



Guidance for Certification Bodies

Scoping for Multi-commodity and Multi-activity Operations

This document 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.

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 enrolls 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.
 5. a) Over time, multi-commodity and multi-activity operations must be audited on a schedule such that all crops/activities are seen on an alternating or 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
Water use (e.g., for washing product)
Other water uses (e.g., hydro-cooling)
Harvesting by hand
Aquaponic production
Hydroponic production (e.g., lettuce)
Cooling cherries

Crops considered higher risk
Leafy greens
Microgreens
Herbs
Cantaloupes
Berries
Tomatoes
Apples

6. For multi-option operations (e.g., operations enrolled in option C and D), the audit must include observation of all options' activities in order for all options to be included on the certificate.
7. In addition to #2 above, if an operation is being certified for Option D as well as other certification options (e.g., Option C, A1, or A2), the audit must include observation of Option D activities **every year** in order to be maintained on the certificate. For the operation's crop/activity combinations certified under option C, the CB may not be observing all crops/activities every year, but may be alternating from one year to the next.
8. If an operation is being certified Option C 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.
9. 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 since the time between audits is already four years.
10. 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.
11. 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.
12. 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.
13. Multiple Visits to complete audits of complex operations:
 - a) When scoping audits for complex operations, it may be necessary to break the audit into two (or more) separate visits, 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 see everything in a single visit.
 - 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.

14. Issuing the audit report to complex operations who have multiple visits during the same season:

- 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 visits
 - how much time has elapsed between visits
 - whether the same version of the audit checklist is in effect
 - how much of the operation was seen in the first visit, how much remains to be seen in the second visit
 - how diverse or complex the operation is.
- b) Certification body personnel should bear in mind the possibility that audit results from a previous visit may be diluted by findings from a subsequent visit. When continuing with the same checklist, findings on a subsequent visit could reduce scoring for all-or-nothing questions.
- c) The Executive Summary should make clear that the audit was made up of multiple visits to the operation, regardless of whether one or more than one audit report is issued.

15. 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 might be 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.

16. 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*

17. 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, 2018 and the certification need is immediate.

Spring 2018: Packing of apples and wholesaling observed.

Certificate: Packing of **Apples** and **Wholesaling of Fresh Fruits and Vegetables**

Summer 2019: 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 2020: 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 2021: 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.

8 products	lettuce	celery	cauliflower	broccoli (with icing)	cucumber	musk melon	peppers	watermelon
2015	x							
2016		x	x		x			
2017					x	x	x	
2018	x			x				x
2019		x	x			x		
2020	x				x		x	

Field packed

Packed in the packinghouse

The operation's certificates would be as follows:

2015: Production and Packing of **Lettuce**

2016: Production and Packing of Lettuce, **Celery, Cauliflower, and Cucumber**

2017: Production and Packing of Lettuce, Celery, Cauliflower, Cucumber, **Peppers, and Musk Melon**

2018: Production and Packing of Lettuce, Celery, Cauliflower, Cucumber, Peppers, Musk Melon, **Watermelon and Broccoli**

2019: Production and Packing of Lettuce, Celery, Cauliflower, Cucumber, Peppers, Musk Melon, Watermelon and Broccoli

2020: 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 multi-site, and 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.