Procedure No.	TP-09-RM
First draft:	May 11, 2020
Last updated:	August 1, 2021

Use of Remote Auditing Methods during the COVID-19 Pandemic

Guidelines and Procedures (August 1, 2021)

1. Overview

This document presents an approach for using remote auditing methods to complete CanadaGAP audits during the COVID-19 pandemic. It was developed in response to challenges presented by this year's extraordinary circumstances.

This approach provides an alternative to regular full on-site CanadaGAP audits for the 2021 crop year. Part of the audit is done on-site, while part of it is completed using remote methods.

The key benefit of using remote methods during the pandemic relates to reducing the amount of time that the auditor must spend on-site to complete the full audit. This document provides Certification Bodies with specific guidelines and procedures to apply remote methods to CanadaGAP auditing should they choose to do so. This alternative to a full on-site audit has two (possibly three) components, as follows:

i. Partial On-site Audit (observation of the premises, interviews with employees, limited review of documentation)
ii. Partial Remote Audit (cross-referencing information gathered on-site, to the operation's documentation and records reviewed off-site)
iii. If needed – "Follow-up" activities, in which the auditor may need to contact the auditee for additional information before the remote partial audit can be completed.

These components will be described in more detail in this document (see below, Section 6. "How Do CanadaGAP Audits Work Using Remote Auditing Methods?").

2. Guiding Principles

Please note the following guiding principles:

2.1 A full on-site audit remains the preferred approach for CanadaGAP audits. Use of remote auditing methods presents an alternative that is considered a **second choice** to a full on-site audit.

2.2 The Certification Body is encouraged to take the approach that full on-site audits will proceed as much as possible. The Certification Body is responsible to:

- Make clear to clients the expectation that the certified company will make every effort to cooperate with the auditor to meet the requirement for a full on-site audit, keeping in mind that

measures can be taken to reduce time spent in close proximity to reduce the risk of exposure to COVID-19 for both the auditor and employees of the certified company

- Inform the client of the certification body's expectations for relevant health and safety measures to be implemented within the operation, in accordance with applicable public health guidelines for COVID-19 (see below, Section 3. "Health and Safety Considerations")
- Reassure the client that the certification body and auditor are also taking all reasonable precautions to safeguard and protect the health and safety of the auditor and of the client's personnel.

2.3 It is always up to the Certification Body (not the program participant) to make the determination as to whether an audit can be completed in part using remote methods.

2.4 Use of remote auditing methods is applicable for the 2021 crop year only, available during the period when clients and/or Certification Bodies are facing constraints to a full on-site audit due to the COVID-19 pandemic.

2.5 Use of remote auditing methods is reserved for CanadaGAP clients who cannot proceed with a full on-site audit for various reasons (see below, Section 4. "Which Clients are Eligible for An Audit with a Remote Component?"), or whose audit cannot be delayed to a later date when a full on-site audit could be completed.

2.6 To be eligible for an audit that uses remote methods, clients would have to demonstrate to the Certification Body their ability to meet the Information and Communication Technology (ICT) requirements, based on criteria in the International Accreditation Forum (IAF) Mandatory Document (MD) 4 (see below, Section 5. "How Do Certification Bodies Assess the Suitability of Using ICT Methods with Clients?").

2.7 During the on-site portion of the audit, it is assumed that remote methods (ICT) will not be utilized. An on-site visit entails the use of traditional, in person auditing practices (e.g., face-to-face interviews with employees, etc.). That being said, some additional measures may be useful to limit the potential for transmission (e.g., holding a greater portion of the on-site visit outdoors than indoors; minimizing the number of people in an enclosed area at one time).

2.8 In all cases, it is understood that the Certification Body may choose whether or not it is preferable to delay an audit and provide a certificate extension, following completion of a risk assessment for the operation (see March 30, 2020 Guidance for Certification Bodies*: CanadaGAP Audits Impacted by COVID-19*. Supplemental to the March 30, 2020 guidance, please note that Options A1 and A2 can receive up to 6 months' extension, while other certification options can receive up to 4 months' extension). If delaying the audit is not a feasible option (e.g., because it will create an even bigger backlog), the Certification Body has the right to decide to proceed with an audit.

2.9 Nothing in this document should be construed as compelling an auditor to perform an audit (whether a full on-site or partially remote). The certification body may assign a different auditor or delay the audit and extend certification if it is not possible for the auditor to carry out an audit in particular circumstances (e.g., facility has an outbreak, individual auditor has health concerns, etc.).

3. Health and Safety Considerations

3.1 This document does not purport to provide guidance on health and safety protocols intended to inform or assist auditors, Certification Bodies, or program participants with reducing the potential for transmission of COVID-19 during CanadaGAP audits. There are numerous resources available to help companies develop such policies, either through private or industry organizations, or from local public health authorities. Links to some useful materials may be found on the CanadaGAP website (www.canadagap.ca/covid-19/).

3.2 Expectations for the Certification Body:

3.2.1 The Certification Body should have in place and implement appropriate protocols to protect the health and safety of auditors and program participants. The Certification Body policies on COVID-19 are expected to reflect public health advice in the applicable jurisdiction (province, state, region, or municipality), and may include measures such as:

- self-monitoring of the auditor's health before each audit
- the auditor practicing physical distancing with company representatives and using PPE as appropriate on-site
- confirming before the audit that the operation has implemented safety measures around social distancing, use of physical barriers (e.g., plexiglass) and/or PPE as appropriate to protect visitors and employees, etc.

3.2.2 The Certification Body should provide auditors with the necessary guidance and personal protective equipment (PPE) if applicable.

3.2.3 The Certification Body should ensure that the operation has taken appropriate precautions to protect the auditor, such as:

- practising physical distancing
- in the event that physical distancing is impossible, having employees wear face masks when interacting with the auditor
- instituting more frequent hand washing
- providing an increased number of hand washing facilities/options
- having disinfecting wipes available to sanitize surfaces that the auditor must touch (e.g., doorknobs, table tops, etc.)
- using methods/materials to ensure safe handling of documents (e.g., wearing gloves, wiping down binders, washing hands after handling all documents, etc.)
- not sharing pens, calculators, flashlights or other tools used by the auditor
- limiting the number of people interacting with the auditor in an enclosed area
- providing a separate room for the auditor to review documents
- communicating clearly to ensure the audit flow is as efficient as possible to minimize the auditor's time on-site (e.g., avoid having to return to an area because something was forgotten, identifying all first aid kids to prevent unnecessary retracing of steps).

4. Which Clients Are Eligible for an Audit with a Remote Component?

4.1 Brokerage operations are eligible for a fully (100%) remote audit. The auditor would review the documents remotely and have a conversation with the food safety contact by phone (or other means) to verify compliance (e.g., ask applicable questions about supplier certificates, communication of MRLs, confirmation of the broker's traceability system).

4.2 Use of remote methods can be considered by the Certification Body only for clients in at least one of the following situations:

a) The audit cannot be delayed to a later date because the client has a short seasonal window in which the audit must occur for the Certification Body to observe relevant crops/activities.
b) The client has no other crops/activities that the Certification Body could observe at a later time.
c) The client has exceptional circumstances to justify asking the Certification Body to review whether the use of remote auditing methods is most appropriate, and the Certification Body has validated these circumstances.

4.3 Remote methods may be used for a year-round operation, although it may be preferable to delay the audit until a full on-site audit is possible (e.g., for a packing, repacking or wholesaling facility that can be audited at a later time, or a greenhouse operation that is in production during most of the year, etc.).

4.4 **It is not possible** to proceed with a partially remote audit if the client has:

a) Temporarily shut down operations

b) Instituted a "No Visitors" policy

c) Denied the auditor full access to: all sites within the operation applicable to the audit scope (e.g., field, packing facilities, etc.), all employees, and all relevant documents (e.g., the operation's food safety manual, individual forms that may need to be verified) for the on-site portion of the audit

d) Made significant modifications to operating processes to reduce transmission of the coronavirus and those modifications have changed normal daily activities to the point where that audit is not truly representative of the operation's regular practices (e.g., fewer employees to remove foreign objects during sorting and grading, the number of packing lines has been significantly reduced, etc.).

4.5 In cases where remote auditing is not feasible, the Certification Body should extend the CanadaGAP certificate based on a risk assessment, and reschedule the audit to a later time.

5. How Do Certification Bodies Assess the Suitability of Using Information and Communication Technology (ICT) Methods with Clients?

5.1 Certification Bodies are required to adhere to IAFMD4 when using ICT methods, to ensure that adequate controls are in place to avoid abuses that could compromise the integrity of the audit process. IAF requires that measures be taken to maintain security and confidentiality throughout audit activities.

5.2 The following criteria must be taken into account when assessing whether a client is suited to having an audit using ICT:

5.2.1 The use of ICT for audit purposes shall be mutually agreed upon by the operation being audited and the Certification Body performing the audit in accordance with information security and data protection measures and regulations, before ICT is used for audit purposes.

a) The security and confidentiality of electronic or electronically-transmitted information is particularly important when using ICT for audit purposes.
b) In the case of non-fulfilment of these measures or non-agreement of information security and data protection measures, the Certification Body shall use other methods to conduct the audit.
c) When no agreement is reached for the use of ICT for audit, other methods shall be used to fulfil audit objectives.

5.2.2 The Certification Body shall identify and document the risks and opportunities that may impact audit effectiveness for each use of ICT under the same conditions, including the selection of the technologies, and how they are managed. For instance, consider:

- Phone capability
- Fax capability
- Email capability (to exchange documents)
- Access to a scanner
- Access to a camera
- Virtual meeting capability (e.g., FaceTime, Skype, Zoom, Whatsapp, etc.)
- Access to courier service
- Turnaround time for postal delivery
- Any constraints to the above technologies
- Etc.

5.2.3 The information in Section 4.2.2 may be documented on the **audit plan**, which shall identify how ICT will be utilized and the extent to which ICT will be used for audit purposes. The objective is to optimize audit effectiveness and efficiency while maintaining the integrity of the audit process.

a) In the audit plan, the Certification Body must note that "CanadaGAP Guidelines and Procedures on the Use of Remote Auditing Methods during the COVID-19 Pandemic" and/or IAF MD4 are being followed.

5.2.4 When ICT is proposed for the audit activities, the application review shall include a check that the client and the Certification Body have the necessary infrastructure to support the use of the ICT proposed.

5.2.5 When using ICT, auditors and other involved persons (e.g., technical experts) shall have the competency and ability to understand and utilize the technologies employed to achieve the desired results of audit(s). The auditor shall also be aware of the risks and opportunities of the ICT used and the impacts that they may have on the validity and objectivity of the information gathered.

5.3 If ICT is used for audit purposes, it contributes to the total audit time as additional planning may be necessary which may impact audit duration.

5.4 Audit reports and related records shall indicate the extent to which ICT has been used in carrying out audit and the effectiveness of ICT in achieving the audit objectives.
a) Use the "Additional Comments" section at the end of the CanadaGAP Audit Checklist to document this.

5.5 **Examples** of ICT use during follow-up to the audit may include but are not limited to:
a) Meetings; by means of teleconference facilities, including audio, video and data sharing
b) Audit of documents and records by means of remote access, either synchronously (in real time) or asynchronously (when applicable).

6. How Do CanadaGAP Audits Work using Remote Auditing Methods?

6.1 General parameters for the On-Site Portion of the Audit:

6.1.1 The Certification Body auditor will visit the operation's premises during activities relevant to the certification, whether or not that timeframe matches the original scope (crop/activity combination) intended for the audit.

6.1.2 Given the choice, the preference is to see (1) the scope that was intended to be seen when the audit was originally planned, or (2) as a second choice, the operation's highest risk activities/crops, or (3) another crop/scope that is relevant to the operation's certification, if it is not possible to proceed with observation of the planned or higher risk scopes. The Certification Body needs to document any planned changes to the scope for 2021, and take these changes into consideration for scoping of 2022 (or future year) audits.

6.1.3 There must be employees on-site handling product during the audit.

6.1.4 As always, the auditor should follow only the observed scope in scoring the audit checklist.

6.1.5 For repacking and wholesaling operations, it is acceptable for the Certification Body auditor to request and review the operation's HACCP Plan in advance of the on-site audit.

6.1.6 For operations that are not using the CanadaGAP food safety manual, but instead have developed their own manual and operation-specific procedures and/or record-keeping systems, it is strongly recommended that the auditor request and review these documents in advance of the on-site visit, especially for new clients whose operation is not familiar to the auditor.

6.1.7 Advance records review:

6.1.7.1 If it helps with audit preparation and planning, the auditor may obtain other documents from the auditee in advance of the on-site visit. The client must be made aware and agree to any potential additional costs associated with the advance review of documents.

6.1.7.2 Reviewing records before the audit may be beneficial in some circumstances, for example:

a) when the client's operation is new to the auditor
b) If a client is new to the CanadaGAP program, seeing documents in advance of the audit can signal possible gaps in their food safety program. This may help with effective planning of the audit to ensure that the auditor is able to gather any information missing from the records.
c) If many crops/activities need to be seen during the on-site visit, the auditor may be able to plan the audit more effectively.

6.1.7.3 The auditor is still required to follow the procedure set out in this document (i.e., obtaining records after the on-site visit to cross-reference what was observed during the audit).

6.2 Procedure

Below is the audit procedure that Certification Bodies and auditors must follow:

6.2.1 <u>For the On-site portion of the audit:</u>

6.2.1.1 The on-site visit occurs *first*, before the remote review of documents (i.e., cross-referencing records to on-site observations).

6.2.1.2 In general, the on-site portion of the audit should take approximately two (2) hours. The duration may vary; it may take less time for smaller, simpler operations. The duration may be longer for larger, more complex operations, or for those whose audits would normally take a full day.

6.2.1.3 The auditor shall hold an opening meeting to cover the following:

a) Introduction of the audit team
b) Audit overview – purpose, scope, objectives and audit methods and procedures
c) Automatic failure items and procedures if an autofail item is found
d) Anticipated duration of the audit and projected time for closing meeting
e) Visitor policies (footwear, hair, jewellery, safety procedures that the auditor must follow)
f) Any changes to the checklist
g) Requested attendance for closing meeting
h) Invitation to the auditee to discuss any questions regarding the audit
i) Explanation that decisions on certification are made by the Certification Body, not the auditor
j) The appeals process.

To reduce time on-site at the audit, if items on the list above can be communicated in different ways (e.g., by email, through advance notice to clients, in the audit plan) by the Certification Body or auditor, that is also acceptable.

6.2.1.4 Tour the premises, using the CanadaGAP Audit Checklist as a reference and/or to take comprehensive notes (i.e., who the auditor interviewed, what was observed, etc.). Ensure all interviewing and conversations with employees and the food safety contact occur while on-site. This will minimize the need to follow up by phone (or other means) afterwards, which can add time to the audit.

6.2.1.5 The information below will be needed to cross-reference to the operation's records after leaving the premises. Therefore, it is imperative to make clear, comprehensive notes on the following items:

- Bin tag numbers
- Pack ID on market product
- Employee name(s)
- Agricultural chemical information (for chemicals in storage)
- Pest control trap numbers and locations
- Water sources and uses, how the fluming/washing/cooling/rinsing process is set up, water treatment methods (e.g., is the UV light on?)
- Interior and exterior of buildings (condition)
- Equipment type and condition
- Any other processes within the operation that will need to be cross-referenced to records after the auditor leaves the premises.

The corresponding records can be provided by the auditee afterwards. The auditor should be able to verify documentation against their observations recorded on-site.

6.2.1.6 There may not be records associated with some items, so the auditor has a single opportunity to check them while on-site. Be sure to record observations about such elements as:

- First aid kits, personal effects, working effects, areas where these items are stored
- Hand washing stations and toilet facilities – employee use, auditor checking to ensure they are properly stocked and functional
- Handling of waste and wastewater
- Types and location of cleaning and maintenance materials (including relevant information from the label)

The above lists are not exhaustive. What the auditor needs to check will depend on the operation.

6.2.1.7 Review the CanadaGAP Food Safety Manual (spending at least 15-20 minutes) to ensure that the manual has been completed. Check that:

- the version number is correct
- the confirmation logs have been signed
- procedures (checkboxes) have been updated for 2021
- any new sections are completed, such as Other Materials (Section 19.4/19.5), Environmental Monitoring Program (Section 19.5/19.6), and Food Safety Culture (Section 23.8).
- The auditor should also make note of the operation's start date (from the front of their manual).

6.2.1.8 HACCP Plan (for repacking and wholesaling operations): Regardless of whether the HACCP Plan was obtained by the auditor in advance of the audit, during the tour the auditor needs to confirm the content of Forms 1 and 4 while on-site. Once the auditor has checked that Forms 1 and 4 are complete, the remainder of the HACCP Plan can be reviewed remotely after the on-site visit.

6.2.1.9 The following records may need to be checked while the auditor is on-site, **depending on the number of documents and/or length of the documentation**:

- Internal audit checklist
- Calibration instructions and details
- Agricultural chemical receipts
- License/certificates or formal training documents for ag chemical applicators
- Documentation related to MRLs for exported products
- Certificates/audit reports from suppliers or outside service providers.

In some cases, it will be preferable to review a lengthy set of documents on-site, rather than obtaining them to review remotely afterwards. Appendix 1 provides a template to remind the auditor of items they may need to check while on-site.

The above is not an exhaustive list of items. What the auditor needs to check will depend on the operation.

6.2.1.10 Question A4 (ongoing program maintenance):

a) Question A4 should be scored while on-site because the auditor has access to the large amount of documentation needed to confirm that the auditee has been maintaining their food safety program between audits. These records (i.e., from last year's crop) would not otherwise be referred to during the auditor's review of documentation for the current season.

b) The consequence of scoring "0" on Question A4 is usually a triggered audit later in the season (or sometimes, early the following year if time has run out in the current season). However, for 2021, the triggered audit could be deferred to 2022 if the Certification Body is facing a serious shortage of auditors in the Fall of 2021. The Certification Body is permitted to make an assessment of the timing for the extra (triggered) audit.

6.2.1.11 Complete the Executive Summary as much as possible before leaving the premises. Fill in general observations from the audit (operation details) and note anything that the auditee has done well based on the auditor's observations on-site. If the auditor was able to identify an autofail while on-site, this should be indicated on the Executive Summary. Both the auditor and auditee will sign the partially completed Executive Summary and as much as possible a copy will be left with the auditee.

6.2.1.12 A new checkbox on the Executive Summary will denote that the document was issued following a PARTIAL AUDIT; make sure to check off the new box.

6.2.1.13 Before leaving the premises, a closing meeting is held with the auditee so that the auditor can:

a) Provide an overview of the on-site audit observations and preliminary results
b) Explain that the on-site audit evidence was collected based on a sample of the information available that day
c) Remind the auditee of the appeals process and complaint procedure (if needed)
d) Review the Executive Summary with the auditee and explain that the findings recorded on the Executive Summary are only partial as they do not include a full review of documentation; sign and leave a copy with the auditee.
e) Review the corrective actions process

f) Explain how the rest of the audit process will work, in which the auditor will complete a remote review of the operation's documentation. If needed, the auditor will contact the auditee to follow-up on any missing information.
g) Explain that once the remote part of the audit is complete, the audit report will be prepared by the auditor and submitted to the Certification Body for review. The final report will come to the auditee from the Certification Body.

6.2.2 <u>For the Remote component of the audit</u>:

6.2.2.1 The remote portion of the audit occurs *after* the auditor has completed an on-site visit to the operation.

6.2.2.2 The remote portion of the audit should be initiated as soon as possible following the on-site visit, preferably within the same week. The remote component **must be completed** no more than 4 weeks (30 days) following the on-site portion of the audit. The sooner the remote portion is completed, the better, to prevent any time lag between observations, interviews, and records review, and to minimize potential disagreement.

The CB can determine if there is maximum number of days within which the auditee must submit the documentation in response to the auditor's request.

6.2.2.3 The auditor must get the desired records from the auditee. This could include the operation's

- completed records (e.g., last three months of records)
- detailed procedures (SSOPs)
- the Recall program (chart from Section 23 and Appendix S)
- mock recall records
- water/ice tests
- letters of assurance
- any documents suggested above (in #6.2.1.9) that were not reviewed during the on-site (e.g., supplier certificates)
- Etc. – the above is not an exhaustive list of documents. It will depend on the operation.

6.2.2.4 The records can be shared in a number of ways, depending on the client and Certification Body. For example:

a) The auditor can contact the auditee following the audit and tell them what records they would need based on the on-site audit notes and findings. The auditee can provide electronic copies, or mail or fax.
OR

b) The auditor/CB could communicate to the client in advance of the on-site audit which records will have to be provided. The auditee could then prepare photocopies of the documents and prepare a hard copy package for the auditor to take with them the day of the on-site audit. If there are privacy/confidentiality/security concerns for clients, use a different method to provide the required assurance to the client (e.g. secure electronic sharing of documents, as in the previous option).

6.2.2.5 If an auditee does not comply with supplying the requested documents before the deadline, that would trigger another on-site visit (at the client's expense) to complete the audit, or else certification would be suspended/withdrawn by the Certification Body.

6.2.2.6 The auditor uses the requested documents to cross-reference with on-site observations and interview finding as noted on the Audit Checklist or in the auditor's notes from visiting the premises.

6.2.2.7 Follow-up on missing information:

a) If the auditor realizes after the on-site visit that they did not observe something significant or did not complete all necessary interviews, the auditor must arrange with the auditee to follow up by phone, Skype, FaceTime or other electronic means to fill in the missing information. A brief "walk around" return visit by the auditor (with or without the auditee present) may be an option in some cases. Photos from the auditee may also be acceptable (e.g., to see the set-up of a handwashing station, the automatic chlorinator, etc.), as may documents that the auditor overlooked on-site but needs to refer to (e.g., operation start date in the client's food safety manual).

b) If a follow-up is needed to fill in missing information, the auditor will record in the "Additional Comments" section at the end of the CanadaGAP Audit Checklist that extra follow-up contact was necessary and why. Details of these activities must be recorded in the "Additional Comments" section.

c) If the auditor is not able to obtain the missing information from the auditee using one of the methods above [i.e., phone, electronic means (email/photo), or quick drop-by for the auditor to observe a building exterior, for example], the Certification Body will be required at its own (CB/auditor) expense to send the auditor back on-site to verify the details that were overlooked.

6.2.2.8 Even when using remote auditing methods, the auditor is expected to apply all three steps of verification in assessing the operation's compliance with program requirements, namely: (1) observation, (2) interviewing (employees and food safety contact or person responsible), and (3) documentation. If any one of the three

elements of verification is omitted, then appropriate steps need to be taken by the auditor to fill in the blanks and appropriately assess compliance. The auditor should never rely on a single element by itself to determine whether a requirement has been met (e.g., accepting statements of the food safety contact without comparing to the auditor's own observations and review of records, document review alone).

6.2.2.9 In the "Additional Comments" section at the end of the CanadaGAP Audit Checklist, a new chart will allow the auditor to confirm that the ICT used to conduct part of the audit were effective in achieving audit objectives. The auditor should complete the chart and may include other notes, if there is anything noteworthy to add about the method of conducting the audit.

6.2.2.10 The auditor must record the date or duration of all components of the audit (on-site visit, remote records review, and collection of follow-up information the auditor may have missed) on the cover page of the CanadaGAP Audit Checklist. All activities should be captured using extra (new) fields on the cover page of the checklist:

a) On-site Audit Date, Start Time and End Time – already captured on the audit checklist
b) Duration of Remote Audit component: _____
c) Duration of any required Follow-up (on-site or remote): _____
d) **Completion Date** of all activities (on-site + remote + follow-up): _____

Appendix 1 – Checklist Template for Auditor

The table below summarizes which items can be checked on-site as compared to documentation that can be reviewed remotely. **This list is not exhaustive**. What the auditor needs to check will depend on the operation. The auditor can use the following chart as a template and add their own items to it.

On-Site Items to Check could include the following:		**Remote Review of Documentation** could include the following:	
CanadaGAP Food Safety Manual		**Strongly recommend that the auditor request and review before the on-site visit:**	
	Correct version number		Operation-specific food safety plan or manual for operations that are not using the CanadaGAP Food Safety Manual, but instead have developed their own set of procedures
	Signed confirmation logs		
	Updated procedures (checkboxes) for 2021		
	New sections completed (Other Materials, EMP, Food Safety Culture, etc.)		Operations that are not using the CanadaGAP Form templates and have developed a highly customized record-keeping system
	Operation's start date		
	Check records to verify compliance with Q. A4		
Depending on the number/length of the documentation, review the following on-site:		**Depending on the number/length of the documentation, review the following remotely:**	
	Internal audit checklist		Internal audit checklist
	Calibration instructions and details		Calibration instructions and details
	Agricultural chemical receipts		Agricultural chemical receipts
	License/certificates or formal training documents for agricultural chemical applicators		License/certificates or formal training documents for ag chemical applicators
	Documentation related to MRLs for exported products		Documentation related to MRLs for exported products
	Certificates/audit reports from suppliers or outside service providers		Certificates/audit reports from suppliers or outside service providers
Check and record while on-site:		**Review after the on-site visit:**	
	Bin tag numbers		Detailed procedures (SSOPs)
	Pack ID on market product		Mock recall records
	Employee name(s)		Water/ice tests
	Agricultural chemical information (for chemicals in storage)		Completed records (3 months +)
	Pest control trap numbers and locations		Letters of assurance
	Water sources and uses, how the fluming/washing/cooling/rinsing process is set up, water treatment methods		Recall program (both the chart from Section 23 and Appendix S)
	Interior and exterior of buildings (condition)		
	Equipment type and condition		

HACCP Plan (repacking and wholesaling)		**HACCP Plan (repacking and wholesaling)**	
	Verify that Forms 1 and 4 accurately reflect the operation		Optional: Before the on-site visit, prepare by reviewing the HACCP Plan
	Optional: review full HACCP Plan while on-site		Required: Once the auditor has confirmed that Forms 1 and 4 are complete, the remainder of the HACCP Plan can be reviewed remotely after the on-site visit
Other: (add items as needed)		**Other:** (add items as needed)	