

**To:** CanadaGAP Program Participants and Stakeholders  
**Date:** June 29, 2020  
**Subject:** CanadaGAP Makes Available Remote Auditing Methods

In response to the continuing coronavirus (COVID-19) pandemic, effective July 1, 2020, at the discretion of the Certification Body, CanadaGAP audits may be performed partly using remote auditing methods.

In certain cases and in accordance with rules set out by CanadaGAP, part of an operation's 2020 audit would be done on-site, while the second part may be completed using remote methods. This approach was developed in response to challenges presented by this year's extraordinary circumstances.

A full on-site audit continues to be the first choice for CanadaGAP certification. Where warranted, an audit that is partly remote gives the Certification Body an alternative approach during the pandemic.

The key benefit of using remote methods during the pandemic relates to reducing the amount of time that the auditor must spend on-site to complete the full audit. A technical procedure available at <https://www.canadagap.ca/covid-19/> provides CanadaGAP Certification Bodies with specific guidelines to apply remote methods to CanadaGAP auditing should they choose to do so.

This communication addresses the following topics:

- **Guiding Principles**
- **Audit Cost**
- **Questions**

### **Guiding Principles**

This temporary approach to CanadaGAP audits is guided by the following principles:

1. Full on-site audits for CanadaGAP certification will proceed as much as possible this season. Since a full on-site audit remains the preferred approach, use of remote auditing methods presents an alternative that is considered a second choice to a full on-site audit for CanadaGAP.
2. Even with a full on-site audit, measures can be taken to reduce time spent in close proximity to reduce the risk of exposure to COVID-19 for both the auditor and employees of the certified company.
3. The Certification Body is responsible to:
  - Inform program participants of its expectations for relevant health and safety measures to be implemented within the operation, in accordance with applicable public health guidelines for COVID-19.
  - Reassure program participants that the Certification Body and auditor are also taking all reasonable precautions to safeguard and protect the health and safety of the auditor and of the client's personnel.

*CanadaGAP® is a program developed in Canada to promote Good Agricultural Practices (GAPs) for fruit and vegetable suppliers.*

4. It is always up to the Certification Body (not the program participant) to make the determination as to whether an audit can be completed in part using remote methods.
5. Use of remote auditing methods is reserved for CanadaGAP clients who cannot proceed with a full on-site audit for various reasons or whose audit cannot be delayed to a later date when a full on-site audit could be completed.
6. In all cases, it is understood that the Certification Body may choose whether or not it is preferable to delay an audit and provide a six-month certificate extension, following completion of a risk assessment for the operation, in accordance with previous CanadaGAP guidance issued in March 2020. If delaying the audit is not a feasible option (e.g., because it will create an even bigger backlog), the Certification Body has the right to decide to proceed with an audit.
7. To be eligible for an audit that uses remote methods, clients would have to demonstrate to the Certification Body their ability to meet the Information and Communication Technology (ICT) requirements, based on criteria in the International Accreditation Forum Mandatory Document 4.
8. During the on-site portion of the audit, it is assumed that remote methods (ICT) will not be utilized. An on-site visit entails the use of traditional, in person auditing practices (e.g., face-to-face interviews with employees, etc.). That being said, some additional measures may be useful to limit the potential for transmission (e.g., holding a greater portion of the on-site visit outdoors than indoors; minimizing the number of people in an enclosed area at one time).
9. Nothing in this approach compels a given auditor to perform a given audit (whether a full on-site or partially remote). The Certification Body may assign a different auditor or delay the audit and extend certification if it is not possible for the auditor to carry out an audit in particular circumstances (e.g., facility has an outbreak, individual auditor has health concerns, etc.).
10. Use of remote auditing methods is applicable for the **2020 crop year only**, available during the period when clients and/or Certification Bodies are facing constraints to a full on-site audit due to the coronavirus pandemic.

### **What Would a Partially Remote Audit Look Like?**

The first part of the audit would consist of the on-site visit to the operation. The auditor will tour the premises, observe the practices, and interview the person responsible for food safety and employees implementing the procedures. A small selection of documents would be reviewed, as set out in CanadaGAP's technical procedure; these would typically include longer documents that are more difficult to review off-site (e.g., food safety manual, supplier certificates, internal audit checklist, records completed since the previous audit, etc.).

In general, the on-site portion of the audit should take approximately two (2) hours. The duration may vary; it may take less time for smaller, simpler operations. The duration may be longer for larger, more complex operations, or for those whose audit would normally take a full day.

The second part of the audit would occur off-site and consist of the auditor reviewing remaining documents and a sampling of the operation's records. The operation would provide the auditor with the requested documents electronically or by some other means (e.g., mail, fax, hard copy at the end of the on-site visit). The auditor will cross-reference the records to the information that he or she gathered during the tour based on observations and interviews with personnel. If follow-up is needed, the auditor would contact the program participant, usually by electronic means (e.g., phone, Skype, FaceTime, whatsapp, etc.).



In special cases, the auditor may request certain documents (e.g., HACCP Plan for repacking and wholesaling operations) to review remotely before the on-site visit.

The remote part of the audit must be completed **within 30 days** of the on-site visit.

### **Audit Cost**

The hours spent by the auditor, both on-site and off-site (remote review of documents), will be charged to the program participant. A reduced time spent on-site does not mean the audit cost will be lower. It is possible that audit fees may be higher due to the use of technology and the administration and remote management of documentation.

### **Questions?**

For more information, please review the detailed procedure at <https://www.canadagap.ca/covid-19/> or contact the CanadaGAP office with any questions.

