, licensed certification bodies will share personnel records as required with CanadaGAP on a confidential basis.

G. Certification Body Notification to CanadaGAP

a) Relative to the status of Program auditors, certification bodies must notify CanadaGAP of the following:
   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
   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)
   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)
   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
   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
   vi. when the certification body decides to delay or not to proceed with onboarding an auditor that is approved or conditionally approved by CanadaGAP (e.g., when an auditor has successfully completed training for an additional scope such as repacking and wholesaling or GMS audits but is not needed to perform those audits, when an auditor does not perform satisfactorily on their witness audit and requires more training, etc.)
   vii. when there are other relevant changes to an auditor's status of which CanadaGAP should be aware.

b) Notification shall be sent by the certification body without delay to info@canadagap.ca

3.3.1.3 Program Requirements for Persons involved in Certification Decisions, Shadow Audits, Witness Audits, Technical Review of Audit Reports, Audit Scoping, or Review of Corrective Actions

This section corresponds to requirements of ISO/IEC 17065, clause 7.4 *Evaluation,* clause 7.5 *Review*, and clause 7.6 *Certification Decision.*

3.3.1.3.1 Persons involved in Certification Decisions

a. ISO/IEC 17065 clause 7.6 *Certification Decisions* requires that the certification body have in place at least one person (or a group of persons) to make certification decisions. To be eligible to participate in certification decisions, a person must be authorized by the certification body to perform that function.

b. The person making the certification decision must be independent of all functions associated with the evaluation. *Evaluation* is explained in clause 7.4 of ISO/IEC

17065 and for CanadaGAP purposes includes conducting the audit, adjusting the audit report as required based on feedback from the technical review, reviewing corrective actions, and closing out corrective action requests where the program participant has demonstrated that they meet the requirements of the standard.

c. The person making the certification decision **may** be the same person undertaking the review of the audit package in 3.3.1.3.2, but in such cases, the person must be technically competent in the CanadaGAP standard and meet the requirements set out by CanadaGAP in *Section 3.3.1.2, Program Auditor Requirements* with the exception of those in subsections C and E (ii).

d. If the person making the certification decision does not meet the requirements set out by CanadaGAP in *Section 3.3.1.2, Program Auditor Requirements* with the exception of those in subsections C and E (ii), then the certification decision maker will receive a recommendation from an independent person who is a qualified technical reviewer approved by CanadaGAP (i.e., meets the requirements set out in Section 3.3.1.3.2 for persons involved in technical review of audit reports). The qualified technical reviewer shall complete a review of the full audit package and make a recommendation regarding certification. That person shall be independent from the evaluation activities.

3.3.1.3.2 Persons involved in Shadow Audits, Witness Audits, Technical Review of Audit Reports, Audit Scoping, or Review of Corrective Actions

a) To be eligible to perform shadow audits, witness audits, or technical review audit reports, a person must:

	For all CanadaGAP scopes except Repacking and Wholesaling and GMS	**For Repacking and Wholesaling audits**	**For GMS audits**
i.	meet all applicable requirements as set out in Section 3.3.1.2, Program Auditor Requirements	meet all applicable requirements as set out in Section 3.3.1.2, Program Auditor Requirements, including specific requirements for repacking and wholesaling auditors	meet all applicable requirements as set out in Section 3.3.1.2, Program Auditor Requirements, including specific requirements for GMS auditors
ii.	have successfully completed CanadaGAP auditor training	have successfully completed CanadaGAP auditor training and Repacking and Wholesaling auditor training, and be approved as a repacking and wholesaling auditor	have successfully completed CanadaGAP auditor training and be approved as a GMS auditor
iii.	have completed a minimum of 25 regular* CanadaGAP audits with a broad range of exposure to different commodities, activities,	have completed a minimum of 25 CanadaGAP audits with a broad range of exposure to different	have completed a minimum of 25 CanadaGAP audits with a broad range of exposure to different

	geography (where applicable to the role), etc. *regular audits do not include GMS or repacking and wholesaling audits	commodities, activities, geography (where applicable to the role), etc. Five (5) of the required 25 audits must be CanadaGAP Repacking or Wholesaling audits.	commodities, activities, geography (where applicable to the role), etc.
iv.	not be the same person making the certification decision after reviewing an audit report, as per ISO/IEC 17065 requirements, unless the reviewer was not involved in any part of the "Evaluation" activities such as making further adjustments to the audit report, reviewing corrective actions evidence and closing out corrective action requests, etc. See Section 3.3.1.3.2 d) below for further details.		

b) Exceptions to the requirements above in Section 3.3.1.3.2 a) may be granted by CanadaGAP upon request, provided the CB supplies a rationale that is acceptable to CanadaGAP.

c) In addition, CanadaGAP must approve certification body personnel who are performing shadow audits, witness audits, technical review of audit reports, and audit scoping. CanadaGAP may raise objections based on concerns with any known limitations to an individual's experience, knowledge or qualifications. The certification body must seek approval from CanadaGAP prior to using selected personnel for the specified functions; the certification body is also required to supply a list of personnel used for those functions upon request by CanadaGAP (e.g., at annual performance review meetings).

d) Consistent with the requirements of ISO/IEC 17065, certification body witness auditors cannot be involved in the following activities if they have given the auditor any feedback, guidance, advice or assistance relating to the witnessed audit prior to:

- reviewing the report for an audit that they have witnessed, or
- recommending certification be granted based on the results of an audit that they have witnessed, or
- making certification decisions based on the results of an audit that they have witnessed.

If feedback, guidance, advice or assistance are provided to the auditor only AFTER the report review or, as the case may be, AFTER the certification decision is complete, then the witness auditor may be involved in reviewing the report for the audit they witnessed, or in recommending that certification be granted or making the certification decision regarding the audit they witnessed.

e) **Audit Scoping:** To be eligible to scope Program audits, a person must meet the requirements of Section 3.3.1.3.2 a) except for GMS audits, which can be scoped by any qualified CanadaGAP technical reviewer.

Audit scoping includes determining the following items, among others:

- the applicable crops and activities to be audited
- the appropriate timeframe(s) for the on-site visit(s) by the auditor in accordance with *Section 3.3.5.4.3 Audit Scheduling*
- subsequent year timing of audits for multi-commodity and multi-activity clients

- which crops and activities can be included in the current year certification
- whether the client's operation includes activities or commodities that are out of scope for the Program; etc.

f) **Review of Corrective Actions**: To be eligible to review corrective actions evidence submitted by program participants, a person must be a Program Auditor approved by CanadaGAP. Exceptions may be granted by CanadaGAP upon request, provided the CB supplies a rationale that is acceptable to CanadaGAP.

3.3.1.3.3 Review Process and Requirements

a. ISO/IEC 17065 clause 7.5 *Review* requires that the certification body have in place at least one person to review all information and results related to the evaluation. *Evaluation* is explained in clause 7.4 of ISO/IEC 17065 and for CanadaGAP purposes includes conducting the audit, adjusting the audit report as required based on feedback from the technical review, reviewing corrective actions, and closing out corrective action requests where the program participant has demonstrated that they meet the requirements of the standard.

b. Persons involved in the review process must be independent of the evaluation activities and must be technically competent according to the requirements set out in Section 3.3.1.3.2 a).

c. The review includes the following elements:
   i) Detailed technical review of the audit report once submitted to the certification body by the auditor
   ii) Full technical review of the audit package (i.e., the final audit report, corrective action requests issued by the auditor, corrective actions evidence received from the auditee, closure of corrective action requests, etc.)

   Elements i) and ii) above may be completed by the same person, or by two different persons within the certification body, provided all review functions are completed by a person meeting the requirements of Section 3.3.1.3.2 a).

d. The person performing the Review function may also make the certification decision as provided for within ISO/IEC 17065 clause 7.6 *Certification decision.*

e. Exceptions to the requirements in Section 3.3.1.3.3 may be granted by CanadaGAP upon request, provided the CB supplies a rationale that is acceptable to CanadaGAP and provided that the Accreditation Body is in agreement.

3.3.1.4 Program Requirements for Persons involved in carrying out contract review

To be eligible to carry out contract review for the Program, a person must have:

a) An understanding of the Program

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

c) Successfully completed food safety training in:

i. hazard analysis and critical control point (HACCP) principles, hazard assessment and hazard analysis, and
ii. food safety management principles including prerequisite programmes (PRPs).

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.

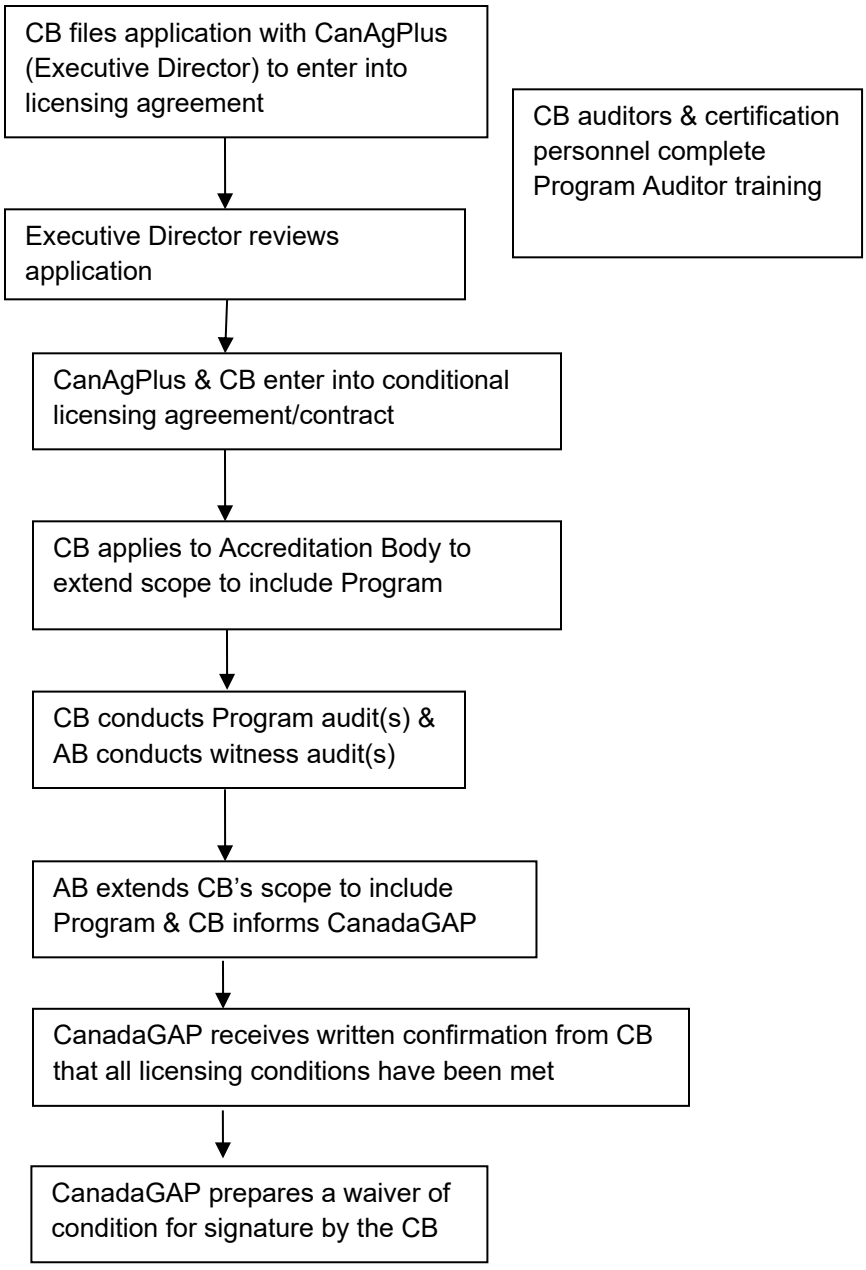
e) Knowledge and skills consistent with the following applicable competency requirements set out in ISO 22003-2 (Annex C, Table C.1):

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
ii. Ability to communicate effectively to fulfil their function within the certification process
iii. Ability to read and write to fulfil their function within the certification process
iv. Ability to identify the auditor competencies required for categories and subcategories in accordance with Table A.1 [of ISO 22003-2] and certification body procedures
v. Ability to identify and to determine factors relevant to food chain categories (with reference to Table A.1) and to the organization, including:
    - PRPs;
    - food safety hazards;
    - statutory and regulatory requirements;
    - any specific seasonality factors related to the organization and its food category or products;
    - specific cultural and social customs related to the categories and geographic areas to be assessed;
    - specific factors required to audit the FSS, food product, process or service.
vi. Ability to apply the application review requirements in this document [ISO 22003-2], specific scheme rules and certification body procedures including:
    - categorizing the organization into food categories and subcategories, in accordance with Annex A [of ISO 22003-2];
    - determining the complexity of the organization's activities;
    - multisite sampling;
    - calculating audit duration.

3.3.1.5 Licensing Process

The Program process for licensing certification bodies involves the steps set out in *Figure 3.1 Process for Licensing Certification Bodies.* CanAgPlus licenses multiple certification bodies to deliver Program audits and certification.

Figure 3.1 Licensing of Certification Bodies



a. The applicant certification body must complete and submit an application (*Form 3.1)* to the Executive Director to initiate the application process.

b. The Executive Director will review the application and determine whether or not it meets the requirements for the signing of a conditional licensing agreement/contract with CanAgPlus.

c. The Executive Director will provide the applicant certification body with a conditional licensing agreement/contract for signature. The Executive Director will consult the Board of Directors as needed relative to the contents of the agreement/contract.

d. With the approval of the Board of Directors, the conditional licensing agreement/contract will be signed by the Executive Director of CanAgPlus.

e. The certification body must already have, or apply to an accreditation body for an extension of its accreditation scope under ISO/IEC 17065 to include the Program, and meet all additional requirements that are required by an external benchmarking program (e.g., Global Food Safety Initiative benchmarking requirements), after entering into the conditional licensing agreement/contract.

f. The accreditation body to which the certification body applies must be a member of the International Accreditation Forum (IAF), or the Global Accreditation Cooperation Incorporated. The certification body's selected Accreditation Body must be signatory to the IAF Multilateral Recognition Arrangement (MLA) or the Global Accreditation Cooperation Incorporated MRA.

g. In circumstances where the certification body has an application for extension of its scope pending with an Accreditation Body, the certification body must provide written notification to, and will receive acknowledgment from, CanadaGAP.

h. The certification body must obtain an extension of its accreditation scope to include the Program, or accreditation including the Program within its scope, within twelve (12) months after the date of its application. In the event that accreditation is delayed beyond twelve months, whether the delay is on the certification body's or the accreditation body's part, the certification body must provide CanadaGAP with a plan to achieve accreditation. The plan will be reviewed by CanadaGAP and a decision will be taken on whether to extend the deadline by which accreditation must be achieved. CanadaGAP shall evaluate and inform GFSI if there is any potential impact on GFSI recognition.

i. The certification body will submit evidence to the Executive Director demonstrating that it has been accredited under ISO/IEC 17065 **and** meets all additional requirements that may be required by an external benchmarking program to provide audit and certification services with respect to the Program (e.g., Global Food Safety Initiative benchmarking requirements).

j. The Executive Director will review the evidence and if found to be acceptable, prepare a waiver of the conditions in the licensing agreement/contract to be sent to the certification body for signature.

k. The Executive Director will enter the name and contact information of each licensed certification body on a list which will be made available to applicants for Program certification on the Program website and/or by other means of communication.

3.3.2 Operational Requirements for Certification Bodies

3.3.2.1 Reporting under the CanadaGAP Program

a. Licensed certification bodies will provide regular updates as stipulated in the licensing agreement/contract (e.g., monthly, quarterly, annually) to the Executive Director concerning the following:
   i. Number of contracts to provide Program audit and certification services;
   ii. A report on the reasons for not proceeding with contracts for Program certification;
   iii. Number of Program initial certification audits;
   iv. Number of Program surveillance audits, including random audits, triggered audits, unannounced audits, and review of declarations of conformity and self-assessments;
   v. Number of Program recertification audits;
   vi. A report on non-conformances, corrective actions and trends therein;
   vii. Number of Program certifications issued, by certification option;
   viii. Number of complaints and a report on their nature and resolution;
   ix. Number of suspensions and withdrawals of Program certifications and a report on their nature and resolution; and,
   x. Number of terminations of Program certifications and a report on the reasons for the termination.

b. A licensed certification body will obtain written permission from all clients to share audit and certification-related information with CanadaGAP, and will provide the Executive Director and/or designated staff, through electronic access to the certification body database or other means, the following information about each certified operation:
   i. Organization name
   ii. Primary contact and contact information
   iii. Current business address and other contact information
   iv. Copy of audit reports (regardless of whether the result was a Pass or Fail)
   v. If applicable, adjusted audit score/result (pass/fail) after corrective actions or approved (by the certification body) corrective actions plan, and copy of corrective actions reports
   vi. Copy of certificates.

c. Certification bodies shall also provide CanadaGAP with all pertinent information and documents relative to program participants who have been audited but failed to achieve certification (e.g., copies of audit reports, CAR Forms, communication of decision not to certify, etc.).

3.3.2.2 Financial and Other Reporting

a. A licensed certification body will submit financial reports as required by the licensing agreement/contract.

b. The certification body will make available the following information at all times:
I. Authority under which the organization operates.
II. Statement in relation to its certification system, including information on rules and procedures for granting, maintaining, extending, suspending and withdrawing certification of its clients.
III. Evaluation procedures and certification process in relation to the certification scheme.
IV. Details of the means of obtaining financial support and fees charged to clients.
V. Details of the rights and requirements of applicants and clients such as the use of logo and marks and the way in which a client can use information in relation to certification.
VI. Details of complaints, appeals and disputes procedures.
VII. A comprehensive list of all certificated clients against the scope of the certification scheme's standard.

c. A licensed certification body must inform CanadaGAP directly and without delay of any change in its accreditation status (e.g., suspension, withdrawal, etc.). The certification body acknowledges that direct dialogue will occur between CanadaGAP and the accreditation body in the event that accreditation is suspended or withdrawn.

3.3.2.3 Program Directory of Certified Clients [Public Directory of Certified Companies]

a. A licensed certification body will maintain and make publicly assessable a web-based directory of valid certifications, searchable by company name and identifying the program standard (i.e., CanadaGAP). The certification body shall make available information for each certified company or group:
   i. name
   ii. scope (i.e., activities and crops covered by the certification)
   iii. certification option
   iv. geographical location (e.g., city, province/state and country)
   v. date of issuance of the certificate
   vi. expiry date of the certificate
   vii. for groups and multi-sites, the relevant information for group members or sites included within the scope of certification.

b. A licensed certification body, acting on instructions from CanadaGAP, will provide such information as is required by any benchmarking scheme about each certified program participant.

3.3.2.4. Assignment of Auditors (Consecutive Audits at the same site)

a. 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 years. This restriction does not apply to the participation of a new auditor candidate in a shadow audit, or of an approved auditor witnessing a new auditor, or to auditors reviewing self-declarations and self-assessments.

3.3.2.5. Certification Body support to Program auditors

a. Licensed certification bodies must provide in-house, trained expertise to support and assist Program auditors requiring clarification/explanation/interpretation of the standard. CanadaGAP is available to assist the CB in responding to questions, but communication

will be between CanadaGAP and the technical expert within the CB, not directly with Program auditors.

b. The certification body – not CanadaGAP – is directly responsible for auditor oversight, auditor training, ongoing updates/education of auditors, auditor calibration, auditor performance and competence. The certification body is also responsible to maintain consistency in its auditors' interpretation and application of Program requirements, to ensure consistent delivery of program audits. To achieve this, each certification body must develop and deliver in-house expertise to support its Program auditors, and must maintain regular contact with auditors and routinely handle questions about program requirements.

c. To maintain the integrity of CanAgPlus's role as scheme owner, CanadaGAP is not involved in providing direct input to auditor evaluations, influencing certification decisions, or commenting on auditor interpretations, observations or findings except where the latter occurs in the context of a witness audit where CanadaGAP directly observes auditor error. CanadaGAP's role is strictly to support the technical expert within the certification body when assistance is required by the CB's technical contact for CanadaGAP or their auditors, and to provide the appropriate training materials and other agreed-upon resources to the certification body as set out in the licensing agreement. Where appropriate, for example if a program participant files a complaint with the certification body or directly with CanadaGAP or the accreditation body, CanadaGAP may have a role. If requested in the event of an appeal or dispute of auditor findings filed with the CB, or of a complaint lodged with CanadaGAP, the certification body or the accreditation body, CanadaGAP will provide clarification, explanation or interpretation (as required) of program requirements. CanadaGAP does not provide specific advice to program participants or their consultants, as the case may be, in its role as manager of the certification program.

d. CanadaGAP is committed to provide technical clarification of the standard, including in response to disputes, appeals or complaints, or in situations where explanation of the requirements is needed by a certification body or its auditors, an accreditation body, program participant or other stakeholder. Requests for clarification, explanation or interpretation of program requirements are to be brought forward to the Executive Director or Technical Manager. CanadaGAP commits to providing the equivalent of four days (30 hours) throughout the year of technical expertise/support to technical contacts at each certification body, to assist with technical questions from auditors and/or other certification body personnel.

3.3.3 Oversight of a Licensed Certification Body

a. The licensing agreement/contract will provide for the oversight by CanadaGAP of a licensed certification body. For greater clarity, CanadaGAP is an operating name of *CanAgPlus*, a Canadian not-for-profit corporation that operates the Program (Corporation Number 822397-1)

b. The Executive Director will annually conduct a review of the performance of each licensed certification body. This review will include:
   i. A meeting with the primary contact of the licensed certification body;
   ii. A review of the materials related to the licensed certification body's annual management review of the Program and internal audit findings;

iii. A review of the information provided by the licensed certification body under *Section 3.3.2.1*, *Reporting under the Program*;
iv. A review of the evidence provided by the licensed certification body to demonstrate its continued accreditation to ISO/IEC 17065 and its continued adherence to all additional requirements that may be required by an external benchmarking program (e.g., Global Food Safety Initiative benchmarking requirements); and
v. A review of documentation related to auditor performance (e.g., reports from witness audits conducted by the 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 (preferably from GFSI-recognized certification option audits), 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.

d. Maintenance of accreditation is a condition of certification bodies offering CanadaGAP audits and certification. The Certification Body is required to inform CanadaGAP immediately should their accreditation to ISO/IEC 17065 be suspended or withdrawn.

3.3.4 Suspension or Termination of Licensing Agreement/Contract with Certification Bodies

a. The Executive Director may initiate the suspension or termination of a licensing agreement/contract with a Licensed Certification Body at any time if:
i. the Licensed Certification Body has been found to supply false, misleading or deceptive information;
ii. the Licensed Certification Body certification system is found to be inadequate;
iii. the Licensed Certification Body fails to comply with any of the conditions of the licensing agreement/contract;
iv. CanadaGAP has reason to believe that the Licensed Certification Body cannot or is not appropriately administering or maintaining the certification system;
v. the accreditation body has withdrawn accreditation of the Licensed Certification Body for the Program; or,
vi. CanadaGAP deems the auditing organization unnecessary.

The Executive Director will prepare a report, including a summary of the evidence and rationale for a suspension or termination, for submission to the Board of Directors. The Board will review the report, and make a decision relative to suspension or termination of the licensed certification body. The Board will authorize the Executive Director to carry out its decision. The Executive Director will notify the Licensed Certification Body in writing and request it to take appropriate corrective actions. Provided appropriate corrective action is taken, no suspension action will be necessary.

b. If the Licensed Certification Body does not initiate the corrective actions requested, or come to some agreeable arrangement for correction, and so advise CanadaGAP in writing within thirty (30) days of being notified, CanAgPlus shall, by written notice, suspend its license until it receives notice satisfactory to it of completion of said actions. When suspension action is taken, clients, potential clients and the public will be notified by the posting of a Suspension Notice on the Program website. Other interested parties

(e.g., accreditation body, CFIA as the recognition body, an external benchmarking entity) will be advised of the suspension action. They will also be advised of any reinstatement action taken.

c. If the Licensed Certification Body initiates but does not or cannot complete the required actions within a further sixty (60) days from the date the original corrective action was requested, it will be subject to suspension.

d. If immediate suspension of a Licensed Certification Body for failing to conform to its licensing agreement/contract appears to be warranted, the Licensed Certification Body will be advised in writing by the Executive Director that a recommendation will be forwarded to the Board of Directors who will decide whether or not to suspend the Licensed Certification Body.

e. The Licensed Certification Body has the right to appeal its case in writing to CanadaGAP within thirty (30) days of receiving the notice advising that it is suspended and that its licensing agreement/contract may be terminated.

f. If an appeal is not made or corrective action satisfactory to the Board of Directors is not taken within the thirty (30) day period referred to above, the licensing agreement/ contract will be terminated. The Executive Director shall so advise the Certification Body and other parties affected.

g. When the Licensed Certification Body has been either suspended or terminated, it and any affiliated parties shall immediately cease making reference to status as a licensed certification body in any promotional materials, or letterhead, in audit or in any other documents or media related to any suspended or terminated activities. It shall also cease displaying its licensing agreement/contract on its premises and cease any use of the Program logo(s) and/or mark(s).

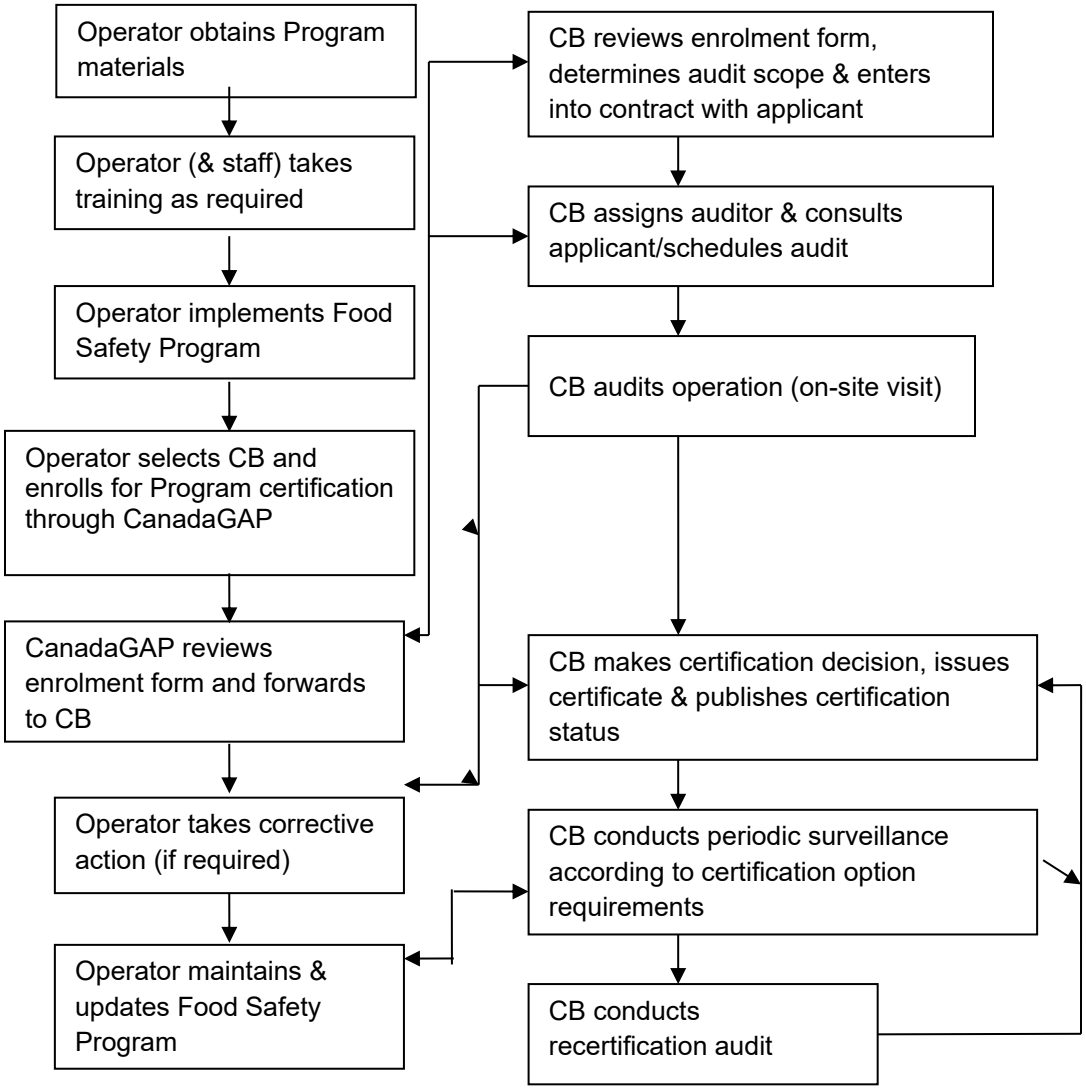
h. The Executive Director or designate will revise the list of licensed certification bodies posted on the Program website and make available by other means of communication to indicate that the certification body has had its license suspended or terminated.

i. The Executive Director will contact the suspended or terminated certification body's accreditation body to:
    i. Inform it of the suspension or termination; and,
    ii. Provide assistance in the process of transferring certifications to another licensed certification body.

3.3.5 Program Certification

a. A Licensed Certification Body will incorporate into its procedures established in compliance with the requirements of ISO/IEC 17065 and all additional requirements that may be required by an external benchmarking program (e.g., Global Food Safety Initiative benchmarking requirements) for reviewing applications, planning, conducting and reporting Program audits and issuing Program certificates, the steps set out in *Figure 3.2: Process for Certifying Operations involved in Production/Packing/Storage/Repacking/Wholesaling/Brokerage.*

Figure 3.2: Process for Certifying Operations Involved in Production/Packing/Storage/Repacking/Wholesaling/Brokerage



3.3.5.1 Application Information Requirements

a. A Licensed Certification Body will require from an applicant the following general information:

   i. Name of the company;
   ii. EAN.UCC Global Location Number (GLN) if available;
   iii. Business Address;
   iv. Name(s) of location(s) to be audited;
   v. Address(es) of location(s)/site(s) to be audited;
   vi. Date of any previous Program certification and name of Certification Body granting certification;

vii. Version of Program to be certified;
viii. Scope of Certification Requested [Certification Option, activities covered (i.e., production, storage, packing, repacking, wholesaling), crops (commodities) to be included]; and,
ix. Name/signature of company representative.

3.3.5.2 Scope of Certification

a. A Licensed Certification Body will provide audit and certification to Program applicants in the following scopes:

i. Activities included (see detailed definitions in *Section 3.3.5.2 c)* for each activity):
- Production;
- Packing (see below for clarification of the definition in *Section 3.3.5.2 c.2*);
- Storage, which may be used on a certificate only in two instances (for further details, refer to *Section 3.3.5.2 h*):
  - 1) when Storage is the sole activity of the operation, or
  - 2) when a producer is storing harvested product for other producers, but only if it is a different commodity than the product for which the operation is already certified for production or packing.
- Repacking;
- Wholesaling;
- Brokerage;
- Combinations of any of the following: Production, Packing, Repacking; Repacking and Wholesaling; Production and Wholesaling. Refer to *Section 3.3.5.2 g*);
- In exceptional cases, one or more sub-scopes of the above activities may apply, where the operation's activities for a given commodity are limited (e.g., Sorting and Grading; Icing and Storing). Refer to *Section 3.3.5.2.d).*
- Relevant exceptions are also noted on certificates (e.g., Production of processing potatoes except for storing; Packing of broccoli except for icing). Refer to Section *3.3.5.2.e*).
- Refer to applicable sub-sections below for further clarification.

ii. Crops/commodities included:
- For Production, Packing and Storage: Certificates **must specify** the individual crops and can include only those commodities identified in the two manuals: 1. *CanadaGAP Food Safety Manual for Fresh Fruits and Vegetables; 2. CanadaGAP Food Safety Manual for Greenhouse Product.*
- For Repacking, Brokerage and Wholesaling: The product scope on certificates shall be "**Fresh Fruits and Vegetables**". Exclusions may be specified on the certificate if required for the purposes of full disclosure. For example, if a repacking operation is certified for "Fresh Fruits and Vegetables" that are within scope, but is also involved in repacking of products specifically outside of scope, such as fresh sprouts, the certificate may specify the exclusion. **In addition**, for repacking and wholesaling operations, the certification body shall have on file a copy of the operation's Form 1 from the site-specific HACCP Plan that was reviewed by the auditor. Form 1 will identify which products are included in the operation's scope at the time of the audit. Certificates shall be withheld by the certification body until the program participant has supplied a copy of Form 1 from the operation's HACCP Plan.

iii. Certification Option included:
- Option A1 – Four year audit cycle (fixed) – not GFSI-recognized
- Option A2 – Four year audit cycle (variable) – not GFSI-recognized
- Option B – Group Certification (GFSI recognized)
- Option C – Annual On-site Audit of Production, Packing or Storage (GFSI-recognized)
- Option D – Annual On-site Audit of Repacking or Wholesaling operations (GFSI-recognized))
- Option E – Annual On-site Audit of Production, Packing or Storage (not GFSI-recognized)
- Option F - Annual On-site Audit or Repacking, Wholesaling or Brokerage (not GFSI-recognized)

b. Applicants for Program certification will clearly identify the scopes for which certification is sought. Certification bodies will confirm the client's requested certification scope and the activities and crops that will be covered by the audit when negotiating and finalizing the contract with the program applicant.

c. Certification bodies are responsible to ensure that the scope requested by the applicant corresponds to the stated scope of the Program. The Program can cover functions carried out under # 1, 2, 3, 4, 5 and 6 below. Use of the term "product" below refers to fruits and vegetables:

1) **Production:** Activities (e.g., growing, harvesting, putting harvested product into harvested product packaging materials, cooling, rinsing, etc.) involved with harvested product. The production operation may or may not store and/or transport product.

2) **Packing**: Includes:
(i) The physical act of taking harvested product and putting it into market ready packaging materials for the first time (both in the production site and in the packinghouse). This does not include re-packing. Note for the purposes of the certification scope, putting product into **harvested product** packaging materials at harvest is not considered "Packing".
(ii) Activities (e.g., icing, labelling/coding, cooling, etc.) that occur once product is in the packaging materials.

The operation involved with packing may or may not store and/or transport packed product.

3) **Storage**: Keeping product in a pre-determined and controlled location for a period of days to months (e.g., atmosphere controlled or modified; cooled, dry, contained location).

For certification purposes (i.e., for "Storage" to appear on a certificate), this description applies only to:
- standalone storage operations storing **harvested product**
- producers storing other producers' **harvested product**, but only if it is a different commodity than the product for which the operation is already certified for production or packing.

4) **Repacking:** Includes:
(i) Removing market product from its market ready packaging materials, re-handling the product (e.g., re-sorting, re-grading, re-trimming, re-washing, re-fluming, etc.), and putting it into market ready packaging materials. Product may also be combined with other product that differs in some way (e.g., type, origin, timeframe, etc.).
(ii) Activities (e.g., icing, labelling/coding, cooling, etc.) that occur once product is in the packaging materials.
The operation involved with repacking may or may not store and/or transport product.

5) **Wholesaling**: Activity where operations are involved ONLY in storage of **market product**. The operation may or may not transport product.

6) **Brokerage:** Activity where the operation is ONLY involved in arranging the transaction of product between a supplier and a buyer. The brokerage operation does NOT physically handle the product in any way. The person responsible for brokerage is the “broker”.

Below are examples of some scenarios that may come up:

Scenario	Activity	Product(s)	Choose this option:	Certificate Scope
1	Storing imported product	Market Product: bananas, citrus, pineapple	Option D or F	Wholesaling of Fresh Fruits and Vegetables
2	Storing imported and domestic product	Market Product (imported): bananas Market Product (domestic): apples	Option D or F	Wholesaling of Fresh Fruits and Vegetables
3	Storing imported and domestic product	Market Product (imported): bananas Harvested Product (domestic): apples	Option D or F for the bananas Option C or E for the apples	One certificate: • Wholesaling of Fresh Fruits and Vegetables • Storage of Apples

4	Storing imported and domestic product	Harvested Product (imported): apples Harvested Product (domestic): apples	Option C or E	Storage of Apples

d. Where the audit scope includes only a subset of activities, the certificate shall specify the particular activity or activities (e.g., “Icing of broccoli) rather than the broader function (e.g., “Production of broccoli” or “Packing of broccoli”). As applicable, more precision is preferred when describing the audit scope on Program certificates, in the interests of full disclosure.

e. Within a given commodity, exclusions of product from the scope of certification can be made only in certain situations. The following are acceptable:
   i. Greenhouse-grown commodity vs. a field-grown commodity. “Greenhouse” should be indicated on the certificate;
   ii. Commodity grown for processing vs. a commodity grown for fresh market;
   iii. U-pick: Certificates need not specify “Excluding U-pick”. It is assumed that most operations exclude their U-pick from the scope of their certification. Rather, if U-pick IS INCLUDED, the certificate should state “Including U-pick”;
   iv. Excluding a main scope of activity (i.e., ALL of production/packing/storing of a given commodity)
      a. However, if storing is a sub-set of production/packing, then it cannot be excluded from the scope of certification UNLESS the exclusion is clearly stated on the certificate. For example, an apple producer also stores apples. The scope of his certificate would be “Production of Apples”, which is understood to include storing. If the producer does not want to include his storage activity in the scope of the audit, the certificate must clearly state that storing apples is excluded. The scope of his certificate would be “Production of Apples (except for storage)”.
      b. The scope of certification cannot be limited to sub-activities within those main scopes of activity (such as harvesting, washing, sorting, etc.) UNLESS those sub-activities are the only activity in which the operation is involved (e.g., icing of broccoli).
      c. Exclusions cannot be made for different varieties, production sites, etc. where the same activity and commodity are involved (e.g., production of the same crop in two different fields).

   v. For operations that outsource an activity that is relevant to the scope of their certification (e.g., contract harvesting, icing, labelling, etc.): If the auditee does not have a valid food safety certificate/third party audit report from an outside service provider performing an activity, then the scope of the outsourced activity must be listed on the certificate as an exclusion. For example, an operation’s certificate would read “Production of Blueberries (except for harvesting)” if the certified company were unable to provide evidence of conformance from their outside service provider(s).

vi. CanadaGAP does not offer certification for aquaponic production of crops. If an operation is growing the same crop (e.g., lettuce or other leafy green) using different production methods, the certificate must specifically exclude the product that is grown using aquaponic methods (e.g., "Excluding lettuce grown aquaponically").

Exclusions should be clearly indicated on the certificate, for example: "*Production of processing potatoes (except for storage)"* or *"Production and packing of greenhouse tomatoes".* This level of specificity is required in special cases to ensure that it is clear on the certificate which of the operation's activities are within scope, and which are not.

f. Detailed lists of applicable commodities for each crop grouping are included in the Manuals and in the Generic HACCP models. The production flow diagrams in the generic HACCP models indicate the activities encompassed by the hazard analysis.

g. Certificates may cover a combination of activities, specifically "Production and Packing" (or sub-activities of Production and Packing), or combinations of Production, Packing and Repacking, and in some cases Wholesaling (see 3.3.5.2 h). For example, an operation that both grows and packs a given product, whether in the field or in a packinghouse, may have a certificate that specifies both "Production and Packing".

h. **With respect to specific commodities**:
   i. "Storage" should not appear on certificates that already specify the scope of "Production" and/or "Packing" with respect to a specific product. While it's true that many who produce and/or pack product also store it, storing is just one of several activities they are regularly engaged in (like cleaning, applying chemicals, transporting, etc.) and should be treated as part of their overall scope of "Production" and/or "Packing". Adding "Storage" to their certificates creates unwanted confusion in situations where the same commodity is both produced and stored, or packed and stored.
   ii. Similarly, the activity of wholesaling may be a subset of the "Packing" scope where a given commodity is packed and then stored in its market ready packaging materials. The certificate should indicate only "Packing" as the scope (and in this case would be an Option C certification);
   iii. The activity of wholesaling may also be a subset of the "Repacking" scope where the **same** commodity is repacked and then stored. In that case, the certificate would indicate only "Repacking" as the scope. More commonly, however, certificates will include both "Repacking and Wholesaling of Fresh Fruits and Vegetables", since in a typical operation many more commodities are being wholesaled than are being repacked.
   iv. With respect to a specific commodity, a certificate covering both "Production" and "Wholesaling" should specify both scopes as they are always mutually exclusive and also represent two different certification options. In other words, there is no overlap of activities between those two scopes (i.e., "Production" pertains only to harvested product, whereas "Wholesaling" pertains only to market product).

i. The Program does NOT offer certification for retailing or processing of fruits and vegetables.

j. Program certification is NOT available for the following scopes:

   a) **"Minimal processing"** activities as is defined in the Glossary of the CanadaGAP Food Safety Manuals

   b) **Processing** of fruits and vegetables (e.g., cooking, freezing, canning, pickling, preserving, juicing, frying, dehydrating, heating, irradiating, pasteurizing, conserving, etc.)

   c) **Production, Packing and Storage of products outside the Program scope** [e.g., sprouts, microgreens, aquaponically-grown products, nuts, mushrooms, dried herbs and spices, wild-gathered products (e.g., fiddleheads, wild garlic, wild mushrooms), processed products, commodities not grown on a commercial scale or at all in Canada (e.g., citrus, tropical fruits and vegetables, etc.)]. Refer to the manuals for the complete list of commodities that are covered by the Program.

      Note: imported fruits and vegetables that are outside the scope of commodities covered by CanadaGAP certification for *production, packing and storage*, would be classified as **market product** and be eligible for certification under Option D or F for repacking, brokerage and wholesaling, since the market for these products is the repacker/broker/wholesaler.

   d) **Repacking, Brokerage and Wholesaling** of fresh sprouts, minimally processed fruits and vegetables, and fresh fruits and vegetables in "hermetically sealed containers" as defined in the Glossary of the CanadaGAP Food Safety Manuals.

k. Following are types of activities that are *not* considered minimal processing and CAN be included within the scope of certification:
   - Removing outer leaves (e.g., of cabbage, broccoli, cauliflower, lettuce, etc.) after harvesting
   - Trimming off leaves, ends, tops or other parts of the product generally considered inedible or unsaleable (e.g., trimming ends from asparagus, removing outer stalks of celery, removing rhubarb leaves, trimming ends from rutabagas, etc.)
   - Removing tops from vegetables such as carrots, beets, turnips, etc.
   - Air drying or curing products such as onions, squash, etc.

l. The Program does not cover sprouts or sprouted seeds.

m. If in doubt about whether a specific client's operations, products or activities can be included within the scope of a Program audit, contact Program staff for clarification.

3.3.5.3 Multi-site Certification for Options A1, A2, C, D, E or F

a. For Options A1, A2, C, D, E and F: A program participant with multiple sites (i.e., separately located facilities or sites using different equipment and normally employing different staff, etc.) may apply for a single certification and a single or combined audit by the certification body if:

   i. There are a minimum of eight (8) locations (at different addresses) involved. This does not include producers who have a number of fields (i.e., production sites) within their operation. Also, producers who have storage facilities or packing

barns in several locations *associated with their production sites* would NOT typically be considered multi-site operations, unless those facilities are clearly run independently of other functions (i.e., with separate crews, which may be the case with some multi-commodity operations). If in doubt, contact CanadaGAP for further guidance. Appendix III.2 comprises additional guidance from CanadaGAP and is to assist CBs with managing audits (e.g., scoping, timing) for complex operations that have numerous fields or multiple activities, etc. but that are not multi-sites;

ii. At each location/address, separate activities are occurring using equipment and employees that are dedicated to that site;
iii. All sites are operating under one centrally controlled and administered management system;
iv. All sites are under the same ownership (e.g., the same company owns or controls activities with all sites);
v. All sites are within the requested scope;
vi. All sites are situated within a geographic boundary that can be effectively served by the certification body (e.g., within 50 km or within a region as determined by the CB); and,
vii. Records are available from all sites showing consistent implementation of the centrally controlled and administered management system.

b. The certification body will determine which site(s) need to be visited by the auditor to evaluate the effectiveness of the food safety program and the centrally controlled management system. For Options D and F, no sampling is permitted; all sites must be audited annually.

Relative to Options A1, A2, C and E: For initial certification, including when a multi-site client transfers to a different CB, the CB will audit all sites. Thereafter, the certification body may determine a sampling plan based on an evaluation of the risk. The certification body shall base the site sampling plan on the rules set out below in Section 3.3.5.3 (h). These rules reflect CanadaGAP's application of GFSI requirements for "Site audit sampling" from Version 2020.1 of the GFSI Benchmarking Requirements document (Part II, clauses 6.21, 6.22, 6.23, 6.24, 6.28, 6.29, and 6.30). It is the CB's responsibility to inform clients of the sampling plan (if any) based on the CB's (not the client's) determination of risk.

c. In terms of certificates for multi-site operations:

i. Only one certificate will be issued for each multi-site certification. Certificates must list all connected sites (locations, addresses, etc.) on the certificate itself or in an annex that forms an integral part of the certificate. Excluded from this clause are participants who require the same certificate, one in each official language (English and French). That circumstance will be considered as a single certificate.
ii. Sites or scopes that are new to the multi-site certification must successfully pass an audit before they are added to the certificate. In addition, an audit of the management system may also be required if the certification body deems it necessary to verify that the new sites and scopes are being effectively managed under the central management system.
iii. If individual sites within the multi-site operation are allowed to sell their product outside of the multi-site organisation, in all cases the individual sites shall be

transparent about the source and scope of certification, by providing customers with a copy of the certificate as issued above (to the central function).

iv. Certificates issued to multi-site operations must have the words “MULTI-SITE” or “EMPLACEMENTS MULTIPLES” appearing somewhere on the certificate itself.

d. Annual Program Fees associated with multi-site certification are administered as follows:

i. If all sites within the multi-site certification are included on the initial enrolment form, and the certification body agrees to proceed with multi-site certification, a single annual program fee along with a per site fee will be charged. An exception applies to multi-sites with locations outside of Canada. Refer to *Section 3.3.5.3 d. iii*) below.

ii. If additional sites are added to the certification scope after initial enrolment in the program, an additional administrative charge equivalent to one year's annual program fee will be charged by CanadaGAP for the addition of multiple new site(s).

iii. For multi-sites involving operations outside of Canada, separate annual program fees will apply each year for each additional country.

iv. Each multi-site operation enrolled in Option A1, A2, C, or E shall pay one annual FVGC Charge of $50. Options D and F are excluded from paying the FVGC Charge.

e. Program participants who require multiple certificates (e.g., each certificate bearing a different company/site name) are *not* considered multi-sites and must enroll each operation for Program certification separately. Regardless, audits may be scheduled together (i.e., in a combined audit) if sites are co-located.

f. Separate companies whose operations are at the same location are NOT considered multi-sites. Each company’s certificate will bear the site’s address.

g. Management system requirements for Option A1, A2, C, D, E and F multi-site operations are reflected below and in the CanadaGAP Management System Audit Checklist for Multi-site Operations [Form 3.6]. When auditing multi-site operations, CBs must use the Management System Audit Checklist to assess the central management system, in addition to the auditor completing the CanadaGAP Audit Checklist [Form 3.2] for all sites sampled by the CB.

h. To be certified, multi-site operations must comply 100% with the questions in the CanadaGAP Management System Audit Checklist for Multi-site Operations [Form 3.6]. The requirements as set out by GFSI and applied within the CanadaGAP program to all certification options are indicated below:

GFSI CLAUSE NUMBER	GFSI CLAUSE NAME	GFSI REQUIREMENT (Version 2020.1, Part II)
6.5	General requirements	The central function shall request certification as a multi-site organisation based on sampling in their application for certification to the Certification Body. The central function, not the individual sites, shall be contracted to the Certification Body.
6.6	General requirements	The central function shall be included in the scope of the certification.

6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. (Note: for CanadaGAP Options A1 and A2, this clause applies only during audit years, not in self-assessment years.) If necessary, a small number of the sample sites may be audited prior to the audit of the central function.
6.3	General requirements	All sites included in the scope of certification of a multi-site organisation shall operate under the same Food Safety Management System and under the control of the central function.
6.4	General requirements	There shall be a legal or contractual link between the sites and the central function.
6.8	Central function	The central function shall ensure management commitment to the system / integrity and clearly describe the roles and responsibilities of management, internal auditors and other members of the organisation. The activities of the central function shall be separate and independent from the operation of the sites (e.g., the conducting of internal audits shall be done impartially, etc.).
6.10	Central function	The central function shall have an effective customer complaint procedure.
6.9	Central function	The central function shall have authoritative control of the Food Safety Management System of all sites within the certification and shall maintain traceability and issue, maintain and retain all relevant documents relating to the sites within the programme.
6.12	Central function	The central function shall have in place sufficient management and technical capacity to implement and maintain the internal audit programme.
6.11	Central function	The central function shall manage and maintain relations with the sites for the activities related to the scope of certification.
6.13	Central function	The central function shall be subject to management review in accordance with Certification Programme requirements and shall be itself subject to internal audit.
6.14	Internal audit	An internal audit programme based on site and risk profile shall be in place and undertaken by the central function. This programme shall ensure audits of all sites, the central function and the management system at least annually.
6.15	Internal audit	The internal audit programme shall have documented procedures and be both practical and feasible in operative terms.
6.16	Internal audit	Clear requirements for internal auditors and technical reviewers shall be defined, documented and reviewed by the Certification Body.
6.17	Internal audit	Internal auditors shall be suitably qualified to conduct internal audits. Their qualifications shall be assessed annually by the Certification Body. These qualifications shall include, at a minimum, requirements related to internal auditor education, training, work experience or other qualifications. (See Section 3.3.1.2 of the CanadaGAP Program Management Manual for further details/guidance around what is expected for external auditors.) Note that internal auditors are not required to complete the CanadaGAP Auditor Training course or pass the exam.

6.18	Internal audit	Internal auditors shall be regularly evaluated, calibrated and monitored.
6.19	Internal audit	Internal auditors shall be assigned by the central function to sites to ensure impartiality.
6.20	Internal audit	Internal audit reports shall be reviewed by the central function and include addressing the non-conformities resulting from the internal audit.
6.28 (*note: numbering is not in order; this is not an error)*	Site audit sampling	The Certification Body shall define a sampling plan for site audits based on the risk-based approach below. A risk-based approach shall determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for sampling audits by the certification body as part of the operation's multi-site certification. • Level 4 (high risk crops/activities) includes: packing (see further details section i) below); using potable water post-harvest on any commodity (as opposed to dry handling of product); production or storage of cantaloupe; production or storage of leafy greens and herbs (including all lettuce, green onions, leeks, leaf of root crops, leafy crops such as kale, chard, chicory, etc.); production or storage of strawberries. **No sampling of these sites is permitted. All sites must be audited by the Certification Body annually.** • Level 3 (medium-high risk crops/activities) includes: production or storage of petioles (celery, rhubarb, fennel); hand harvesting of cherries and blueberries. **These sites must be sampled at 3 times the square root**. • Level 2 (medium risk crops/activities) includes: production or storage of small fruit other than strawberries (except for hand harvesting of blueberries); production or storage of tomatoes, peppers, cucumbers and melons (other than cantaloupe); production or storage of tree and vine fruit; production or storage of cruciferous vegetables such as broccoli, cauliflower, cabbage, etc. **These sites must be sampled at 2 times the square root**. • Level 1 (lower risk crops/activities) includes: production and storage of all other crops and activities not identified above. **The square root of these sites may be sampled**.
6.21	Site audit sampling	The Certification Body is also permitted to increase sample size based on various risk factors that may be applicable to a particular multi-site organisation (e.g., audit scope, types of activities on-site, findings of the central management system audit, findings at sampled sites, customer requirements, etc.), size of the multi-site organisation and the internal structure.
6.22	Site audit sampling	Certification Programme Owners shall ensure that the Certification Body audit a sample of the sites every year.
6.23	Site audit sampling	The annual sampling size of the Certification Body audit sampling programme shall be based on IAF MD1 current version. The sample of the Certification body's audit of the sites shall be calculated per risk category (**see Levels 3, 2, 1 as defined above**). The calculation of the sampled audits must be rounded upwards to the next whole number if there are any decimals. The sampling programme can be adjusted based on the use of monitoring technologies.

6.24	Site audit sampling	The programme shall be partly selective and partly non-selective, but at least 25% of the sample shall be randomly selected from the total number of sites. Selected sites shall be identified based on the organisation's internal audit programme findings and the site risk profiles as per IAF MD 1.
6.29	Site audit sampling	The sampling programme shall be determined so that all sites within the multi-site organisation are audited within a defined period, based on the risk of the commodity as specified below: • Level 3 (medium-high risk crops/activities): on an ongoing basis, all Level 3 sites must be audited by the Certification Body over a three-year period • Level 2 (medium risk crops/activities): on an ongoing basis, all Level 2 sites must be audited by the Certification Body over a four-year period • Level 1 (lower risk crops/activities): on an ongoing basis, all Level 1 sites must be audited by the Certification Body over a five-year period
6.30	Site audit sampling	Twenty-five per cent (25%) of the sites selected to be audited by the Certification Body shall be unannounced audits. See Section 3.3.5.4.3 h) for detailed rules on unannounced audits.
6.25	Management of non-conformities and certification	Non-conformities found on sites shall be assessed to ascertain if these indicate an overall Food Safety System deficiency and therefore may be applicable to all or other sites. If non-conformities relate to all or other sites, corrective action shall be undertaken and verified both by organisation and by the Certification Body.
6.26	Management of non-conformities and certification	In the event that non-conformities are found when auditing sites, which may not jeopardise certification but may raise concerns on conformity of the organisation, the Certification Body shall increase the sample size to ensure adequate confidence in the conformity of the organisation.
6.27	Management of non-conformities and certification	If the organisation, or any site fails to meet the critical Certification Programme requirements, then the whole organisation, including all sites, will fail to gain certification. Where certification has previously been in place, this shall initiate the Certification Body's process to suspend or withdraw its certification.

i) Within Risk Level 4 (highest risk), field-packing of certain commodities should not be considered a "High-Risk" activity. The following table indicates which commodities when field-packed would NOT be in Level 4 for the purposes of CB sampling:

Risk Level 3	**Risk Level 2**	**Risk Level 1**
Field packing of:	***Field packing of:***	***Field packing of:***
Melons (except Cantaloupe) including Watermelons Small Fruit (except Strawberries,	Apples Apricots Beans Broccoli Cabbage Cauliflower	Artichoke Asparagus Beets Brussels sprouts Carrots Cranberries

Cranberries and Haskap)	Celery Cucumbers Eggplant Fennel Grapes Kiwis Nectarines Peaches Pears Peas Peppers Plums Tomatoes	Garlic Haskap Onions Potatoes Pumpkins Radish Rhubarb Rutabagas Sea Buckthorn Squash Sweet corn Turnips

Risk Level 4 therefore includes the following remaining crops that are field-packed: Cantaloupe, Leafy Greens and Herbs (including all lettuce, green onions, leeks, leaf of root crops, mixed greens, radicchio, kohlrabi, leafy crops such as kale, chard, chicory, etc.), and Strawberries.

Note: If field packing includes use of potable water post-harvest, regardless of commodity, this activity is considered Risk Level 4.

For information about Group Certification (Option B), refer to *Section 3.3.5.8, Certification Options.*

3.3.5.4 Program Audit and Certification Process

3.3.5.4.1 Procedures

i. This section provides a summary of the procedures to be followed by the Certification Body. Refer to subsequent sections for further details.

ii. A Licensed Certification Body will incorporate into its procedures established in compliance with the requirements of ISO/IEC 17065 **and** all additional requirements that may be required by an external benchmarking program (e.g., Global Food Safety Initiative benchmarking requirements) for planning, conducting and reporting Program audits and issuing Program Certificates, the following:

   a. The Program requirements for Auditors and other personnel involved in certification decision making, contract review and audit scoping (*Section 3.3.1.2, Program Auditor Requirements, Section 3.3.1.3, Program Requirements for Persons involved in Certification Decisions, Shadow Audits, Witness Audits, Technical Review of Audit Reports, or Audit Scoping* and *Section 3.3.1.4, Program Requirements for Persons involved in carrying out contract review*);

   b. The Audit Checklist [*Form 3.2*] and the Manuals that comprise the Program standard. The latest versions are always those identified and posted on the Program website at: www.canadagap.ca. Program users are responsible to check the website to obtain and ensure they are using the latest versions for certification.

   c. Group Management System Checklist [*Form 3.4*]

d. The Self-Declaration and Self-Assessment Checklist [*Form 3.3*];

e. The Program minimum set of elements for an audit report, as follows:
   - General Information
     - Name of the company
     - EAN.UCC Global Location Number (GLN) if available
     - Address
     - Name of Certification Body
     - Address
     - Name of audited location
     - Address (see Section 3.3.5.4.1 o) below for further details)
     - Date(s) of audit
     - Date of previous audit and name of Certification Body conducting audit
     - Duration of audit (e.g., start and end times)
     - Version of Program audited
     - Certification Option (A1, A2, B, C, D, E or F)
     - Scope of audit relative to activities [e.g., Production/Packing/ Storage/Repacking/Wholesaling; Group Management System]
     - Scope of audit relative to crops included. Option D and F program participants must provide a copy of Form 1 from their site-specific HACCP Plan to attach to the audit report.
     - List of key personnel present at audit
     - Name/signature of company representative
     - Name/signature of auditor
   - Summary of Results
   - Description of HACCP/food safety management system and/or Manual(s) implemented
   - Details of existing certificates
   - Overview of assessing processes
   - Conclusion of audit
   - Expiry Date of Certificate
   - List of Non-compliances
   - Detailed Evaluation Report/Sampled Items
     - Program Requirements with results per key element
     - Relevant remarks

f. The Program certification period of one year;

g. A minimum surveillance activity of at least once each calendar or crop 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 and/or activities, 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 the original certification cycle may be required**. Some flexibility and discretion are extended to CBs to address exceptional situations. Refer also to:

- *Section 3.3.5.4.3 Audit Scheduling;*
- *Section 3.3.5.4.5 Multi-Commodity and Multi-Activity Sites of Production, Storage, Packing, Repacking, Wholesaling and Brokerage;*
- *Section 3.3.5.5.2 Certification Cycle and Audit Timing;*
- *Section 3.3.5.5.3 Date of Certification and Certificate Expiry Date;*
- *Section 3.3.5.5.4, Extension of Certificate Validity.*

h. Criteria for undertaking a triggered audit, including:

i. A change to the scope of certification;
ii. Major changes in operations or processes;
iii. Changes to the legal, commercial or organizational status or ownership and/or the management (e.g., key managerial, decision-making or technical staff);
iv. Changes to the location of the site(s) included in the certification;
v. Serious concerns raised by the CB's review of self-assessments;
vi. Complaints received by the certification body or by CanadaGAP;
vii. Audit finding that the program participant is not continuously maintaining their food safety program (see CanadaGAP Audit Checklist, Form 3.2).

The certification body shall undertake a triggered audit if there is evidence or suspicion of non-conformity within a certified operation. Triggered audits are those audits that are initiated outside of the usual surveillance program (i.e., in addition to the planned annual audit or self-assessment review). They do not include a return visit to complete an audit that was previously started and left unfinished for some reason, or to return to an operation to close out Corrective Action Requests. Those partial audit/follow-up visits should not be considered as "triggered audits". The reason a triggered audit is undertaken is usually because of a potential food safety issue (e.g., the operation's food safety program is not being continuously maintained between audits – i.e., score of 0 on question A4 on the CanadaGAP audit checklist; the operation's food safety controls must be verified because ownership or management has changed, or the operation has added new crops, processes or activities that introduce new risks; a complaint about the operation has been received; previous non-conformities or non-compliance with program rules have raised concerns about the operation's commitment to their food safety program; etc.). A triggered audit is almost always a full audit, although there may be exceptional situations in which a triggered audit is used to assess conformance with only selected elements, rather than all aspects of the operation's food safety program.

An audit that is triggered after the certification body has reviewed and deemed unacceptable an operation's self-assessment, is considered a triggered audit. However, if for other reasons an audit has already been triggered at an operation certified under Option A1 or A2 (e.g., score of 0 on question A4 during the previous audit, or doubts as to an operation's compliance based on how they completed a previous self-assessment), the certification body should not also be reviewing the

operation's self-assessment for the crop year during which the triggered audit occurs. The triggered audit **replaces** the usual surveillance activity (in this case, the usual surveillance activity would have been the CB's review of the self-assessment).

When an Option A1 or A2 program participant is subject to a triggered audit due to a **change in management or ownership**, the certification body shall reset the four-year audit cycle to Year 1 (i.e., the triggered audit becomes the new Year 1 of the four-year audit cycle). Similarly, if a change to the scope of the operation triggers a new full audit for an Option A1 or A2 program participant, and all scopes (crop/activity combinations) are seen during the triggered audit, the CB shall reset the operation's four-year audit cycle to year 1 (i.e., the triggered audit becomes the new Year 1 of the four-year audit cycle).

i. The Corrective Actions Report *[Form 3.5]* and procedures for follow-up by the certification body reviewer on Corrective Action Requests (CARs) if the program participant:
   - autofails
   - does not achieve a passing score on the audit, or
   - chooses to increase their audit score.

   Refer to Procedure TP-02-CA for further information.

j. CBs must endeavour to meet a turnaround time of 30 business days, to make a certification decision and issue the audit report to the client. The auditor is given 10 business days between conducting the audit and providing the audit report to the certification body. A technical review of each audit report is required to be completed by a qualified technical reviewer approved by CanadaGAP prior to the audit report being transmitted to the program participant. The technical review of the audit is typically conducted within 10 business days after receiving the audit package from the auditor, and then a final ten (10) business days is usually allotted to administrative functions associated with receiving a recommendation and/or making a decision on certification and transmitting the audit results to the client.

k. To be certified:

   - To be certified under Option A1 or A2 (not GFSI-recognized): the program participant must achieve a score of at least 85% on the audit checklist and have no autofailure items.

   - To be certified under Options E and F (not GFSI-recognized): the program participant must achieve a score of at least 95% on the audit checklist and have no autofailure items.

   - To be certified under Option C or D (GFSI-recognized): the program participant must have no autofailure items and must achieve a score of 100% on the audit checklist. Achieving a score of 100% may occur following completion of corrective actions and/or after the certification body has approved the operation's corrective action **plan** for the subsequent year/season, depending on the nature of the CARs issued to the auditee. For certain non-conformities, a corrective action plan may be acceptable, since it may not be possible for the operation to address certain issues during the current year/season. The auditee may be able to present a reasonable plan to implement corrective actions in the following year/season. The CB/auditor will be

responsible to make the determination in each case, and the operation's effective implementation of the proposed corrective actions must be verified during the next audit.

- Multi-site operations certified under Options A1, A2, C, D, E and F must also comply 100% with all requirements on the Management System Audit Checklist for Multi-site Operations.

- To be certified under Option B: the group must comply 100% with all requirements on the Group Management System checklist, AND all sampled sites must have no autofailure items and must achieve a score of 100% on the audit checklist. Achieving a score of 100% may occur following completion of corrective actions and/or after the certification body has approved the member operation's corrective action **plan** for the subsequent year/season, depending on the nature of the CARs issued to the auditee. For certain non-conformities, a corrective action plan may be acceptable, since it may not be possible for the operation to address certain issues during the current year/season. The auditee may be able to present a reasonable plan to implement corrective actions in the following year/season. The CB/auditor will be responsible to make the determination in each case, and the operation's effective implementation of the proposed corrective actions must be verified during the next audit.

Refer to *Section 3.3.5.6, Corrective Action Requests Follow-up* for more information.

l. If successful, the program participant will be advised that a certificate will be issued. Successful certifications will also be published by company name in the certification body's on-line registry. For transparency, certification bodies will ensure that the public registry is searchable by company name and that the program standard is identified (i.e., CanadaGAP). For Option B-certified groups, the public registry must provide access to the certificate annex listing the group members included within the certification.

m. Unannounced Audits: Each year, each certification body must perform unannounced audits on a minimum of 5% of its Option A1 and A2 clients and on a minimum of 10% of its Option C, D, E and F clients. See *Audit Scheduling*, *Section 3.3.5.4.3 g)* for further information about unannounced audits. See Appendix III.1 for information about unannounced audits of Option B group members. Should a CB fail to reach the required minimum sampling on unannounced audits, the CB must present a corrective action plan for review and approval by CanadaGAP.

n. Certification decisions may not be taken in the absence of a technically reviewed audit report.

o. Addresses where audits occur:
    i. The address(es) of **all** locations that are visited during the course of the audit must be identified within the audit report, on page 2 of the CanadaGAP Audit Checklist. If more space is needed, the address es/locations visited during the audit can be included in the Executive Summary, with a note on page 2 pointing to the Executive Summary for the information.
    ii. For operations with multiple fields, only the addresses of the fields where a structure of some kind is located, or where a well is located, need to be included in the audit report.

iii. While it is not necessary to include ALL addresses associated with the operation within the audit report or on the certificate, the Certification Body should capture all addresses connected to each client within its own records, files and/or database.

p. In extraordinary circumstances, CanadaGAP may need to make adjustments to the audit and certification process. CanadaGAP shall inform Certification Bodies, program participants and other stakeholders accordingly of any changes. To address audit delivery under extenuating circumstances, CanadaGAP developed guidance for certification bodies regarding the use of remote auditing methods (see TP-09-RM).

q. **Split audits.** A split audit occurs when the audit takes place over two or more on-site visits that are separated in time (e.g., a 0.5-hour visit to see harvesting on September 12 followed by a 3.5-hour on-site document review on November 14). On-site CanadaGAP audits **must not be split** into two or more separate visits except under highly unusual circumstances, and only when the Certification Body has received written authorization from CanadaGAP to split the audit. Permission must be sought in writing by the Certification Body, along with a clear description of the circumstances, and approval must be obtained from CanadaGAP in advance of the audit.

r. **Communication with auditees**. Certification body and auditor communication with auditees is expected to be done early, and with enough lead time for audits to occur as scoped. The following is provided in terms of general guidance:
   i. For recurring clients, the first communication from the CB related to **scoping** the appropriate timeframe for the audit should occur before the operation's season begins.
   ii. Clients who are selected for an **unannounced audit** should receive notice directly from the CB early in the season (e.g., spring). Communication should not be delayed, even if the unannounced audit is many months in the future. Further information around communicating unannounced audit selection can be found in *Section 3.3.5.4.3, Audit Scheduling.*
   iii. Communication from the CB or auditor related to **scheduling** an audit should occur as early as possible in the season to ensure that the appropriately scoped timeframe is achieved. Leaving the communication until weeks before the planned audit date is often too late given the variables of weather, seasonality of crops, etc. Earlier communication is better.
   iv. At the first points of communication related to audit scoping and scheduling, the CB and auditor should inform clients very clearly that the client is responsible to communicate to the CB any changes in the timing of relevant activities (harvest, packing, etc.) and/or crops that could affect their audit timing.
   v. Auditors must communicate clearly with clients at both the opening and closing meetings of the audit, the process regarding CARs and CAR closure.

s. **Role of Consultants during CanadaGAP audits:** CBs are required to train and regularly refresh auditors on the limits of the role of a consultant during CanadaGAP audits. Auditors are to be reminded that a consultant cannot serve the role of 'person responsible' for activities within the operation, since the consultant is not on site at the operation on a daily basis. As such, while a consultant may attend the audit as an observer, the consultant is not to be considered the 'auditee' and cannot be delegated by the operation to answer the auditor's questions on behalf of the auditee or to explain the food safety management system in place. Rather, employees who are responsible

on a day-to-day basis to carry out the functions associated with food production within the operation and for implementing the food safety procedures are to be considered the auditee(s).

The consultant may also help the auditee(s) implement the program, set up the Forms and ensure the requirements have been completed. The auditee(s) are then responsible to maintain their program on a daily basis and continue to fulfill the requirements and prove their understanding, involvement and responsibility during the audit.

Depending on the activity involved, the 'person responsible', as defined in the Glossary of the CanadaGAP Food Safety Manuals, is 'The one(s) who carries out an activity (e.g., harvesting, packing, storage, cooling, icing, labelling/coding, transporting, etc.) and ensures that the activity within his or her control is complete'. By default, the owner is considered the 'person responsible' for the operation. However, in many operations, there will be someone else responsible for the management of the food safety program and this person would then be considered the 'person responsible'. Obviously, there will be many activities/tasks that this person will delegate further, since they can't do everything themselves. However, they are still the person responsible and therefore are still expected to oversee everything and ensure food safety is being managed. A consultant who is present at an operation only one day a week would not be able to fulfill this obligation. The consultant could sit in during an audit and provide support when needed, but since they do not oversee the daily food safety procedures should not be answering the questions. Each operation needs to have someone overseeing the food safety requirements, and that person should be answering the auditor's questions.

3.3.5.4.2 Audit Duration

a. The minimum duration of an audit will be one half-day per site, except for:
   i. Repacking and Wholesaling audits, which will take at least one day (7 hours);
   ii. Multi-site Management System audit, which will take three or more hours (but in no case, less than two hours);
   iii. Group Management System audit (Option B), which will take at least one day (7 hours).

   A half-day audit (3.5 hours) is typical for a straightforward on-farm operation (i.e., production of fruits or vegetables). Other, more complex operations (i.e., audit scope covers both production and packing; the auditor will observe multiple commodities and/or numerous on-site activities; the operation is a large packinghouse) will take longer to audit (e.g., one day or 7 hours), particularly if the program participant lacks experience with audits or is not well prepared, etc. In scoping the audit, the certification body will determine the required audit duration depending on the relevant factors.

b. The minimum duration shall apply to the most simple circumstances (e.g., one on-farm location, one or few crops, no or few workers, no packing or complicated processes or equipment, documentation is well organized, subsequent audit, etc.).

c. Should the audit take less than the minimum duration, 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 audit time billed to the program participant.
   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.

Some of the acceptable reasons for not meeting the minimum audit duration may include:

- Operation has a limited scope (e.g., one or few crops, limited activities)
- Operation has few locations (e.g., only one production site)
- Operation has few employees
- Operation has simple procedures (e.g., one piece of equipment)
- Operation has well-organized documentation (e.g., readily available, simple SSOPs or record-keeping system, electronic records easy to access)
- Operation has a very well-implemented and clear food safety program
- Multi-site operation is very basic (e.g., only 2 sites that are in close proximity).

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.

d. The audit report shall record the duration of the audit (e.g., start and end times).

e. Sufficient audit duration shall allow the CB to hold an opening meeting with the person responsible, inspect all applicable procedures, inspect all crops within the audit scope, visit all production, storage, packing, repacking, wholesaling, brokerage and other relevant locations (e.g., water sources), inspect equipment, interview and observe personnel, evaluate the records, complete the audit checklist with comments and sufficient detail to enable effective review by the CB and accurately reflect the auditor's observations, and review the Executive Summary with the person responsible at the end of the audit.

f. Minimum requirements for audit duration as set out within Component 3 do NOT include the time needed to complete the CanadaGAP Addendum for Pollinator Health. See Component 6 for further guidance on additional time needed during the audit to complete the addendum.

3.3.5.4.3 Audit Scheduling

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**.** 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. The information below provides guidance to certification bodies on the appropriate timing for scheduling external audits by the certification body, and, for the purposes of Group Certification, internal audits by the group. The CB or group management may still need to make case-by-case decisions on audit timing for certain situations and crops. Justification for an audit occurring outside of the optimal timeframe must be indicated on the audit report.

    i. **Production**: Optimally the audit is conducted during harvest. While it is ideal that harvesting is underway during the audit, if the operation is still in their harvest season but not actually harvesting on the day of the audit, then the

audit should proceed. Further it is more important to see harvest of products that are being hand harvested such as lettuce than those that are mechanically harvested such as potatoes. In the latter case, more flexibility in timing may be allowed at the discretion of the CB. Only if absolutely necessary should an audit be scheduled when only agronomic activities are occurring (e.g. spraying, pruning, growing, etc.), or during storing and shipping. If audits are scheduled before or after harvest, then the CB **must** schedule subsequent audits during harvest, even if the subsequent audit would need to take place during the same calendar year to avoid a period without certification.

ii. **Storage**: Optimally the audit is conducted during shipping of product. However, any time the storage is in use is acceptable.

iii. **Packing**: The audit must be conducted during the packing season. This means there is packing ongoing, but again, packing may not actually be occurring the day of the audit. However, the packing line and facilities will be set up and there may be product in storage.

iv. **Production/Packing**: The approach will depend on the certification option chosen:

a. For Options A1, A2 or E: If the program participant has requested certification for both production and packing, the audit is optimally scheduled during packing (or when harvesting **and** packing). However, during harvest may be acceptable if necessary. Only if absolutely necessary should an audit be scheduled during storing and shipping, and this exception would be applicable only to certain storage crops. If audits are scheduled during harvest, storing and/or shipping, the CB **must** schedule subsequent audits during packing. For Option E, over a 3-4 year timeframe, audit coverage of all processes included within the scope of the certification is required.

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.

v. **Repacking/Wholesaling/Brokerage**: Audits can occur at any time of year that the facility is in operation and product is being handled/brokered. If the operation is repacking in addition to wholesaling, then the audit must take place when repacking is occurring.

c. For Options A1, A2, and E multi-commodity operations involved in production, storage and packing, there may not ever be a time when all commodities are in harvest, storage or packing. It is up to the certification body to ensure that subsequent audits occur at different times of the year to cover the range of commodities and activities. Over a 3-4 year timeframe, audit coverage of all processes and crops within the scope of the certification is required. Commodities/activities should not be included on the certificate

until the auditor has obtained meaningful evidence (i.e., through observation, interviews, records review, etc.) pertinent to the respective crop/activity. See Section 3.3.5.4.5, *Multi-Commodity and Multi-Activity Sites of Production, Storage, Packing, Repacking, Wholesaling and Brokerage*. For further guidance on timing of audits for complex operations (i.e., multi-activity, multi-commodity) refer to Appendix III.2.

d. **Exceptions**: There may be circumstances where exceptions may be allowed.

Example 1: An audit may occur while the operation is in production but there is no activity on that particular day. For example, several fresh grape growers require an audit, it is their only commodity and they all want to be audited in a two-week window.

Example 2: Other clients may schedule the audit three weeks in advance but because of weather or other unforeseen circumstances they finish up production earlier or start up later than expected and they are not actually in production when the audit occurs. In these cases the CB should assess whether enough evidence can still be gathered to make a certification decision, and if so, carry out the audits to the best of their abilities. The auditor will review records and observe anything s/he still can. Auditors are to score N/A for anything that cannot be observed. The CB should use its best judgment in determining whether to limit the scope of the certification. (Refer to Section 3.3.5.4.4, Certification Body Limitation on Certification Scope*.) A note should be made on the audit and future audits need to be scheduled appropriately by the CB to ensure that all activities are assessed.*

e. **Optimal Audit Timing for certification of crop production, storage and packing**. The following table indicates specific timeframes during which production, storage and packing of identified horticultural crops in Canada must be assessed:

Crop Grouping	Specific Commodities	Optimal Audit Timing
Tree and Vine Fruit	Cherries, plums	June – July
	Peaches	August
	Pears and grapes	August – September
	Apples	Harvest starts in Sept. with storage & packing until June
Small Fruit	Strawberries, raspberries, blueberries, Saskatoon berries	June – August
	Cranberries	October
Greenhouse	General	March – November
	For those using grow lights	Year round
Leafy Vegetables and Cruciferae	Lettuce, spinach, leafy greens	May – October
	Endive	Fall through to spring
	Cabbage	Harvest July –November, storage and packing continues until June
	Broccoli and cauliflower	July-November
	Asparagus	May – early June

Combined Vegetables	Bulb and root Vegetables	Harvest July to November with storage and packing continuing all winter
	Radishes	May – October
	Fruiting Vegetables	July – October
	Sweet corn	Mid July – early September
	Legumes	July – August
Potatoes		Harvest starts end of June with storage, packing and shipping until March

f. **Crop Profiles**. For more information on production cycles for specific horticultural crops, consult the Canadian crop profiles at:

English: https://agriculture.canada.ca/en/science/agriculture-and-agri-food-research-centres/pest-management-centre/pesticide-risk-reduction-pest-management-centre/crop-profiles

French: https://agriculture.canada.ca/fr/science/centres-recherche-lagriculture-lagroalimentaire/centre-lutte-antiparasitaire/reduction-risques-lies-aux-pesticides-au-centre-lutte-antiparasitaire/profils-culture

g. **Unannounced Audits for CanadaGAP Certification Options A1, A2, E and F (not GFSI-recognized):**

i) *Scope*: The unannounced audit programme described in this section applies to program participants in CanadaGAP certification **Options A1, A2, E and F**. Refer to section 3.3.5.4.3 h) for unannounced audits for CanadaGAP certification Options C and D and Appendix III. 1 for details on unannounced audits for group certification (Option B).

ii) *Definition*: Unannounced audits will not be scheduled in advance with program participants. The certification body will provide 2 to 5 business days' notice that the auditor is coming. This short advance notice is required for the CB/auditor to ensure that the client will be available and relevant activities will be occurring. Only if needed, the certification body or auditor may contact the program participant ahead of time (e.g., early in the season)
- To confirm the scope of the operation's certification
- To confirm in general when certain activities are occurring (e.g., harvesting, packing, shipping, etc.)
- NOT to identify a specific time for the audit.

iii) An unannounced audit will take place **instead of** a scheduled audit (NOT additional to a scheduled audit). The program participant will pay the regular audit fee for the unannounced audit.

iv) The full CanadaGAP audit checklist must be used for unannounced audits.

v) Like regularly scheduled CanadaGAP audits, unannounced audits must occur while activities relevant to the scope of the operation's certification are occurring.

- The program participant cannot block off “busy periods” like harvesting or shipping.
- Unannounced audits can occur during periods of high activity.

vi) *Refusing notification*: The program participant can refuse the first notification, for valid reasons as determined solely by the certification body. As these are logistical issues, CanadaGAP will not be providing CBs with further guidance. The program participant **cannot** refuse the second notification. Not responding to the notification (phone or email) from the certification body or auditor will be considered an ACCEPTED notification. Failure to comply with the unannounced audit requirement will result in the certification body suspending or withdrawing certification. The program participant will not be allowed to re-enroll in the program for one year following withdrawal of certification.

vii) *After notification is accepted*: If the client is not prepared to proceed with the audit when the auditor arrives, the client will still be charged for the cost of the auditor’s time and travel. If possible, the auditor will return for another unannounced audit during the current season. It may not always be possible for the auditor to return during the current season due to scheduling demands. In other words, not being prepared for the unannounced audit could put the program participant’s certification in jeopardy.

viii) *Selection of program participants for unannounced audits*:

a. A minimum of 5% of each CB’s Option A1 and A2 clients will be required to have an unannounced audit each year. A different 5% of clients must be selected each year until all program participants have had an unannounced audit. If a CB has fewer than ten clients, at least one client must undergo an unannounced audit each year. If a CB has only one client, the client must be audited unannounced every fourth audit. Over time, all certified companies will have an unannounced audit. The overall number of unannounced audits must represent 5% of the CB’s total number of Option A1 and A2 clients.

b. A minimum of 10% of each CB’s Option E and F clients will be required to have an unannounced audit each year. A different 10% of clients must be selected each year until all program participants have had an unannounced audit. If a CB has fewer than ten clients, at least one client must undergo an unannounced audit each year. If a CB has only one client, the client must be audited unannounced every fourth year. Over time, all certified companies will have an unannounced audit. The overall number of unannounced audits must represent 10% of the CB’s total number of Option E and F clients.

Each year’s selection will be managed by individual CBs. The logistics involved with performing unannounced audits may be challenging; therefore, each CB will have to determine the approach that works within their existing audit planning, scoping and scheduling systems.

ix) The CB is responsible to conduct the number of required unannounced audits according to CanadaGAP rules and to inform CanadaGAP of all program

participants who have undergone an unannounced audit, so that CanadaGAP can track which program participants have been audited unannounced and how many still need to be**.**

x) Program participants enrolled in CanadaGAP certification Option A1 or A2:
- Will see no change to their four-year audit cycle, and
- Will see no change to the way that random audits work.

Program participants will continue to be informed in advance if they have been randomly selected for an audit. However, if chosen for an unannounced audit in conjunction with being randomly selected, the program participant will not be told the exact date of the audit. Likewise, if they already expect to be audited this year (because they are due for an audit in their four-year cycle), this audit could be unannounced. “Unannounced” means the program participant will not be informed more than 2 to 5 business days in advance of the date of the audit. They will still know in advance that they are having an audit sometime this year.

xi) As certification bodies are responsible for managing audit timing for clients selected for unannounced audits, CBs are also required to factor in the likely need for certificate extensions as part of the audit scoping and audit planning processes for unannounced audit clients. Certification bodies are expected to clearly communicate with clients the process for requesting certificate extensions as may be needed, with the goal of ensuring that the processes are understood and followed by program participants. It remains the program participant’s responsibility to request a certificate extension according to the procedure set out in *Section 3.3.5.5.4, Extension of Certificate.*

xii) Unannounced audits must be a FULL audit, not a partial or follow-up visit.

xiii) Audit reports and certificates must clearly identify whether the audit was unannounced.

h) Unannounced Audits for CanadaGAP Certification Options C and D (GFSI-recognized):

i) *Scope*: The unannounced audit programme described in this section applies to program participants in CanadaGAP certification **Options C and D.** Refer to section 3.3.5.4.3 g) for unannounced audits for CanadaGAP certification Options A1, A2, E and F, and Appendix III. 1 for details on unannounced audits for group certification (Option B).

ii) *Definition*: 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 will contact the program participant ahead of time (i.e., early in the year) to:
- inform them that they have been selected for an unannounced audit that year
- discuss the timing of all crops/activities relevant to the operation’s certification, including the crops/ activities that need to observed that year
- discuss any health and safety policies that the auditor needs to be aware of prior to visiting the operation
- 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.

iii) *Unannounced Audit (UA) Option 1*: Certification bodies must offer their clients Unannounced Audit (UA) Option 1, in which an unannounced audit takes place **instead of** a regularly scheduled audit, and during which the auditor **must** observe the crops/activities that need to be seen that year. The program participant will pay the regular audit fee for the unannounced audit. See more detailed rules pertaining to UA Option 1 below in *vi*).

iv) Additionally, at the discretion of each certification body, CBs may offer both UA Option 1 (see *iii*), AND a second unannounced audit option: UA Option 2, described below in *v*). Clients of CBs offering both options can choose their preferred approach when they are selected for an unannounced audit.

v) *Unannounced Audit (UA) Option 2*: If offered by the certification body, under UA Option 2 the program participant would undergo **two audits** on that year's crop: one **announced** and one **unannounced**. The program participant will pay the audit fees for both audits.
   a. One of the audits will be a regularly scheduled, announced audit during the period relevant to the crops/activities that need to be observed.
   b. The other audit will be completely unannounced, with the CB giving the program participant NO prior notice of the exact audit day or time. The unannounced audit must pertain to the same **crop year/season** as the announced audit, but does not need to happen during the active period of harvesting, packing, loading out, etc.

vi) The rules for UA Option 1 are as follows:
   a. The unannounced audit **replaces** that year's regularly scheduled audit.
   b. The unannounced audit must be timed such that the auditor can observe the crops/activities that **need to be seen** that year. Because the unannounced audit replaces the regularly scheduled audit, it must occur while activities relevant to the scope of the operation's certification are occurring. The program participant cannot block off "busy periods" like harvesting or shipping. Unannounced audits can occur during periods of high activity.
   c. Program participants will receive **NO** advance notice of the exact day or time of the auditor's arrival. Operations will have a general idea only that the unannounced audit will happen during the timeframe when relevant crops/activities are underway.
   d. Early in the year, when the CB first selects which program participants they will see unannounced, and begins scoping the audit, determining the audit plan, and/or assigning an auditor, the CB is permitted to address the following points and agree with the program participant in advance:
      i. any health and safety policies that the auditor must adhere to, so that the auditor can properly prepare in advance of the audit to avoid being refused access to the premises as a result of failing to comply with the operation's health and safety policies.

ii. the timing of crops and activities relevant to the certification, so that the CB may plan the timing of the audit to coincide with the crops/activities that need to be observed on audit day.
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.

e. The auditor will show up at the operation completely unannounced. The program participant has no opportunity to refuse the unannounced audit, since they receive no prior notice from the auditor.
f. It is the **responsibility of the program participant** to keep the CB informed and updated on the timing of the crops/activities that need to be seen during the audit. If anything changes from the original scoping (e.g., if harvest will be early or late, if the packing schedule is modified, etc.), then the CB must be kept informed so that the audit timing can be adjusted and the auditor can ensure that crops/activities relevant to the certification will be seen. If the auditor arrives unannounced and all activity relevant to the audit scope is done for the season, then the program participant may face loss of their certification until the following year.
g. If, despite the advance planning done in consultation with the program participant, it is impossible for the auditor to proceed on the day of the unannounced audit (e.g., there is no relevant activity occurring when the auditor arrives, relevant food safety personnel are not available, the auditor is refused entry), then:
    i. The program participant will bear the cost of the auditor's visit that day, as per the terms and conditions of the CB's contract with the client.
    ii. Where possible, the CB will schedule a return visit (also unannounced) by the auditor.
    iii. Note, there is no guarantee that an auditor will be available to reattempt the audit. The program participant must accept the possibility that a limited number of CB auditors may result in delays in rescheduling the audit, and/or a lapse in certification if a follow-up unannounced audit cannot occur in a timely manner, and/or potential loss of certification if a return visit cannot be accommodated before the end of the operation's season.
h. If a second attempt at an unannounced audit is possible, it too will occur without any prior notice to the program participant.
i. If the second attempt at an unannounced cannot proceed due to reasons that are not deemed valid by the CB (e.g., the operation's season has ended and the program participant did not inform the CB), the program participant faces

loss of certification until the following year/season when an unannounced audit can occur.

j. The program participant pays for one (unannounced) audit that year, since the unannounced audit replaces a regularly scheduled audit. If a second attempt is needed for the CB to perform the unannounced audit, audit fees will be charged to the program participant for both visits.

vii) The rules for UA Option 2 are as follows:

a. Early in the year, when the CB first selects which clients they will see unannounced, the CB and client will discuss the timing of crops and activities relevant to the certification so that the CB has the information they need to plan both audits appropriately.
b. The timing of the unannounced audit will be within a pre-arranged window. The general timeframe of the unannounced audit window will depend on the crops/activities covered by the certification and will be determined by the CB in consultation with the client.
c. The timing of the unannounced audit can be either before or after the announced audit, as long as the scope of the audit pertains to the same crop year/season. For example, Option 2 unannounced audits for tree fruit production and packing could be timed to occur earlier in the production season (e.g., in May/June/July) when pre-harvest activities are occurring, workers are present on-farm, etc., and if auditors are available. The announced audit would then occur later in the season, when harvesting/packing are underway. It should be noted that this approach may not be practical for participants who are new to the CanadaGAP program; CBs will determine the suitability of the unannounced audit window in each case.
d. The CB will determine the audit window and inform the client at least 30 days before the audit window starts. The audit window will typically be within a 30-day period, unless extenuating circumstances justify the CB allowing a shorter or longer window. The justification must be documented by the CB.
e. The client may indicate one blackout date for every six days within the audit window (e.g., a 30-day audit window would allow the client five blackout dates). 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.
f. Both the announced and unannounced audits must pertain to the same year's/season's crop(s), but may not necessarily happen during a single calendar year, as it depends on which activities need to be seen. For example, to certify production of the 2024 potato crop:
    - The announced audit could occur in the Fall during harvest of the 2024 crop; the unannounced audit then could occur the following winter (2025) during the storage/shipping period for the 2024 crop, OR
    - The announced audit could happen in the winter (2025) during loading out of the 2024 crop, if that activity needs to be seen. The unannounced audit could occur the summer prior (2024) before harvest, or could occur the following spring (2025) if potatoes from the 2024 crop are still in storage.

g. It is permissible for the scope of the unannounced audit to pertain to a different crop/activity than was observed during the announced audit (e.g., for multi-commodity, multi-activity operations). However, the unannounced audit cannot substitute for a **triggered audit** (e.g., an extra audit required because of the program participant's results on Q.A4 of the audit checklist, or because the operation wants to expand their certification scope, or because the auditor was unable to observe a crop/activity planned within the scope of a regular audit). In those cases, the usual triggered audit must occur, and cannot be combined with the requirement for the operation to undergo an unannounced audit.
h. For multi-commodity and/or multi-activity operations, if the unannounced audit is timed such that the auditor can observe a scope different from the crops/activities observed during the announced audit, then the CB can take into account what was seen during the unannounced audit when scoping audits in subsequent years. However, if the relevant crops/activities for the different scope are not actively underway within the operation during the unannounced audit, then as per the CB's usual scoping practices, the applicable crops/activities must be observed in a subsequent year's announced audit.
i. Auditors shall focus on auditing the operation's activities, procedures, and records pertinent to the **current crop year/season**, and avoid looking back at previous year's records and documents.
j. Certification Bodies must issue two separate audit reports, one for the announced audit and another for the unannounced audit. The report for the unannounced audit must be clearly marked as such.
k. Unannounced audits are intended to be full audits, not simply a review of records and documentation. That being said, scoring must always reflect what was seen and what could be assessed on the day of the audit. This could result in a significant number of items being marked N/A during the unannounced audit, depending on audit timing.
l. It is permitted for the CB to assign both the announced and unannounced audits to the same auditor, and have the auditor determine the timing/scheduling of the unannounced audit as a follow-up to what was observed at the announced audit. This approach may not be possible in some cases; it will depend on the operation's crops/activities, the timing of the announced audit, and the auditor's availability.
m. The same CanadaGAP Corrective Actions policy and procedures (TP-02-CA) will apply to an operation's audit findings, regardless of whether an audit is announced or unannounced.
n. A certification decision will be made by the CB as a result of an unannounced audit (i.e., a decision to maintain, suspend or withdraw certification). If the decision is made to maintain certification following an unannounced audit, no new certificate will be issued by the CB, assuming that a valid certificate is already in place until the next regularly scheduled, announced audit. However, if the decision is to suspend or withdraw certification as a result of findings from the unannounced audit, the CB will proceed with suspension or withdrawal of the operation's certificate.
o. If it is impossible for the auditor to proceed on the day of the unannounced audit (e.g., despite the pre-arranged audit window there is no one present at the operation, or the auditor is refused entry), then the program participant

will bear the cost of the auditor's visit as per the terms and conditions of the CB's contract with the client. Certification will be suspended or withdrawn as a result of the client failing to comply with the agreed timeframe for the unannounced audit. Truly extenuating circumstances will be reviewed on a case-by-case basis.

viii) The full CanadaGAP audit checklist must be used for all unannounced audits.

ix) Failure to comply with unannounced audit requirements will result in the certification body suspending or withdrawing certification. The program participant will not be allowed to re-enroll in the program for one year following withdrawal of certification.

x) *Selection of program participants for unannounced audits*: Each year CBs must select 10% of their clients from a combination of operations enrolled in CanadaGAP certification options C and D. Certification Bodies **must** choose a different 10% of their clients each year to be audited unannounced, until all program participants have had an unannounced audit. New program participants may be selected for an unannounced audit, at the discretion of the CB. If a CB has fewer than ten clients, at least one client must undergo an unannounced audit each year. If a CB has only one client, the client must be audited unannounced every fourth year. Over time, all individually certified companies will have an unannounced audit.

xi) The selection of the 10% of program participants to be audited unannounced each year will be managed by individual CBs. The logistics involved with performing unannounced audits are challenging; therefore, each CB will have to determine the approach that works within their existing audit planning, scoping and scheduling systems.

xii) The CB is responsible to conduct the number of required unannounced audits according to CanadaGAP rules and to inform CanadaGAP of all program participants who have undergone an unannounced audit, so that CanadaGAP can track which program participants have been audited unannounced and how many still need to be**.**

xiii) As certification bodies are responsible for managing audit timing for clients selected for unannounced audits, CBs are also required to factor in the likely need for certificate extensions as part of the audit scoping and audit planning processes for unannounced audit clients. Certification bodies are expected to clearly communicate with clients the process for requesting certificate extensions as may be needed, with the goal of ensuring that the processes are understood and followed by program participants. It remains the program participant's responsibility to request a certificate extension according to the procedure set out in *Section 3.3.5.5.4, Extension of Certificate.*

xiv) Unannounced audits must be a FULL audit, not a partial or follow-up visit.

xv) Audit reports and certificates must clearly identify whether the audit was unannounced. For Option C program participants who have more than one audit in a year (e.g., one for Production and another for Packing, per xvii) below), if any

of the audits performed in connection with that certification is unannounced, the certificate shall indicate “Unannounced”.

xvi) Certification Bodies must determine whether program participants new to CanadaGAP were previously certified under a different GFSI-recognized program, and if so, whether the client has been audited unannounced (and if so, when the unannounced audit occurred). That information shall factor into the certification body’s decision as to when the operation will be chosen for their CanadaGAP unannounced audit.

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 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.

3.3.5.4.4 Certification Body Limitation on Certification Scope

a. The Certification Body has the right to refuse to include an activity (e.g., production, storage or packing) or crop within the scope of the certification if, after gathering information from the client and the assigned auditor, in the Certification Body’s judgment a fair assessment of the facility’s conformity cannot be made until the next production season. The Certification Body may limit the scope of the certification if there is a lack of evidence to assess conformity for a given scope during the on-site audit.

b. The Certification Body will consider the following in making such determinations: depending on an individual situation: seasonality of crops and processes, availability of records, access to infrastructure, access to employees, auditor’s ability to assess the functioning of the overall system, or other relevant factors. The scope of the initial certification audit may be limited to certain aspects of a facility’s operations.

3.3.5.4.5 Multi-Commodity and Multi-Activity Sites of Production, Storage, Packing, Repacking, Wholesaling and Brokerage

3.3.5.4.5.1 For Options A1, A2, E and F (not GFSI-recognized):

a. In the case of multi-commodity, multi-production, multi-activity sites enrolled in Option A1, A2, E or F, scheduling of the initial certification audit and subsequent surveillance audits **must** be managed by the Certification Body to ensure coverage of the full scope of on-site activities over a period of 3 to 4 years. As such, surveillance audits may, at the discretion of the Certification Body, be timed to occur sooner than the 12-month certificate expiry date; or may be scheduled after the 12 months elapse, but no later than 18 months after the prior certificate was issued. In the latter case, if the certificate will expire before the re-certification audit, the Certification Body must issue a certificate extension until the re-certification audit is completed and a new certificate is issued.

Example 1: multi-commodity operation with two crops (asparagus, apples). The Certification Body schedules the initial certification audit during asparagus harvest (April/May). It is likely not possible for apples to be certified the same year, unless the auditor returns to the farm in September/October.

Example 2: multi-commodity operation with two crops (asparagus, apples). The Certification Body schedules the initial certification audit in October, during apple harvest. It is not permitted to include within the scope of the certification the asparagus crop that has already been harvested. The CB will return to the farm the following spring to include asparagus within the scope of the certification.

Example 3: multi-commodity operation with various leafy crops (lettuce, broccoli, cabbage, Brussels sprouts). The Certification Body schedules the initial certification audit during lettuce harvest (July). It may be possible for the other, later produced commodities to be included within the scope of the initial certification audit, depending on availability of audit evidence related to processes underway and on-site personnel involved with later produced crop(s). Regardless, the CB will schedule the subsequent audit during the harvest of later crops (e.g., Brussels sprouts) and may, as required, extend the certificate by up to 6 months.

b. In such cases, optimal audit timing may be longer than 12 months after the previous audit; therefore, provision is made for the subsequent audit to occur up to 18 months after the previous audit. Should the 12-month certificate expire before the re-certification audit, the Certification Body may extend a certificate by a maximum of 6 months. Refer to *Section 3.3.5.5.4, Extension of Certificate Validity.* As certification bodies are required to manage audit timing for multi-commodity operations, CBs are also required to factor in the likely need for certificate extensions in subsequent years as part of the audit scoping and audit planning processes for multi-commodity clients. Certification bodies are expected to clearly communicate to their multi-commodity clients future audit timing and the need in subsequent years for certificate extensions, with the goal of ensuring that the processes are understood and followed by program participants. It remains the program participant's responsibility to request a certificate extension according to the procedure set out in *Section 3.3.5.5.4, Extension of Certificate.*

c. If the later crop is audited first, it is possible to expand the scope of the certification in the subsequent year without the CB needing to extend the certificate expiry date. If the earlier crop is audited first, depending on the commodities and activities involved, it may be possible to certify a larger scope in one year. In either case, the re-certification audits in subsequent years would be scheduled by the CB to coincide with the crop(s) and/or activities that need to be evaluated to ensure full coverage of the requested certification scope over a 3 to 4 year period.

d. Additional guidance to CBs on managing audits and certification for complex operations (multi-commodity, multi-activity) is available from CanadaGAP. Refer to Appendix III.2 for further details.

3.3.5.4.5.2 For Options B, C and D (GFSI-recognized):

a. CanadaGAP is recognized for two GFSI scopes: BI – Farming of Plants, and BIII – Pre-Process Handling of Plant Products.

b. The following chart shows the correspondence between the two GFSI scopes for which CanadaGAP is recognized, and the CanadaGAP certification scopes (by activity). See

Section 3.3.5.2 of the CanadaGAP Program Management Manual for further description of the CanadaGAP certification scopes.

	CanadaGAP Certification Scopes (by activity):
GFSI Scope BI Farming of Plants	● Production ● Production-related sub-scopes such as “Harvesting” ● Storage (including standalone operations storing harvested product)
GFSI Scope BIII Pre-Process Handling of Plant Products	● Packing ● Packing-related sub-scopes such as “Icing”, “Sorting and Grading”, etc. ● Repacking ● Wholesaling

c. 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).

d. Both harvesting AND packing-related activities must be observed annually.

e. For companies certified to both Options C and D, it may be necessary to perform multiple audits in a single year to observe harvesting, packing (if applicable) AND repacking/wholesaling.

f. Certification bodies shall time audits such that as many relevant activities as possible can be observed in a single audit. Where that is not possible, the certification body will have to schedule more than one audit in a single year.

g. The certification body must continue to observe different commodities each year, in accordance with long-standing CanadaGAP guidance on scoping complex operations. Over a 3-4 year period, all commodities listed on the certificate must be observed. Determination by the certification body of which commodities to see each year shall be based on risk as well as logistics. If auditor availability is an issue, certification bodies are encouraged to contact the CanadaGAP office for further guidance on scoping.

h. Refer to Appendix III.2 for additional guidance on managing audits for complex operations, bearing in mind that GFSI requirements and the rules within this section 3.3.5.4.5.2 of the CanadaGAP Program Management Manual supersede the scoping guidance contained in Appendix III.2.

i. For information on certification decisions and issuing certificates to complex operations requiring more than one annual audit, refer to:
   - *Section. 3.3.5.5.2, Certification Cycle and Audit Timing*
   - *Section 3.3.5.5.3, Date of Certification and Certificate Expiry Date*

j. For information on Unannounced Audits for complex operations requiring more than one annual audit, refer to Section 3.3.5.4.3 h) xv) and xvii).

3.3.5.4.6 Preparation of Audit Plan

a. Certification bodies are required to prepare an audit plan (also known as an "audit schedule" or "audit agenda") for each audit. Certification bodies may assign this task to the auditor.

b. The audit plan must be shared with, and confirmed by, the auditee in advance of the audit. This requirement applies equally to program participants selected for unannounced audits, although the audit date would be omitted until disclosed to the program participant. Any changes to the agreed upon plan must also be communicated to the auditee. It is important for the certification body and program participant to agree on the scope before the audit, as the scope may not be changed at the audit, except for reducing scope during the initial certification audit, which is permitted, as per ISO/IEC 17065. Competent and qualified personnel must be used by the certification body to scope CanadaGAP audits (see *Section 3.3.1.3.2, Scoping of Program Audits)*.

c. The audit plan or schedule shall include at a minimum:
   i. Name and address of auditee
   ii. Current certification information, as needed (e.g., certificate number and expiry date, certification option)
   iii. Indication of whether this is an initial certification, or a re-certification audit
   iv. Site location(s)
   v. Audit date, demonstrating that due consideration has been given to scheduling the audit at the optimal time for the commodities/activities being assessed. It is advisable to include a specific statement/question similar to the one included on the Audit Checklist: "Which commodities/activities will be *observed* during the audit?"
   vi. Expected audit duration
   vii. Commodities and activities to be included in the scope of the audit, including mention of any relevant exclusions to commonly understood scopes (e.g., "production of *dry-harvested* cranberries only")
   viii. Information relevant to multi-commodity and/or multi-activity clients, demonstrating that due consideration has been given to which commodities/ activities can be observed during this audit, and which remain to be observed in a subsequent audit
   ix. Detailed plan for the day (opening meeting, audit activities, closing meeting, etc.) including times and locations if required
   x. The name and contact information of the assigned auditor
   xi. Name(s) of observers/witnesses to the audit, where applicable
   xii. Auditor's signature

3.3.5.5 Certification Period

3.3.5.5.1 Certificate Validity

a. Certificates are valid for 12 months.

b. A certificate is not transferable from one owner to another when an operation changes owner. In this case a new certification audit is required.

3.3.5.5.2 Certification Cycle and Audit Timing

a. The Certification Body must schedule all audits at the optimal time of year, as set out under *Section 3.3.5.4.3, Audit Scheduling.* If extenuating circumstances lead to the Certification Body proceeding with an audit at a less than optimal time, the CB **is required** to justify the deviation on the corresponding audit report, and schedule the subsequent audit at an optimal time to effectively assess activities included in the scope of certification, regardless of when the certificate expires.

b. The following provisions relative to the certification cycle apply to each program participant and all certification options:

   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 18 months between on-site audits for complex operations with multiple commodities and/or activities . Refer to *Section 3.3.5.5.4, Extension of Certificate Validity.)*

   ii. The CB must conduct at least one audit activity in each calendar year (2023, 2024, 2025, etc.) or crop year, as applicable (e.g., the 2023 crop, the 2024 crop, the 2025 crop).

   iii. More than one audit activity in a given year is possible, and **may in fact be required** if:
      a. A certified Option C operation has both Production and Packing (or packing-related activities) within the scope of their certification, and in a given year both Production and Packing (or packing-related activities) cannot be observed in a single audit; OR
      b. the previous audit took place at a less than optimal time for the Certification Body to assess the full extent of the activities and/or crops included within the scope of certification. Justification for a second audit in the same calendar or crop year (as applicable) must be recorded by the CB on the corresponding audit report.

c. The scheduling of re-certification audits will be managed and determined by the Certification Body based on optimal audit timing for the scope of certification. It is up to the CB to initiate audit scheduling, particularly if the timing for a given client differs from year to year. The CB is responsible to track audit dates independently of certificate validity periods to ensure audit activities occur at appropriate times.

d. The Certification Body is responsible to ensure audit activity is occurring:

   i. at least once in each calendar year or crop year (as applicable), and
   ii. within 12 months of the last audit activity (with limited exceptions), and
   iii. at optimal times during the season to properly evaluate the operation, and
   iv. at optimal times from year to year to ensure full coverage of CB assessment of an operation (all crops and activities applicable to the scope of certification) over a 3-4 year timeframe, and
   v. to observe both Production and Packing for Option C operations and group members under Option B whose activities encompass both scopes.

3.3.5.5.3 Date of Certification and Certificate Expiry Date

a. The certification date shall be the date when the Certification Body makes the certification decision, after corrective action requests are closed out.

b. **Certificate Expiry Date:** If the audit has been scoped and timed properly, under normal circumstances, the certificate expiry date shall be 12 months from the certification date. This is roughly equivalent to one year plus one month from the audit date. Exceptions include:
   i. Cases where the auditee fails the audit, and later takes corrective actions to get certified. In such cases, the CB shall issue a certificate that expires one year plus one month (more or less) from the previous ***audit*** date. See more information below in Section 3.3.5.5.3 c).
   ii. Complex operations with multiple commodities and/or activities may see certification decisions postponed after audits to correspond to certificate expiry date.

c. The Certification Body is justified in shortening the certification cycle and the validity period of the certificate. E.g., the certificate expiry would be less than 12 months from the certification date if a program participant delays closing out corrective actions or fails to follow up on a self-assessment for several months. The CB is justified in issuing a certificate that expires less one year plus one month (more or less) from the previous *audit* date.

d. The CB may not issue certificates that are valid for longer than 12 months, except:
   i. In the event of extenuating circumstances, such as a CB termination or withdrawal of services, CanadaGAP may allow the incoming CB to issue certificates with a validity period longer than 12 months when that is necessary to maintain stability in the client's audit or certification cycle. Such exceptions will be granted by CanadaGAP on a case-by-case basis and CBs must receive advance approval in writing. See also Section 3.3.5.10 i) l.

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 or crop year (as applicable). Limited exceptions may be possible (e.g., in justified cases where complex operations with multiple commodities and/or activities may receive an extension of up to six months in order to time a subsequent audit appropriately; multi-activity operations with a long storage and shipping season).

f. 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:
   i. 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 or reissued to include both scopes (e.g., "Production of Asparagus and Packing of Apples").

   ii. 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.

3.3.5.5.4 Extension of Certificate Validity

a. In exceptional cases (e.g., multi-commodity program participant, extenuating circumstances such as a strike or severe weather, previous audits occurring at times that were not optimal because of errors in audit scoping, previous certificates being issued with expiry dates that do not reflect correct timing for subsequent audits, changes in an operation's activities or crops, etc.), the CB may be requested to extend the validity period of the certificate beyond its original expiry date. The validity may be prolonged beyond the 12 months (for a maximum period of 6 months) only under the following conditions:

   i. The extension is granted by the Certification Body prior to certificate expiry, and
   ii. The program participant has accounts in good standing with CanadaGAP (the Certification Body must confirm with CanadaGAP prior to granting an extension), and
   iii. The audit will occur during the extension period, and
   iv. Justification for the extension is recorded in the corresponding audit report, and
   v. The certification body provides CanadaGAP with a copy of the extension letter and/or extended certificate.

b. When an extension is granted, the following year, the CB will generally revert to the original 12-month certification period, depending on the reasons the certificate extension was granted (see 3.3.5.5.4 a) above). Some limited exceptions may apply when the initial certification cycle was based on inappropriate or improper scoping and/or audit scheduling; see *Section 3.3.5.4.1 g) Procedures.*

c. If it is impossible for an audit to proceed due to the circumstances (e.g., complete loss of crop, storage, packing facility or other infrastructure), the Certification Body will make efforts to assist the program participant in dealing with immediate customer requirements for certification. For instance, the CB could consider providing the program participant with a written explanation as to why the CB is unable to offer certification until the following season/crop production period, etc. A letter of non-conformance may be given to the program participant by the CB where the participant cannot be re-certified for reasons beyond their control (e.g., force majeure, natural disaster, etc.). The letter is not meant to circumvent program participants closing out Corrective Action Requests.

3.3.5.5.5 Certification Decision

a. The Certification Body shall make the certification decision within a maximum of 30 business days after the audit if there are no CARs issued. If CARs are issued, refer to Section 3.3.5.6 for the applicable procedures and timeframes for Corrective Action Requests Follow-up. In order to make the certification decision, each audit report must

be given a thorough technical review by the certification body. For the review to be effective, the Certification Body must ensure that:

- the reviewer is impartial and technically capable of understanding the content of reports and that the reports are accurately assessed to demonstrate satisfactory evidence of compliance with the Program,
- all requirements of the standard have been fully covered, using any supporting notes made during the audit by a suitably qualified auditor,
- the scope of the report covers the scope applied for by the client and that the report provides satisfactory evidence that all areas of the scope have been fully investigated,
- all areas of non conformity have been identified and effective corrective action has been taken to resolve these non conformities.

b. Any appeals or complaints against CBs will follow the CB's own complaints and appeals procedure, which each CB must have, make public and communicate to its clients. The CB will also comply with all requirements in *Section 3.3.7*, *Program Appeals* and *Section 3.3.8, Program Complaints* relative to appeals and complaints. In case the CB does not respond adequately, the complaint can be addressed to the CanadaGAP Program c/o 245 Menten Place, Suite 312, Ottawa, ON K2H 9E8 or to the CB's accreditation body (e.g., ANAB-ANSI, SCC).

c. The person who makes the certification decision or at least one member of the certification committee of the CB shall comply with the requirements set out in *Section 3.3.1.3, Program Requirements for Persons involved in Certification Decisions, Shadow Audits, Witness Audits, Technical Review of Audit Reports, or Audit Scoping, or Review of Corrective Actions*.

d. Each CB will be responsible for the information filed relative to certification decisions; documentation related to Program procedures or program participants must be made available to CanadaGAP on request.

e. On completion of the full evaluation process a full written report will be produced which summarizes the evaluation activity undertaken (date of the audit, sites and facilities visited and duration of the audit), provides information on how the program participant complies with the requirements of the standard, and provides detail of any non-conformance identified. The audit report will be made on the format provided by CanadaGAP (the Audit Checklist, the Management System Audit Checklist for Multi-site Operations, and the Group Management System Checklist, as applicable).

f. CanadaGAP service standards require that Certification Bodies issue audit reports within 30 business days of the audit date, regardless of whether the program participant passed or failed the audit.

g. The certification decision will be communicated by the CB to the program participant and to CanadaGAP within the same timeframe (30 business days from the audit) where certification is not delayed due to closing out of Corrective Action Requests (CARs). Certificates shall be issued by the CB at the same time or promptly thereafter.

h. Copies of the audit report, corrective actions report and/or certificate will only be provided to other parties if the applicant provides express written authorization, except in the case of the CB and the AB.

3.3.5.5.6 CanadaGAP Requests to CBs to Withhold Certificates

a. Certification Bodies shall withhold or delay issuing certificates to program participants whose accounts are 90 days overdue with CanadaGAP (i.e., non-payment of annual program fees). CanadaGAP will provide Certification Bodies with an updated list of unpaid accounts on a monthly basis. The CB shall withhold any associated certificates until the program participant's name is removed from CanadaGAP lists of past due accounts.

3.3.5.5.7 Certificate of Conformity

i. The paper and/or electronically-issued certificate must contain all required information specified below and in the licensing agreement between CanAgPlus and the Certification Body. A template must be approved by CanadaGAP prior to use by the Certification Body.

ii. Each certificate of conformity must include the following information:

   a. Title: "Food Safety Certification"; « Certification pour la salubrité des aliments »
   b. Statement of Conformance: "[*Insert name of Certification Body*] has **certified [insert name and address of certified company]** as meeting CanadaGAP Program requirements in a third party audit conducted by [*insert CB name*], assuring compliance to the CanadaGAP Program Management Manual, Version [# currently in effect] and CanadaGAP Food Safety Manual, Version [# currently in effect] for **[insert Scope of Certification]"**
   « [*Insert name of Certification Body]* atteste que **[insert name and address of certified company]** satisfait aux exigences du Programme CanadaGAP, selon une vérification indépendante réalisée par [*insert CB name*] assurant la conformité au Guide de gestion du programme CanadaGAP, Version [# currently in effect] et au Guide de salubrité des aliments de CanadaGAP, Version [# currently in effect] pour **[insert Scope of Certification]**. »
   c. Scope of Certification relative to activities and crops/commodities/products included and Certification Option (Refer to *Section 3.3.5.2, Scope of Certification)*. 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.
   d. Date of Issue; « Date de délivrance »
   e. Certificate expiry date; « Date d'expiration du certificat »
   f. Certificate number; « Numéro de certificat »
   g. Issuer's identifying information (Certification Body – company name, full address, etc.)
   h. Signature of authorized person issuing the certificate
   i. Disclaimers, as follows:

   "[*Insert name of Certification Body*] and/or the CanadaGAP Program do not accept any responsibility for the programs and/or the facility being audited nor for any events or actions prior or subsequent to [*insert CB name*]'s audit. [*Insert CB name*] is only certifying that the facility meets the requirements in a third party audit it has conducted to assure conformance with the CanadaGAP standard for the process described herein, as of the date of this certificate. [*Insert CB name*] and/or the CanadaGAP Program do not assume any responsibility or liability as to whether the facility does or does not carry out

the recommendations as contained in the audit report. The CanadaGAP logo is a certification mark owned by *CanAgPlus* used under license by [*insert CB name*]."

« [*Insert name of Certification Body*] et le Programme CanadaGAP déclinent toute responsabilité à l'égard des programmes et des installations qui font l'objet d'un audit de même qu'à l'égard de toute activité ou mesure survenant avant ou après l'audit réalisé par [*insert CB name*]. [*Insert CB name*] certifie uniquement que l'établissement satisfait aux exigences dans le cadre de l'audit indépendant qu'il a réalisé pour s'assurer de la conformité à la norme CanadaGAP de la procédure décrite aux présentes, à la date figurant sur le certificat. [*Insert CB name*] et le Programme CanadaGAP déclinent toute responsabilité ou obligation en ce qui a trait à la mise en œuvre ou non par l'établissement des recommandations formulées dans le rapport d'audit. Le logo de CanadaGAP est une marque de certification appartenant au *CanAgPlus* utilisée avec permission par [*insert CB name*]. »

CanadaGAP will provide the Certification Body with any additional required corresponding wording in French, for French-language certificates issued by the Certification Body.

j. Program certification mark as provided by CanadaGAP (refer to licensing agreement between CanAgPlus and the Certification Body).

k. Certification Body authorized trade-mark

l. Certification Body accreditation information

m. An indication on the certificate as to whether certification was granted based on a successful Unannounced Audit

n. With respect to the address(es) of the certified company included on the certificate, the following rules apply:

    1. The CB may include multiple addresses on a certificate if requested by the program participant due to a buyer/customer requirement, even if the operation is not a multi-site. The CB may charge an additional fee for this service, as extra administration may be involved. The program participant must specifically ask for additional addresses to be included on their certificate (e.g., as may be required by their customers, if for example if the operation has one or more packinghouses, has storages and fields located separately from the main farm, etc.).

    2. The address(es) listed on the certificate must reflect the actual physical location of at least one of the sites below in # 4. These are presented in order of preference – i.e., the first choice for an address on the certificate would be the main farmyard address. If there is no main farmyard, the CB should list the main packinghouse address. If there is no main packinghouse, the CB should list the address of one of the packhouses, a storage building, or another building or temporary structure located within the operation. If there are no buildings or structures at all, the CB should list the address of the field where there is a well.

3. The address on the certificate cannot be someone's home if that is different from the location of the farm. Nor can it be an address that does not connect to the actual physical location of the operation. The address on the certificate must be a municipal address, not a P.O. box.

4. The address on the certificate should reflect one of the following location(s). These are presented in order of preference (as explained in # 2 above), and depend on the scope of certification:

    a. The main farmyard – for certificates with the "Production" scope
    b. The packinghouse (one or more, as applicable) – for certificates that include "Packing" or "Repacking" in the scope
    c. Storage building – for certificates with scopes of "Storage", or "Wholesaling" – might also apply to certificates with scopes of "Production" or "Packing" if there are separate storage locations
    d. Field(s) where there is a building such as an agricultural chemical storage shed, packaging material storage, temporary packing structure, or where a well is located.

5. In summary, at least one of the above must be on the certificate, and they are presented in order of preference. For example: If there is no main farmyard, consider the next option – is there a packing shed? a storage building? a field with some kind of building on it? The CB should use that address if there is no main farmyard. If there is a main farmyard, additional addresses as indicated above **could** be included on the certificate, but only if specifically requested by the program participant due to a buyer/customer requirement.

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".

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.

p. Certification bodies are strongly encouraged to include the most recent audit date(s) on the certificate, or in a document accompanying the certificate, for transparency to other stakeholders (e.g., customers and buyers).

3.3.5.6 Corrective Action Requests Follow-up

3.3.5.6.1 For all Certification Options:

a. All corrective actions will be evaluated by the Certification Body, with clarification provided by the program participant to show whether the action taken and evidence provided is sufficient to close the CAR.

b. Objective evidence of corrective actions can be provided to the CB in the form of documentary evidence or photographic evidence as appropriate. Evidence shall be filed

and must be made available to CanadaGAP on request.

c. There may be occasions where demonstration of the corrective action can only be confirmed by a further site visit. Where this is required, the program participant is responsible for resulting fees charged by the Certification Body.

d. For GFSI-recognized certification options B, C and D: Depending on the nature of the CAR(s) issued to the operation by the auditor, it may not be possible for the auditee to take corrective action until the subsequent year/season. In such cases, to achieve the audit score of 100% needed to be certified in the current year, the auditee may provide the certification body/auditor with a corrective action **plan**, to be reviewed by the certification body/auditor as the basis for determining whether the corrective actions that the auditee plans to implement the following year/season are acceptable and sufficient for the certification body to grant certification in the current year.

3.3.5.6.2 For Certification Options A1 and A2:

a. Follow-up by the certification body on Corrective Action Requests (CARs) issued by the auditor will occur only if the program participant:
   - has autofailure items
   - does not achieve a score of at least 85% on the audit, or
   - requests the opportunity or is required (e.g., by a customer) to implement corrective actions to increase his audit score.

b. In such cases, the program participant is responsible to initiate contact with the certification body, usually but not always through the auditor, to determine which corrective actions will be undertaken to remedy autofail items, achieve a passing score or increase his audit score. While the maximum timeframe to close out Corrective Actions Requests is prescribed below (*Section 3.3.5.6.2 d)*, note that the program participant's customer(s) may have superseding timeframes to correct deficiencies; the onus is on the program participant to meet customer requirements.

c. If the program participant has been issued automatic failure items, he must correct these first. The program participant is then directed to refer to the Executive Summary of the audit report to determine higher priority corrective actions already identified by the auditor. Program participants are advised to: 1) avoid delaying implementation of corrective actions, and 2) to contact the certification body in advance if necessary to determine if it is too late in the season to implement and/or confirm certain corrective actions. In the case of a failed audit, no certificate will be issued until corrective actions required to pass the audit are closed out.

d. Absent customer requirements, the *program participant* who fails the audit or who chooses to increase his score will have 45 calendar days from receipt of the audit report to address Corrective Action Requests, **or before the end of the operation's season, <u>whichever is sooner</u>**. Those who have not provided the CB/auditor with evidence of implemented corrective actions by the deadline will not be certified or will have certification withdrawn, or will lose the opportunity to increase their audit score.

e. CARs must be closed out by the *Certification Body* within 60 calendar days of issuing the audit report. The 60-day period includes the time (up to 45 calendar days or **before the end of the operation's season, <u>whichever is sooner</u>**) that the auditee has to

respond to the CARs. This means that the CB/auditor would have at least 15 calendar days to review evidence of the implemented corrective actions, and to make the certification decision.

f. Review of CARs evidence by the CB/auditor may occur after the operation's season has ended; however, the operation must **submit** evidence of their implemented corrective actions **before** their season ends. To close out CARs, corrective actions supported by evidence must be reviewed and approved by the auditor/Certification Body.

g. As determined by the Certification Body, provision can be made for a longer timeframe than 60 calendar days for CAR closeout, if needed to deal with exceptional circumstances (e.g., the auditee may require additional time to address CARs if a significant capital investment is needed, such as replacing a cooler or packing line, etc.).

h. The original audit report must NOT be modified and reissued to the auditee. Any adjustments to the original audit scoring/result must be captured on the Corrective Actions Report, which is finalized by the CB and issued to the auditee once CARs are closed out. Refer to Procedure TP-02-CA for further information.

3.3.5.6.3 For Certification Options C and D:

a. The program participant is responsible to close out Corrective Action Requests (CARs) issued by the auditor if the auditee:
   - has autofailure items
   - does not achieve a score of 100% on the audit.

b. In such cases, the program participant is responsible to initiate contact with the certification body, usually but not always through the auditor, to provide objective evidence of correction actions that need to be taken to remedy autofail items and to achieve a score of 100% on the audit. While the maximum timeframe to close out Corrective Actions Requests is prescribed below (*Section 3.3.5.6.3 d)*, note that the program participant's customer(s) may have superseding timeframes to correct deficiencies; the onus is on the program participant to meet customer requirements.

c. Program participants are advised to: 1) avoid delaying implementation of corrective actions, and 2) to contact the certification body in advance if necessary to determine if it is too late in the season to implement and/or confirm certain corrective actions. For certain non-conformities, a corrective action plan may be acceptable, since it may not be possible for the operation to address certain issues during the current year/season. The program participant may be able to present a reasonable plan to implement corrective actions in the following year/season. The certification body/auditor will be responsible to make the determination in each case, and the program participant's effective implementation of the proposed corrective actions must be verified during the next audit.

d. Absent customer requirements, the *program participant* who fails the audit will have 45 calendar days from receipt of the audit report to address Corrective Action Requests, **or before the end of the operation's season, <u>whichever is sooner</u>**. Those who have not, by the deadline, provided the CB/auditor with evidence of implemented corrective actions, or proposed corrective actions plan for the following year/season, will not be certified, or will have certification withdrawn.

e. CARs must be closed out by the *Certification Body* within 60 calendar days of issuing the audit report. The 60-day period includes the time (up to 45 calendar days or **before the end of the operation's season, <u>whichever is sooner</u>**) that the auditee has to respond to the CARs. This means that the CB/auditor would have at least 15 calendar days to review evidence of the implemented corrective actions, or the proposed corrective actions plan, and to make the certification decision.

f. Review of CARs evidence or corrective actions plans by the CB/auditor may occur after the operation's season has ended; however, the operation must **submit** evidence of their implemented corrective actions, or a corrective actions plan **before** their season ends. To close out CARs, corrective actions supported by evidence and proposed corrective action plans must be reviewed and approved by the auditor/Certification Body.

g. As determined by the Certification Body, provision can be made for a longer timeframe than 60 calendar days for CAR closeout, if needed to deal with exceptional circumstances (e.g., the auditee may require additional time to address CARs if a significant capital investment is needed, such as replacing a cooler or packing line, etc.).

h. The original audit report must NOT be modified and reissued to the auditee. Adjustments to the original audit scoring/result must be captured on the Corrective Actions Report, which is finalized by the CB and issued to the auditee once CARs are closed out. Refer to Procedure TP-02-CA for further information.

3.3.5.6.4 For Group Certification (Option B):

a. All non-conformances against a group in Option B shall be resolved before a certificate can be issued to the group.

b. Conformance means: 100% compliance with the requirements of the Group Management System Checklist, AND all sampled sites must achieve a score of 100% on the Audit Checklist.

c. For initial certification, the timeframe to close out CARs is 3 months after the initial audit. If CARs are not closed out within 3 months, another audit is required for certification.

d. For subsequent surveillance audits, the timeframe to close out CARs is 28 days after the audit date. If CARs are not closed out within 28 days, the CB will suspend the group certification. Refer to *Appendix III.1, Section 6, Certification Body Sanctions against the Group*.

3.3.5.6.5 For Certification Options E and F:

a. The program participant is responsible to close out Corrective Action Requests (CARs) issued by the auditor if the auditee:
   - has autofailure items
   - does not achieve a passing score of 95% on the audit
   - requests the opportunity or is required (e.g., by a customer) to implement corrective actions to increase his audit score.

b. In such cases, the program participant is responsible to initiate contact with the certification body, usually but not always through the auditor, to provide objective

evidence of correction actions that need to be taken to remedy autofail items and to achieve a passing score of 95% on the audit. While the maximum timeframe to close out Corrective Actions Requests is prescribed below (*Section 3.3.5.6.5 d)*, note that the program participant's customer(s) may have superseding timeframes to correct deficiencies; the onus is on the program participant to meet customer requirements.

c. Program participants are advised to: 1) avoid delaying implementation of corrective actions, and 2) to contact the certification body in advance if necessary to determine if it is too late in the season to implement and/or confirm certain corrective actions. For certain non-conformities, a corrective action plan may be acceptable, since it may not be possible for the operation to address certain issues during the current year/season. The program participant may be able to present a reasonable plan to implement corrective actions in the following year/season. The certification body/auditor will be responsible to make the determination in each case, and the program participant's effective implementation of the proposed corrective actions must be verified during the next audit.

d. Absent customer requirements, the *program participant* who fails the audit will have 45 calendar days from receipt of the audit report to address Corrective Action Requests, **or before the end of the operation's season, <u>whichever is sooner</u>**. Those who have not, by the deadline, provided the CB/auditor with evidence of implemented corrective actions or their proposed corrective actions plan for the following year/season, will not be certified, or will have certification withdrawn.

e. CARs must be closed out by the *Certification Body* within 60 calendar days of issuing the audit report. The 60-day period includes the time (up to 45 calendar days or **before the end of the operation's season, <u>whichever is sooner</u>**) that the auditee has to respond to the CARs. This means that the CB/auditor would have at least 15 calendar days to review evidence of the implemented corrective actions, or the proposed corrective actions plan, and to make the certification decision.

f. Review of CARs evidence or corrective actions plans by the CB/auditor may occur after the operation's season has ended; however, the operation must **submit** evidence of their implemented corrective actions, or a corrective actions plan **before** their season ends. To close out CARs, corrective actions supported by evidence and proposed corrective action plans must be reviewed and approved by the auditor/Certification Body.

g. As determined by the Certification Body, provision can be made for a longer timeframe than 60 calendar days for CAR closeout, if needed to deal with exceptional circumstances (e.g., the auditee may require additional time to address CARs if a significant capital investment is needed, such as replacing a cooler or packing line, etc.).

h. The original audit report must NOT be modified and reissued to the auditee. Adjustments to the original audit scoring/result must be captured on the Corrective Actions Report, which is finalized by the CB and issued to the auditee once CARs are closed out. Refer to Procedure TP-02-CA for further information.

3.3.5.7 Self-Declarations, Self-Assessments and Random Audits for Options A1 and A2

3.3.5.7.1 Administrative Procedures:

a. Each year, CanadaGAP generates random audit lists and provides the names of the randomly selected companies to the CBs to schedule audits. CanadaGAP will communicate in writing with each of the selected participants to inform them they have been selected for a random audit. Since the list is randomly generated, it is possible for the same certified company to be chosen for an audit each year. Detailed procedures related to internal administration of the random audit programme are contained in TP-04-RA.

b. Each year, CanadaGAP mails participants a copy of the self-declaration and self-assessment checklist in either spring or fall.

c. Completed self-declarations and self-assessments must be returned by the program participant by mail, fax, or email to the certification body at least one month prior to the certificate expiry date. The self-assessment checklist must be completed **during** the period when the program participant has activities occurring within their operation that are relevant to the certification scope (e.g., production, packing, storage, etc.) and pertains to activities relevant to the current crop season. The deadline is clearly communicated in writing to participants, as is the consequence that failure to respond will lead to loss of certification. Participants are also advised that there will be no follow-up contact (emails or phone calls) by CanadaGAP or the CB if completed forms are not submitted on time. To regain certification status after letting the certificate lapse, the program participant is required to restart the four-year audit cycle.

d. Participants who return a completed self-declaration and self-assessment checklist, but who subsequently fail to cooperate in a timely fashion prior to their certificate expiry with the Certification Body's requests for additional information, are advised that their lack of cooperation is likely to result in: 1) an on-site audit by the Certification Body, at the participant's expense; and/or 2) loss of certification.

e. Program participants selected for a random audit must comply with the audit. Refusal to cooperate with the certification body in scheduling the random audit will result in the certification body suspending or withdrawing certification. The program participant will not be allowed to re-enroll in the program for one year following withdrawal of certification.

3.3.5.7.2 Certification Body Review of Self-Declaration and Self-Assessment Checklists – Procedures:

a. The Certification Body ensures that the Self-Declaration is completed in full. The CB verifies if any changes have been made to client contact information, which has not been previously communicated by the client, and notifies CanadaGAP of any changes to client contact information that have not been previously reported to CanadaGAP on the Change of Status Form. CBs and CanadaGAP databases are updated accordingly.

b. Auditor/reviewer is provided with copy of/access to the program participant's previous audit report(s) along with the completed Self-Declaration and Self-Assessment Checklist.

c. Auditor/reviewer of the Self-Declaration and Self-Assessment Checklist reviews the program participant's answer to each question and makes any necessary comments in the Comments box at the end of the Self-Assessment Checklist. Auditor/reviewer must complete the last page of the Self-Assessment Checklist with name, signature, date, and any relevant comments.

d. The purpose of the Self-Declaration and Self-Assessment is to ask the program participant to confirm that he is continuing to follow his on-farm food safety program. His answers should indicate he is doing so, and/or is taking action (*Action Plan*) to maintain conformance with program requirements.

e. If the auditor/reviewer requires further information or clarification on an answer, or finds inconsistencies between the responses on the self-assessment checklist and the operation's previous practices, the auditor/reviewer is expected to call or email the program participant to obtain more information to address any doubts or concerns.
   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.
   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.
   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.

f. Corrective Action Requests should not routinely be raised at this stage, unless there is a flagrant or major deficiency made evident through the responses on the Self-Declaration and Self-Assessment Checklist. If the auditor/reviewer notes a blatant problem or clear non-compliance or non-conformance, his comments should make clear where there may be a significant issue.

g. Auditor/reviewer returns the Self-Declaration and Self-Assessment Checklist with his comments for review by the Certification Body. Based on those comments, if there is clear and substantial evidence that the program participant is not continuing to follow his on-farm food safety Program, the Certification Body may withhold certification and ask the auditor/reviewer to follow up with Corrective Action Requests. This may include requesting copies of records, test results, etc. as required to satisfy any concerns raised by the review. Follow up on Corrective Action Requests is at the program participant's expense, and will not be paid by CanadaGAP. In severe cases of documented non-compliance or non-conformance, the Certification Body may trigger an on-site audit, provided the Self-Declaration and Self-Assessment Checklist, and any subsequently requested evidence or lack thereof, provides evidence sufficient to justify that follow-up. Triggered audits are paid for by the program participant. Refer below to 3.3.5.7.2 m) for further information on Triggered Audits.

h. If raised, Corrective Actions Requests (CARs) are noted on the last page of the Self-Assessment checklist in the Comments box. CBs will instruct program participants to respond to CARs using the CanadaGAP *Corrective Actions Report*. Certification will not be issued until major deficiencies or flagrant violations of program requirements are addressed. The auditor/reviewer makes recommendations about closing CARs; the decision rests with the Certification Body to grant certification.

i. The idea is not to issue CARs for minor items. 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. However, the annual review of the Self-assessment checklist is the only opportunity for surveillance by the CB in a non-audit year. The purpose of completing and reviewing the checklist is to ensure ongoing compliance with program requirements. The Self-Declaration is also a sworn and legally binding statement that program participants are continuing to follow the required procedures.

j. Once the certification decision is made, the Certification Body provides the program participant with a completed copy of the Self-Declaration and Self-Assessment Checklist containing auditor/reviewer comments, to help the program participant maintain ongoing conformance with the requirements.

k. The Self-Declaration and Self-Assessment Checklists from prior years should be made available to, and consulted by, auditors performing future audits for that program participant.

l. Self-Declaration and Self-Assessment Checklists must be reviewed by the auditor and/or certification body reviewer who performed and reviewed the prior audit, unless the auditor/CB reviewer is no longer assigned to Program audits. All other exceptions to this rule must be approved in advance by CanadaGAP.

m. When an audit is triggered by the Certification Body to follow up on an unacceptable self-assessment, the triggered audit becomes the surveillance activity for the crop year in question. The Certification Body does not need and is not expected to also review the operation's self-assessment for the crop year during which the triggered audit occurs. See additional information on Triggered Audits in Section 3.3.5.4.1 h).

3.3.5.8 Certification Options

3.3.5.8.1 Individual Certification: Options A1, A2, C, D, E and F

a. This section is applicable to applicants that are single legal entities (individual company) with single production sites or multiple production sites that are not separate legal entities and are all centrally managed by the applicant.

b. This section describes audit and surveillance activities for Options A1, A2, C, D, E and F.

c. **Option A1** certified operations will have a full on-site audit in the first year followed by three (3) years of self-declarations. The four-year cycle of on-site audits is **fixed** (i.e., on-site audits will occur in Years 5, 9, 13, etc. regardless of whether the participant is chosen for a random audit in another year).

d. Surveillance activity for **Option A1** certified operations includes Certification Body review of an annual self-declaration and self-assessment, and/or a random on-site audit. The random audit component maintains program rigour in the years where a program participant is not automatically scheduled for an on-site visit. “Random” does not mean a surprise visit; it means an operation is randomly chosen during any (or all) of the self-assessment years.

e. **Option A2** is a variation of Option A1, which it resembles in almost every respect (refer to clauses c) and d) above for **Option A1**). The difference is that for Option A2 participants selected for a random audit in Years 2, 3 or 4, their next scheduled audit will be extended to four years from the *random* audit date. Neither option (A1, A2) is GFSI-recognized.

f. **Options C, D, E and F** program participants undergo an annual on-site audit by the Certification Body.
   - Options C and D are GFSI-recognized.
   - Options E and F are **not** GFSI-recognized.
   - 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.
   - 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.
   - Brokerage operations have only one CanadaGAP certification option available: Option F.

   Refer to Appendix III.3 for further comparison of the certification options available.

g. A chart summarizing all seven certification options is provided in Appendix III.3. Refer to Section 3.3.5.2 c) for further guidance on scoping the appropriate certification option by activity and commodity.

3.3.5.8.2 Group Certification

i) General Information

a. This section is applicable to groups.

b. The applicant is responsible for ensuring that all group members under the certification scope comply with the certification requirements at all times.

c. The CB does not audit all group members, but just a sample. Thus it is not the responsibility of the CB to determine whether each group member is complying with program requirements. This responsibility rests with the applicant. The CB must assess whether the Group’s internal controls are appropriate.

ii) Option B: Audit and Surveillance Activities

a. Option B certified operations must meet the Group Certification audit frequencies set out in Appendix III.1, which are based on the IAF MD1 (current version). Surveillance activity by the Certification Body includes an annual on-site group management system audit,

plus on-site audits for a specified sample of group members (i.e., producers, and packing and storage sites).

b. An applicant for group certification may enroll under Option B when:

i. All sites are within the requested scope; and
ii. All sites are operating under one centrally controlled and administered Group Management System; and
iii. The internal audits of all sites shall comply with the CanadaGAP Program;
iv. Audit findings of the individual sites shall be considered indicative of the entire system and corrective action must be implemented accordingly;
v. An internal audit (i.e., by the Group's qualified internal auditor completing and scoring the Group Management System Checklist) has been conducted on the Group Management System within 12 months prior to certification;
vi. An internal audit (i.e., by the Group's qualified internal auditor(s) completing and scoring the CanadaGAP Audit Checklist) has been conducted on each group member (i.e., all producers, and all packing and storage sites) within 12 months prior to certification;
vii. Following certification, an internal audit shall be carried out annually by the Group's qualified internal auditor(s) on the Group Management System and annually on each group member (i.e., all producers, and all packing and storage sites).

Refer to *Appendix III.1* for detailed information about Option B.

3.3.5.9 Program Participant Changes to Certification Scope

i) Changes to crops or activities covered by the Certification:

a. Certified operations who wish to change or add crops or activities (i.e., production, packing, storage, repacking, wholesaling, brokerage) to the scope of their certification must inform CanadaGAP in writing by completing the Change of Status form. The Change of Status form is available on the Program website (www.canadagap.ca) or by contacting the CanadaGAP office.

b. Program participants may choose to be certified for a new scope by their current Certification Body, or by a new Certification Body.

c. Expanded Scope of Certification involving Application to a new CB:

i. When a program participant already enrolled in the Program applies to a new CB for certification of a different crop or activity (production, packing, storage, repacking, wholesaling, brokerage), the program participant must inform CanadaGAP so that enrolment information can be transmitted to the new CB.

ii. A copy of the most recent certificate and previous audit report(s) must be provided by the program participant to the new CB.

iii. These are the minimum requirements for program participants who are already enrolled in the Program and who are seeking certification for a new scope with a different CB. CBs may implement procedures or actions, which are more stringent than those contained herein, provided that an organization's freedom to choose a CB

is not unduly or unfairly constrained.

d. When CBs are informed directly by clients requesting changes to their certification scope, CB personnel are to direct program participants to the CanadaGAP office and/or the Program website to complete the Change of Status form.

e. Once received, CanadaGAP will provide a copy of the completed Change of Status form to the CB and record changes in its internal database.

f. Depending on the nature of the changes, the addition of new crops and/or activities to the certification scope normally requires a new audit.

ii) Changes to Certification Option:

a. Requests for change of certification option will be accepted at any time.

b. Certified operations who wish to change certification options must inform CanadaGAP in writing by completing the Change of Status form. The Change of Status form should be received by CanadaGAP **at least** fifteen (15) business days before the scheduled audit date. A request for change in certification option received after an audit will be considered as received for the next year's audit. (For example, an operation has an onsite audit for Option A1 on 16 June 2023. CanadaGAP receives a change of status from the operation requesting a change in their option from Option 'A1' to Option 'C' on 20 June 2023. The request received on 20 June 2023 would be considered for the next year, i.e. the 2024 audit). The Change of Status form is available on the Program website (www.canadagap.ca) or by contacting the CanadaGAP office. Notwithstanding the foregoing, program participants who have been enrolled in a group and who wish to switch to an individual certification option (A1, A2, C, D, E or F) must submit a completed enrolment form. See also Section 3.3.5.9 ii) i. below regarding the addition of a certification option (e.g., Option D or F) during an audit. See Section 3.3.5.9 ii) j. below for operations wishing to change certification options following an audit (e.g., switching from Option C to Option E or A1).

c. When CBs are informed directly by clients requesting changes to their certification option, CB personnel are required to direct program participants to the CanadaGAP office and/or the Program website to complete the Change of Status form.

d. Once received, CanadaGAP will provide a copy of the completed Change of Status form to the CB and record changes in its internal database.

e. Relative to the four-year audit cycle:
   i. Certified companies switching from Option C or E to Option A1 or A2 must begin in Year 1 in the four-year audit cycle and have a full on-site audit in the effective year of the change, even if they keep the same certification scope (i.e., the same crops and activities certified) and the same Certification Body. The company cannot start immediately in Year 2 of the four-year audit cycle.
   ii. A program participant switching from option A1 to A2 can continue where they are in their four-year audit cycle, but they CANNOT use a random audit previously performed under option A1 to reset their audit cycle under their new certification option, A2. For example, a company enrolled in option A1 had a random audit in 2023 and switched to option A2 after the audit. The 2023 random

audit does not count as a “Year 1” reset under option A2. Rather, the program participant would simply continue where they are in their current four-year audit cycle. Similarly, a program participant enrolled in option A1 who is selected for a random audit cannot switch to option A2 until after the random audit is completed. The program participant can then switch to option A2 and will continue where they are in their current four-year audit cycle.

f. Regardless of certification option, certified companies changing options must restart the audit cycle (i.e., have an on-site audit) *if they are also*:

   i. changing the scope of their certification (i.e., crops and activities covered by the certificate), and/ or
   ii. transferring Certification Bodies.

g. **Program participants are strongly advised to check directly with their customer(s) to ensure their chosen certification option will be acceptable to the market**. The CBs and CanadaGAP are not in a position to interpret customers’ varying requirements.

h. Certification to multiple options: Companies may be certified to more than one certification option for different commodities or scopes. One certificate will be issued to the company reflecting all applicable certification options. In exceptional cases, as is sometimes required by customers, the certification body on a cost recovery basis may issue the company separate certificates (specific to a certification option/scope) on condition that prior approval is obtained from CanadaGAP.

i. If a program participant indicates that they wish to add another certification option (e.g., Option D or F) to their certificate during the opening meeting of their audit, the auditor must:
   a) ensure that he or she is qualified to audit the additional scope
   b) before proceeding, contact the Certification Body to confirm the addition of the scope. If the CB does not authorize the additional scope at that time, the auditor should not proceed with auditing the new scope
   c) If the CB authorizes proceeding with auditing the additional scope, the auditor must inform the program participant that the repacking and wholesaling scopes entail extra audit time and will result in additional audit fees, as well as a higher annual program fee payable to CanadaGAP.
   d) The auditor must inform the program participant to send a Change of Status Form to the CanadaGAP office without delay.

j. 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., switch from Option C to Option E or A1). In such cases, it is not necessary for the certification body to perform a new audit. The certification body shall:
   i. Instruct the auditee to submit a Change of Status Form to CanadaGAP;
   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);
   iii. Instruct the auditee to address any remaining corrective action requests on the CAR Form;

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.

3.3.5.10 Transfers between Certification Bodies

i) Procedures:

a. This explains how to proceed when program participants enrolled in the Program change Certification Bodies and how to transfer companies between CBs licensed by CanAgPlus, subject to restrictions set out in the subsequent *Section 3.3.5.10 ii), Restrictions on Certification Body Transfers.* The provisions in this section apply to all program participants, whether they have passed or failed a Program audit.

b. The objective is to assure the maintenance of the integrity of Program certificates issued by one CB if subsequently transferred to another CB, and/or to guarantee that the case of any program participant entering into contract with a licensed Certification Body will be reviewed in light of that company's history with the Program.

c. These are the minimum requirements for the transfer of program participants between CBs licensed by CanAgPlus. CBs may implement procedures or actions, which are more stringent than those contained herein, provided that an organization's freedom to choose a CB is not unduly or unfairly constrained.

d. Program participants and groups must communicate in writing their request to transfer CBs to CanadaGAP by completing the Change of Status form. The Change of Status form is available on the Program website (www.canadagap.ca) or by contacting the CanadaGAP Office.

e. In the case of certified companies, a request for a transfer between CBs may be prompted well before certificate expiry, e.g. when the outgoing CB contacts the program participant to schedule a re-certification audit.

f. When CBs are contacted directly by clients requesting transfers, CB personnel are to direct program participants to the CanadaGAP office and/or the Program website (www.canadagap.ca) to complete the Change of Status form.

g. Program participants transferring CBs must provide the new CB with a copy of their previous Program audit report(s), Corrective Action Report(s) and certificate(s) if previously certified. Subject to any contractual obligations or restrictions within the respective CB policies, the incoming CB may request from the outgoing CB information about the transferring client. This may include whether the client was selected for and complied with an unannounced audit, or whether the client had a triggered audit pending with the outgoing CB. If the transferring client was selected by the outgoing CB for an unannounced audit and failed to comply, the incoming CB must conduct the first audit unannounced. If the transferring client had a pending triggered audit with the outgoing CB, the incoming CB must complete the triggered audit with the client as soon as is practicable.

h. On the Change of Status form, the program participant must provide details of the last audit date and the requested audit scope (if any changes from the current scope). Before accepting the client, the new CB will verify the audit date and the scope of any existing certification vs. the requested audit scope.

i. The transfer is initiated only when the program participant requests it in writing through CanadaGAP. CanadaGAP notifies, in writing, both the outgoing CB and the accepting CB of the request for transfer. The transfer is complete only when the accepting CB has signed a contract with the program participant.

j. It may be necessary for CanadaGAP to request certificate transfers between CBs (e.g., when there is a loss of accreditation of the outgoing CB, the outgoing CB has stopped its Program activities, the outgoing CB has been taken over by the accepting CB, etc.) This type of transfer from one CB to another CB takes place during a certification cycle and can only continue on request and after approval from CanadaGAP. In such cases, it may be possible to waive certain restrictions as set out below in 3.3.5.10 ii) provided there is mutual agreement between CanadaGAP and the certification body (e.g., program participants certified under Option A1 or A2 may be able to continue where they are currently in their four-year audit cycle). Transfers are subject to the program participant disclosing full information to the accepting CB regarding their certification status, timing of previous audits for multi-commodity and multi-activity operations, previous audit findings that are relevant to the transfer, open CARs, complaints, certificate expiry and the potential need for a certificate extension, compliance with terms of use for the mark of conformity, etc.).

k. When a program participant initiates a transfer to another CB well in advance of their production season and well before the expiry of their certificate, the outgoing CB is requested to maintain certification until such time as the incoming CB can schedule and perform a new audit.

   For example, if a blueberry grower initiates a transfer in March 2024, and his certificate is valid until August 2024 (based on a July 2023 harvest audit), the incoming CB should go ahead and scope and schedule his upcoming July 2024 audit. The outgoing CB should maintain the certification until the transfer can be completed (i.e., July/August 2024 – new audit performed by the incoming CB).

l. Under certain circumstances as determined solely by CanadaGAP (e.g., CB termination or withdrawal of services), to facilitate a client's transition to a new CB CanadaGAP may waive certain rules to which the new CB is usually bound. For example, CanadaGAP may allow the new CB to issue certificates with a validity period longer than 12 months when that is necessary to maintain stability in the client's audit or certification cycle. Such exceptions will be granted by CanadaGAP on a case-by-case basis and CBs must receive advance approval in writing.

ii) Restrictions on Certification Body Transfers

a. The following restrictions apply to certified companies wishing to transfer CBs.

b. **Option A1 and Option A2** certified companies cannot transfer CBs for a minimum of four consecutive years. Those who choose to proceed with a CB transfer before the end

four years must restart the audit cycle in Year 1, with a full on-site audit by the new Certification Body. Program participants must share previous audit report(s) and certificate(s) with the incoming CB, as per the requirements in Section 3.3.5.10 (i) g above.

c. **For all certification options:** 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).

d. **Option B** groups who transfer CBs must revert to the Initial Audit (Year 1) requirements for Option B. See Appendix III.1 for further details relating to Option B requirements.

e. **Options C, D, E and F** certified companies may transfer to a different Certification Body from year to year, provided that they share previous audit report(s), corrective action report(s), and certificate(s) with the incoming CB, as per the requirements in Section 3.3.5.10 (i) g above.

f. In the case of multi-commodity applicants under Options A1, A2 and E: For the purposes of program integrity, the new Certification Body must be able to perform their first audit when activities are occurring that have not previously and/or recently been audited, taking into account risk and the requirement for all relevant activities to be assessed over a 3-4 year period.

g. Notwithstanding the above clauses under 3.3.5.10 ii), restrictions on transfers may be lifted where circumstances warrant, as solely determined by CanadaGAP (e.g., based on provisions set out under *Section 3.3.5.10 i. j)*, or in the event that a sub-contractor to one certification body ceases to offer its services and instead sub-contracts with another certification body. Should the sub-contractor's clients wish to transfer to the second certification body, CanadaGAP shall determine and communicate whether program participants are required to restart the certification cycle.) See also 3.3.5.10 i. j).

3.3.5.11 Maintenance of Certification

a. Each year, the program participant must reconfirm enrolment by remitting the applicable annual program fee to CanadaGAP, and if changes are being made to the program participant's status, submitting a completed Change of Status form, available from the CanadaGAP office or on the Program website at: www.canadagap.ca

3.3.6 Suspending, withdrawing, terminating or reducing the scope of Certification

3.3.6.1 General Information

a. All the requirements given in ISO/IEC 17065 **and** all additional requirements as required by an external benchmarking program (e.g., GFSI benchmarking requirements) will apply. The Certification Body must inform CanadaGAP in writing of all suspensions, withdrawals and terminations (at the request of the client) of certification. In addition the following requirements will apply from **Section 9.6.5 of ISO/IEC 17021-1:**

9.6.5 Suspending, withdrawing or reducing the scope of certification

9.6.5.1 The certification body shall have a policy and documented procedure(s) for suspension, withdrawal or reduction of the scope of certification, and shall specify the subsequent actions by the certification body.

9.6.5.2 The certification body shall suspend certification in cases when, for example,

- The client's certified management system has persistently or seriously failed to meet certification requirements, including requirements for the effectiveness of the management system,
- the certified client does not allow surveillance or recertification audits to be conducted at the required frequencies, or
- the certified client has voluntarily requested a suspension.

9.6.5.3 Under suspension, the client's management system certification is temporarily invalid.

9.6.5.4 The certification body shall restore the suspended certification if the issue that has resulted in the suspension has been resolved. Failure to resolve the issues that have resulted in the suspension in a time established by the certification body shall result in withdrawal or reduction of the scope of certification. NOTE In most cases the suspension would not exceed 6 months.

9.6.5.5 The certification body shall reduce the client's scope of certification to exclude the parts not meeting the requirements, when the certified client has persistently or seriously failed to meet the certification requirements for those parts of the scope of certification. Any such reduction shall be in line with the requirements of the standard used for certification.

b. When a program participant chooses to reduce the scope of certification:

   i) Situation 1: During the audit (at the opening meeting, closing meeting or anytime in between), if the auditee chooses to **remove** a crop and/or an activity from the scope of their certification, the auditor is permitted to make that change to the audit plan. The auditor should obtain the auditee's signature to indicate their acceptance of the change to the audit plan. If required by the certification body, the auditor may also report the scope reduction in the Executive Summary of the audit report.

   ii) Situation 2: After the auditee has received their audit report, if the auditee chooses to address an audit finding by taking a corrective action that involves reducing the scope of certification (e.g., removing a crop and/or an activity from their certificate), the program participant is allowed to do so. In such cases, the certification body shall adjust the audit report to remove scoring of the elements that are no longer included within the scope of certification. Such adjustments are 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. From that point, the auditee will take corrective action as needed to address any other audit findings. The certification body shall retain copies of both the original audit report and the revised audit report.

   iii) Under any circumstances and at all times, the decision to grant certification to a client for a given scope rests with the certification body.

3.3.6.2 Procedures

In addition to *Section 3.3.6.1, General Information*, the following applies:

a. CBs shall deny, suspend or withdraw certification when the program participant (individual or group) cannot show objective evidence of implementation of effective corrective actions after a mandatory CAR has been issued.

b. Mandatory CARs usually refer to: those requiring correction to achieve group (re)certification, autofailure items requiring correction to achieve individual (re)certification, and selected CARs requiring correction to achieve a passing score after a failed audit.

c. The CB can deny, suspend or withdraw certification for certain crops/activities or for all crops/activities of the certification scope.

d. The CB must communicate suspensions, withdrawals and terminations of certification in writing to the program participant, with a copy to CanadaGAP.

e. CBs can issue and lift suspensions to individual certificate holders including groups, but not to group members.

f. After a suspension is applied, the CB will set the period allowed for correction. This will not normally exceed 6 months as per ISO/IEC 17021-1.

g. During the period of suspension, the program participant is prohibited from using the certificate, the Program logo or other mark(s) or any other document or claim that is any way liked to certification in relation to the suspended scope. The CB is required to communicate this prohibition to the program participant when the suspension is issued.

h. If the program participant notifies the CB that appropriate corrective action has been implemented before the set period, the suspension will be lifted by the CB, subject to satisfactory evidence and closing out.

i. If the cause of the suspension is not resolved within the set period, certification is withdrawn by the CB.

j. **Customer notification of certificate withdrawal:** The CB will automatically inform relevant customer(s) of certificate withdrawals only if the program participant has authorized release of a copy of his certificate to customer(s).

3.3.6.3 Requests for Certificate Suspension or Withdrawal

In addition to *Sections 3.3.6.1, General Information* and *Section 3.3.6.2, Procedures*, the following applies:

a. Certificates may be suspended or withdrawn for cause by the Certification Body, including upon request by CanadaGAP if reasonable grounds are provided (e.g., follow up to a complaint received by CanadaGAP resulting in a triggered audit by the Certification Body or other investigation by CanadaGAP or the Certification Body).

b. Cause for withdrawal of certification includes non-payment of annual program fees to the CanadaGAP Program and of audit fees levied by the Certification Body.

c. When requested by CanadaGAP, the Certification Body will proceed with withdrawal of certification from program participants whose accounts payable to the CanadaGAP Program are overdue.

d. The Certification Body must inform, in writing, the program participant of the withdrawal of the certificate, and must request return of the withdrawn certificate without delay. The Certification Body must copy CanadaGAP on this written communication.

e. Further, this written communication must include notification that the program participant is prohibited from using the withdrawn certificate, the Program logo or other mark(s) or any other document or claim that is any way liked to certification in relation to the withdrawn certificate.

f. Information about withdrawn certificates will be made publicly accessible as per the requirements in ISO 17021-1, clause 4.5.1.

3.3.6.4 Certification Body Responsibilities in the event of a Food Safety Prosecution, Significant Regulatory Incident or Nonconformity, or Product Recall

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. This shall include any recall notice issued by a regulatory authority that cites a confirmed outbreak, illness, hospitalization or fatality associated with a product that is produced, handled or brokered by a CanadaGAP-certified company. Reporting shall occur without delay (i.e., within 48 hours of the information coming to the CB's attention). 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.

3.3.7 Program Appeals

a. All the requirements given in ISO/IEC 17065 **and** all additional requirements as required by an external benchmarking program (e.g., GFSI benchmarking requirements) will apply to licensed certification bodies. In addition the following requirements will apply from **Section 9.7 of ISO/IEC 17021-1:**

9.7 Appeals

9.7.1 The certification body shall have a documented process to receive, evaluate and make decisions on appeals.

9.7.2 The certification body shall be responsible for all decisions at all levels of the appeals-handling process. The certification body shall ensure that the persons engaged in the appeals-handling process are different from those who carried out the audits and made the certification decisions.

9.7.3 Submission, investigation and decision on appeals shall not result in any discriminatory actions against the appellant.

9.7.4 The appeals-handling process shall include at least the following elements and methods:
a) an outline of the process for receiving, validating and investigating the appeal, and for deciding what actions are to be taken in response to it, taking into account the results of previous similar appeals;
b) tracking and recording appeals, including actions undertaken to resolve them;
c) ensuring that any appropriate correction and corrective action are taken.

9.7.5 The certification body receiving the appeal shall be responsible for gathering and verifying all necessary information to validate the appeal.

9.7.6 The certification body shall acknowledge receipt of the appeal and shall provide the appellant with progress reports and the result of the appeal.

9.7.7 The decision to be communicated to the appellant shall be made by, or reviewed and approved by, individual(s) not previously involved in the subject of the appeal.

9.7.8 The certification body shall give formal notice to the appellant of the end of the appeals-handling process.

b. Where interpretation of the standard is required by the Certification Body and/or program participant to resolve an appeal filed by the client with respect to their audit findings, CanadaGAP will provide the opinion of a qualified expert to clarify, explain or interpret the technical requirement as needed.

3.3.8 Program Complaints

a. All the requirements given in ISO/IEC 17065 **and** all additional requirements as required by an external benchmarking program (e.g., GFSI benchmarking requirements) will apply to licensed certification bodies. In addition the following requirements will apply from **Section 9.8 of ISO/IEC 17021-1:**

9.8 Complaints

9.8.1 The certification body shall be responsible for all decisions at all levels of the complaints-handling process.

9.8.2 Submission, investigation and decision on complaints shall not result in any discriminatory actions against the complainant.

9.8.3 Upon receipt of a complaint, the certification body shall confirm whether the complaint relates to certification activities that it is responsible for and, if so, shall deal with it. If the complaint relates to a certified client, then examination of the complaint shall consider the effectiveness of the certified management system.

9.8.4 Any complaint about a certified client shall also be referred by the certification body to the certified client in question at an appropriate time.

9.8.5 The certification body shall have a documented process to receive, evaluate and make decisions on complaints. This process shall be subject to requirements for confidentiality, as it relates to the complainant and to the subject of the complaint.

9.8.6 The complaints-handling process shall include at least the following elements and methods:
a) an outline of the process for receiving, validating, investigating the complaint, and for deciding what actions are to be taken in response to it;
b) tracking and recording complaints, including actions undertaken in response to them;
c) ensuring that any appropriate correction and corrective action are taken.
NOTE: ISO 10002 provides guidance for complaints handling.

9.8.7 The certification body receiving the complaint shall be responsible for gathering and verifying all necessary information to validate the complaint.

9.8.8 Whenever possible, the certification body shall acknowledge receipt of the complaint, and shall provide the complainant with progress reports and the results of the complaint.

9.8.9 The decision to be communicated to the complainant shall be made by, or reviewed and approved by, individual(s) not previously involved in the subject of the complaint.

9.8.10 Whenever possible, the certification body shall give formal notice of the end of the complaints handling process to the complainant.

9.8.10 The certification body shall determine, together with the certified client and the complainant, whether and, if so to what extent, the subject of the complaint and its resolution shall be made public.

b. Where interpretation of the standard is required by the Certification Body, the program participant and/or the Accreditation Body to resolve a complaint, CanadaGAP will provide the opinion of a qualified expert to clarify, explain or interpret the technical requirement.

3.3.9 Annual Program Fee

3.3.9.1 Setting the Annual Program Fee

The Board of Directors, on the advice of the Executive Director and Financial Controller, will annually establish the Annual Program Fee to be collected from each company enrolling for Program Certification and annually from each program participant.

3.3.9.2 Fee Collection

a. The CanadaGAP Program will collect the Annual Program Fee upon receipt of an enrolment for certification from each enrollee and annually thereafter collect the Annual Program Fee from each program participant for the duration of the program participant's enrolment in CanadaGAP.

b. Annually, CanadaGAP will mail an invoice to each program participant one month before the enrolment anniversary date. The invoice is payable within 30 days of receipt. For overdue accounts:

- If payment is not received within 45 days of the invoicing date: CanadaGAP sends a statement by email. If the program participant does not have an email address, they do not receive a statement until their account is 30 days overdue. (see next bullet)
- If the invoice is not paid within 60 days of the invoicing date (i.e., 30 days overdue): CanadaGAP sends by regular mail a statement marked “past due” to program participants.
- If the invoice is not paid within 75 days of the invoicing date (i.e., 45 days overdue): Program participants will receive a phone call from CanadaGAP reminding them of the overdue account.
- If the invoice is not paid within 90 days of the invoicing date (i.e., 60 days overdue): CanadaGAP resends the statement accompanied by a “final notice” letter by registered mail. The program participant is advised that membership rights in CanAgPlus are suspended since dues are now in arrears, and that if the account is not settled by month’s end, CanadaGAP will instruct the CB to withdraw certification. CBs are informed of the delinquent accounts so that pending certificates can be withheld until accounts are settled.
- At 90 days overdue:
    - If the program participant has a current certificate they are informed that CanadaGAP is processing a request to the certification body to withdraw certification. The request is then sent to the certification body. See *3.3.6.3, Requests for Certificate Withdrawal.*
    - If the program participant does not have a current certificate they are sent a letter or email advising them that they have been removed from the CanadaGAP program and informing them they must re-enroll if they require certification. An email is sent to the certification body advising them that CanadaGAP has removed the program participant from the “active” list.

c. **Refunds and Credits**: Program participants may voluntarily terminate their participation in the CanadaGAP Program without cause. The program participant must inform CanadaGAP **directly in writing** of any change in status (e.g., failed audit, withdrawal or suspension of certification, delay in certification, crop failure, etc.) that could lead to a refund or credit. Refunds or credits must be requested in writing by the program participant to CanadaGAP.

- ***Refunds***: Should the program participant terminate their participation in the program (e.g., after a failed audit), upon request the Annual Program Fee is refundable to the program participant less a $100 processing fee, provided a written request (email or mail) is received within nine (9) months from the date of receipt of payment. In that case, the operation’s membership in the corporation that operates the CanadaGAP Program (CanAgPlus*)* will be revoked effective immediately. That is, the operation will not be considered a CanAgPlus member in good standing and will forfeit all member rights (including to participate in and vote at member meetings, submit resolutions, elect directors, etc.).

- ***Credits***: Alternatively, should a program participant decide to postpone certification, upon request the Annual Program Fee can be carried forward as a credit for one year. In that case, the operation’s membership in the corporation that operates the CanadaGAP Program (CanAgPlus*)* will be suspended for the current year and will resume in the subsequent year. That is, for the current year, the operation will forfeit

all member rights (including to participate in and vote at CanAgPlus member meetings, submit resolutions, elect directors, etc.). Full membership status will be restored January 1 of the following year, when the Annual Program Fee is applied. See also *Section 3.3.9.4, Prepaid Annual Program Fees.*

d. **The FVGC Charge of $50** collected annually by CanadaGAP for the Fruit and Vegetable Growers of Canada cannot be refunded or applied as a credit under any circumstances. It is due annually for the duration of the program participant's enrolment in CanadaGAP, regardless of certification status. The fee only applies to those enrolled in Options A1, A2, B, C and E.

3.3.9.3 Notification of Fee Changes

The Executive Director will post Annual Program fees on the Program website and, if the fee is changing, will notify each Licensed Certification Body and each program participant in writing of the fees at least thirty (30) days prior to their implementation.

3.3.9.4 Prepaid Annual Program Fees

In the event of crop loss or other extenuating circumstances where the program participant is unable to proceed with certification, program participants may request that current year program fees they have already paid be carried forward for one year. Such requests must be communicated in writing to the CanadaGAP office in a timely manner (e.g., before the end of the applicable production season). See Section 3.3.9.2 b) for more information about credits and refunds. No certificate will be issued for the crop season/year for which the annual program fee is deferred, unless CanadaGAP is notified in writing of the program participant's change in status. In that case, the deferred payment will be reapplied to the current crop season/year.

For program participants enrolled in Option A1 or A2 who already had their first on-farm audit (so were in Year 2, 3, or 4 of their four-year cycle): if the reason for the crop loss did not present any new food safety risks, the year of the crop loss would be considered an "active" year in the cycle, even though no audit activity is occurring that year (since there is no crop). Nor would the cycle start over again (as "Year 1") following the crop loss. For example, if 2022 was Year 1 in the program, 2023 (year of the crop loss) was to be Year 2 -- then 2024 will be Year 3 and 2025 will be Year 4.

On the other hand, if the crop was lost because of flooding (for example), this does present a new food safety risk, so an on-site audit would be required the following year.

Option A1 and A2 program participants are not expected to submit a self-assessment checklist for the year of the crop failure. There is no crop and nothing to assess in terms of safe food handling practices. However, the program participant must advise the CB and CanadaGAP (in writing) of the crop loss. Communication must be received before or around the time that the self-assessment would otherwise be due for submission to the CB, not after the fact. Without this communication, failure to submit the self-assessment would lead to loss of certification.

As for the audit/certification: if the program participant has just enrolled (Year 1), there will be no audit as there is no crop.

If the program participant requires a letter from the certification body explaining why an audit or (re)certification is not occurring during the crop loss year, a letter may be requested directly from

the certification body, as provided for under Section *3.3.5.5.4 c), Extension of Certificate Validity*.

3.3.10 Burden of Proof

a. In the case of information (e.g. MRL exceedance, microbial contamination, etc.) bearing potential impact on the certified status/claim is transmitted to CanadaGAP about a certified company, it is the responsibility of the company to refute the claim by verifying and providing evidence for compliance with the Program standard.

b. In these cases:
   i. CanadaGAP has filed a complaint against the certified company who will carry the responsibility of presenting sufficient evidence to the responsible certification body (CB) to close out the case.
   ii. CanadaGAP will give the company a certain amount of time to do this.
   iii. If the CB does not deem the supplied evidence adequate, the CB will issue a suspension and will follow sanctioning procedures as described in *Section 3.3.6, Suspending, withdrawing or reducing the scope of Certification.*

c. Certified companies will have to have full traceability in place including any records needed to verify and check the case. In case the evidence includes laboratory analyses, accredited laboratories (ISO 17025) and independent sampling must be included.

d. Certified companies shall have an agreement in place with their direct customers (packers, repackers, wholesalers, retailers, processors, brokers, exporters, importers, etc.) that their GLN or other identifying information (as applicable) will not be misused in the supply chain and that the customer will follow best practices in traceability and labelling (e.g., in the case of a producer, not label other producers' products with the producer's GLN nor mix the certified producer's product with other non-certified product, which are then labelled with the producer's GLN).

3.3.11 Data Management System

Initial enrolment of program participants for certification, as outlined in steps 2 and 3 of *Figure 3.2*, *Process for Certifying Operations Involved in Production/Packing/Storage/Repacking/ Wholesaling/Brokerage*, is the responsibility of CanadaGAP. In connection with these administrative activities, CanadaGAP maintains a comprehensive database of program participant information. Holding and maintaining this data is required for the effective management and operation of the Program, and CanadaGAP ensures that the data management system incorporates data in relation to the requirements of GFSI benchmarking requirements [e.g., number of certificates issued, number of delisted sites (i.e., sites whose certification has been withdrawn by the Certification Body)].

These data include but are not limited to:

- Legal Operating Name
- Name of Person(s) Responsible for the Operation
- Mailing & Billing Address
- Contact information including phone, fax, cell phone and email address
- Name of Program Contact
- Contact information for Program contact

- Certification option
- Certification body
- Crop grouping(s) (note: not applicable to Repacking, Brokerage and Wholesaling scopes)
- Scope of activity (production, packing, storage, repacking, wholesaling, brokerage)
- Preferred language of correspondence
- Date of enrolment
- Annual program fee payment information
- Certificate number
- Versions number(s) applicable to certificate
- GFSI scope(s) – if applicable (Options B, C, D)
- Audit date
- Audit score
- Certification date (certificate issue and expiry)
- Status (e.g., Withdrawn, Inactive, Suspended, etc.)
- Type of audit (e.g., unannounced, triggered, random)
- Use of information technology (e.g., partially remote audit)

3.4 Training/Education/Communication Procedure (re: conformity assessment processes)

The Executive Director will be responsible to ensure that individuals and stakeholders as indicated in this plan are trained, educated or communicated to. This procedure focuses on the selection, licensing, monitoring (oversight), suspension and termination of outsourcing of the Program conformity assessment processes to licensed certification bodies. Where amendments are made to Program materials the appropriate procedures for training, education and communication in the relevant components will be followed.

3.4.1 Training

The objective of training is to present pertinent information to a select number of individuals with the intent that it be understood, and that this understanding be tested in the form of a test. With respect to the conformity assessment processes, Program Auditors and other personnel involved in Program certification decision-making, contract review and audit scoping require training as described in *Section 3.3.1.2, Program Auditor Requirements*, *Section 3.3.1.3, Program Requirements for Persons involved in Certification Decisions, Shadow Audits, Witness Audits, Technical Review of Audit Reports, or Audit Scoping, or Review of Corrective Actions*, *Section 3.3.1.4, Program Requirements for Persons involved in carrying out contract review* and *Section 4.4.1, Training*.

3.4.2 Education

The objective of education is to present pertinent information to a select number of individuals with the intent that it will be understood. Education does not require confirmation of learning by means of a test.

The Board of Directors, the Technical Advisory Committee, the Executive Director and Program staff will be required to be educated in principles and procedures of conformity assessment and of the procedures set out in this section.

Education will be provided to the selected individuals prior to the initiation of the relevant process, and can be done through a formal class setting, through distance education or by other

means (e.g., meetings, information sessions, specific mailings, email, website, telephone or direct conversations). The Executive Director will be required to produce the tools used for education and must keep a record of the attendance of the individuals being educated.

3.4.3 Communication

The objective of communication is to disseminate appropriate information in order to inform individuals of any amendments.

The tools used to perform this communication will be diverse and will be the decision of the individual performing the communication. The methods of communication can include the program website, meetings, specific mailings, email, articles in newsletters, special bulletins to program participants, telephone or direct conversations, etc.

The Executive Director may decide, based on *Section 3.4.2, Education*, that certain individuals only need communication, rather than education. This communication must occur prior to the initiation of the relevant process, although communication can continue after this date. When such communication occurs, evidence of the communication (e.g., copies of the newsletter, meeting agendas, etc.) should be retrievable during an audit.

The Executive Director will evaluate incoming communication to ensure CanadaGAP is up to date with issues/information relevant to this section, including any changes or proposed changes to the ISO standards referenced.

Form 3.1 – Application to be a Licensed Certification Body for CanadaGAP[1]

[Note: This form is based on SCC's Management Systems Accreditation Program (MSAP): Certification Body Application Form [F 93.1.1] to facilitate cross-referencing by applicant CBs]

CanadaGAP Office Use: Application #: _____
Date received: _____

Section 1: Certification Body Information

Name of Company: _____
(Legal/Corporate/Trading name & acronym)

Address:

Street: _____

_____

City: _____ **Province:** _____

Postal Code: _____ **Country:** _____

Telephone: _____ **Facsimile:** _____

Email: _____ **Website:** _____

Section 2: Contact Information

1. Name of Person Completing Application: _____

Telephone: _____ **Email:** _____

2. Name of Organizational Contact: _____
(Public contact for posting to CanadaGAP Program website)

Telephone: _____ **Email:** _____

3. Name of Oversight Contact:
(Contact for CanadaGAP Program regarding performance reporting, scheduling, meetings, follow-up, etc.)

Telephone: _____ **Email:** _____

[1] CanadaGAP is an operating name of *CanAgPlus*, a Canadian not-for-profit (Corporation Number 822397-1).

4. Name of Financial Contact:

(Contact for CanadaGAP Program regarding reporting, billing, fees, etc.)

Telephone: _____ **Email:** _____

5. Name of Information Contact: _____
(Contact for CanadaGAP Program regarding registry of certified companies, etc.)

Telephone: _____ **Email:** _____

6. Name of Senior Executive: _____

Telephone: _____ **Email:** _____

Section 3: Legal Entity Status

1. Information from applicant Certification Body regarding Legal Status:

- ☐ Incorporated
- ☐ Private
- ☐ Registered Partnership
- ☐ Other

2. Part of larger legal entity:

☐ **Yes or** ☐ **No**

If Yes,

- ☐ Subsidiary
- ☐ Division
- ☐ Affiliate

If Yes, Name of larger entity: _____

3. Controlling Ownership or Interest:

Country of control: _____

Names of foreign & domestic owners: _____
(Individuals &/or Corporations)

Location & extent of financial interest: _____

_____

4. **Date & Place of Incorporation or Registration:**

   ☐ Copy of articles of incorporation attached

5. **Insurance** ☐ Copies of certificates attached

6. **Organizational information:** (brief description of company & activities including audit, certification, training, consultation, etc.)

_____

_____

_____

_____

_____

_____

7. **Current Organizational Charts:**

   ☐ Legal entity chart (including related bodies)
   ☐ Organizational chart (by staff function & operational units)
   ☐ Organizational reporting chart (between staff functions, organizational units & related bodies)

8. **Financial Information** (evidence of financial stability)

   ☐ Financial statements attached
   ☐ Other (e.g., Annual Report) _____

_____

_____

_____

Section 4: Accreditation Information

Please complete table below and check off (✔) applicable columns:

Accreditation	*Scope*	*Yes ✔*	*No ✔*	*In progress*	*Accreditation Body*	*Certificate attached*
ISO/IEC 17065						
Other (specify)						

2. Other accreditation information/scopes: (e.g. GLOBALG.A.P., SQF, organic, etc.)

☐ Copy of certificates attached

3. Listing of working relationships: (sub-contracts, MOUs, and/or mutual recognition agreements with other Certification Bodies)

4. Locations where Certification Body activities would be undertaken regarding CanadaGAP Program: (include addresses, contact information, contact person for each office/location)

Section 5: Application Agreement

The applicant, by way of signing and submitting this application, acknowledges that the following general clauses governing the licensing of a successful applicant have been read, understood and accepted:

QUALIFICATION

The applicant represents and warrants that it is fully qualified, staffed, capitalized, equipped and has the requisite authority to successfully establish and operate an auditing and certification system, and has the requisite experience to provide the services as contemplated by this application.

The applicant understands that among the requirements to function as certification body for the CanadaGAP Program, the certification body must obtain and maintain accreditation for CanadaGAP to ISO/IEC 17065, **and** meet all additional requirements that may be required of certification bodies by an external benchmarking program (e.g., Global Food Safety Initiative benchmarking requirements). The certification body's selected Accreditation Body must be signatory to the IAF Multilateral Recognition Arrangement (MLA) or the Global Accreditation Cooperation Incorporated MRA. The applicant acknowledges that such requirements may be revised from time to time and the applicant's obligations relate to the revised requirements as well.

MANAGEMENT SYSTEM

The applicant acknowledges that CanadaGAP has developed and maintains a management system to govern the Program and agrees to comply with and adhere to all policies and procedures as defined by the management system. CanadaGAP will provide the successful applicant with copies of all such policies and procedures.

INSURANCE

A successful applicant shall, at its sole expense, obtain and maintain, during the term of its license, the appropriate policies of insurance to fully protect the parties from and against all expenses, claims, actions, liabilities and losses arising out of the subjects covered by said policies of insurance, including:

(a) Workers compensation insurance;
(b) Comprehensive general liability insurance including coverage for bodily injury and damage to property;
(c) Automobile liability insurance for all owned leased or rented licensed vehicles used in the performance of services;
(d) Professional liability insurance (including errors and omissions insurance).

The licensee shall ensure that all auditors, whether employees or contractors, carry appropriate Auditor Liability Insurance.

TRAINING

The successful applicant shall ensure that all employees, contractors and subcontractors providing auditing and certification services to program participants attend and pass training courses specific to the CanadaGAP Program, in addition to other training requirements. The Certification Body is responsible to ensure that its potential CanadaGAP auditors have access to the CanadaGAP Auditor Training course, which may involve the CB (or a partner organization) in becoming a training provider using the CanadaGAP Auditor Training program materials and a qualified trainer approved by CanadaGAP. Training material relating to the CanadaGAP Program is the exclusive property of *CanAgPlu*s, a Canadian not-for-profit corporation that operates CanadaGAP (Corporation Number 822397-1), and shall not be used for any purpose without obtaining CanAgPlus' prior written approval. Trainees who complete the CanadaGAP auditor training program must have a record of successful completion AND must be formally approved as auditors by CanadaGAP before they can begin auditing. Those who provide CanadaGAP auditor training must first be approved by CanadaGAP as qualified auditor trainers.

INTELLECTUAL PROPERTY

The applicant acknowledges that CanadaGAP and related Trade-marks are valid and enforceable and are the sole and exclusive property of CanAgPlus. CanadaGAP and related Trade-marks can be used only under the terms of the licensing agreement.

The applicant will not claim in any way, verbally or in wiring, status as a certification body for the CanadaGAP Program until a fully executed licensing agreement with CanAgPlus is in effect.

The applicant acknowledges that CanAgPlus is the owner of copyright in the CanadaGAP Standard including but not limited to CanadaGAP Manuals, HACCP Models, Audit Checklists, training materials, etc. and agrees not to claim or assert any copyright interest in the CanadaGAP Standard.

COMPLIANCE WITH LAWS AND GOOD BUSINESS PRACTICES

The successful applicant shall comply with any and all federal, provincial or territorial and local laws, regulations and ordinances and industry standards applicable to the operation of the audit and certification services contemplated by this application, including but not limited to those relevant to environmental matters, employment matters and privacy and protection of personal information. The successful applicant shall comply with all federal and applicable provincial or territorial Human Rights, Employment Standards, Workers' Compensation, Workplace Safety and Insurance and labour relations legislation.

The successful applicant shall, at its sole expense, obtain and maintain all permits and licenses which may be required under any applicable federal, provincial or territorial or local law, ordinance, rule or regulation by virtue of anything done in the provision of the audit and certification services contemplated by this application, and shall provide copies of same to CanadaGAP.

INDEMNIFICATION

The applicant shall indemnify and hold harmless CanAgPlus and the CanadaGAP Program, its directors, employees and those having a function in program activities, for any damage or loss resulting from, or in any way connected with, the licensing of the applicant by CanAgPlus for delivery of CanadaGAP Program services.

TERMINATION OF LICENSE

The applicant acknowledges that at any time during the term of a licensing agreement with CanAgPlus, CanAgPlus or the licensee each has a right to terminate the agreement by giving to the other party at least 180 days prior written notice of such termination.

_____
Name of Authorized Person

_____ _____
Signature Date

Return completed form and all required attachments to:

CanadaGAP Program
c/o Executive Director
245 Menten Place, Suite 312
Ottawa, Ontario, Canada K2H 9E8
Tel: 613-829-4711, ext. 101
Fax: 613-829-9379
Email: info@canadagap.ca

NOTE: *Form 3.1* is also publicly available at: www.canadagap.ca.

Form 3.2 – CanadaGAP Audit Checklist

A copy of the latest version of the CanadaGAP Audit Checklist is located at:

S:\CanadaGAP Program\Certification Program\Audit Checklist

and is publicly available at: www.canadagap.ca.

Form 3.3 – CanadaGAP Self-Declaration and Self-Assessment Checklist

The CanadaGAP Self-Declaration and Self-Declaration Checklist is used as follows within the CanadaGAP program:

- Option A1 and A2-certified operators must submit the Self-Declaration and Self-Assessment Checklist in years 2, 3, 4 of the audit cycle.
- The Self-Assessment Checklist can be used to meet the internal audit requirement within certified companies.

The CanadaGAP Self-Declaration and Self-Assessment Checklist comprises two parts:

1. a signed or sworn statement by the program participant that the CanadaGAP program is in place on the operation ("Declaration of Conformity"), and
2. the CanadaGAP Self-Assessment Checklist.

The Self-Declaration is a declaration of ongoing conformity and an attestation by the operation that all the specified requirements of the program are met. The Declaration of Conformity includes the following elements:

- unique identification of the Declaration of Conformity (assigned by the Certification Body);
- the name and contact address of the operation;
- the name of the food safety program;
- the scope of the certification (i.e., production, storage, packing);
- the name of the commodity(ies);
- the name and address of any certification body involved;
- the conformity statement;
- reference to the relevant certificates;
- a statement of the operator's commitment to the Program requirements;
- the date and place of issue of the Declaration of Conformity;
- the signature and name of the authorized person(s) acting on behalf of the operation;
- any limitation on the validity of the Declaration of Conformity.

In filing the Declaration with the certification body, the operation must include the completed CanadaGAP Self-Assessment Checklist. The Certification Body may request further evidence in the form of records or documents after reviewing the Self-Assessment Checklist. (Refer to Section 3.3.5.7.2, Certification Body Review of Self-Declarations and Self-Assessment Checklists – Procedures).

A copy of the latest version of the CanadaGAP Self-Declaration and Self-Assessment Checklist for the Production, Packing, Repacking, Storage, Wholesaling and Brokerage of Fruits and Vegetables and Greenhouse Product is located at:

S:\CanadaGAP Program\Certification Program\Self Assessment

and is publicly available at: www.canadagap.ca.

Form 3.4 – CanadaGAP Group Management System Checklist

A copy of the latest version of the CanadaGAP Group Management System Checklist is located at:

S:\CanadaGAP Program\Certification Program\Group Management System Checklist

and is publicly available at: www.canadagap.ca

Form 3.5 – CanadaGAP Corrective Actions Report

A copy of the latest version of the CanadaGAP Corrective Actions Report is located at:

S:\CanadaGAP Program\Certification Program\Corrective Actions Report

and is publicly available at: www.canadagap.ca.

Form 3.6 – CanadaGAP Management System Audit Checklist for Multi-site Operations (Option A1, A2, C, D, E or F)

A copy of the latest version of the CanadaGAP Management System Audit Checklist for Multi-site Operations (Options A1, A2, C, D, E or F) is located at:

S:\CanadaGAP Program\Certification Program\Management System Audit Checklist for Multi-sites

and is publicly available at: www.canadagap.ca.

APPENDIX III.1 – Group Certification: OPTION B

1. General Information

1.1. Overview

a. Production/packing/storage operations can be certified to the CanadaGAP Program by organizing themselves as a Group and running a central food safety management system. This approach was developed based on GLOBALG.A.P.'s group certification scheme (a.k.a. *Option 2*). If cost considerations are the driver for group certification, it should be noted that this approach has proven most beneficial to larger groups (e.g., at least 75 group members) where existing resources of the group can be effectively applied and economies of scale achieved.

b. Essentially, Group Certification offers a two-layered approach to auditing, involving:
    a. Use of qualified internal auditors engaged by the Group to audit all member sites (i.e., production, storage and packing locations), and the Group Management System annually, and
    b. External audits of the Group by a licensed certification body, annually.

c. **Internal audits**: Using qualified internal auditors, the Group must carry out annual audits on all registered group members (i.e., production, storage and packing sites) and the Group Management System. No sampling is permitted. The audits of production, storage and packing sites must cover the full CanadaGAP Audit Checklist. New members of the group must pass the audit prior to being entered on the registered list. The audit reports, corrective actions, etc. must be impartially reviewed by the Group Management System Internal Auditor or another qualified person who did not perform the audit of the group member's operation. The Group must engage a qualified Group Management System Internal Auditor to perform an annual internal audit based on the CanadaGAP Group Management System Checklist. In effect, the Group is charged with acting as if it were a certification body operating with initial certification and annual surveillance audits of its group members' operations. For further details, refer below to *Section 5, Audit and Surveillance Activities.*

    More specific information related to duration, scoping and scheduling of CanadaGAP audits can be found in Component 3 of the CanadaGAP Program Management Manual. Since the central function of the group is effectively acting as certification body for its members, the sections listed below are of particular relevance to groups in planning and performing member audits. Note that this list may not be exhaustive, and other sections of Component 3 may also be useful to group management.
    - Section 3.3.1.3.2 *Persons involved in Shadow Audits, Witness Audits, Technical Review of Audit Reports, or Audit Scoping*
    - Section 3.3.5.2 *Scope of Certification*
    - Section 3.3.5.4 *Program Audit and Certification Process*, in particular:
        - Section 3.3.5.4.2 *Audit Duration*
        - Section 3.3.5.4.3 *Audit Scheduling*
        - Section 3.3.5.4.5 *Multi-Commodity and Multi-Activity Sites of Production, Storage, Packing, Repacking, Wholesaling and Brokerage*
        - Section 3.3.5.4.6 *Preparation of Audit Plan*

    For more information about requirements for internal auditors, refer below to *Section 4, Internal Auditor Qualifications.*

d. **External audits**: Audits of the Group by a licensed Certification Body. The external audit functions must be carried out by a CanadaGAP-licensed certification body. The certification body must meet or exceed the requirements defined in IAF MD1 current version. Sampling of the group members (i.e., production, storage and packing sites) is permitted to certify the Group under Option B. For further details, refer below to *Section 5, Audit and Surveillance Activities.*

   For more information about the qualifications required of CB auditors performing group certification audits, refer to *Component 3, Section 3.3.1.2, Program Auditor Requirements*.

2. Requirements for Option B Groups

This section establishes the requirements that groups must comply with to achieve certification under Option B. These requirements need to be internally and externally assessed via the CanadaGAP Group Management System Checklist to ensure completeness and effectiveness. All compliance criteria are contained in the checklist and groups must comply 100% with the requirements to be certified.

2.1 Legality, Administration and Structure

2.1.1 Legality

a) There shall be documentation, which clearly demonstrates that the applicant is or belongs to a legal entity (e.g., a cooperative, a producer association, a packing, trading or farming company).

b) The legal entity must have been granted the legal right to carry out agricultural production and/or trading, and be able to legally contract with and represent the group members.

c) The legal entity shall enter into a contractual relationship with CanadaGAP through the signature of the enrolment agreement, and with a licensed certification body through the signature of a CB contract. The legal entity becomes the sole holder of the CanadaGAP certificate.

d) A single legal entity cannot operate more than one Group Management System per crop per country. Only a legal entity that can be certified under Option A1, A2, C or E can join a group for Option B certification. If a group joins another group, the two management systems shall merge into one to be managed by one single legal entity that will be the certificate holder.

2.1.2 Group Members

2.1.2.1 Requirements for Groups

(i) There shall be written contracts in force between each group member (i.e., production/storage/packing operation) and the legal entity. The contracts shall include the following elements:

   a) Group name and legal identification.
   b) Name and/or legal identification of the group member (production/storage/packing operation).
   c) Group member's contact address.

d) Details of the individual production/storage/packing locations, including crops and activities included in the certification scope, and crops and activities excluded from the certification scope.
e) Details of area or quantity of production.
f) Group member's commitment to comply with the requirements of the CanadaGAP standard.
g) Group member's agreement to comply with the group's documented procedures, policies and where provided, technical advice.
h) Sanctions that may be applied by the Group in case of CanadaGAP and any other internal requirements not being met.
i) Signature of the member and Group representatives.

(ii) The registered members of the group must be legally responsible for their respective production, packing and storage locations*, although certification takes place under the common Group Management System.*

(iii) The production/packing/storage operation is permitted to sell its own products that are certified under the Group option. Product sold outside of the group is deemed to fall under the Group's certification, given that members of the Group are subject to annual internal auditing and cannot exclude parts of their production (e.g., certain varieties or orchards/blocks/fields of the same commodity) from the scope of the audit.

2.1.3 Group Internal Register

(i) A register shall be maintained of all contracted group members and of all the applicable sites used for production, storage and packing in accordance with the CanadaGAP standard.

(ii) For the purposes of CanadaGAP billing the group for its annual program fee, the certification body must provide CanadaGAP with any updates to the group's certification, as the number of group members encompassed by the certification may change from time to time. CanadaGAP will invoice the group based on the number of members covered by the certification at the time of billing. CanadaGAP invoices are payable within thirty days of receipt. Should the number of members in the group change subsequent to billing, an adjustment will be made and applied on the subsequent invoice when the number of members can be verified by the group's certificate.

2.1.3.1 Requirements for Group Members

(i) All group members in the Group's internal register must be listed individually on the CanadaGAP program enrolment form.

(ii) The internal register shall at least contain the following information for each member:

a) Name of production/packing/storage operation
b) Name of contact person
c) Full address (physical and postal)
d) Contact data (telephone number and e-mail and/or fax number)
e) Other legal identity ID (tax roll number, etc.) where required
f) Crops and activities within scope of certification
g) Growing/production area and/or quantity for each registered crop
h) Certification body(ies) if a member makes use of more than one CB
i) Status (e.g., if sanctions have been applied)

(iii) Those members of the legal entity who do not apply to be included in the CanadaGAP group certification must be listed separately and are not required to be disclosed to CanadaGAP (unless they are already in the CanadaGAP database having enrolled under a different certification option). This list is for management purposes within the group, and the disclosure of its contents externally is not required, unless it is needed for clarification of any issues raised, for example on the effectiveness of the group's management system. All data protection rules shall be published and observed.

2.2 Management and Organization

a) The Group Management System must be robust and show that the registered members of the group comply in a uniform manner with CanadaGAP requirements. All sites included in the scope of a group certification must be operated under the same Food Safety Management System and under the control of group management. The central function (group management) shall be included in the scope of certification.

2.2.1 Structure

a) The structure must enable the appropriate implementation of a Group Management System across all registered members of the group.

b) The applicant shall have a management structure and sufficient suitably trained resources to effectively ensure that CanadaGAP requirements are met by all group members.

c) The organizational structure shall be documented and shall include individuals responsible for:
   i. Managing the implementation of CanadaGAP.
   ii. Managing the Group Management System.
   iii. On-site audits by the Group of each member annually [i.e., internal auditor(s)].
   iv. The internal audit of the Group Management System and verifying the member audits (i.e., Group Management System Internal Auditor).
   v. Technical advice to the group (depending on the scope of the group). *This could be the same person as in (i) above.*

d) The Group shall be structured such that it can clearly demonstrate management commitment to the system and its integrity.

e) The Group management shall be separate and independent from the group members (sites).

2.2.2 Competency and Training of Staff

a) The competency requirements, training and qualifications for key personnel (those mentioned in 2.2.1 but also any other identified personnel) shall be documented and shall meet any defined competency requirements laid out by CanadaGAP (e.g., below in *Section 4, Internal Auditor Qualifications*).

b) The management shall ensure that all personnel with responsibility for compliance with CanadaGAP are adequately trained and meet the defined competency requirements.

i. The competence of internal auditors (as set out below in *Section 4, Internal Auditor Qualifications*) shall be checked by management.
ii. Where the Group Management System Internal Auditor does not have the necessary Food Safety and G.A.P. training, but only management system training/experience, another person with these qualifications (and identified in the Group management system) must form part of the "audit team" to perform the approval of the member audits.

c) Records of qualifications and training shall be maintained for all key personnel (managers, auditors, etc.) involved in compliance with CanadaGAP requirements to demonstrate competence.

d) Internal auditors shall be regularly evaluated, calibrated and monitored. If there is more than one internal auditor, they shall undergo training and evaluation to ensure consistency in their approach and interpretation of the standard (e.g., by documented shadow audits). If there is only one internal auditor, the group is expected to seek support from other organizations (e.g., another group, a trade association or training provider) to ensure the internal auditor is calibrated.

e) Systems shall be in place to demonstrate that key staff is informed and aware of development, issues and legislative changes relevant to the compliance to the CanadaGAP standard.

2.3 Document Control

a) All documentation relevant to the operation of the Group Management System for CanadaGAP compliance shall be adequately controlled. This documentation shall include, but is not limited to:

(i) The management system manual
(ii) CanadaGAP operating procedures
(iii) Work instructions (where applicable)
(iv) Record-keeping forms
(v) Relevant external standards, e.g. the current CanadaGAP manuals, checklists etc.

b) Policies and procedures shall be sufficiently detailed to demonstrate compliance checks of CanadaGAP requirements.

c) Procedures and policies shall be available to relevant staff and registered group members.

d) The contents of the management system manual shall be reviewed periodically to ensure that it continues to meet the requirements of CanadaGAP and those of the applicant. Any relevant modifications of the CanadaGAP standard or published guidelines that come into force must be incorporated into the management system manual within the period given by CanadaGAP.

e) The Group shall issue, maintain and retain all relevant documents relating to the group members (sites) within the programme.

2.3.1 Document Control Requirements

a) There shall be a written procedure defining the control of documents.

b) All documentation shall be reviewed and approved by authorized personnel before issue and distribution.

c) All controlled documents shall be identified with an issue number, issue date/review date and be appropriately paged.

d) Any change in these documents shall be reviewed and approved by authorized personnel prior to their distribution. Wherever possible an explanation of the reason and nature of the changes shall be identified.

e) A copy of all relevant documentation shall be available at any location where the Group Management System is being controlled.

f) There shall be a system in place to ensure that documentation is reviewed and that following the issue of new documents, obsolete documents are effectively rescinded.

2.3.2 Records

a) There shall be records to demonstrate effective control and implementation of the Group Management System and compliance with CanadaGAP requirements.

b) Records shall be kept for a minimum of 2 years.

c) Records shall be genuine, legible, stored and maintained in suitable conditions and shall be accessible for inspection as required.

d) Records that are kept online or electronically are valid. If a signature is required, this can be a password or electronic signature that ensures the unique reference and authorization of the person signing. If a written signature of the responsible person is needed then this must be present. The electronic records must be available during the CB audits. Back-ups must be available at all times.

2.4 Complaint Handling

a) The applicant shall have a system for effectively managing customer complaints and the relevant part of the complaint system shall be available to group members.

b) There shall be a documented procedure that describes how complaints are received, registered, identified, investigated, followed up and reviewed.

c) The procedure shall be available to customers as required.

d) The procedure shall cover both complaints to the applicant and against individual group members.

2.5 Internal Group Management System Audit

a) The Group Management System for CanadaGAP shall be internally audited at least annually. The Group shall also be subject to management review annually.

b) Group Management System Internal Auditors shall comply with the requirements as set out below in *Section 4, Internal Auditor Qualifications*.

c) Group Management System Internal Auditors shall be independent of the area being audited.

(i) It is permitted for the same person to initially develop the Group Management System and then undertake the required internal annual Group MS audit; however, the person responsible for the day-to-day ongoing management of the Group Management System is not allowed to undertake the internal management system audits.

d) Records of the internal audit, audit findings and follow up of corrective actions resulting from an audit shall be maintained and available.

e) The completed Group Management System Checklist with comments for every control point must be available on site for review by the CB auditor during the external audit.

f) Where the internal audit is not performed in one day but continuously over a 12-month period, a pre-defined schedule shall be in place.

2.6 On-site Audits of Group Members by the Group (Internal Audits)

a) On-site audits shall be carried out by the Group at each registered member site(s) at least once per year against the full CanadaGAP Audit Checklist.

b) Internal auditors of group members shall comply with the requirements as set out below in *Section 4, Internal Auditor Qualifications*.

c) Internal auditors shall be assigned by the Group management (central function) to group member sites in a way that ensures impartiality. Internal auditors of group members shall be independent of the area being audited. Internal auditors cannot audit their own daily work.

d) New members of the group shall always be internally audited prior to entering into the internal register of group members.

e) The original audit reports and notes shall be maintained and available for the CB audit.

f) The audit report shall contain the following information:
   (i) Identification of registered group member and production location(s)
   (ii) Signature of the registered group member responsible
   (iii) Date
   (iv) Auditor name
   (v) Crops and activities within the scope of the audit
   (vi) A score for each question on the audit checklist
   (vii) Identification of any autofailure items
   (viii) Details of any non-compliances identified and period for corrective action in the Executive Summary
   (ix) Final audit result with calculation of compliance
   (x) Duration of the audit and justification for deviations from the audit plan, if applicable
   (xi) Name of Group Management System Internal Auditor or other qualified audit team member who verified and approved the audit report.

g) The Group Management System Internal Auditor (or audit team; refer to *Section 2.2.2.b.ii)* above) shall review and make the decision on whether the group member is compliant with CanadaGAP requirements, based on the audit reports presented by the internal auditor who visited the member site(s).

h) In case there is only one internal auditor who also performs the on-site audits of group members, another person with appropriate qualifications, e.g. management representative identified in the Group's management system, must approve the internal audits of group members. That person (or several persons forming the "audit team" to review reports from the

internal audits of group members) must meet the GMS auditor qualifications set out in 4.2.1.2 (i), (iv) and (v).

i) Where the internal audits of group members take place continuously over a 12-month period, a pre-defined schedule shall be in place.

j) Timing of group member audits shall be in accordance with the CanadaGAP Program Management Manual, Section 3.3.5.4.3, *Audit Scheduling.*

k) Review of internal audit reports by the Group shall include addressing the non-conformities resulting from the internal audit.

l) The internal audit programme shall have documented procedures and be both practical and feasible in operative terms.

2.7 Non-Compliances, Corrective Action and Sanctions

a) There shall be a procedure to handle non-compliances and corrective actions, which may result from internal or external audits, customer complaints or failures of the Group Management System.

b) There shall be documented procedures for the identification and evaluation of non-conformance to the Group Management System and non-compliances by the group or by members of the group, respectively.

c) Corrective actions following non-compliances and non-conformance shall be evaluated and a timescale defined for action.

d) Responsibility for implementing and resolving corrective actions shall be defined.

e) A system of sanctions and handling of non-conformances shall be operated with group members that meet the requirements defined below in *Section 3, Sanctions and Internal Handling of Non-conformances.*

f) Mechanisms shall be in place to notify the certification body and CanadaGAP immediately of suspensions or cancellations of registered group members.

g) Records shall be maintained of all sanctions including objective evidence of subsequent corrective actions and decision-making processes.

2.8 Product Traceability and Segregation

a) Crops produced, stored or packed in conformity with CanadaGAP requirements and represented as such shall be traceable by the Group and handled in a manner that prevents mixing with products not produced, stored or packed according to CanadaGAP requirements.

b) The Group shall have a documented procedure for the identification of products conforming to CanadaGAP requirements and to enable traceability of all products both conforming and non-conforming to the applicable production sites. A mass balance exercise must be carried out to demonstrate compliance within the legal entity.

c) Each produce handling site shall operate procedures which enable conforming product to be identifiable and traceable from receipt, through handling, storage and dispatch.

d) Effective systems and procedures shall be in place to negate any risk of mislabelling or mixing of conforming and non-conforming products.

2.9 Withdrawal of Product

a) Documented procedures shall be in place to effectively manage the withdrawal of products covered by the certification.

b) Procedures shall identify the types of event that may result in a withdrawal, persons responsible for taking decisions on the possible withdrawal of product, the mechanism for notifying customers and the certification body, and methods of reconciling stock.

c) The procedure shall be capable of being operated at any time.

d) The procedure shall be tested in an appropriate manner at least annually to ensure that it is effective and records of the test retained.

2.10 Subcontractors

a) Where any services are subcontracted to third parties, procedures shall exist to ensure that these activities are carried out in accordance with CanadaGAP requirements.

b) Records shall be maintained to demonstrate that the competency of any subcontractor is assessed and meets the requirements of the standard.

c) Subcontractors shall work in accordance with the Group Management System and relevant procedures, and this shall be specified in service level agreements or contracts.

2.11 Registration of Additional Group Members to the Certificate

a) New group members and sites may be added (**subject to internal approval procedures being met, including internal audits by the Group**) to a certificate in effect. It is the responsibility of the certificate holder (i.e., the Group) to immediately update CanadaGAP and the certification body on any addition or withdrawal of sites to/from the list of registered group members.

b) Up to 10% of new group members in one year can be added to the approved list of registered group members by enrolling the new members of the group with CanadaGAP and the certification body, without necessarily resorting to further verification by the certification body.

c) When the number of group members increases by more than 10% in one year, further CB sample audits of the newly added group members, and optionally an audit of the Group Management System, will be required during that year **before** additional group members can be added to the approved list. See Section 5.2.3 below regarding CB sampling of member sites.

3. Sanctions and Internal Handing of Non-conformances

a) When a non-conformance is detected within a group member's program (e.g., a failed audit), the Group shall apply a sanction (Warning, Suspension or Cancellation) as indicated in this section.

b) Group members cannot change groups, or be certified as an individual operation by the same or a different CB, until the non-conformance that led to the respective sanction by the Group is satisfactorily closed out.

c) ONLY the Group that has issued the sanction is entitled to lift it, provided there is sufficient and timely evidence of corrective action (either through a follow-up visit or other written or visual evidence).

3.1 Warning

a) A warning is issued for all types of non-conformance detected.

b) If non-conformance is detected during the internal audit of the group member, the member must be served a warning when the audit is finalized. This is a provisional decision that could be overridden by the Group Management System Internal Auditor responsible for approving group members, or by the group's audit team if applicable.

c) Initial audit:

(i) Outstanding non-conformances shall be closed within three months from the date of the first internal audit of a group member.

(ii) If the cause of the warning is not resolved within three (3) months, a complete audit must be performed before the Group can add the member to the group's register.

d) Subsequent audit:

(i) Outstanding non-conformances shall be closed within a maximum of 28 days.

(ii) The period given for compliance before suspension is applied will depend on the criticality of the non-compliance in terms of food safety, evaluated by the Group Management System Internal Auditor or the Group's audit team carrying out the audit decision on the period for implementing corrective actions. No time is given for compliance where a serious threat to food safety is present and a suspension is issued immediately. This will be communicated via an official warning letter.

(iii) If the cause of the warning is not resolved within the period set (maximum of 28 days), a suspension is imposed.

3.2 Management of Suspensions within the Group

a) Two types of suspension are possible*:*

3.2.1 Group Member declares self-suspension

i) A group member may voluntarily ask the Group management for a suspension of one, several or all of the crop covered by the certificate (unless the Group has already imposed a sanction). This can occur if the group member experiences difficulty with compliance to the standard and needs time to close out any non-compliance.

ii) This suspension will not delay the certificate renewal date, nor will it allow the group member to avoid paying fees related to certification. The group member's status on the group's register shall change to "Self-declared Suspension" on the applicable scope (crops/activities).

iii) The deadline for closing out any non-compliance is set by the declaring group member, which must be agreed upon with the Group management but must be closed out before the Group may lift the suspension.

3.2.2 Group Suspension of a Member

i) Groups can issue and lift suspensions to their registered group members.

ii) Groups shall issue a suspension when the member cannot show objective evidence of implementation of effective corrective actions after a CAR has been issued.

iii) The Group can issue a suspension for certain crops or activities, or for all crops/activities of the certification scope.

iv) After the suspension is applied, the Group will set the period allowed for correction (not longer than 12 months).

3.3 Cancellation

a) A cancellation of the contract shall be issued where:

(i) The Group finds evidence of fraud and/or lack of trust to comply with CanadaGAP requirements, or

(ii) A group member cannot show evidence of implementation of effective corrective action after a Group declared suspension, or

(iii) When there is a contractual non-conformance.

b) A cancellation of the contract will result in the total prohibition (for all crops, activities and sites of the member's operation) of the use of the CanadaGAP logo or other mark(s), the group's certificate, or any device or document that may be linked to CanadaGAP.

c) A group member that has received a cancellation shall not be accepted for CanadaGAP certification within 12 months after the date of cancellation.

3.4 Notification and Appeals

a) The group member must either resolve the non-conformance communicated or appeal to the Group in writing against the non-conformance, explaining the reasons for the appeal.

b) If the non-conformance is not resolved within the permitted period, the sanction will be escalated.

4. Internal Auditor Qualifications

4.1 Key Tasks

4.1.1 On-site Audits of Group Members by the Group – Internal Auditors:

a) May undertake audits of group members to assess compliance with the certification requirements.
b) May not perform tasks of the Group Management System Internal Auditor.
c) Must produce timely and accurate reports on such audits.

4.1.2 Group Management System Internal Auditors:

a) Audit the Group Management System to assess compliance with the certification requirements.
b) Approve group members, based on review of audit reports completed by the internal auditor who visited the group member sites. *If the Group Management System Internal Auditor conducts the member audits, he/she cannot approve that audit report. See Section 2.6 h).*
c) Produce timely and accurate reports on such audits.

4.2 Qualification Requirements

a) The Group shall document clear requirements for internal auditors and technical reviewers of audit reports, and these shall be reviewed by the certification body.

b) The qualifications of group internal auditors shall be assessed annually by the certification body.

4.2.1 Formal Qualifications, Training and Technical Skills

4.2.1.1 For On-Site Audits of Group Members – Internal Auditors:

(i) A post high school diploma in a discipline related to the scope of certification (crops, including greenhouse), or an agricultural high school qualification with 2 years experience in fruits and vegetables after qualification, or equivalent as determined by the external certification body audit.

(ii) One-day practical inspection/auditing skills course setting out basic principles of inspection/auditing.

(iii) One shadow audit (i.e., accompanying a CanadaGAP audit conducted by a licensed CB) AND 1 witness audit by the CB.

(iv) Training in HACCP principles either as part of formal qualifications or by the successful completion of a formal course based on the principles of Codex Alimentarius or training in ISO 22000.

(v) Food hygiene training either as part of formal qualifications or by the successful completion of a formal course.

(vi) Maintenance of competencies through **annual** refresher training/testing based on CanadaGAP-issued updates as part of a refresher training/testing program established by group management.

(vii) Internal auditors must:
   a. have successfully completed the CanadaGAP Auditor Training course including passing the exam, and
   b. maintain competency by participating in auditor refresher testing available through CanadaGAP.

4.2.1.2 Group Management System Internal Auditors:

(i) A post high school diploma in a discipline related to the scope of certification (crops, including greenhouse), or an agricultural high school qualification with 2

years experience in crops after qualification, or 2 years experience in quality management systems with 2 years experience in fruits and vegetables after qualification.

(ii) Practical knowledge of quality management systems.

(iii) Completion of an internal auditor-training course related to quality management systems (min. 16 hours).

(iv) Training in HACCP principles either as part of formal qualifications or by the successful completion of a formal course based on the principles of Codex Alimentarius or training in ISO 22000.

(v) Food hygiene training either as part of formal qualifications or by the successful completion of a formal course.

See also: *Section 2.2.2, Competency and Training of Staff.*

4.2.2 Communication Skills

a) "Working language" skills in the corresponding native/working language. This must include the locally used specialist terminology in this working language.

***NOTE: The relevant CB shall have a complete and current list of all the group internal auditors**. These internal auditors shall be approved by the CBs during the external audits.*

4.3 Provisions to Prevent Conflict of Interest for Internal Auditors

a) Internal auditors engaged by the Group cannot audit their own work.

b) Internal auditors engaged by the Group cannot provide site-specific consultation to any group member within 2 years of the internal audit.

c) Internal auditors cannot review their own audit reports. Internal audit reports must be reviewed and signed off by another appropriately qualified person within the Group Management System (e.g., reports completed by an internal auditor performing on-farm audits of group members are reviewed by the Group Management System internal auditor, or by an "audit team", comprised of the GMS auditor and another person, that collectively possess the necessary qualifications, etc.).

d) Internal auditors may be required by the Group and/or the Certification Body to complete Form 1.9.

5. Audit and Surveillance Activities

5.1. Summary of Audits and Surveillance Activities to be undertaken before an Option B certificate is issued and annually thereafter:

*Note: Certification to Option B occurs on an **annual** basis.*

OPTION B	Annual Audit Programme
Internally by the group	1. The Group Management System Internal Auditor audits the Group Management System

	2. The Group's qualified internal auditor(s) audit(s) all group members (i.e., producers, storage and packing sites)
Externally by the Certification Body	1. Announced audit of the Group Management System 2. Announced audits of group members (i.e., producers, storage and packing sites) – see site sampling below in Section 5.2.3 3. Unannounced audits of 25% of sampled group members (i.e., producers, storage and packing sites) – neither the group management nor the group member will receive advance notice of the date or time of the unannounced audit. Unannounced audits will be conducted by the CB as described in *Component 3, Section 3.3.5.4.3 h*) – i.e., either as UA Option 1 or UA Option 2 depending on which UA Options are available to/selected by the group.

5.2 Description of Audit and Surveillance Activities

5.2.1 Internal Audits by the Group's Internal Auditor(s)

a) The applicant shall undertake **annual** internal audits [i.e., by the Group's qualified internal auditors] of the Group Management System and of all group members (i.e., producers, storage and packing sites) to verify and ensure compliance with the certification requirements.

b) The internal audits shall comply with requirements set out above in *Section 2, Requirements for Option B Groups* and include:

i. A minimum of one internal audit of the Group Management System shall be carried out by the Group Management System Internal Auditor within the 12 months before the first CB audit and thereafter once per annum. The audit shall be based on the CanadaGAP Group Management System Checklist [*Form 3.4*] available on the CanadaGAP website at: www.canadagap.ca.

ii. A minimum of one internal audit of each group member (i.e., producers, storage and packing sites) shall be carried out by the Group's qualified internal auditor(s) within the 12 months before the external Group Management System audit by the CB and thereafter once per annum. The audit shall be based on the full CanadaGAP Audit Checklist [*Form 3.2*] available on the CanadaGAP website at: www.canadagap.ca and shall comply with guidance provided to CBs for external audits, in terms of audit timing/scheduling, scoping and duration. See Appendix III.1, Section 1.1 c) for references to relevant sections of the CanadaGAP Program Management Manual.

iii. Self-assessments by each member of the group are required only if it is an internal requirement by the group, but it is not a CanadaGAP requirement. Copies of the Self-Assessment Checklist are available on the CanadaGAP website at: www.canadagap.ca if needed. [*Form 3.3*]

iv. Internal auditors engaged by the Group shall be properly qualified and meet all requirements as set out above in *Section 4, Internal Auditor Qualifications*.

v. The Group's handling of non-conformance by group members (e.g., if a sampled site fails the internal audit) shall be in accordance with the rules set out above in *Section 3, Sanctions and Internal Handling of Non-conformances*.

vi. Refer to the CanadaGAP Program Management Manual, Component 3, Section 3.3.5.3 for further guidance and principles to manage audits for group members with multiple

sites. Section 3.3.5.4 provides detailed expectations around audit scoping, scheduling and duration.

5.2.2 External Group Management System Audit by the Certification Body

a) Management system audits shall be carried out by a qualified CB auditor who meets all requirements for CanadaGAP auditors as set out in *Component 3, Section 3.3.1.2, Program Auditor Requirements*. It is the responsibility of CBs to have within their auditor pool appropriately trained and qualified auditors to meet the demand for group certification.

b) Management system audits shall be based on the Group Management System Checklist [*Form 3.4*] available on the CanadaGAP website.

c) The evaluation process shall involve a sampling of the components to assess compliance with the standard and enable certification. All documentation, sites, personnel and operations that are declared by the group to be relevant and pertinent to the setting up and administration of the Group Management System as described above in *Section 2, Requirements for Option B Groups* must be evaluated.

d) The evaluation process is designed to establish that the Group's Management System and administrative structure meet the criteria and that the group's internal audits of its members (i.e., producers, storage and packing sites) meet the requirements for competency, independence and accuracy.*)*

e) The evaluation process is divided into two elements:
   i. Audit of the Group's Management System and
   ii. Audits of a sample of group members – Refer below to *Section 5.2.3***.**

f) The audits that comprise the two elements may be performed by more than one auditor from the CB as long as the audit team works closely together (e.g., one Lead Auditor responsible for the Group Management System audit, supported by one or more CanadaGAP auditors performing audits of producers, storage and packing sites).

g) The CB shall send the audit plan to the management of the applicant prior to the audit.

h) The Group Management System audit or "System Check" will be undertaken at the central office of the group or administrative centre for the group scheme.

i) The Group Management System audit will take one or more days and will include:
   i. Opening meeting with management
   ii. Review of all relevant documentation
   iii. Evaluation of records
   iv. Review of internal audits conducted
   v. Discussion / interviews with key staff
   vi. Closing meeting including review of non-compliances identified.

j) As part of the Group Management System audit, the results of the external and internal audits will be compared, to identify structural and non-structural non-compliances*.*

k) The final report and result can only be concluded after both the Group Management System and sample of group members are evaluated.

l) Non-compliances will be raised as Corrective Action Requests and must be closed out **before** a certificate can be issued to the group.

m) Compliance means: 100% compliance by the group with all applicable requirements of the Group Management System Checklist, AND all sampled group members (i.e., producers, storage and packing sites) must achieve a score of 100% with no autofailure items on the CanadaGAP Audit Checklist.

n) For initial certification, the timeframe to close out CARs is three (3) months after the initial audit. If CARs are not closed out within three months, another audit is required for certification.

o) For subsequent surveillance audits (announced or unannounced), the timeframe to close out CARs is 28 days after the audit date. If CARs are not closed out within 28 days, the CB will suspend the group certification. Refer to *Section 6, Certification Body Sanctions against the Group,* below.

p) Only one certificate is issued, to the Group applicant. A list of the group members (i.e., producers, storage and packing sites) to which the certificate relates shall be issued in an appendix referred to in the certificate. The appendix must identify the scope of the group certification applicable to each group member, including individual on-farm and central storage and packing facilities.

q) Individual members of a group are not allowed to leave the group and register with another group (for the applicable crops) if there is any pending sanction on the member issued by the group, or if there are any issues relevant to the member raised by the CB that have not been closed out.

5.2.2.1 Group Management System Announced Audits

i. The CB shall carry out one announced external audit of the Group Management System at the initial assessment and thereafter once per annum. An annual GMS audit by the CB is the minimum requirement. The CB may increase the frequency or trigger a GMS audit (announced or unannounced) based on risk. Risk factors may include the following: severity of previous non-conformities; evidence of a lack of effective oversight of group members or of internal auditors; an identified need (based on risk) to verify implementation of substantial corrective actions issued as a result of an internal or external GMS audit; a trend showing significant discrepancies between external and internal audit findings; significant changes in the structure or operation of the group; significant changes to the scope of group members' operations; complaints received about the group, or other credible information that may raise concern about the integrity of certification. Clear justification for triggered GMS audits must be provided to the group and to CanadaGAP.

ii. The Group Management System audit must be undertaken before the CB completes sampling audits of the group member sites. If necessary, a small number of the sample sites may be audited prior to the audit of the Group Management System.

5.2.3 External Producer or Site Audits by the Certification Body

a) Site audit sampling: Annually, a qualified CanadaGAP auditor from the Certification Body shall carry out external audits of group members (i.e., producers, storage and packing sites) according to the risk-based sampling plan in the table below. The sampling programme shall be determined so that all members within the Group are audited within a defined period, based on the risk of the commodity/activity as specified below:

RISK LEVEL	CROPS/ACTIVITIES INCLUDED	CB SAMPLING PLAN
Level 4 (high risk crops/activities) **Certain** crops or activities deemed "high-risk" are not eligible for sampling by the external certification body.	Includes: • packing (see further clarification below in 5.2.3 p) • using potable water post-harvest on any commodity (as opposed to dry handling of product) • production or storage of cantaloupe • production or storage of leafy greens and herbs (including all lettuce, green onions, leeks, leaf of root crops, leafy crops such as kale, chard, chicory, etc.) • production or storage of strawberries	• Annually, all Level 4 group members must be audited by the Certification Body. • "Packing" includes packing activities **on-farm** (i.e., in the field, in packing sheds, barns, or other buildings, in temporary structures, etc.) as well as packing product in central facilities or standalone packinghouses. • For the identified high risk crops, no sampling is permitted regardless of the activity (i.e., production, packing, storage).
Level 3 (medium-high risk crops/activities)	Includes: • production or storage of petioles (celery, rhubarb, fennel) • hand harvesting of cherries and blueberries	• Annually, group members with medium-high risk crops/activities must be sampled at 3 times the square root by the Certification Body. • On an ongoing basis, all group members must be audited by the Certification Body within a three-year period.
Level 2 (medium risk crops/activities)	Includes: • production or storage of small fruit other than strawberries (except for hand harvesting of blueberries) • production or storage of tomatoes, peppers, cucumbers and melons (other than cantaloupe) • production or storage of tree and vine fruit • production or storage of cruciferous vegetables such as broccoli, cauliflower, cabbage, etc.	• Annually, group members with medium risk crops/activities must be sampled at 2 times the square root by the Certification Body. • On an ongoing basis, all group members must be audited by the Certification Body within a four-year period.

Level 1 (lower risk crops/activities)	Includes: • production or storage of all other crops and activities not identified above	• Annually, a minimum of the square root of group members with lower risk crops/activities must be sampled by the Certification Body. • On an ongoing basis, all group members must be audited by the Certification Body within a five-year period.

b) Within risk Levels 1, 2, 3 identified above in a), sample size calculation shall be based on the number of group members for **each certification scope** [i.e., activities (production, storage), crops/crop grouping, and combinations thereof]. It may be possible to use crop groupings in certain cases (e.g., some tree fruits) where the risk profiles/handling activities are very similar.

c) For complex operations, in addition to the requirements of the current section 5.2.3 of Appendix III.1:
   i. Refer also to applicable requirements in *Component 3, Section 3.3.5.4.5.2*.
   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”.
   iii. Further guidance may be found in Appendix III.2 “Guidance for Certification Bodies: Scoping for Multi-commodity and Multi-activity Operations”.

d) Storage activities: When central storage facilities are used by the group, or when a group member stores product for other producers:
   i. The sampling plan for CB audits of group members must take into account all storage sites, including group members performing on-farm storage for other producers.
   ii. For Level 1 (lower risk crops/activities), the CB must audit as a minimum the square root of the total number of registered storage sites, including: (1) storage sites located on individual producers’ farms, and (2) central storage facilities.
   iii. Storage operations, whether on-farm or off-farm storages, that handle medium (Level 2), medium-high (Level 3), and high risk (Level 4) crops, must be sampled at the corresponding rates set out in the table above in Section 5.2.3 a).
   iv. For the internal audits, every storage facility including those on the farms of producer members of the group must be audited annually by the Group’s qualified internal auditor.

e) In the case where a group has a member with multiple sites, that member shall be taken into account for calculating the sample size and not the number of his sites. This member shall have a higher chance of being sampled based on the associated risk. Provided that the internal audits covered all of this members’ sites and activities, the CB shall audit **at minimum** (based on the risk ranking in 5.2.3 a) the square root of the sites of that member. In case that member operated a management system, it must be merged with the central group management system; there can be only one management system within the group.

f) Members who move from one group to another shall have a higher possibility of being included in the sample of group members chosen by the CB.

g) The sampling plan shall be partly selective and partly nonselective, but at least 25% of the sites chosen for sampling shall be randomly selected from the total number of sites. In cases where the sites fall into different risk levels (as per the table in 5.2.3 a), the random selection may represent 25% of the total number of sites eligible for sampling, rather than the CB having to select 25% within each risk Level. Selected sites shall be identified based on the Group's internal audit programme findings and the site risk profiles as per IAF MD 1.

h) The calculation of the sampled audits must be rounded upwards to the next whole number if there are any decimals.

i) Certification bodies may, based on justifiable criteria, increase the verification rate of total numbers of group members. The Group has the right to appeal against such a decision. Doubts as to the consistency of application of the group management system within the Group could arise from:
    i. Customer complaints
    ii. Inconsistencies between the internal audit reports and the CB audit findings, etc.

    The Certification Body is permitted to increase sample size based on various risk factors that may be applicable to a particular Group (e.g., audit scope, types of activities on-site, findings of the group management system audit, findings at sampled sites, customer requirements, etc.), size of the group and the internal structure.

j) In the event that non-conformities are found when auditing member sites, which may not jeopardise certification but may raise concerns on conformity of the Group, the CB shall increase the sample size to ensure adequate confidence in the conformity of the Group.

k) The final selection and communication to the Group of which and how many group members (i.e., producers, storage and packing sites) to audit shall normally be done by the CB after undertaking the Group Management System audit, using criteria based on the group structure and defined in a sampling procedure, which is risk-based. The notification shall be given 2-5 business days in advance for each group member selected for an audit.

l) The sampling programme can be adjusted based on the use of monitoring technologies.

m) The CB shall use the complete CanadaGAP Audit Checklist for all external audits of group members (i.e., producers, storage and packing sites).

n) **Audit Timing:**
    i. The timing of external audits of any group member shall be based on the same rules as apply to individual certification for **announced audits** (Refer to *Component 3, Section 3.3.5.4.3, Audit Scheduling*).
    ii. Group members who have both "Production and Packing" in their certification: 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. A separate audit report must be completed for each audit. Refer to *Component 3, Section 3.3.5.4.5* for further guidance on multi-commodity situations.
    iii. For **unannounced** audits of group members (i.e., producers, storage and packing sites), the audit scheduling rules for Option C and D shall be followed (Refer to *Component 3, Section 3.3.5.4.3 h)*.

o) **Unannounced audits:**
    i. Annually, twenty-five per cent (25%) of the sites selected to be audited by the Certification Body shall be unannounced audits.
    ii. Unannounced audits are to be timed, scoped and planned in the same way as regular audits and depending on which UA Options are made available to/selected by the

group, following the same rules as set out in *Component 3, Section 3.3.5.4.3 h)*. The CB may conduct unannounced audits on selected group members during the same timeframe as the remainder of the group members receive their announced audits, or during a separate visit(s), as best determined by the Certification Body in accordance with CanadaGAP audit scoping guidelines and Section 3.3.5.4.3 h) requirements.

iii. An unannounced audit means that the group member receives **no notice** from the CB.

iv. The commodity and activity risk level (based on the description of Risk Levels in Section 5.2.3 a) above) shall be considered in determining which group members the CB will audit unannounced. A higher number of unannounced audits shall be performed on group members in Risk Levels 4 and 3, and a lesser number of group members in Risk Levels 2 and 1 shall be selected for unannounced audits.

v. 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.

p) Within Risk Level 4 (highest risk), field-packing of certain commodities should not be considered a "High-Risk" activity. The following table indicates which commodities when field-packed would NOT be in Level 4 for the purposes of CB sampling:

Risk Level 3	**Risk Level 2**	**Risk Level 1**
Field packing of:	***Field packing of:***	***Field packing of:***
Melons (except Cantaloupe) including Watermelons Small Fruit (except Strawberries, Cranberries and Haskap)	Apples Apricots Beans Broccoli Cabbage Cauliflower Celery Cucumbers Eggplant Fennel Grapes Kiwis Nectarines Peaches Pears Peas Peppers Plums Tomatoes	Artichoke Asparagus Beets Brussels sprouts Carrots Cranberries Garlic Haskap Onions Potatoes Pumpkins Radish Rhubarb Rutabagas Sea Buckthorn Squash Sweet corn Turnips

Risk Level 4 therefore includes the following remaining crops that are field-packed: Cantaloupe, Leafy Greens and Herbs (including all lettuce, green onions, leeks, leaf of root crops, mixed greens, radicchio, kohlrabi, leafy crops such as kale, chard, chicory, etc.), and Strawberries.
Note: If field packing includes use of potable water post-harvest, regardless of commodity, this activity is considered Risk Level 4.

6. Certification Body Sanctions against the Group

6.1 Unresolved Non-Compliances

a) **Initial audit:** Failure by the group to resolve any non-compliances within three (3) months of the initial audit will require another audit for certification.

b) **Subsequent audit:** Failure by the group to resolve any non-compliances within 28 days of a subsequent audit will lead to the Certification Body issuing a suspension of the group.

c) If non-conformities found on one member site relate to all or other member sites, corrective action shall be undertaken and verified both by Group management and by the Certification Body.

6.2 Suspensions

a) The CB can apply a suspension to the group for one, several or all of the crops and activities (production, storage, packing) covered by the certification.

b) After a suspension is applied, the CB will set the period allowed for correction. This will not normally exceed 6 months as per ISO/IEC 17021-1.

c) During the period of suspension, the group is prohibited from using the certificate, the CanadaGAP logo or other mark(s) or any other document or claim that is any way liked to CanadaGAP certification in relation to the suspended scope.

d) If the group notifies the CB that appropriate corrective action has been implemented before the set period, the suspension will be lifted by the CB, subject to satisfactory evidence and closing out.

e) If the cause of the suspension is not resolved within the set period, certification is withdrawn by the CB. For information on withdrawal of certification, refer to *Component 3, Section 3.3.6, Suspending, withdrawing or reducing the scope of Certification*.

APPENDIX III.2 – Guidance for Certification Bodies

Scoping for Multi-commodity and Multi-activity Operations

This appendix is intended as guidance to assist Certification Body personnel with audit scoping, timing, and scheduling for complex operations. It outlines some of the basic principles to keep in mind for clients with multiple commodities, multiple activities, more than one certification option, numerous production sites (i.e., fields, orchards, etc.). Not all elements of this guidance may be applicable in every case. If further guidance is needed, contact the CanadaGAP office.

IMPORTANT NOTE

For Option C individual operations and Option B group members whose scope of certification includes both "Production and Packing" activities:

● 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.

1. In general, any combination of commodity and activity (e.g., harvesting of cranberries) must be observed during an audit before the corresponding scope (e.g., "Production of Cranberries") can be included on the certificate. The following are other examples of crop/activity combinations:
    - Wet packing of apples
    - Wholesaling of grapes and kiwi
    - Hand-packing (dry) of blueberries
    - Production of lettuce (must be seen at harvest)
    - Production of squash (must be seen at harvest)
2.
    a) When a complex operation first enrols in the program, it is preferable for the initial audit to be scheduled at a time to allow for the observation of as many crop/activity combinations as possible.

    b) Alternatively, or in addition to the above principle, certification body personnel should speak with the operator to ensure that the crop/activity combinations that the operation most needs certified are observed during the initial audit.

    c) Regardless, for initial certification, only crop/activity combinations seen during the audit can be on the certificate (with some exceptions – Refer to further guidance on crop groupings in # 3 below).

    d) In certain cases, additional visits may be needed in the first year to get all scopes on the certificate. See # 10 below.

3. a) In some cases, certain crops can be grouped together or considered equivalent when the crops and their associated handling processes are very similar. For example:

    i. Tree fruits (peaches, plums, nectarines, pears, apples) generally tend to be grown and harvested the same way and can often be grouped together – i.e., if the auditor observes harvesting of pears, it's probably fine to also include production of peaches and nectarines on the certificate.
        - Caveat: CB personnel should always investigate whether different production practices are used for any of the additional crops, which could introduce different risks and therefore warrant a separate audit.

    ii. There are exceptions to the above approach to grouping tree fruit crops. For example:
        - Cherries are often harvested differently from other tree fruits.
        - Apples may be wet packed whereas other tree fruits are often dry packed.

    iii. A number of leafy green crops are grown and harvested the same way (e.g., different lettuces, kale, chicory, etc.). The key is to gather information during the scoping process to determine if there are differences in how various commodities are grown or handled.

    iv. A small fruit producer may grow raspberries, strawberries, blackberries and blueberries. It may or may not be possible to group these crops together depending on the operation's production practices. Some berries could be harvested manually, others harvested mechanically; some crops may be field-packed, while others may be packed into harvested product packaging materials and then sorted in the packinghouse. These questions need to be posed up front when scoping the operation.

4. Audits of processing potatoes can and should optimally be scheduled to occur at different stages of product handling – for example, the first year's audit would be scheduled during harvest, and a subsequent year's audit while potatoes are being loaded out of the storage and shipped to the processor. The operation can initially be certified for "Production" based on either activity (i.e., harvesting or loading/shipping), but over time both activities should be seen, and thereafter can be seen on an alternating or rotating basis depending on risk, customer requirements or other relevant factors. It is acceptable to prioritize seeing activities that involve more product handling (e.g., loading product out of storage during the shipping period), as long as harvesting is also seen occasionally. Fresh market potatoes may also be considered similarly, depending on the certification option and based on a risk assessment (e.g., mechanical vs hand harvesting, etc.).

5. a) Over time, multi-commodity and multi-activity operations must be audited on a schedule such that all crops/activities are seen on a rotating basis. No more than 3 or (maximum) 4 years should elapse between seeing a given crop/activity combination.

b) Determinations of how often to see each crop/activity combination should be based on risk. Some crop/activities need to be seen more often based on risk. In general terms, higher risk crops and activities include:

Activities considered higher risk
Packing
Other water uses (e.g., hydro-cooling)
Harvesting by hand
Hydroponic production (e.g., lettuce)
Cooling cherries

Crops considered higher risk
Leafy greens
Herbs
Cantaloupes
Tomatoes
Apples

6. With respect to audits for operations enrolled in more than one certification option:
   i. Option D or F (Repacking, Wholesaling, Brokerage) activities must be observed every year.
   ii. Option C Packing or activities related to Packing (e.g., Washing, Icing, etc.) must be observed every year.
   iii. Option C Production activities must be observed every year.
   iv. Option C multi-commodity operations may not have all crops observed every year.
   v. Option A1, A2, or E activity/crop combinations (e.g., similar groupings with respect to the activity or crops) can be observed on a rotating basis.

7. If an operation is being certified Option C or E for both greenhouse and field/orchard products, the audit must include observation of both greenhouse and field/orchard products every year in order to be included and maintained on the certificate.

8. Program participants who are enrolled in Option A1 or A2 and have complex operations with multiple crops and activities need to have ALL crop/activity combinations audited every four years. A rotating/alternating schedule cannot be used (except for similar groupings) since the time between audits is already four years.

9. Audit Duration: When scoping audits for complex operations (multi-commodity, multi-activity), it is advisable to plan for a longer audit duration to allow enough time for all crop/activity combinations to be properly assessed during the audit.

10. Long-term planning: Certification body personnel responsible for scoping may find it useful to prepare a 3- to 4-year plan for complex operations with multiple commodities and activities to ensure that all crops and activities for which the company is (or wants to be) certified is seen over time and at the appropriate audit frequency. If the scope for each client is being thoroughly reviewed each year, it may not be necessary to use a long-term planning approach.

11. In cases where the client transfers to a new CB, the incoming CB may continue with the existing plan and doesn't have to observe all of the crops/activities in the first year in order to include them on the certificate, provided that the incoming CB can confirm that the outgoing CB had previously observed all crops/activities included on their certificate. To make this confirmation, the CB will need to obtain from the transferring client a copy of the report from more than one preceding audit.

12. Multiple Audits for complex operations (Options A1, A2 and E):

a. When scoping audits for complex operations, it may be necessary to complete more than one audit, especially if the program participant wants to include multiple commodities and activities on his certificate during his first year in the program. Since harvesting and/or packing activities must be seen during the audit, there may not be a time when it is possible to audit everything at once.

b. If the program participant does not need all crops/activities on his certificate at once, additional crop/activity combinations can be seen during subsequent year audits and added to the certificate as they are observed.

13. Issuing the audit report(s) to complex operations (Options A1, A2 and E) who have multiple audits during the same season/year:

a) The CB may issue one or multiple audit reports, depending on the nature of the operation. Each situation is different and needs to be handled as the Certification Body deems most appropriate. Below for consideration are some factors that may influence the CB's decision to include everything on one audit report:
- whether the same auditor is returning to the operation for all audits
- how much time has elapsed between each audit
- whether the same version of the audit checklist is in effect
- how much of the operation was seen during the first audit, how much remains to be seen during the second
- how diverse or complex the operation is.

b) An Executive Summary must be issued for each audit.

14. Other General Tips for Scoping:

a) The program participant may not provide all relevant information on the program enrolment form or in other documents that the CB uses to collect information about the operation. Especially for complex operations, the most efficient approach is to speak with the operator to understand exactly what and how they are doing things.

b) The requested date for the audit on the program enrolment form likely suits the operation but may not be the optimal audit timing, particularly for a complex multi-commodity or multi- activity operation. In speaking with the operator, the optimal timing to observe the crops/activities requested within the certification scope can be determined.

c) Scoping is best done well in advance of the season, when CB personnel have time to confirm the clients' activities for the upcoming year (e.g., scope in January-March for the upcoming season). Having this conversation with the client well ahead of time will prevent last minute surprises about activities the program participant is involved in and may not have written on the program enrolment form or other CB paperwork.

d) Each year, CB personnel should review scoping for all clients, including clients for whom a plan has already been developed for the next 3-4 years (to ensure full coverage of multiple crops and activities). It is not uncommon for an operation's activities and crops to change; therefore, audit timing and scoping needs to be

confirmed annually.

e) Where feasible for the CB, the timing of the audit of year-round operations could take into account the operation's start date, to enable water test results, etc. to be verified appropriately.

f) Some operations have numerous production sites but are NOT considered multi-site operations. (See CanadaGAP Program Management Manual, Section 3.3.5.3 for further information.) Where operations have numerous production sites (i.e., a number of fields, orchards, etc.), the main facility needs to be seen each year, but ALL of the production sites do not. A reasonable number must be seen, especially if they are within close proximity. If there are too many to be seen reasonably, if production sites are similar to others already observed, or if distance is a factor, then over time the remainder must be observed. If the production site is associated with an agricultural chemical storage, a well, or some other item/activity where the risks must be assessed each time, then it must be observed every year. This approach also applies when there is something different or unusual about the production site that distinguishes it from the rest (e.g., migratory path, etc.). This guidance may similarly be applied to operations with a number of long-term storage facilities (e.g., potato). If they are largely similar, then they may be sampled over time.

g) For complex operations with multiple locations/facilities, packing activities must be seen by the CB auditor annually.

15. Further direction on scoping and handling certification of multi-commodity operations is provided in the following sections of the CanadaGAP Program Management Manual:

i. Section 3.3.5.2 *Scope of Certification*
ii. Section 3.3.5.4.5 *Multi-Commodity and Multi-Activity Sites of Production, Storage, Packing, Repacking, Wholesaling and Brokerage*
iii. Section 3.3.5.4.3 c) *Audit Scheduling*
iv. Section 3.3.5.4.6 c) *Preparation of Audit Plan*
v. Section 3.3.5.5.2 b i) *Certification Cycle and Audit Timing*
vi. Section 3.3.5.5.3 b iii) and e) *Date of Certification and Certificate Expiry Date*
vii. Section 3.3.5.10 ii f) *Transfers between Certification Bodies*

16. Examples

a) Case Study A:

An operation packs apples, pears, peaches, nectarines, plums, apricots, and blueberries. They have a packing line that has a wet dump for apples which runs sporadically year round. There is also a dry dump located after the dump tank and washing brushes and it is used for packing peaches, nectarines and pears seasonally. Apricots and plums are packed by hand, transferring the harvested product from bins directly into market ready packaging materials on a small table. Blueberries are dumped by hand onto a separate sorting belt where they are graded and sorted by hand before being packed into market ready packaging materials.

Wholesaling is also done year-round. The initial audit request comes in on March 1st, 2021 and the certification need is immediate.

Spring 2021: Packing of apples and wholesaling observed.

Certificate: Packing of Apples and Wholesaling of Fresh Fruits and Vegetables

Summer 2022: Packing of peaches, nectarines, pears, apricots, plums and blueberries and wholesaling observed.

Certificate: Packing of Apples, Peaches, Nectarines, Pears, Apricots, Plums and Blueberries and Wholesaling of Fresh Fruits and Vegetables

Fall 2023: Packing of apples and Wholesaling observed

Certificate: Packing of Apples, Peaches, Nectarines, Pears, Apricots, Plums and Blueberries and Wholesaling of Fresh Fruits and Vegetables

Summer 2024: Packing of peaches, nectarines, pears, apricots, plums and blueberries and wholesaling observed.

Certificate: Packing of Apples, Peaches, Nectarines, Pears, Apricots, Plums and Blueberries and Wholesaling of Fresh Fruits and Vegetables

b) Case Study B:

An operation has production of ALL of the below and packs this product in two different ways. The operation does not need a GFSI-recognized certification.

8 products	lettuce	celery	cauliflower	broccoli (with icing)	cucumber	musk melon	peppers	watermelon
2019	x							
2020		X	x		x			
2021					x	x	x	
2022	x			x				x
2023		X	x			x		
2024	x				x		x	

Field packed **Packed in the packinghouse**

The operation's certificates would be as follows:
2019: Production and Packing of Lettuce
2020: Production and Packing of Lettuce, Celery, Cauliflower, and Cucumber
2021: Production and Packing of Lettuce, Celery, Cauliflower, Cucumber, Peppers, and Musk Melon
2022: Production and Packing of Lettuce, Celery, Cauliflower, Cucumber, Peppers, Musk Melon, Watermelon and Broccoli
2023: Production and Packing of Lettuce, Celery, Cauliflower, Cucumber, Peppers, Musk Melon, Watermelon and Broccoli
2024: Production and Packing of Lettuce, Celery, Cauliflower, Cucumber, Peppers, Musk Melon, Watermelon and Broccoli

c) Case Study C:

An operation has the following:

Group A – mechanical harvest of radicchio. Packing in packinghouse.
Group B – manual field packing of chicory and escarole.
Group C – manual harvest of spinach. Packing in packinghouse (fluming/final rinse).
Group D – manual harvest of swiss chard and kale cabbage. Packing in packinghouse (final rinse).

Year 1: Group A (radicchio) and Group D (swiss chard) observed.

Certificate: Production and Packing of Radicchio, Swiss Chard and Kale Cabbage

Year 2: Group B (chicory), Group C (spinach) observed.

Certificate: Production and Packing of Radicchio, Swiss Chard, Kale Cabbage, Chicory, Escarole, Spinach

Year 3: Group A (radicchio) and Group D (kale cabbage) observed.

Certificate: Production and Packing of Radicchio, Swiss Chard, Kale Cabbage, Chicory, Escarole, Spinach

Year 4: Group B (escarole), Group C (spinach) observed.

Certificate: Production and Packing of Radicchio, Swiss Chard, Kale Cabbage, Chicory, Escarole, Spinach

d) Case Study D:

An operation is multi-commodity, multi-activity and has several orchards. The company is certified for two certification options (options C and D).

CGAP Manual Group	CGAP Manual Subgroup	Crop	Packing	Wholesale	Water used	*Grouping	Year Observed
Tree and Vine Fruit	Pome Fruits	Apples	•		•	A	1, 2, 3, 4
		Pears	•		•	A	1, 2, 3, 4
	Stone Fruits	Apricots	•			B	1
		Cherries	•		•	A	1, 2, 3, 4
		Nectarines	•			B	2
		Peaches	•		•	A	1, 2, 3, 4
		Plums	•			B	3

		Prune Plums	•			B	4
	Vines	Grapes		•		C	1, 2, 3, 4

***Group A – Packing (hydro-cooling, fluming and/or final rinse), Group B – Dry packing, Group C – Wholesaling**

Year 1 Certificate: Packing of Apples, Pears, Apricots, Cherries, Peaches, Nectarines, Plums and Prune Plums and Wholesaling of Fresh Fruits and Vegetables

All commodities could be added to the certificate even though nectarines, plums and prune plums were not observed (the activities/commodities are similar to other activities/commodities).

Therefore, year 2, 3 and 4 – nothing new added to the certificates and based on risk most of the activities/commodities are observed each year. Wholesaling is observed every year.

APPENDIX III.3 – CanadaGAP Certification Options

Recognized by	*Option*	*Applies to*	*Audit Frequency*	*Features*	*Food Safety Elements*	*Unannounced Audits*	*Audits for Multi-activity Operations*
Canadian Government Food Safety Recognition Program **Not GFSI-recognized**	A1	Individual Supplier	● Every 4 years – scheduled audit on-site ● Could also be randomly selected for on-site audit in Years 2, 3 and 4 of the cycle	● Year 1 is always a scheduled audit by the Certification Body (CB) ● Annually – if not selected for random audit, must complete sworn declaration and self-assessment ● Annually – CB reviews declarations and self-assessments	● The food safety standard is the same for all certification options – except A1 is excluded from GFSI requirements for EMPs, Food Safety Culture, Food Fraud, Food Defense, etc. ● Passing score on the audit 85%	● 5% of CB's clients selected each year for an unannounced audit ● 2-5 business days' notice given by the auditor	● According to rules in Appendix III.2 of the CanadaGAP Program Management Manual
Canadian Government Food Safety Recognition Program **Not GFSI-recognized**	A2	Individual Supplier	● Every 4 years – on-site audit (scheduled or random) ● No more than 4 years between on-site audits. If selected for a random audit, scheduled audit date will be extended to four years from the random audit date	● Year 1 is always a scheduled audit by the CB ● Annually – if not selected for random audit, must complete sworn declaration and self-assessment ● Annually – CB reviews declarations and self-assessments	● The food safety standard is the same for all certification options – except A2 is excluded from GFSI requirements for EMPs, Food Safety Culture, Food Fraud, Food Defense, etc. ● Passing score on the audit 85%	● 5% of CB's clients selected each year for an unannounced audit ● 2-5 business days' notice given by the auditor	● According to rules in Appendix III.2 of the CanadaGAP Program Management Manual

Recognized by	*Option*	*Applies to*	*Audit Frequency*	*Features*	*Food Safety Elements*	*Unannounced Audits*	*Audits for Multi-activity Operations*
GFSI-recognized Canadian Government Food Safety Recognition Program	B	Group Certification	● Annually – Group must internally audit all member farms and central function ● Annually – CB audit of Group Management System ● Annually – Sampling audits by CB of group members	● Group must run its own internal Management System and effectively act as CB for its members ● Group Management System is subject to oversight by external CB ● Design of Option B was based on GLOBALG.A.P requirements	● The food safety standard is the same for all CanadaGAP options ● Includes additional GFSI requirements for EMPs, Food Safety Culture, Food Fraud, Food Defense, etc. ● Certification requires 100% compliance with audit criteria	● 25% of sampled group members are audited unannounced each year ● No prior notice of the auditor's arrival, other than initial scoping by the CB early in the season to confirm the timing of relevant activities	● According to rules in Appendix III.2 of the CanadaGAP Program Management Manual and GFSI requirements – group members certified for both Production AND Packing may require more than one audit in a given year
GFSI-recognized Canadian Government Food Safety Recognition Program	C	Individual Supplier involved in Production, Packing, or Storage	● Annual	● On-site audit by Certification Body	● The food safety standard is the same for all CanadaGAP options. ● Includes additional GFSI requirements for EMPs, Food Safety Culture, Food Fraud, Food Defense, etc. ● Certification requires 100% compliance with audit criteria	● 10% of CB's clients selected each year for an unannounced audit ● No prior notice of the auditor's arrival, other than initial scoping by the CB	● According to rules in Appendix III.2 of the CanadaGAP Program Management Manual and GFSI requirements – operations certified for both Production AND Packing may require more than one audit in a given year

Recognized by	***Option***	***Applies to***	***Audit Frequency***	***Features***	***Food Safety Elements***	***Unannounced Audits***	***Audits for Multi-activity Operations***
GFSI-recognized Canadian Government Food Safety Recognition Program	D	Individual Repacking or Wholesaling Operation ***NOTE:*** *Option D is no longer available to Brokerage operations – see Option F instead*	● Annual	● On-site audit by Certification Body	● The food safety standard is the same for all CanadaGAP options. ● Includes additional GFSI requirements for EMPs, Food Safety Culture, Food Fraud, Food Defense, etc. ● Certification requires 100% compliance with audit criteria	● 10% of CB's clients selected each year for an unannounced audit ● No prior notice of the auditor's arrival, other than initial scoping by the CB	● According to rules in Appendix III.2 of the CanadaGAP Program Management Manual
Canadian Government Food Safety Recognition Program **Not GFSI-recognized**	E	Individual Supplier involved in Production, Packing, or Storage	● Annual	● On-site audit by Certification Body	● The food safety standard is the same for all CanadaGAP options. ● Includes additional GFSI requirements for EMPs, Food Safety Culture, Food Fraud, Food Defense, etc. ● Passing score on the audit 95%	● 10% of CB's clients selected each year for an unannounced audit ● 2-5 business days' notice given by the auditor	● According to rules in Appendix III.2 of the CanadaGAP Program Management Manual

Recognized by	***Option***	***Applies to***	***Audit Frequency***	***Features***	***Food Safety Elements***	***Unannounced Audits***	***Audits for Multi-activity Operations***
Canadian Government Food Safety Recognition Program **Not GFSI-recognized**	F	Individual Repacking, Wholesaling or Brokerage Operation ***NOTE:*** *Option F is the only CanadaGAP certification option available to Brokerage operations*	● Annual	● On-site audit by Certification Body	● The food safety standard is the same for all CanadaGAP options. ● Includes additional GFSI requirements for EMPs, Food Safety Culture, Food Fraud, Food Defense, etc. ● Passing score on the audit 95%	● 10% of CB's clients selected each year for an unannounced audit ● 2-5 business days' notice given by the auditor	● According to rules in Appendix III.2 of the CanadaGAP Program Management Manual