



**Revisions to CanadaGAP Unannounced Audit Program
for Certification Options B, C, and D (GFSI-recognized)**

Effective October 1, 2021

Background

As of October 1, 2021, to maintain compliance with GFSI Benchmarking Requirements, CanadaGAP will no longer allow Certification Bodies (CBs) to provide 2-5 business days' notice of the auditor's arrival to program participants who have been selected for an unannounced audit.

This new requirement applies only to program participants enrolled in the GFSI-recognized certification options: B, C, and D. For program participants enrolled in Options A1, A2, E and F (which are not GFSI-recognized), the CanadaGAP Unannounced Audit Program continues as it is currently designed, with 2-5 days' prior notice of the auditor's arrival. This is to ensure that the appropriate people and activities will be available for the audit.

What Remains the Same

For Options B, C, and D, CanadaGAP remains committed to its requirement for at least one audit to occur annually during the period when crops/activities relevant to the operation's certification are underway.

For Options C and D:

- Certification Bodies are required to select at least 10% of their clients each year for an unannounced audit. A different 10% of clients must be chosen each year to ensure all certified operations receive an unannounced audit over time.
- All clients will continue to be informed at the time they are first selected (i.e., early in the year, typically between January and April depending on each CB's procedure) that they have been chosen for an unannounced audit. At this early stage of general notification, CBs are permitted to obtain information from the client to assist with audit scoping (e.g., details of the timing of crops and activities relevant to the certification and needing to be seen during the 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*

For Options A1, A2, E and F: Unannounced audit rules for program participants enrolled in CanadaGAP certification options A1 and A2 remain unchanged (i.e., prior notice of 2-5 business days, allowance for one refusal based on CB accepting justification, etc.). Unannounced audit rules for program participants enrolled in the new CanadaGAP options E and F are the same as those for A1 and A2.

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

To meet new GFSI requirements, starting October 1, 2021 Certification Bodies must offer program participants enrolled in Options B, C or D, and selected for an unannounced audit, UA Option 1 below.

At the discretion of each CB, CBs may offer **two** options for unannounced audits: UA Option 1 and UA Option 2, both described below. Clients of CBs offering both options can choose their preferred approach when they are selected for an unannounced audit.

- UA Option 1: Unannounced audit that year, to **replace** the client's regularly scheduled audit.
- UA Option 2: **Two audits that year**, one announced and one unannounced.

1. **UA Option 1: Unannounced audit that year, to replace the client's regularly scheduled audit**

- 1.1 Program participants who opt for their unannounced audit to replace their regularly scheduled audit must accept that the CB will provide **NO** advance notice of the exact day or time of the auditor's arrival.
- 1.2 Early in the year, when the CB first selects which clients 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 client in advance:
 - a. The CB and client will discuss any health and safety policies (e.g., COVID-related protocols) 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.
 - b. The CB and client will discuss 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. Even though the audit will be completely unannounced, the CB is required to audit on a day when relevant crops/activities are underway within the operation. In that sense, the client is aware of the general timeframe in which the unannounced audit will occur, but not the exact day or time.
 - c. 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 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., a two-week cherry harvest), whereas as many as five blackout dates could be acceptable with regards to activities that occur over a longer period.

- 1.3 If, despite the planning described above in 1.2 b), 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 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. Where possible, the CB will schedule a return visit (also unannounced) by the auditor. The client must accept the possibility that a limited number of 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 client's season. A return visit is subject to the same rules as the original unannounced audit.
 - 1.4 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.
- 2. UA Option 2: Two audits that year – one announced and one unannounced.**
- 2.1 If the CB elects to offers UA Option 2 in addition to UA Option 1, and the program participant selects UA Option 2, then the operation will undergo **two audits** on that year's crop:
 - i. One of the audits will be a regularly scheduled, announced audit during the period relevant to the crops/activities that need to be observed.
 - ii. 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 timing of the unannounced audit will be within a pre-arranged window, either earlier or later than the announced audit, as decided by the CB. 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. For example, the unannounced audit could occur during the production period before harvest, or after the height of the season is over. The general timeframe will depend on the crops/activities covered by the certification and will be determined by the CB in consultation with the client.
 - 2.2 The following points also apply to unannounced audits under UA Option 2:
 - a. Early in the year, when the CB first selects which clients they will see unannounced, the CB will inform each client that they have been selected. 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. The CB and client will also discuss any health and safety policies (e.g., COVID-related protocols) 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.

- b. The CB will determine the "audit window" (i.e., the timeframe during which the unannounced audit will occur) 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.
- c. The client may indicate 1 blackout date for every 6 days within the audit window (e.g., a 30-day audit window would allow the client 5 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 8 weeks in advance.
- d. 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.
- e. Both audits must pertain to the same year's/season's crop(s), but will not necessarily happen during a single calendar year, depending on which activities need to be seen. For example, to certify production of the 2021 potato crop:
 - The announced audit could occur in the Fall during harvest of the 2021 crop; the unannounced audit then could occur the following winter (2022) during the storage/shipping period for the 2021 crop, OR
 - The announced audit could happen in the winter (2022) during loading out of the 2021 crop, if that activity needs to be seen. The unannounced audit could have been held the previous summer (2021) prior to harvest, or could occur the following spring (2022) if potatoes from the 2021 crop are still in storage.
- f. 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 client's results on Q.A4 of the audit checklist, or because the client 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.
- g. 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.
- h. 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.
 - i. Program participants who choose Option 2 for their unannounced audit are required to pay for both audits, unless otherwise informed by the CB. CBs are free to and may choose to establish a pooled contribution mechanism, whereby clients may be charged slightly higher fees across the board, with a view to setting aside a portion of those fees to offset the cost of the unannounced audit for the 10% of clients selected each year. Program participants are advised to check with their CB as to whether a pooling mechanism is in place to cover the cost of unannounced audits.
 - j. For CanadaGAP certification options C and D: Certification Bodies **must** choose a different 10% of their clients each year to be audited unannounced. This helps to keep costs more manageable and predictable for individual operations, and over time ensures that CBs perform unannounced audits on all of their clients.
 - k. New program participants may be selected for an unannounced audit, at the discretion of the CB.
 - l. CBs must select the following percentages of clients for unannounced audits:
 - 10% from a combination of operations enrolled in CanadaGAP certification options C and D
 - 10% from a combination of operations enrolled in CanadaGAP certification options A1 and A2
 - 25% of group members from an Option B certified group.
 - m. Certification Bodies must issue two separate audit reports, one for each audit, with the unannounced audit clearly marked as such. Unannounced audits are intended to be full audits, not simply a review of records and documentation. That being said, scoring must always reflect that 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.
 - n. 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.

- o. 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.

- p. A certification decision will be made by the CB as the 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.

- q. 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.