



## CanadaGAP Audits Impacted by COVID-19 Guidance for Certification Bodies

Updated March 30, 2020

On March 16, 2020, GFSI released its position regarding the coronavirus (COVID-19) and its impact on carrying out audits against GFSI-recognized programs. The statement was updated March 23 and again on March 30. See below for the latest link.

March 30 – Updated Statement on GFSI Position: [https://mygfsi.com/news\\_updates/update-on-temporary-audit-measures-during-covid-19-pandemic](https://mygfsi.com/news_updates/update-on-temporary-audit-measures-during-covid-19-pandemic)

- GFSI states that: *“CPO’s and CB’s should follow requirements stipulated by applicable national regulation to manage the COVID-19 outbreak; if those differ from the content of [the GFSI] position, the regulatory requirements prevail.”*

### Travel Restrictions

For CanadaGAP audits, the emphasis is on considering travel restrictions within and between countries, namely Canada and the United States.

The situation is changing rapidly, but effective today:

- Within Canada, public health authorities have advised people to stay at home as much as possible, and to practise physical distancing. Some provincial and territorial borders have closed.
- Within the U.S., public health authorities have given similar advice to the above.
- Between Canada and the U.S, travel restrictions were announced March 18, 2020 by both countries, with a formal closure of the Canada-U.S. border on March 221, 2020.

### Alternatives to On-site Audits

Out of an abundance of caution, CBs have taken the decision to suspend or postpone on-site audits for the coming weeks. Please be advised that GFSI is not allowing for alternatives to on-site auditing. Based on the latest communication from GFSI, remote and virtual auditing is not an acceptable substitute to on-site audits.

GFSI has committed to convening a forum to explore those options. According to GFSI’s communication, it appears that other options would be considered if the pandemic continues for a longer period of time (i.e., “GFSI will facilitate a forum specifically for the purpose of exploring options for non-standard auditing (remote, virtual) that it could recognise *if the COVID-19 crisis continues indefinitely*”).

## Certificate Extensions and Risk Assessment

Under extraordinary circumstances such as we are facing with COVID-19, IAF guidance enables certification bodies to extend certificates for up to 6 months based on a risk assessment. The details provided by GFSI are as follows:

- Follow IAF ID3:2011, “Management of Extraordinary Events or Circumstances Affecting AB’s, CB’s and Certified Organizations”. [CBs have a copy]
- CB’s must review if there is a possibility of using auditors from other regions, that have no travel restrictions, to audit sites. [The global pandemic has created a situation wherein many CBs have adopted policies reflecting public health authority advice, and auditors are staying home.]
- For countries and/ or regions, where sites cannot be visited because of travel restrictions, and no auditors are able to reach the site, the following considerations are recommended to determine if an extension to their certificate can be granted:
  - The CB must fully demonstrate that there is no other possibility but to extend the certificate.
  - If an extension is granted, all decisions and procedures that led to the extension of the certificate, must be fully documented and based on risk assessments as indicated on the IAF ID 3:2011 document.
  - Continual re-evaluation by the CB of the certified site’s ability to accept an on-site audit should be maintained and an audit should be undertaken at the earliest opportunity.
  - The certificate extension can last for a period of up to 6 months. GFSI will continue to monitor the COVID-19 situation in the meantime to determine whether further actions are needed. GFSI will also try to publish monthly updates.
- Once the travel restriction has been lifted, audits should be rescheduled, and CB’s should establish procedures to determine via a risk assessment the order in which the rescheduling of audits should take place.
- CPOs should have a system in place to track for how long the certificate extension has been granted and to which sites.
- CPO’s will be asked to submit their risk assessment for granting a certificate extension to GFSI for review.

CanadaGAP supports certification bodies granting certificate extensions to operations who are currently due for an audit. There are a number of CanadaGAP-certified companies whose certificates are set to expire in April and May; these are being given priority. To meet the final point in GFSI’s position (above), CanadaGAP will require CBs to provide a justification/risk assessment that can be supplied to GFSI. CBs are asked to provide an **overall** risk assessment in support of their policies, as each CB is working within its own protocols to ensure auditor and client safety.

CanadaGAP has requested that CBs ensure any certificates that are extended due to COVID-19 include a code in the subject line of the email (e.g., EXTCOVID19) to help CanadaGAP track those certificate extensions that must be reported to GFSI.

## Requests for Extensions

If a certified company does not want to put their employees at risk, they may ask voluntarily for the certification body to extend a certificate that will be expiring in the near future. The CBs will manage

these requests as per the guidance provided above (i.e., develop criteria for risk assessment, ongoing communication/monitoring of the certified company).

It is recognized that delaying many audits early in the year (March, April) will create significant challenges for certification bodies to have enough auditors during the peak season (July through October) to carry out not only the usual volume of CanadaGAP business, but also to undertake audits that have been postponed. Measures will be taken by CanadaGAP to investigate the possibility of further certificate extensions if required for year-round operations (e.g., packing facilities, greenhouses, Option D operations, etc.) and to explore the feasibility of alternate auditing methods (virtual/remote) for operations that are equipped to do so. GFSI is convening a forum to begin discussions around alternatives to on-site auditing, and these will inform GFSI's ongoing review of its COVID-19 policy.

### **Resumption of Regular Certification Cycle following Extensions**

Operations that receive a certificate extension will revert to their regular certification cycle the following year (cycle).

### **Audits Occurring Outside of the Production Period**

Depending on how long the pandemic lasts, there is the possibility that the certification body will not be able to carry out an audit during the usual period for CanadaGAP audits, when the auditor is expected to observe activities relevant to the scope of certification, such as harvest, packing, or handling of specific commodities, etc. CanadaGAP recognizes that CBs may have no choice but to conduct an audit later in the year, after the farming season is over. Deviations to the usual approach will be determined as required, if the pandemic persists into the summer months. Adjustments will also depend on the certification body's risk assessment criteria and the approach taken to maintain oversight of the certified company during the period in which a certificate extension has been granted.

### **Unannounced Audits**

CanadaGAP advises certification bodies to proceed as normal, with the caveat that CBs pre-identify an additional 10% of clients (for a total of 20%) that could be selected for an unannounced audit this year. Doing so would give the CB a small cushion in the event that a planned unannounced audit cannot take place in 2020. CanadaGAP is seeking further clarification from GFSI on whether any dispensation might be considered, given the extraordinary circumstances.

We will continue to update this guidance as the situation evolves. Please contact the CanadaGAP office with any questions.