

To: CanadaGAP Stakeholders
Date: August 31, 2021
Subject: **Upcoming Changes to CanadaGAP Unannounced Audits for Certification Options B, C, and D**

Starting October 1, 2021, to maintain compliance with GFSI requirements, unannounced audits will work differently for CanadaGAP program participants enrolled in certification options B, C, and D.

A reminder of the CanadaGAP certification options affected by this change:

- Option B – Group Certification
- Option C – Individual Certification with an annual audit
- Option D – Certification for Repacking, Wholesaling, and Brokerage operations

What stays the same

- Program participants enrolled in CanadaGAP certification options A1 and A2, with a four-year audit cycle, are **not affected** by this change.
- For CanadaGAP certification options C and D:
 - Certification Bodies (CBs), the companies that perform CanadaGAP audits, will continue to select 10% of their clients each year to undergo an unannounced audit. The 10% selection must be of different operations each year. Program participants who have already had an unannounced audit in the last five years (which was when CanadaGAP introduced unannounced audits for Options C and D) will not be selected again under the new program until the remainder of the Certification Body's clients have had an unannounced audit.
 - Certification Bodies will continue to contact clients selected for an unannounced audit early in the year (typically between January and April), to inform them that they have been chosen that year and to discuss the timing of the crops/activities that are relevant to the certification and that need to be seen during that year's audit.
- For Option B Group Certification: CBs will continue to select 25% of the group members each year to undergo an unannounced audit, in accordance with the group certification requirements set out in Appendix III.1 of the *CanadaGAP Program Management Manual*.

Changes on the way – for certification options B, C, and D

Starting October 1, 2021, CanadaGAP is introducing two new unannounced audit (UA) options for program participants enrolled in certification options B, C, and D:

1. All CanadaGAP Certification Bodies must make available the first option (UA Option 1)
2. At the discretion of the CB, they may also make available the second option (UA Option 2).

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The two options are explained in more detail in the table below, alongside a comparison with the CanadaGAP unannounced audit program that is currently in effect for all certified companies.

	New Unannounced Audit Option 1	New Unannounced Audit Option 2	FOR COMPARISON: Current Unannounced Audit Program
Implementation date	<ul style="list-style-type: none"> Effective October 1, 2021: all CanadaGAP Certification Bodies must make this new unannounced audit program available to program participants enrolled in certification options B, C, and D. 	<ul style="list-style-type: none"> Effective October 1, 2021: some CBs may also offer this new unannounced audit program to clients enrolled in certification options B, C, and D <p>**Check with your Certification Body to confirm whether this new unannounced audit option 2 is available**</p>	<ul style="list-style-type: none"> Until September 30, 2021: Applies to all CanadaGAP-certified companies Effective October 1, 2021: Available only to operations enrolled in CanadaGAP certification options A1 and A2 (four-year audit cycle)
Prior contact with CB	<ul style="list-style-type: none"> Early in the year, the CB contacts clients chosen for an unannounced audit to: <ul style="list-style-type: none"> inform them that they have been selected for an unannounced audit that year gather information about the timing of crops/activities that need to be seen during the unannounced audit discuss any health and safety policies that the auditor needs to be aware of prior to visiting the operation. 	<ul style="list-style-type: none"> Early in the year, the CB contacts clients chosen for an unannounced audit to: <ul style="list-style-type: none"> inform them that they have been selected for an unannounced audit discuss the timing of all crops/activities relevant to the operation's certification, including the crops/ activities that need to be observed that year obtain information about any health and safety policies that the auditor needs to be aware of prior to visiting the operation. 	<ul style="list-style-type: none"> Early in the year, the CB contacts clients chosen for an unannounced audit to: <ul style="list-style-type: none"> inform them that they have been selected gather information about the timing of crops/activities that need to be seen during the unannounced audit discuss any health and safety policies relevant to the auditor.
Number of audits	<ul style="list-style-type: none"> The unannounced audit replaces that year's regularly scheduled audit. The program participant receives no prior notice of the unannounced audit date, other than knowing that the audit will happen during the 	<p>The program participant will have two audits that year:</p> <ol style="list-style-type: none"> One announced audit, scheduled as usual during the timeframe when the auditor can be sure to observe the crops/ activities that need to be seen that year. One unannounced audit during a general timeframe 	<ul style="list-style-type: none"> The unannounced audit replaces that year's regularly scheduled audit. The program participant receives 2-5 business days' advance notice of the unannounced audit date.

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	timeframe when relevant crops/activities are underway.	("audit window") determined by the CB, and confirmed with the program participant.	
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Timing of unannounced audit	<ul style="list-style-type: none"> The unannounced audit must be timed such that the auditor can observe the crops/activities that need to be seen that year. It is the responsibility of the program participant to keep the CB informed as the season progresses if the timing changes for the crops/activities that need to be seen during the unannounced audit. Failure to keep the CB updated on timing of crops/activities that need to be observed, can lead to loss of certification if the auditor arrives for the unannounced audit and the activities that need to be audited are done for the year. 	<p>For the timing of the unannounced audit:</p> <ul style="list-style-type: none"> The CB will set and inform the client of the unannounced audit "window", typically a 30-day timeframe during which the unannounced audit will occur. In extenuating circumstances, the CB can set a shorter or longer audit window. It is possible that the unannounced audit "window" will be outside of the operation's peak season of activity. The window is determined by the CB, depending on the availability of auditors, the crops/activities within the scope of certification, and other relevant factors. The client may indicate 1 blackout date for every 6 days within the audit window. Blackout dates are in addition to days when the operation would normally be closed (e.g., public holidays). The client must inform the CB of the blackout dates at least 8 weeks in advance. 	<ul style="list-style-type: none"> The unannounced audit must be timed such that the auditor can observe the crops/ activities that need to be seen that year.
Advance notice from the auditor	<ul style="list-style-type: none"> The program participant receives no advance notice of the unannounced audit date. The client knows only the general timeframe for the unannounced audit, based on contact 	<ul style="list-style-type: none"> The program participant receives no advance notice of the unannounced audit date. The client knows only the general timeframe for the unannounced audit (e.g., sometime during the audit window) since that has been determined by the 	<ul style="list-style-type: none"> The client receives 2-5 business days' advance notice of the day that the auditor will arrive for the unannounced audit. This ensures that the crops/ activities that need to be seen during the audit are underway at the

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	with the CB earlier in the year.	CB with the client's consent, including the blackout dates agreed with the CB.	operation when the auditor plans to visit.
Consequence of not complying	<ul style="list-style-type: none"> The auditor will show up at the operation completely unannounced. The client has no opportunity to refuse the unannounced audit, since they receive no prior notice from the auditor. If the auditor arrives for the unannounced audit on a day when there is no activity occurring at the operation, the auditor will attempt to reschedule the audit. Note, there is no guarantee that an auditor will be available to reattempt the audit. If a second attempt at the unannounced audit is possible, it too will occur without any prior notice. If the second attempt at an unannounced cannot proceed due to reasons that are not deemed valid by the CB (e.g., the client's season has ended and the client did not inform the CB), the client faces loss of certification until the following year/season when an unannounced audit can occur. 	<ul style="list-style-type: none"> The client cannot refuse the unannounced audit, since the CB and the client have previously arranged the timing (e.g., during the audit "window", excluding any blackout dates). The client must be ready to proceed with the audit the day the auditor arrives. Failure to cooperate with the unannounced audit will result in suspension or withdrawal of certification, since the audit window was known to the client and agreed in advance. Independent certification decisions will be made for both the announced and unannounced audits. Assuming the program participant already holds a valid certificate, the unannounced audit findings can result in a decision by the CB to maintain, suspend, or withdraw certification. 	<ul style="list-style-type: none"> The client has one opportunity to refuse the unannounced audit, for valid reasons as determined solely by the CB. The second notification (2-5 business days in advance of the auditor's arrival) cannot be refused. Failure to cooperate with the second notification of the unannounced audit will result in loss of certification.
Cost implications	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> The program participant pays for two audits that year, both the announced and unannounced audits. Paying for an extra audit allows the program participant to plan for their regular audit during peak season, and to have 	<ul style="list-style-type: none"> The program participant pays for one (unannounced) audit that year, since the unannounced audit replaces a regularly scheduled audit.

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	<p>perform the unannounced audit, audit fees will be charged for both visits.</p>	<p>advance notice of the audit “window” for the unannounced visit.</p> <ul style="list-style-type: none"> • Since the CB must select a different 10% of program participants each year, the cost of an additional audit applies only in the year when the client is chosen for an unannounced audit. 	
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For further information please consult:

- your Certification Body
- the CanadaGAP office at 613-829-4711 or info@canadagap.ca
- FAQ(s) about unannounced audits on the CanadaGAP website at: <https://www.canadagap.ca/program/faq/audit-process/>
- Version 9.1 of the *CanadaGAP Program Management Manual* (2021) at www.canadagap.ca.

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CanadaGAP Program ■ 245 Menten Place, Suite 312, Ottawa, Ontario, Canada K2H 9E8

Tel: 613-829-4711 ■ Fax: 613-829-9379 ■ info@canadagap.ca ■ www.canadagap.ca

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