CANADAGAP\textsuperscript{1} PROGRAM MANAGEMENT MANUAL

COMPONENT 3: Conformity Assessment System\textsuperscript{2}

UNCONTROLLED COPY

Version 7.2

\textsuperscript{1} CanadaGAP is an operating name of CanAgPlus, a Canadian not-for-profit (Corporation Number 822397-1)

\textsuperscript{2} In Component 3, unless otherwise indicated, references are to the GLOBALG.A.P. General Regulations Version 5_July2015.
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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 17065:2012 from an accreditation body that is a member of the International Accreditation Forum (IAF), and for meeting all additional requirements that may be required by an external benchmarking program (e.g., Global Food Safety Initiative benchmarking requirements). Under certain circumstances, the Certification Body may have an application for extension of their scope pending with an Accreditation Body. It must, however, have a current accreditation to ISO/IEC 17065:2012. Written notification of such a circumstance from the Certification Body must be provided to and acknowledged by CanadaGAP;

• Ensuring that accreditation specific to the Program is obtained within one year from the date of application to an Accreditation Body. Failure to obtain accreditation within this period will result in termination of the licensing agreement;

• Making publicly available the limits and scope of the accreditation, including pertinent information about suspension or withdrawal of accreditation for ISO/IEC 17065:2012 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;

• 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 Stakeholder 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;

• 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. This designated member of staff 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 basis 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. As a minimum, the quality manual shall contain:

I. A quality policy statement,

II. A description of the legal status of the organisation, including ownership and an organisational structure including named individuals, their job titles and the description of their responsibilities. The organisational structure shall include a chart listing each job title and how these functions interrelate through a management structure,

III. A list of named individuals employed by the organisation, which includes their qualifications and full details of their experience,

IV. A description of the management of the certification process including its committee structure, terms of reference and procedures.

V. Details of management review policy and procedures,

VI. Procedures in relation to documentation control,

VII. Details of operational and functional responsibilities pertaining to quality and defining individual limits of responsibility and accountability,

VIII. Recruitment procedures; i.e. selection, initial training, ongoing training and performance assessment for all relevant Certification Body personnel,

IX. A list of all subcontractors and a detailed procedure for their appointment, assessment and their ongoing management,

X. Procedures for actions in response to non conformities and the effectiveness of agreed corrective and preventative actions taken,

XI. Procedures in relation to the use of the certificate and, in the event of a requirement to withdraw or suspend certification, the actions taken by the Certification Body,

XII. Policies and procedures relating to appeals, complaints and disputes,

XIII. Procedures for conducting internal audits and for corrective actions arising from internal audits.

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;
• 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) in compliance with ISO/IEC 17065:2012, and meet all additional requirements that may be required by an external benchmarking program (e.g., Global Food Safety Initiative benchmarking requirements). The Accreditation Body must be signatory to the Multilateral Recognition Arrangement (MLA).

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 to obtain an extension of its accreditation scope to include the Program; and,

vi) Have successfully obtained within 12 months the extension of its accreditation scope to include the Program or its accreditation with the Program included in its scope. Accreditation must be received within one year of application to the accreditation body; failure to comply will result in termination of the licensing agreement between the certification body and CanadaGAP.

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 19011:2002 and ISO/TS 22003:2007;
ii. be approved by CanadaGAP for all 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:

- 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;
- Work experience in fresh fruit and vegetable farming and handling;
- Including the of produce-related work experience, 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;
- 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.

ii. Before completing any CanadaGAP audits, all Program Auditors must have successfully completed:
a. 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 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.

b. 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/TS 22003). 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).

c. All prerequisites of the Auditor Training program, including completion of the pre-course assignment;

d. The Auditor Training course, with a passing grade of 80%;

e. 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;

f. 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; and

g. 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.

h. **Extension of scope:** 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, conduct supervised audits and must be assessed and signed off as competent by the Certification Body to conduct audits in the new sector. See also Section 3.3.1.2 B (v) below regarding Repacking and Wholesaling auditors.

i. 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.

j. i) 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:
   - 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
   - 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.*

iii. **Group Management System Auditors** (CanadaGAP Certification Options B and A3) 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. *ref: Annex III.2, Section 2 a*

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. *ref: Annex III.2, Section 3.1 a*

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. *ref: Annex III.2, Section 3.1 b*

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. *ref: Annex III.2, Section 3.1 c*

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. *ref: Annex III.2, Section 3.4 (b) and c*

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., WordPerfect, MS Word, MS Excel).

v. **Repacking and Wholesaling auditors:** CanadaGAP auditors completing 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 ii) f. The witness auditor must have previously completed five (5) Repacking or Wholesaling audits on their own to qualify as a witness auditor.

vi. **Equivalent Qualifications:** 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 ii).

C. Audit Experience and Auditing Skills Assessment

Certification bodies must assess auditor performance in a combination of 10 audit days and 5 audits in accordance with the Certification Body’s written programme and as a pre-requisite to meeting applicable requirements of the Program.

Other than for Option D 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.

iii. GFSI Auditor Competencies

a) To enhance the competency of all auditors auditing for GFSI-recognized certification programs, the Global Food Safety Initiative (GFSI) Auditor Competency Program was established to develop a common set of auditor competencies and a set of tools to evaluate those competencies. The GFSI tools include:
  i. GFSI Knowledge Exam (for primary production)
  ii. GFSI Knowledge Exam (for post-farmgate)

b) The exams are designed to test and evaluate the core auditor competencies as identified by GFSI. As a GFSI-recognized program, CanadaGAP requires all active auditors to successfully complete the GFSI Knowledge Exam for primary production.
c) Evaluation against the GFSI competencies is required of all auditors who audit for GFSI-recognized certification programs. GFSI auditor competency credentials gained in conjunction with an auditor’s work for one GFSI-recognized program are transferable to another GFSI-recognized program. Auditors who have already completed the GFSI exam for primary production with another program or certification body must provide evidence of their credentials to their CanadaGAP-licensed certification body, who must share copies with CanadaGAP. Auditors and certification bodies are advised to confirm that the credentials correspond to the applicable scope (i.e., primary production) for CanadaGAP.

d) **GFSI Knowledge Exam:** All CanadaGAP auditors must successfully complete the **GFSI Knowledge Exam for primary production**.

i. Active auditors must successfully complete the exam within the implementation timeframe prescribed by GFSI. Auditors newly qualifying for CanadaGAP in 2019 must successfully complete the GFSI exam by July 1, 2019. Existing CanadaGAP auditors who were approved and active before January 1, 2019 have until December 1, 2021 to successfully complete the GFSI exam.

ii. Candidates who are not currently approved auditors for CanadaGAP must successfully complete the exam before they submit their credentials to the certification body for qualification, and before the certification body submits the auditor’s credentials to CanadaGAP for approval.

iii. Exam delivery will occur through the available mechanisms approved by GFSI. Detailed procedures for CanadaGAP delivery of the GFSI exam are contained in TP-07-GFSI. Contact CanadaGAP for more information.

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; and,
- Complete specific continuing education requirements, as determined through assessments and monitoring by the certification body(ies).

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 must maintain written records of all relevant training undertaken.

ii. **Auditing**

Auditors must complete at least five (5) on-site audits at five (5) different organizations (clients) per year against the Food Safety Program to maintain category and scheme knowledge.
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;
     - Review of auditor’s scoring/audit results;
     - Annually, participation in group exercises/calibration/refresher training session(s) organized by the CB;
     - Participation in, at a minimum, one additional witness audit within a 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.

b. **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.

   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 17065:2012 and ISO/IEC17021:2011 related to personnel.

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
   II. Organization affiliation and position held
   III. Educational qualification and professional status
   IV. Experience and training in the relevant fields of competence in relation to CanadaGAP requirements
   V. Details of performance appraisal.

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.

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

3.3.1.3.1 Persons involved in Certification Decisions

To be eligible to participate in certification decisions, a person must meet the requirements set out in Section 3.3.1.2, Program Auditor Requirements with the exception of those in subsections C and E (ii). As per ISO/IEC 17065:2012, the person making the certification decision cannot be involved in any way with evaluation activities (e.g., technical review of reports regardless of whether or not the report is adjusted, etc.).

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

a) To be eligible to perform shadow audits, witness audits or technical review of CanadaGAP audit reports, a person must:
   i. meet all of the requirements set out in Section 3.3.1.2, Program Auditor Requirements;
   ii. have successfully completed auditor training in the relevant scope(s) (e.g., passed the repacking and wholesaling exam if performing shadow or witness audits or reviewing audit reports for repacking or wholesaling operations);
   iii. have completed a minimum of 25 CanadaGAP audits with a broad range of exposure to different 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 17065:2012 requirements;
v. have previously completed five (5) CanadaGAP Repacking or Wholesaling audits on their own, in order to qualify as witness auditors for Repacking and Wholesaling audits;

vi. be qualified as auditors in the applicable scope in order to review audit reports specific to that scope (e.g., Repacking and Wholesaling, Group Management System audits, etc.). Exceptions may be granted by CanadaGAP upon request, provided the CB supplies a rationale that is acceptable to CanadaGAP.

b) In addition, CanadaGAP must be informed (e.g., provided with a list) of which certification body personnel are performing shadow audits, witness audits or technical review of audit reports. CanadaGAP retains the right to raise objections based on concerns with any known limitations to an individual’s experience, knowledge or qualifications.

c) 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.

3.3.1.4 Program Requirements for Persons involved in carrying out contract review and audit scoping

3.3.1.4.1 Contract Review

To be eligible to carry out contract review for the Program, a person must meet the requirements of Section 7.2.2 of ISO/TS 22003:2007 as set out below and have:

a) An understanding of the Program, and

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.

Excerpt below from ISO/TS 22003:2007

7.2.2 Personnel carrying out contract review

7.2.2.1 Education
The certification body shall ensure that personnel carrying out contract review have the knowledge corresponding to a secondary education.
7.2.2.2 Food safety training
The certification body shall ensure that personnel carrying out contract review have successfully completed training in:

a) hazard analysis and critical control point (HACCP) principles, hazard assessment and hazard analysis,
b) food safety management principles including prerequisite programmes (PRPs), and
c) relevant FSMS standards (e.g. ISO 22000).

7.2.2.3 Audit training
The certification body shall ensure that personnel carrying out contract review have 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.

7.2.2.4 Competences
The certification body shall ensure that personnel carrying out contract review demonstrate the ability to apply knowledge and skills in the following areas:

a) classification of applicants in food chain categories and sectors;
b) assessment of applicant products, processes and practices;
c) deployment of FSMS auditor competences and requirements;
d) determination of audit time (see to Annex B) and duration requirements;
e) certification body's policies and procedures related to contract review.

3.3.1.4.2 Scoping of Program Audits
To be eligible to scope Program audits, a person must meet the requirements of Section 3.3.1.3.2 Persons involved in Shadow Audits, Witness Audits or Technical Review of Audit Reports.

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.

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

CB files application with CanAgPlus (Executive Director) to enter into licensing agreement

Executive Director reviews application

CanAgPlus & CB enter into conditional licensing agreement/contract

CB applies to Accreditation Body to extend scope to include Program

CB conducts Program audit(s) & AB conducts witness audit(s)

AB extends CB’s scope to include Program & CB informs CanadaGAP

CanadaGAP receives written confirmation from CB that all licensing conditions have been met

CanadaGAP prepares a waiver of condition for signature by the CB
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 17065:2012 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) which has been subject to a peer evaluation with respect to ISO/IEC 17021:2011 or to ISO/IEC 17065:2012 with a positive recommendation in its report.

g. 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. No extensions will be possible.

h. The accreditation body will witness a minimum of one (1) Program audit each by minimum two (2) auditors engaged by the certification body as part of its process for either extending or granting accreditation.

i. The certification body will submit evidence to the Executive Director demonstrating that it has been accredited under ISO/IEC 17065:2012 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 after corrective actions, and copy of corrective actions reports
   vi. Copy of certificates.

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 audits. This restriction does not apply to the participation of an auditor in shadow or witness audits, 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 17065:2012 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 spot checks on audit reports, 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.

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 17065:2012 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.
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).
   - Option A2 – Four year audit cycle (variable).
   - Option A3 – Group Certification with three-year certification period and four-year internal audit cycle.
   - Option B – Group Certification (GFSI recognized).
   - Option C – Annual On-site Audit (GFSI recognized).
   - Option D – Annual On-site Audit of Repacking, Brokerage or Wholesaling operations (GFSI recognized for Repacking and Wholesaling).

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 co-mingled with other product.
   (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 (wholesale) 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:

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Activity</th>
<th>Product(s)</th>
<th>Choose this option:</th>
<th>Certificate Scope</th>
<th>CanadaGAP Annual Program Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Storing imported product</td>
<td>Market Product: bananas, citrus, pineapple</td>
<td>Option D</td>
<td>Option D – Wholesaling of Fresh Fruits and Vegetables</td>
<td>$788</td>
</tr>
</tbody>
</table>
| 2        | Storing imported and domestic product | Market Product (imported): bananas  
Market Product (domestic): apples | Option D | Option D – Wholesaling of Fresh Fruits and Vegetables | $788 |
| 3        | Storing imported and domestic product | Market Product (imported): bananas  
Harvested Product (domestic): apples | Option D for the bananas  
Option C for the apples | One certificate:  
- Option D – Wholesaling of Fresh Fruits and Vegetables  
- Option C – Storage of Apples | $788 |
<table>
<thead>
<tr>
<th></th>
<th>Storing imported and domestic product</th>
<th>Harvested Product (imported): apples</th>
<th>Harvested Product (domestic): apples</th>
<th>Option C</th>
<th>Option C – Storage of Apples</th>
<th>$263</th>
</tr>
</thead>
</table>

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).
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, 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 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. However, "microgreens" are covered within the Leafy Greens category.

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 or D

a. For Options A1, A2, C and D only: 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 multiple 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. Additional guidance from CanadaGAP is also available to CBs to assist 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 Option D, no sampling is permitted; all sites must be audited annually.

Relative to Options A1, A2 and C: 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. In all cases, the sample size shall not be less than the square root of the number of sites; that is a minimum rather than the default sample size. In addition, at least 25% of the sites chosen for sampling must be randomly selected. 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. The table below provides guidance to certification bodies on evaluating risk:

<table>
<thead>
<tr>
<th>High-risk Activities/Crops:</th>
<th>Frequency of Audits at each site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Packing</td>
<td>Annually</td>
</tr>
<tr>
<td>Using water on product (vs. dry handling of product) – excludes agricultural water</td>
<td>Annually</td>
</tr>
<tr>
<td>Production/handling of commodities generally recognized as higher risk, such as tomatoes, leafy greens, berries, herbs, or others identified in customer requirements, etc. (vs. potatoes for example)</td>
<td>Annually, generally speaking (some crop types and production practices may present a lower risk profile)</td>
</tr>
<tr>
<td>Other activities with potentially higher risk of contamination (e.g., trimming lettuce, hand harvesting cherries, hand cutting asparagus at harvest)</td>
<td>Annually, generally speaking</td>
</tr>
</tbody>
</table>

c. 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.
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 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 or C shall pay one annual CHC Charge of $50. Option D is excluded from paying the CHC 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 and D 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 are indicated below:

<table>
<thead>
<tr>
<th>GFSI CLAUSE NUMBER</th>
<th>GFSI CLAUSE NAME</th>
<th>GFSI REQUIREMENT (Version 7.2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>MSS 1.3</td>
<td>General requirements</td>
<td>The Applicant shall request multi-site sampling in their application for certification to the Certification Body. The central function, not the individual sites, shall be contracted to the Certification Body.</td>
</tr>
<tr>
<td>MSS 1.4</td>
<td>General requirements</td>
<td>The central function shall be included in the scope of the certification.</td>
</tr>
<tr>
<td>MSS 1.5</td>
<td>General requirements</td>
<td>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.)</td>
</tr>
<tr>
<td>MSS 1.6</td>
<td>General requirements</td>
<td>All sites must be operated under the same Food Safety Management System and under the control of the central function.</td>
</tr>
<tr>
<td>MSS 1.7</td>
<td>General requirements</td>
<td>There shall be a legal or contractual link between the sites and the central function.</td>
</tr>
<tr>
<td>MSS 2.1</td>
<td>Central function</td>
<td>There shall be a clearly defined central function to ensure management commitment to the system / integrity and clearly describe the roles and responsibilities of management, internal auditors and other members of the organisation.</td>
</tr>
<tr>
<td>MSS 2.2</td>
<td>Central function</td>
<td>The central function shall have an effective customer complaint procedure.</td>
</tr>
<tr>
<td>MSS 2.3</td>
<td>Central function</td>
<td>The central function shall have authoritative control of the Food Safety Management System of all sites within the certification and shall issue, maintain and retain all relevant documents relating to the sites within the programme.</td>
</tr>
<tr>
<td>MSS 2.4</td>
<td>Central function</td>
<td>The central function shall have in place sufficient management and technical capacity to implement and maintain the internal audit programme.</td>
</tr>
<tr>
<td>MSS 2.5</td>
<td>Central function</td>
<td>The central function shall manage and maintain relations with the sites for the activities related to the scope of certification.</td>
</tr>
<tr>
<td>MSS 2.6</td>
<td>Central function</td>
<td>The central function shall be subject to management review in accordance with Certification Programme requirements and shall be itself subject to internal audit.</td>
</tr>
<tr>
<td>MSS 3.1</td>
<td>Internal audit</td>
<td>An internal audit programme shall be in place and undertaken by the central function. This programme shall ensure an annual audit of all sites, the central function and the management system.</td>
</tr>
<tr>
<td>MSS 3.2</td>
<td>Internal audit</td>
<td>The internal audit programme shall have documented procedures and be both practical and feasible in operative terms.</td>
</tr>
<tr>
<td>MSS 3.3</td>
<td>Internal audit</td>
<td>Clear requirements for internal auditors and technical reviewers shall be defined and documented. Internal auditors shall be suitably trained and qualified to carry out internal audit. Their qualifications shall be assessed annually by the Certification Body.</td>
</tr>
<tr>
<td>MSS 3.4</td>
<td>Internal audit</td>
<td>Internal auditors shall be regularly evaluated, calibrated and monitored.</td>
</tr>
<tr>
<td>MSS 3.5</td>
<td>Internal audit</td>
<td>Certification Programme Owners may require the organisation’s internal auditors to successfully complete the Certification Programme Owner’s specific auditor training.</td>
</tr>
<tr>
<td>MSS 3.6</td>
<td>Internal audit</td>
<td>Internal auditors shall be assigned to sites to ensure impartiality.</td>
</tr>
<tr>
<td>MSS 4.1</td>
<td>Site audit sampling</td>
<td>Certification Programme Owners shall have a system in place for the Certification Body to define a risk-based sampling programme.</td>
</tr>
<tr>
<td>MSS 4.2</td>
<td>Site audit sampling</td>
<td>High risk sites shall be included in the yearly audit plan.</td>
</tr>
<tr>
<td>MSS 4.3</td>
<td>Site audit sampling</td>
<td>Certification Programme Owners shall ensure that the Certification Body audit a sample of the sites every year.</td>
</tr>
<tr>
<td>MSS 4.4</td>
<td>Site audit sampling</td>
<td>The annual sampling size of the Certification Body audit sampling programme shall be the square root of the number of sites (rounded to the upper whole number) in accordance with principles defined in IAF MD1 current version.</td>
</tr>
<tr>
<td>MSS 4.5</td>
<td>Site audit sampling</td>
<td>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. In relation to the selected sites, these shall be identified based on the organisation’s internal audit programme findings and the individual site risk profiles.</td>
</tr>
<tr>
<td>MSS 5.1</td>
<td>Management of non-conformities and certification</td>
<td>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.</td>
</tr>
<tr>
<td>MSS 5.2</td>
<td>Management of non-conformities and certification</td>
<td>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.</td>
</tr>
<tr>
<td>MSS 5.3</td>
<td>Management of non-conformities and certification</td>
<td>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.</td>
</tr>
</tbody>
</table>

For information about Group Certification (Options A3 and 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 17065:2012 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, and Section 3.3.1.4, Program Requirements for Persons involved in carrying out contract review and audit scoping);

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
     - 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, A3, B, C or D)
     - 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 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 (i.e., one year for all options except A3, which is a three-year certification);

g. A minimum surveillance activity of at least once each year for all options except A3, 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 numerous multiple commodities, 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 is 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 contact address and/or sites 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).

  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. The auditor is given 10 business days between conducting the audit and providing the audit report to the certification body. The technical review of the audit will be conducted within 10 business days after receiving the audit package from the auditor, and ten (10) business days allotted to administrative functions associated with making a decision on certification and transmitting the audit results to the client.

k. To be certified under Option A1, A2, C and D: the program participant must achieve a passing score on the audit checklist and have no autofailure items. To be certified under Option A3 and B: the group must comply 100% with all requirements on the Group Management System checklist, AND all sampled sites must achieve a passing score on the Audit Checklist and have no autofailure items. 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).

m. Unannounced Audits: Each certification body must perform unannounced audits on a minimum of 5% of its clients each year. See Audit Scheduling, Section 3.3.5.4.3 g) for further information about unannounced audits.

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

3.3.5.4.2 Audit Duration

a. The minimum duration of an audit will be one half-day per site, except for Repacking and Wholesaling audits which will take at least one day. A half-day audit is typical for a straightforward on-farm operation (i.e., production of fruits or vegetables). Other, more complex operations will take longer to audit (e.g., minimum one day), particularly if the program participant lacks experience with audits or is not well prepared, has multiple commodities and/or numerous on-site activities, etc. In scoping the audit, the certification body will determine the required audit duration depending on the relevant factors.

b. The minimum of 3.5 hours 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.). (ref: GLOBALG.A.P. Crops Rules v5_July2015 4.3 c)

c. Should the audit take less than 3.5 hours, 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 half-day billed to the program participant. (ref: GLOBALG.A.P. Crops Rules v5_July2015 4.3 d)

d. The audit report shall record the duration of the audit (e.g., start and end times). (ref: Part III, 6.2 a)

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. (ref: Part III, 6.2 b)

3.3.5.4.3 Audit Scheduling

a. Audits must be scheduled to occur when the production period is underway – i.e., during harvest, product handling, packing season, shipping, storage period, etc. depending on the scope of the company’s certification.

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: 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.

v. If audits are scheduled during harvest, storing and/or shipping, the CB must schedule subsequent audits during packing. Over a 3-4 year timeframe, audit
coverage of all processes included within the scope of the certification is required.

vi. **Repacking/Wholesaling/Brokerage**: Audits can occur at any time of year that the facility is in operation and product is being handled/brokered.

c. For 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.

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:

<table>
<thead>
<tr>
<th>Crop Grouping</th>
<th>Specific Commodities</th>
<th>Optimal Audit Timing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tree and Vine Fruit</td>
<td>Cherries, plums</td>
<td>June – July</td>
</tr>
<tr>
<td></td>
<td>Peaches</td>
<td>August</td>
</tr>
<tr>
<td></td>
<td>Pears and grapes</td>
<td>August – September</td>
</tr>
<tr>
<td></td>
<td>Apples</td>
<td>Harvest starts in Sept. with storage &amp; packing until June</td>
</tr>
<tr>
<td>Small Fruit</td>
<td>Strawberries, raspberries, blueberries, Saskatoon berries</td>
<td>June – August</td>
</tr>
<tr>
<td></td>
<td>Cranberries</td>
<td>October</td>
</tr>
<tr>
<td>Greenhouse</td>
<td>General</td>
<td>March – November</td>
</tr>
<tr>
<td></td>
<td>For those using grow lights</td>
<td>Year round</td>
</tr>
</tbody>
</table>
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<table>
<thead>
<tr>
<th>Leafy Vegetables and Cruciferae</th>
<th>Lettuce, spinach, leafy greens</th>
<th>May – October</th>
</tr>
</thead>
<tbody>
<tr>
<td>Endive</td>
<td>Fall through to spring</td>
<td></td>
</tr>
<tr>
<td>Cabbage</td>
<td>Harvest July – November, storage and packing continues until June</td>
<td></td>
</tr>
<tr>
<td>Broccoli and cauliflower</td>
<td>July-November</td>
<td></td>
</tr>
<tr>
<td>Combined Vegetables</td>
<td>Asparagus</td>
<td>May – early June</td>
</tr>
<tr>
<td>Bulb and root Vegetables</td>
<td>Harvest July to November with storage and packing continuing all winter</td>
<td></td>
</tr>
<tr>
<td>Radishes</td>
<td>May – October</td>
<td></td>
</tr>
<tr>
<td>Fruiting Vegetables</td>
<td>July – October</td>
<td></td>
</tr>
<tr>
<td>Sweet corn</td>
<td>Mid July – early September</td>
<td></td>
</tr>
<tr>
<td>Legumes</td>
<td>July – August</td>
<td></td>
</tr>
<tr>
<td>Potatoes</td>
<td>Harvest starts end of June with storage, packing and shipping until March</td>
<td></td>
</tr>
</tbody>
</table>

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


g. **Unannounced Audits:**

i) **Scope:** The unannounced audit programme described in this section applies to program participants in CanadaGAP certification Options A1, A2, C and D. Those enrolled in group certification also have an unannounced component to their option, although the details are different (see Appendices III.1 and III.2).

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 in production. 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 all 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 minimum of 5% of each CB’s 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 fifth year. Over time, all individually certified companies will have an unannounced audit.

The selection of the 5% each year 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.

The overall number of unannounced audits must represent 5% of the CB’s total number of clients. This 5% can be made up of any ratio of the applicable certification options; that is, the annual selection of clients to be audited unannounced need NOT consist of 5% of the CB’s pool of Option A1 clients, 5% of its Option A2 clients, 5% of its Option C clients, and 5% of its Option D clients.

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 (four-year audit cycle):
• 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 randomly selected for an audit. However, if chosen for an unannounced audit, they 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 won’t know 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.

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

a. In the case of multi-commodity, multi-production, multi-activity sites, 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 16 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 4 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 16 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 4 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 on-farm 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.

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 2 to 5 business days in advance. 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 17065:2012. Competent and qualified personnel must be used by the certification body to scope CanadaGAP audits (see Section 3.3.1.4.2, 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
   xiii. Auditee’s signature, where required.

3.3.5.5 Certification Period

3.3.5.5.1 Certificate Validity

a. Certificates are valid for 12 months (except for Option A3). For option A3, the certification period is three years.

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 except Option A3:

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 16 months between on-site audits for operations involved in multi-commodity production/packing/storage. 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 (2013, 2014, 2015, etc.).

iii. More than one audit activity in a given year is possible, and may in fact be required if 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 year 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. Except for Option A3, the Certification Body is responsible to ensure audit activity is occurring:

i. at least once in each calendar year, 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.

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. (ref: Part I, 6.7.1 d)

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. Option A3. Certificates are issued for a three-year period.

ii. 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 3.3.5.3 c).

iii. Multi-commodity audits may see certification decisions postponed 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. *(ref: Part I, 6.7.1.f i)*

d. The CB may not issue certificates that are valid for longer than 12 months, except:
   i. For Option A3 certification (valid for 3 years)
   ii. 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 year. Limited exceptions may be possible (e.g., in justified cases where an operation involved in multi-commodity production/packing/storage may receive an extension of up to four months in order to time a subsequent audit appropriately; multi-activity operations with a long storage and shipping season).

### 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), 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 4 months) only under the following conditions: *(ref: Part I, 6.7.2 a)*

   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 must revert to the original 12-month certification period (except Option A3: revert to three-year certification period). 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 *(ref: Part III, 6.1 and Part I, 6.3)*

a. The Certification Body shall make the certification decision within a maximum of 30 business days after the audit. If a program participant is not certified because the company has failed the audit, but the participant implements corrective actions, the Certification Body shall make the certification decision within a maximum of 30 business days after the closure of the Corrective Action Requests (CARs). *(ref: Part I, 6.3 a)* 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., ANSI, SCC). *(ref: Part I, 6.3 b)*

c. The person who makes the certification decision or at least one member of the certification committee of the CB shall comply with auditor qualifications as set out in Section 3.3.1.3, Program Requirements for Persons involved in Certification Decisions. *(ref: Part III, 6.1 a)*

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. *(ref: Part III, 6.1 b)*

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 and the Group Management System Checklist, as applicable). (ref: Part III, 6.1 d)

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 to the program participant by the CB 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 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 Program standard 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 à la norme SA 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)

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.

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. (ref: Part III, 6.3 a)

b. 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. (ref: Part III, 6.3 b)
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. (ref: Part III, 6.3 c)

3.3.5.6.2 For Individual Certification (Options A1, A2, C and D):

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 or does not achieve a passing score on the audit, or if the program participant requests or is required (e.g., by a customer) to have the opportunity 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 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 60 days from receipt of the audit report to close out Corrective Action Requests, or the end of the season, whichever is sooner. Those who have not implemented corrective actions by the deadline will not be certified/or will have certification withdrawn and will need another audit, or will lose the opportunity to increase their audit score. As determined by the Certification Body, provision can be made for a longer timeframe than 60 days to deal with exceptional circumstances (e.g., if needed for major capital investments).

e. 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 Group Certification (Options B and A3):

a. All non-conformances against a group in Option B or Option A3 shall be resolved before a certificate can be issued to the group. (ref: Part III, 6.3 d)

b. Conformance means: 100% compliance with the requirements of the Group Management System Checklist, AND all sampled sites must achieve a passing score 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. \(\textit{(ref: Part I, 6.4.1 \, c \, (ii)}\)

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 \textit{Appendices III.1 and III.2, Section 6, Certification Body Sanctions against the Group}.

\subsection*{3.3.5.7 Self-Declarations, Self-Assessments and Random Audits for Options A1 and A2}

\subsubsection*{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.

\subsubsection*{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. 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 clarification on an answer, it is appropriate to call or email the program participant to address any doubts or concerns.

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.

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; the decision rests with the Certification Body to close CARs.

i. The idea is not to issue CARs for minor items. Program participants have already been audited for their initial certification and found to be in conformance with the program. 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. The Self-Declaration and Self-Assessment constitutes a surveillance activity to remind program participants they need to keep doing those practices. It 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.

m. 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.

3.3.5.8 Certification Options

3.3.5.8.1 Individual Certification: Options A1, A2, C and D
(ref: Part I, 5.1)

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. (ref: Part I, 5.1 a)

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

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.

f. Options C and D program participants undergo an annual on-site audit by the Certification Body. Option D is the only CanadaGAP certification option available to repacking, brokerage or wholesaling operations.
g. 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. *(ref: Part I, 5.2 a)*

b. The applicant is responsible for ensuring that all group members under the certification scope comply with the certification requirements at all times. *(ref: Part I, 5.2 b)*

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. *(ref: Part I, 5.2 c)*

d. The audit and surveillance activities differ between Option B group certification and Option A3 group certification. Refer to the relevant section below for each option.

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 in accordance with the principles defined in 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.

iii) Option A3: Audit and Surveillance Activities
a. Option A3 is a Group Certification option that incorporates elements of the four-year audit cycle. The Group’s internal audit programme must cover all of its members over a four-year period. Members who are not internally audited in the current year must submit self-declarations and self-assessment checklists for review by the Group’s qualified internal auditor. While the Group conducts surveillance activities of its members annually, the Certification Body’s surveillance activity of the Group occurs every three years.

b. Every three years, the Group must undergo an external surveillance audit by the Certification Body that includes an audit of the Group Management System and on-site audits of a selected sample of central packing and storage sites and of internally audited producers (including producers with on-farm packing and storage sites).

c. An applicant for group certification may enroll under Option A3 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 completing and scoring the CanadaGAP Audit Checklist) has been conducted on each central packing and storage site within 12 months prior to certification;
vii. An internal audit (i.e., by the Group’s internal auditor completing and scoring the CanadaGAP Audit Checklist) has been conducted on a minimum of 25% of producers currently registered on the list of group members, including producers with on-farm packing and storage sites, within 12 months prior to certification; and
viii. Following certification, an internal audit shall be carried out annually on the Group Management System and on all central packing and storage facilities, and over the next three years on the remaining 75% of producers (including producers with packing and storage sites), resulting in 100% coverage (internal audits) of all group members over a four-year period.

For more detailed information about Option A3, refer to Appendix III.2.

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 to change certification options will be accepted only between December 1 and May 15 each year unless allowed by CanadaGAP on a case-by-case basis.

   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 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 or D) must submit a completed enrolment form.

   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. If certified companies keep the same certification scope (i.e., the crops and activities certified) and the same Certification Body, they can change to a different certification option and continue where they are in the audit cycle. E.g., an operation certified last year under Option C wants to switch this year to Option A2.
The company is staying with the same CB and has no change to the crops or activities certified. The company can start immediately in Year 2 of Option A2.

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
iii. transferring from Option B to Option A3. Transfers to Option A3 must always begin in Year 1 of the three-year certification cycle under Option A3.

Example 1: A certified operation wishes to switch from Option C to A2, but is changing the scope of its certification, and/or is transferring to a new Certification Body. The operation must begin in Year 1 of Option A2.

Example 2: A group enrolled in Option B is transferring CBs. The group must start over in Year 1 of the Option B requirements. That is, the re-certification (announced surveillance) audits by the new Certification Body will require that the sample size of group members be at least the square root of the number of producers, storage and packing sites. Refer to Appendix III.1 for more information.

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.

3.3.5.10 Transfers between Certification Bodies (ref: Part III, 7)

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. (ref: Part III, 7 a)

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. (ref: Part III, 7 a)

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. *(ref: Part III, 7 b)*

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) 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.

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. *(ref: Part III, 7 e)*

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 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 2018, and his certificate is valid until August 2018 (based on a July 2017 harvest audit), the incoming CB should go ahead and scope and schedule his upcoming July 2018 audit. The outgoing CB should maintain the certification until the transfer can be completed (i.e., July/August 2018 – new audit performed by the incoming CB).

i. 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. **Option A3** is unique in that it entails a three-year certification period. Option A3 groups cannot transfer CBs for a minimum of six consecutive years (i.e., two three-year certification periods). Groups who choose to proceed with a CB transfer before the end of six years must restart a three-year cycle (i.e., be externally audited by the new Certification Body), AND must meet Year 4 requirements (i.e., must have conducted internal audits on 100% of group members within the four years prior to the external audit by the new CB). Refer to Appendix III.2 for more information. Groups transferring to Option A3 from another option must always begin in Year 1 of the three-year certification cycle for Option A3.

d. **Option B** groups who transfer CBs must revert to the Initial Audit (Year 1) requirements for Option B. That is, the re-certification (announced surveillance) audits by the new Certification Body will require that the sample size of group members be at least the square root of the number of producers, storage and packing sites. No reductions in sample size will be permitted.

e. **Option C and D** certified companies may transfer to a different Certification Body from year to year, provided that they 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.

f. In the case of multi-commodity applicants: 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 (ref: Part I, 6.7.3 a)

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 17065:2012 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 of ISO/IEC 17021:2011:

9.6 Suspending, withdrawing or reducing the scope of certification

9.6.1 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.

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

- 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.

9.6.3 Under suspension, the client’s management system certification is temporarily invalid. The certification body shall have enforceable arrangements with its clients to ensure that in case of suspension the client refrains from further promotion of its certification. The certification body shall make the suspended status of the certification publicly accessible (see 8.1.3) and shall take any other measures it deems appropriate.

9.6.4 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 The certification body shall reduce the client’s scope of certification to exclude the parts not meeting the requirements, when the 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.
9.6.6 The certification body shall have enforceable arrangements with the certified client concerning conditions of withdrawal [see 8.4.3.d] ensuring upon notice of withdrawal of certification that the client discontinues its use of all advertising matter that contains any reference to a certified status.

9.6.7 Upon request by any party, the certification body shall correctly state the status of certification of a client's management system as being suspended, withdrawn or reduced.

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 evidence of implementation of effective corrective actions after a mandatory CAR has been issued. (ref: Part I, 6.4.2 c.)

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. (ref: Part I, 6.4.2 d)

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 (ref: Part I, 6.4.2 b.)

f. After a suspension is applied, the CB will set the period allowed for correction (ref: Part I, 6.4.2 f.). This will not normally exceed 6 months as per ISO/IEC 17021:2011.

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 in any way liked to certification in relation to the suspended scope. (ref: Part I, 6.4.2 g) 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. (ref: Part I, 6.4.2 h)

i. If the cause of the suspension is not resolved within the set period, certification is withdrawn by the CB. (ref: Part I, 6.4.2 i)

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 17021:2011, clause 8.1.3.

3.3.6.4 Certification Body Responsibilities in the event of a Food Safety Prosecution, Significant Regulatory 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 nonconformity or any product recall relating to food safety. 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). At a minimum, the Certification Body must inform CanadaGAP of any product recalls.

3.3.7 Program Appeals

a. All the requirements given in ISO/IEC 17065:2012 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 17021:2011:

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 A description of the appeals-handling process shall be publicly accessible.
9.7.3 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.

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

9.7.5 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.

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

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, 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 17065:2012 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 17021:2011:

9.8 Complaints

9.8.1 A description of the complaints-handling process shall be publicly accessible.

9.8.2 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.

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

9.8.4 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.
9.8.5 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.

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

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

9.8.8 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.

9.8.9 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 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)
CanadaGAP Program Management Manual – UNCONTROLLED COPY

- 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. 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 CanAgPlus 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 CHC Charge of $50** collected annually by CanadaGAP for the Canadian Horticultural Council 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, A3, B and C.

### 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 2018 was Year 1 in the program, 2019 (year of the crop loss) was to be Year 2 -- then 2020 will be Year 3 and 2021 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 3.3.5.4 c), *Extension of Certificate Validity*.

### 3.3.10 Burden of Proof (ref: Part I, 4.3.3 (a) to c)
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
- Name of customer(s) if available
- Crop grouping(s) (note: not applicable to Repacking, Brokerage and Wholesaling scopes)
- Scope of activity (production, packing, storage, repacking, wholesaling)
- Preferred language of correspondence
- Date of enrolment
- Annual program fee payment information
- Audit date
- Audit score
- Certification date
- Status (e.g., Withdrawn, Inactive, Suspended, etc.)

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, Section 3.3.1.4, Program Requirements for Persons involved in carrying out contract review and audit scoping 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 Stakeholder 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.

NOTE:
Appendix III.1 contains specific rules for Option B Group Certification.
Appendix III.2 contains specific rules for Option A3 Group Certification.
Form 3.1 – Application to be a Licensed Certification Body for CanadaGAP

[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]

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: ___________________

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

Page 1 of 7
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
     - [ ] 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:

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<th>Scope</th>
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</tbody>
</table>
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)

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**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 17065:2012, 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 Multilateral Recognition Arrangement (MLA). 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 CanAgPlus, 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 ninety (90) 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-Declaration and Self-Assessment Checklist is used internally by Groups certified under Option A3.
- 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 or D)

A copy of the latest version of the CanadaGAP Management System Audit Checklist for Multi-site Operations (Options A1, A2, C or D) 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.

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. 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 (ref: GLOBALG.A.P. General Regulations, Part II)
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** *(ref: Part II, 1.1)*

2.1.1 **Legality** *(ref: Part II, 1.1.1)*

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, or C 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** *(ref: Part II, 1.1.2)*

2.1.2.1 **Requirements for Groups** *(ref: Part II, 1.1.2.1)*

(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 cannot sell its own products that are certified under the Group option except through the group, or in cases where that is unavoidable, any product sold outside of the group is deemed not to fall under the Group’s certification, notwithstanding that for the purposes of obtaining Group certification, members of the Group cannot exclude parts of their production (e.g., certain varieties or orchards/blocks/fields of the same commodity) from the scope of the audit. Refer to Section 3.3.5.2 e) regarding which exclusions from scope are permissible.

2.1.3 Group Internal Register (ref: Part II, 1.1.3)

(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 (ref: Part II, 1.1.3.1)

(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 1 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 (ref: Part II, 2)

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.

2.2.1 Structure (ref: Part II, 2.1)

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.

2.2.2 Competency and Training of Staff (ref: Part II, 2.2)

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. *(ref: Part II, 2.2.b)*

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) 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). *(ref: Part II, 2.2.d)*

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. *(ref: Part II, 2.2.e)*

**2.3 Document Control** *(ref: Part II, 3)*

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.

**2.3.1 Document Control Requirements** *(ref: Part II, 3.1)*

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 (ref: Part II, 3.2)

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 (ref: Part II, 4)

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 (ref: Part II, 5)

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) \(\text{ref: Part II, 6}\)

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 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
   (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.

2.7 Non-Compliances, Corrective Action and Sanctions (ref: Part II, 7)

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 evidence of subsequent corrective actions and decision-making processes.

2.8 Product Traceability and Segregation (ref: Part II, 8)

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 *(ref: Part II, 9)*

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 *(ref: Part II, 10)*

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 *(ref: Part II, 11)*

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 (minimum is the square root of new group members/sites) 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.

3. Sanctions and Internal Handing of Non-conformances *(ref: Part I, 6.4)*

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 (ref: Part I, 6.4.1)

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 (ref: Part I, 6.4.2.1)

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. (ref: Part I, 6.4.2.1 i)

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
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. (ref: Part I, 6.4.2.1 iv)

3.2.2 Group Suspension of a Member

i) Groups can issue and lift product suspensions to their registered group members. (ref: Part I, 6.4.2 c)

ii) Groups shall issue a suspension when the member cannot show evidence of implementation of effective corrective actions after a CAR has been issued. (ref: Part I, 6.4.2 a)

iii) The Group can issue a suspension for certain crops or activities, or for all crops/activities of the certification scope. (ref: Part I, 6.4.2 d)

iv) After the suspension is applied, the Group will set the period allowed for correction (not longer than 12 months). (ref: Part I, 6.4.2 f)

3.3 Cancellation (ref: Part I, 6.4.3)

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 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 (ref: Part I, 6.5)

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 (ref: Annex II.1)

4.1 Key Tasks (ref: Annex II.1, 1)
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 (ref: Annex II.1, 2)

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) It is strongly recommended that internal auditors:

- have successfully completed the CanadaGAP Auditor Training course including passing the exam, and
- are maintaining competency by participating in auditor refresher training and testing offered by 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 (ref: Annex II.1, 2.3)

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: (ref: Part I, 5.2 d)
Note: Certification to Option B occurs on an annual basis.

<table>
<thead>
<tr>
<th>OPTION B</th>
<th>Initial Audits (First Year)</th>
<th>Audits in Subsequent Years (Surveillance/Re-certification)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Internally by the group</td>
<td>1. The Group Management System Internal Auditor audits the Group Management System</td>
<td>1. The Group Management System Internal Auditor audits the Group Management System</td>
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<td>2. The Group’s qualified internal auditor(s) audit(s) all group members (i.e., producers,</td>
<td>2. The Group’s qualified internal auditor(s) audit(s) all group members (i.e., producers, storage and packing sites)</td>
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<td>storage and packing sites)</td>
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</tr>
<tr>
<td></td>
<td>2. Announced audits of (minimum) square root of group members (i.e., producers, storage</td>
<td>2. Unannounced Group Management System audit of 10% of certificate holders (in addition to announced GMS audits)</td>
</tr>
<tr>
<td></td>
<td>and packing sites)</td>
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</tr>
<tr>
<td></td>
<td>3. Within 30 to 335 days of the initial audit: unannounced audits of (minimum) 50% square</td>
<td>3. Announced audits of (minimum) 50% square root of group members (i.e., producers, storage and packing sites)</td>
</tr>
<tr>
<td></td>
<td>root of group members (i.e., producers, storage and packing sites)</td>
<td>4. Within 30 to 335 days of the last announced audit: unannounced audits of (minimum) 50% square root of group members</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(i.e., producers, storage and packing sites)</td>
</tr>
</tbody>
</table>

5.2 Description of Audit and Surveillance Activities

5.2.1 Internal Audits by the Group’s Internal Auditor(s) (ref: Part I, 5.2.1)

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. (ref: Part I, 5.2.1 a)

b) The internal audits shall comply with requirements set out above in Section 2, Requirements for Option B Groups and include: (ref: Part I, 5.2.1 b)

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. (ref: Part I, 5.2.1.b i) 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. (ref: Part I, 5.2.1.b ii) The audit shall be based on the full CanadaGAP Audit Checklist [Form 3.2] available on the CanadaGAP website at: www.canadagap.ca.
iii. Self-assessments by each member of the group are only required 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.

5.2.2 External Group Management System Audit by the Certification Body (ref: Part I, 5.2.2)

a) Management system audits (announced and unannounced) 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. (ref: Part I, 5.2.2.a). 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 (announced and unannounced) shall be based on the Group Management System Checklist [Form 3.4] available on the CanadaGAP website. (ref: Part I, 5.2.2.b)

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. (ref: Part III, 5.4.1 a)

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. (ref: Part III, 5.4.1 b)

e) The evaluation process is divided into two elements: (ref: Part III, 5.4.1 c)

i. Audit of the Group’s Management System and (ref: Part III, 5.4.1.c i)

ii. Audits of a sample of group members (i.e., producers, storage and packing sites) (ref: Part III, 5.4.1.c ii) Refer below to Section 5.2.3.1, Surveillance audits (external) of group members by the Certification Body (announced and unannounced).

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. (ref: Part III, 5.4.1 d)

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. (ref: Part III, 5.4.1 e)

i) The evaluation process will take one or more days and will include: (ref: Part III, 5.4.1 f)

i. Opening meeting with management (ref: Part III, 5.4.1.f i)

ii. Review of all relevant documentation (ref: Part III, 5.4.1.f ii)

iii. Evaluation of records (ref: Part III, 5.4.1.f iii)

iv. Review of internal audits conducted (ref: Part III, 5.4.1.f iv)

v. Discussion / interviews with key staff (ref: Part III, 5.4.1.f vi)
vi. Closing meeting including review of non-compliances identified. *(ref: Part III, 5.4.1.f vii)*

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. *(ref: Part III, 5.4.1. h)*

k) The final report and result can only be concluded after both the Group Management System and minimum sample of group members (i.e., producers, storage and packing sites) are evaluated. *(ref: Part III, 5.4.1 i)*

l) Non-compliances will be raised as Corrective Action Requests and must be closed out before a certificate can be issued to the group. *(ref: Part III, 6.3 d)*

m) Compliance means: 100% compliance by the group with the all applicable requirements of the Group Management System Checklist, AND all sampled group members (i.e., producers, storage and packing sites) must achieve a passing score 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. *(ref: Part I, 6.4.1 c (ii))*

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. *(ref: Part I, 6.4.1 d) 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. *(ref: Part III, 6.4.1 c) 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. *(ref: Part I, 4.2.2 c)*

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. *(ref: Part I, 5.2.2.1)*

ii. The Group Management System audit must be undertaken before the CB completes sampling audits of the group member sites.

5.2.2.2 Group Management System Unannounced Surveillance Audits *(ref: Part I, 5.2.2.2)*

i. The CB shall carry out additional Group Management System unannounced surveillance audits on a minimum of 10% of all the groups certified under Option B annually. *(ref: Part I, 5.2.2.2 i) Unannounced audits are in addition to announced audits.*

ii. Non-compliances detected will be handled as in an announced audit. Non-conformances of the Group Management System will affect the certification status of the whole group. *(ref: Part I, 5.2.2.2 ii)*

iii. The CB will inform the certificate holder of the audit. This notification will normally not exceed 48 hours (2 working days) in advance of the intended visit. In the exceptional case where it is impossible for the certificate holder to accept the proposed date (due to medical or other justifiable reasons), the certificate holder will receive one more...
chance to be informed of an unannounced surveillance audit. The certificate holder shall receive a written warning if the first date has not been accepted. The certificate holder will receive another 48-hour notification of a visit. If the visit cannot take place because of non-justifiable reasons, a complete suspension of the group will be issued. *(ref: Part I, 5.2.2.2 iii)*

iv. The selection of the 10% must not only take into account total numbers, but must be calculated considering such factors as geography, legislation (where several jurisdictions are covered by the CB), crop type, scope of activities (i.e., production, storage and packing), compliance history, etc. *(ref: Part III, 5.5 a)*

v. The 10% shall be calculated for the calendar year. *In order to meet the 10% target, the CB shall theoretically conduct one unannounced surveillance audit after every 10 certificates issued.* The number of unannounced surveillance audits per year shall reflect 10% of the Option B certificates issued by the CB in that year. *(ref: Part III, 5.5 b)*

vi. The 10% shall be distributed among the countries where the CB has certificate holders. It must be representative of the countries. *(ref: Part III, 5.5 c)*

vii. There shall be a minimum of one (1) audit per year: i.e., if the CB has issued fewer than 10 certificates, at least one Option B certificate holder must be audited annually. *(ref: Part III, 5.5 e)*

viii. CBs with only one Option B certificate holder shall perform an unannounced Group Management System audit at least every two (2) years. *(ref: Part III, 5.5 f)* The unannounced audit can replace the announced audit if the Group is willing. If the certification body is in the position of having only one Option B certification holder, the CB should discuss this approach with the Group in advance of the unannounced audit being required (e.g., months in advance or even the year before, or as much in advance as possible).

ix. Unannounced audits are *full audits* based on the Group Management System Checklist. *(ref: Part I, 5.1.2.2 ii)*

### 5.2.3 External Producer or Site Audits by the Certification Body *(ref: Part I, 5.2.3)*

a) Annually, a qualified CanadaGAP auditor from the Certification Body shall carry out external audits of group members (i.e., producers, storage and packing sites). *(ref: Part I, 5.2.3 a)*

b) The CB shall use the complete CanadaGAP Audit Checklist for all external audits of group members (i.e., producers, storage and packing sites). *(ref: Part I, 5.2.3 b)*

c) The timing of external audits of any group member shall be based on the same rules as apply to individual certification (Refer to Component 3, Section 3.3.5.4.3, Audit Scheduling). This rule applies both to announced and unannounced audits of group members (i.e., producers, storage and packing sites).

d) **Initial audit:** Before a new certificate can be issued (initial certification or an audit by a new CB), the CB must audit as a minimum:

i. the square root of the total number of producers, and

ii. the square root of the total number of registered storage and packing sites, including (1) central facilities and (2) storage and packing sites located on individual producers’ farms, included in the certification scope. *(ref: Part I, 5.2.3 c)*

e) The square root must be rounded upwards to the next whole number if there are any decimals. *(ref: Part I, 5.2.3 c)*

f) Based on risk, the sampling plan for CB audits of group members must take into account producers with on-farm storage or packing (i.e., storage and packing that does not take place in central facilities). A minimum of the square root of storage and packing sites, including individual on-farm and central facilities, shall be audited annually by the CB. *(ref: Part III, 5.4.2.1 f)*
g) A minimum sample size is based on the square root of the number of group members for each certification scope [i.e., activities (production, storage and packing), crops/crop grouping, and combinations thereof]. (ref: Part III, 5.4.2.1 d) Further guidance is available in the CanadaGAP document entitled “Guidance for Certification Bodies: Scoping for Multi-commodity and Multi-activity Operations”

h) Additionally, sample size calculation shall be based on the number of group members separated into subgroup combinations taking into account production type including but not limited to those set out in the following point. (ref: Part III, 5.4.2.1 c)

i) For example, group members will be classified by the following production types: field crops, perennial crops, greenhouse products. (ref: Part III, 5.4.2.1 c)

Example: A group consists of a total of 100 producers who grow combinations of tree fruit, small fruit and greenhouse products. 16 produce small fruit and cherries; 49 grow a variety of tree fruits; 35 grow combinations of greenhouse products and fruits. The sample would be determined as: \(\sqrt{16} + \sqrt{49} + \sqrt{35} = 4 + 7 + 6 = 17\) producers to be audited externally by the CB.

j) 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. This, however, does not imply that the CB must choose this member for external audits every year. Provided that the internal audits covered all the production sites of this member, the CB shall audit only 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.

Example: in a group of 25 members, one member classifies as a member with multiple (4) sites. The CB shall inspect 5 group members (square root of 25). If the multi-site member is chosen as one of the 5 group members, 2 (square root of 4) of his sites will be inspected. In total 6 sites for the group will be inspected. (ref: Part III, 5.4.2.1 g)

k) Producers (including producers with on-site storage and packing) 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. (ref: Part III, 5.4.2.1 e)

l) 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: (ref: Part III, 5.4.2.1 b)

i. Customer complaints

ii. Inconsistencies between the internal audit reports and the CB audit findings, etc.

m) 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 normally not exceed 48 hours (2 working days) per group member (i.e., producers, storage and packing sites). (ref: Part III, 5.4.2.2 b)

n) The CB must endeavour over time to sample all group members (i.e., producers, storage and packing sites). This may not be feasible with very large groups. In all cases and particularly in very large groups, the sampling plan shall be designed to take the level of risk of individual group members into account.

o) High-risk sites shall be included in the CB’s yearly audit plan.

p) 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 relation to the selected sites, these shall be identified based on the organisation’s internal audit programme findings and the individual
q) 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.

5.2.3.1 Surveillance audits (external) of group members by the Certification Body (announced and unannounced) (ref: Part I, 5.2.3 d)

(a) **Announced audits**: The CB shall carry out announced external audits of each Group annually (i.e., audits of a sample of group members). The minimum number of group members to be audited announced per certificate holder depends on the outcome of the previous unannounced audits and the Group Management System audit carried out at the regular announced surveillance audit. *(ref: Part I, 5.2.3.d. i)*

(b) The minimum number of sites to be audited during a one-year certification cycle shall be equivalent to the square root of the current number of group members (i.e., producers, storage and packing sites). *(ref: Part I, 5.2.3.d. iii)*

(c) The audits shall be split into two: 50% shall be audited **unannounced** during the validity period of the certificate (12 months), and the other 50% during the regular announced surveillance audit. *(ref: Part I, 5.2.3.d. ii)*

(d) These audits shall be done by the Certification Body during two separate visits that shall be minimum 30 days apart from each other. *(ref: Part III, 5.4.2.2 a)*

(e) Only if the group members audited externally pass the unannounced audit, the sample size for the following regular announced audits by the CB will be reduced to the square root of the current number of the group members minus the number of group members audited unannounced (providing the findings from the Group Management System audit carried out at the regular announced audit are also favourable to this reduction). *(ref: Part I, 5.2.3.d. iv)*

(f) Before a certification decision can be made, the square root of the total number of producers, and the square root of the total number of storage and packing sites (including individual on-farm and central facilities), must have been audited during the last 12 months. *(ref: Part I, 5.2.3.d v)*

(g) Example 1: Nine months after the certificate was issued to a group of 25 producers (full compliance with Group Management System audit and 5 successful on-farm audits), the CB audits 3 (50% of 5 = 3) unannounced. If the 3 producers pass the unannounced audit, the CB will only check 2 (5 minus the 3 already audited) producers during the following regular announced audit IF the Group Management System audit during the regular announced visit does not show any non-conformances. If non-compliant farms are found during the unannounced audits, the Group will be sanctioned accordingly (i.e., the CB will issue a CAR to the Group which must be closed out within 28 days), and no reduction of sample size will result in the next regular announced audit.

Example 2: In a producer group with 50 members, during the initial audit 8 group members (square root of 50) need to be audited, and during the validity period of the certificate an additional 4 (0.5 x 8) group members need to undergo unannounced surveillance audits. The total number of audits in the first year is 12. In the next year, if no non-compliant group members were found during the unannounced surveillance audits and if there are no non-conformances raised in the regular annual surveillance audit of the Group Management System, the CB will sample 4 (0.5 x 8) group members during the regular announced audit, and another 4 group members during the unannounced surveillance audits. *(ref: Part III, 5.2.3.d iv)*

5.2.3.2 Storage and Packing Facility Audits (ref: Part III, 5.6)
(a) For the external audits by the Certification Body, the square root of the total number of storage and packing sites registered on the list of group members shall be audited annually. *(ref: Part I, 5.2 table)*

(b) Where central storage and packing sites are used, these shall be audited by the CB using the square root sampling. Where the storage and packing does not take place centrally, but on the farms of producer members of the group, the packing/ storage activities shall be taken into account when determining the sample of producers to be audited. *(ref: Part III, 5.6)*

(c) The sample must include as a minimum:
   
   i. the square root of the combined total number of storage and packing sites (i.e., individual on-farm and central facilities for storage and packing).

(d) For the internal audits, every storage and packing site including those on the farms of producer members of the group must be audited annually by the Group’s qualified internal auditor. *(ref: Part III, 5.6 c)*

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. *(ref: Part I, 6.4.1 c ii)*

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. *(ref: Part I, 6.4.1 d i)*

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. *(ref: Part I, 6.4.2 d)*

b) After a suspension is applied, the CB will set the period allowed for correction. *(ref: Part I, 6.4.2 f)* This will not normally exceed 6 months as per ISO/IEC 17021:2011.

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. *(ref: Part I, 6.4.2 g)*

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. *(ref: Part I, 6.4.2 h)*

e) If the cause of the suspension is not resolved within the set period, certification is withdrawn by the CB. *(ref: Part I, 6.4.2 i)* 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 – Group Certification: OPTION A3

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. 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:

   i. Use of qualified internal auditors engaged by the Group to audit group member sites (i.e., production, storage and packing locations) and the Group Management System, and
   ii. External audits of the Group by a licensed certification body.

c. **Internal audits:** Using a qualified internal auditor(s), the Group must carry out audits each year on 25% of registered group members, all central storage and packing facilities, and the Group Management System. 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 collect and review the CanadaGAP Self-Declaration and Self-Assessment Checklist submitted by each group member who is not internally audited in a given year.

   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 surveillance audits of its group members’ operations. For further details, refer below to Section 5, Audit and Surveillance Activities.

   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. Sampling of the group members (i.e., production, storage and packing sites) is permitted to certify the Group under Option A3. All external audits for Option A3 are announced, and are performed by the Certification Body every three years. 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 A3 Groups

This section establishes the requirements that groups must comply with to achieve certification under Option A3. 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 growers’ 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, or C can join a group for Option A3 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/package/storage operations) 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/packing/storage 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 group member and Group representatives.
(ii) The group registered members must be legally responsible for their respective production locations, although certification takes place under the common Group Management System.

(iii) The production/packing/storage operation cannot sell its own products that are certified under the Group option except through the group, or in cases where that is unavoidable, any product sold outside of the group is deemed not to fall under the Group’s certification, notwithstanding that for the purposes of obtaining Group certification, members of the Group cannot exclude parts of their production (e.g., certain varieties or orchards/blocks/fields of the same commodity) from the scope of the audit. Refer to Section 3.3.5.2 e) regarding which exclusions from scope are permissible.

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 group 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) Crops and activities within scope of certification
   f) Certification body(ies) if a member of the group makes use of more than 1 CB
   g) Status (e.g., if sanctions have been applied)

(iii) Those group 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 group’s registered members comply in a uniform manner with CanadaGAP requirements.

2.2.1 Structure

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

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 group member [i.e., internal auditor(s)].
   iv. The internal audit of the Group Management System and verifying the group 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.*

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 group 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) 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).

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 CanadaGAP.

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.

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 3 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.

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 annually by the Group at a minimum of 25% of registered group member site(s) 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 of group members shall be independent of the area being audited. Internal auditors cannot audit their own daily work.

d) Relative to adding new members to the group, refer to Section 2.11 below.

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
   (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 group 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.
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 or non-compliances by the group or by its members, respectively.

c) Corrective actions following non-compliances 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 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 limited number of new group members and sites may be added (subject to internal approval procedures being met, including internal audits/review of self-assessments 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.

a) During the three-year certification period, up to 10% of new group members 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.

b) During the three-year certification period, or in any one year during the certification period, when the number of group members increases by more than 10%, further CB sample audits (minimum is the square root of new members/sites) of the newly added group members, and an audit of the Group Management System, will be required that year before additional group members can be added to the approved list.

### 3. Sanctions and Internal Handing of Non-conformances

a) When 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) In most cases, outstanding non-conformances shall be closed within three months from the date of the first internal audit of a group member.

(d) 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 group member to the group’s register.

(e) Depending on the criticality of the non-compliance, the period given for compliance before suspension is applied can be less than three months. This will be 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.

(f) If the cause of the warning is not resolved within the period set, 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 product suspensions to their registered members.
ii. Groups shall issue a suspension when the group member cannot show 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.

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 group member’s operation) of the use of the CanadaGAP logo or other mark(s), the group’s certificate, or any device or document 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 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.*
c) Produce timely and accurate reports on such audits.

4.2 Qualification Requirements

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) It is strongly recommended that internal auditors:

   a. have successfully completed the CanadaGAP Auditor Training course including passing the exam, and
   b. are maintaining competency by participating in auditor refresher training and testing offered by 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 A3 certificate is issued (Initial Certification) and in subsequent years (Re-Certification).

See chart on the next page.
**Note:** Certification to Option A3 occurs on a three-year basis. Nothing in the chart below is meant to suggest a four-year certification period. The chart is simply intended to illustrate activities that occur each year over a four-year period.

<table>
<thead>
<tr>
<th>Option A3</th>
<th>Year 1 (Initial Certification)</th>
<th>Year 2</th>
<th>Year 3</th>
<th>Year 4 (Re-Certification)</th>
</tr>
</thead>
</table>
| **Internally by the Group** | The Group Management System Internal Auditor audits the Group Management System  
The Group’s qualified internal auditor audits all central packing and storage facilities  
The Group’s qualified internal auditor audits 25% of group members (i.e., producers, and on-farm storage and packing sites)  
The Group’s qualified internal auditor reviews self-declarations and self-assessments from the 75% of group members not being internally audited in the current year | The Group Management System Internal Auditor audits the Group MS  
The Group’s qualified internal auditor audits all central packing and storage facilities  
The Group’s qualified internal auditor audits an additional 25% of group members (i.e., producers, and on-farm storage and packing sites)  
The Group’s qualified internal auditor reviews self-declarations and self-assessments from the 75% of group members not being internally audited in the current year | The Group Management System Internal Auditor audits the Group MS  
The Group’s qualified internal auditor audits all central packing and storage facilities  
The Group’s qualified internal auditor audits an additional 25% of group members (i.e., producers, and on-farm storage and packing sites)  
The Group’s qualified internal auditor reviews self-declarations and self-assessments the 75% of group members not being internally audited in the current year | The Group Management System Internal Auditor audits the Group MS  
The Group’s qualified internal auditor audits all central packing and storage facilities  
The Group’s qualified internal auditor audits the final 25% of group members (i.e., producers, and on-farm storage and packing sites)  
The Group’s qualified internal auditor reviews self-declarations and self-assessments the 75% of group members not being internally audited in the current year |
| **Externally by the CB** | Announced audit of the Group MS  
Audits of (minimum) square root of group members (i.e., producers, and all storage and packing sites that have been internally audited by the group) – at least 25% of these audits must be unannounced (i.e., | Not applicable | Not applicable | Announced audit of the Group Management System  
Audits of (minimum) square root of all group members (i.e., producers, storage and packing sites) – at least 25% of these audits must... |
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 internal audits, 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 requirements.

(b) The internal audits shall comply with requirements set out above in Section 2, Requirements for Option A3 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 central storage and packing facility included in the group shall be carried out by the Group’s qualified internal auditor within the 12 months before the first CB audit and thereafter once per annum. Audits shall be based on the full CanadaGAP Audit Checklist [Form 3.2] available on the CanadaGAP website at: www.canadagap.ca.

iii. A minimum of one internal audit of 25% of group members (i.e., producers, and on-farm 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. Thereafter, an additional 25% of group members (i.e., producers, and on-farm storage and packing sites) shall be internally audited each year. Audits shall be based on the full CanadaGAP Audit Checklist [Form 3.2] available on the CanadaGAP website at: www.canadagap.ca.

iv. Over a four-year period, every storage and packing site including those on the farms of producer members of the group must be audited by the Group’s qualified internal auditor.

v. Review by the Group’s qualified internal auditor(s) of Self-Declarations and Self-Assessments from group members (i.e., producers, and on-farm storage and packing sites) who are not internally audited in the current year. Copies of the Self-Declaration and Self-Assessment Checklist [Form 3.3] are available on the CanadaGAP website at: www.canadagap.ca.

vi. Internal auditors engaged by the Group shall be properly qualified and meet all requirements as set out above in Section 4, Internal Auditor Qualifications.

vii. 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.

viii. 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.

5.2.2 External Group Management System Audit by the Certification Body
(a) A licensed CB shall carry out one announced external audit of the Group Management System at the initial assessment and thereafter every three years.

(b) 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.

(c) Management system audits shall be based on the Group Management System Checklist [Form 3.4] available on the CanadaGAP website.

(d) 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 A3 Groups must be evaluated.

(e) 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.

(f) 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 (i.e., producers, storage and packing sites)
      Refer below to Section 5.2.3, External Audits of Group Members by the Certification Body.

(g) 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).

(h) The CB shall send the audit plan to the management of the applicant prior to the audit.

(i) 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.

(j) The evaluation process 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.

(k) 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.

(l) The final report and result can only be concluded after both the Group Management System and minimum sample of group members (i.e., producers, storage and packing sites) are evaluated.

(m) Non-compliances will be raised as Corrective Action Requests and must be closed out before a certificate can be issued to the group.

(n) Compliance means: 100% compliance by the group with the all applicable requirements of the Group Management System Checklist, AND all sampled group members (i.e., producers, storage and packing sites) must achieve a passing score on the CanadaGAP Audit Checklist.

(o) 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.
(p) 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 Section 6, Certification Body Sanctions against the Group, below.

(q) 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.

(r) 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 group member raised by the CB that have not been closed out.

5.2.3 External Audits of Group Members by the Certification Body

(a) Every three years, a qualified CanadaGAP auditor from the Certification Body shall carry out the external audits of group members (i.e., producers, storage/packing sites).

(b) The CB shall audit a minimum of the square root of internally audited group members (i.e., producers, storage and packing sites) currently registered on the group’s list of members. The minimum number of group members to be audited per certificate holder depends on the outcome of the Group Management System audit. At least 25% of the audits must be unannounced (i.e., the group member receives no more than 2 business days’ notice).

(c) The CB shall audit a minimum of the square root of central packing and storage facilities every three years. The minimum number depends on the outcome of the Group Management System audit. At least 25% of the audits must be unannounced (i.e., the group member receives no more than 2 business days’ notice).

(d) The CB shall use the complete CanadaGAP Audit Checklist for all external audits of group members (i.e., producers, storage and packing sites).

(e) The timing of external audits of any group member shall be based on the same rules as apply to individual certification. (Refer to Component 3, Section 3.3.5.4.3, Audit Scheduling).

(f) Initial audit: Before a new certificate can be issued (initial certification or an audit by a new CB), the CB must audit as a minimum:
   i. the square root of the total number of producers who have been internally audited by the group, and
   ii. the square root of the total number of registered storage and packing sites, including (1) central facilities and (2) storage and packing sites located on individual producers’ farms that have been internally audited, included in the certification scope.

(g) The square root must be rounded upwards to the next whole number if there are any decimals.

(h) Based on risk, the sampling plan for CB audits of group members must take into account producers with on-farm storage or packing (i.e., storage and packing that does not take place in central facilities). A minimum of the square root of storage and packing sites, including central facilities and individual on-farm storage and packing operations that have been internally audited, shall be audited by the CB every three years.

(i) A minimum sample size is based on the square root of the number of internally audited group members for each certification scope [i.e., activities (production, storage and packing), crops/crop grouping, and combinations thereof]. Further guidance is available in the CanadaGAP document entitled “Guidance for Certification Bodies: Scoping for Multi-commodity and Multi-activity Operations”.

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Appendix III.2 – Option A3 (Group) Certification
(j) Additionally sample size calculation shall be based on the number of internally audited group members separated into subgroup combinations taking into account production type including but not limited to those set out in the following point.

(k) For example, group members who have been internally audited will be classified by the following production types: field crops, perennial crops, greenhouse products. Example: A group consists of a total of 100 internally audited producers who grow combinations of tree fruit, small fruit and greenhouse products. 16 produce small fruit and cherries; 49 grow a variety of tree fruits; 35 grow combinations of greenhouse products and fruits. The sample would be determined as: √16 + √49 + √35 = 4 + 7 + 6 = 17 producers to be audited externally by the CB.

(l) In the case where a group has an internally audited member with multiple sites, that group 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. This, however, does not imply that the CB must regularly choose this member for external audits. Provided that the internal audits covered all the sites/production units of this member, the CB shall audit only the square root of the sites/production units 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.

Example: in a group of 25 members, one member classifies as a member with multiple (4) sites. The CB shall inspect 5 members (square root of 25). If the multi-site member is chosen as one of the 5 members, 2 (square root of 4) of his sites will be inspected. In total 6 sites for the group will be inspected.

(m) Producers (including producers with on-site storage and packing) 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.

(n) 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.

(o) The final selection and communication to the Group of which and how many group members (i.e., producers, storage and packing sites) the CB will audit shall normally be done after the Group Management System audit, using criteria based on the group structure and defined in a sampling procedure, which is risk-based. The notification by the CB shall normally not exceed 48 hours (2 working days) per group member (i.e., producers, storage and packing sites). At least 25% must be audited unannounced (i.e., the group member receives no more than 2 business days’ notice).

(p) The CB must endeavour over time to sample all group members (i.e., producers, storage and packing sites). This may not be feasible with very large groups. In all cases and particularly in very large groups, the sampling plan shall be designed to take the level of risk of individual group members into account. CBs must also endeavour to perform unannounced audits on all group members over time.

(q) All sampling audits must be successfully completed before a certification decision can be made.

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.

### 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 17021:2011.

(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*. 
Option A3 Certification (Group) – Certification Components:

(Note: Certification to Option A3 occurs on a three-year basis. Nothing in the chart below is meant to suggest a four-year certification period. The chart is simply intended to illustrate activities that occur each year over a four-year period.)

<table>
<thead>
<tr>
<th>Component</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Group Annual Program Fee (Up to 25 group members)</td>
<td><img src="" alt=" " /> <img src="" alt=" " /> <img src="" alt=" " /> <img src="" alt=" " /></td>
</tr>
<tr>
<td>Additional Group Members Fee (per each additional 25 group members)</td>
<td><img src="" alt=" " /> <img src="" alt=" " /> <img src="" alt=" " /> <img src="" alt=" " /></td>
</tr>
<tr>
<td>Internal Audit of Group Management System by Group Management System Internal Auditor</td>
<td><img src="" alt=" " /> <img src="" alt=" " /> <img src="" alt=" " /> <img src="" alt=" " /></td>
</tr>
<tr>
<td>Internal Audits of each Central Storage/Packing Site by Group’s qualified internal auditor(s)</td>
<td>Each central site</td>
</tr>
<tr>
<td>Internal Audits of each Group Member by Group’s qualified internal auditor(s)</td>
<td>Minimum: 25% of group members (i.e., producers, storage and packing sites)</td>
</tr>
<tr>
<td>Review of Self-Declarations and Self-Assessment Checklists by Group’s qualified internal auditor(s)</td>
<td>All group members who are not internally audited in Year 1</td>
</tr>
<tr>
<td>Certification Body (External) Audit of Group Management System</td>
<td><img src="" alt=" " /></td>
</tr>
<tr>
<td>Certification Body (External) Audits of Central Storage/Packing Sites (at least 25% of which must be unannounced)</td>
<td>Square root of # of central sites</td>
</tr>
<tr>
<td>Certification Body (External) Audits of Selected Group Members – in conjunction with Group Management System Audit (at least 25% of which must be unannounced)</td>
<td>Minimum: Square root of number of internally audited producers, storage and packing sites</td>
</tr>
<tr>
<td>Certification Body (External) Triggered Audit (if needed to investigate a potential Food Safety risk at a particular site)</td>
<td>Possible</td>
</tr>
<tr>
<td>Certification Body Auditor Travel Costs</td>
<td>Cost varies by location</td>
</tr>
</tbody>
</table>