CHAPTER 10

CANADAGAP
CERTIFICATION RULES

CONTROL UNION SERVICES S.A.C.

Contents

1. SCOPE AND APPLICABILITY

1.1. APLICABILITY

The CanadaGAP Inspection regulation is applicable to all clients in CanadaGAP program.

1.2. SCOPE

a)   The following documents are applicable for the CanadaGAP certification program:
- CanadaGAP Program Management Manual- Component 3
- CanadaGAP Fruit and Vegetable Manual
- CanadaGAP Greenhouse Manual
- CanadaGAP Appendices
- CanadaGAP checklists according to the scope/option:
  o CanadaGAP audit checklist for production, packing, repacking, storage, wholesaling and brokerage of Fruits and Vegetables and Greenhouse products
  o CanadaGAP Group Management system checklist
  o CanadaGAP Multi-site Management system checklist

The current versions of these documents can be found on the CanadaGAP website: https://www.canadagap.ca/

b)   Scope of the audit covers the following:
- Activities: Production, packing, storage, repacking, wholesaling, and brokerage. These combinations are possible: Production, packing and repacking/ repacking and wholesaling/ production and wholesaling.

- Crops/commodities:
  o For Production, packing and storage: ONLY those included in the manuals Fruit and Vegetables, Greenhouse.
  o For Repacking, brokerage and wholesaling: Fresh Fruits and Vegetables or products outside of scope like for example fresh sprouts.

- Options:

  Not GFSI-recognized:
  o   Option A1
  o   Option A2
  o   Option E
  o   Option F

  GFSI-recognized:
  o   Option B
  o   Option C
  o   Option D

The applicant is responsible to ensure their chose certification option is acceptable to the market and their customers, CU nor CanadaGAP are not in a position to interpret customers' varying requirements.

c)   Unannounced audits for CanadaGAP certification*

For Options B, C and D only, in case the applicant is selected for an unannounced audit in the year, CU offers (2) options:

- Unannounced audit Option 1

- Unannounced audit Option 2

CanadaGAP does not include certification for retailing or processing of fruits and vegetables, including Minimal processing, Processing (e.g. cooking, freezing, canning, dehydrating, etc.), Production, packing, and storage of products outside the program scope (e.g. sprouts, microgreens, nuts, mushrooms, etc,) Processed products, commodities not grown on a commercial scale or at all in Canada (e.g. citrus, tropical fruits, etc.), Repacking, brokerage and wholesaling of fresh sprouts, minimally processed fruits and vegetables or hermetically sealed containers fresh fruit and vegetables.

2. DEFINITIONS

2.1. DEFINITIONS RELATED TO THE STANDARD.

- **CanAgPlus:** Established in 2012 to operate the CanadaGAP Program. CanAgPlus is a not-for-profit organization whose members are participating in the voluntary CanadaGAP food safety certification program for the production, packing, storage, repacking, brokerage and wholesaling of fresh fruits and vegetables.
- **CanadaGAP Program**: Program is for operations who need to demonstrate to their customers that they are following the CanadaGAP manuals.
- **Enrolment Form:** Form provided by CanadaGAP (website) to applied for CanadaGAP program before get in contact with CU.
- **Applicant:** The client also known as the owner of the certificate.

3. EVALUATION PROCEDURE

3.1. CONTRACTING

a) The applicant will confirm the related scope completing the Enrolment form selecting CU and pay for the annual program fee directly to CanadaGAP. Each year reconfirm the enrolment to CanadaGAP and if changes in the operation, complete the Change of Status form from CanadaGAP website.

b) CanadaGAP will review the enrolment form and forwards to CU.

c) Once CU is selected as the certification body, CU CanadaGAP application form shall be completed to determine the audit scope, CU will quote the cost of the audits and get in contractual relationship with the applicant through the signature of the CU offer letter before the execution of the audit.

d) In case of CB transfers, applicants shall communicate their request to transfer CBs **to CanadaGAP**, completing the Change of Status form available on the CanadaGAP website. Already certified companies a request for a transfer between CBs can be done before the certificate expiry. Provide a copy of the previous audit report, corrective action report and certificates if applicable. CU may contact the outgoing CB asking for any pending issue, if no pending issues, CU will verify the audit date and the scope of any existing certification vs the requested audit scope. Transfer is accepted once the offer letter with CU is signed.

Option A1 and Option A2 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 CB.
Any change in the scope (e.g., certification option) during audit, once the certifier/Scheme Manager approves it, may require additional audit fee payment to CU, extra audit time for the auditor to complete the audit and new program fee payment to CanadaGAP.

Certified operations who wish to change certification options must inform CanadaGAP through the CanadaGAP Change of Status form, send it to CanadaGAP at least fifteen (15) business days before the scheduled audit If you

have been enrolled in a group and wish to switch to an individual certification option (A1, A2, C, D, E or F) submit a completed enrolment form.

3.2. PLANNING:

After receiving the payment of the fee for the inspection and certification service, CU will plan the visit of Inspection.
Planning is based on the scope of application.

It is the client's responsibility to comply with CanadaGAP' s requirements for maintaining a minimum of records keeping, a minimum of 3 months of the season records are required to pass the first CanadaGAP audit (Initial audits).

Split audits (over two or more on-site visits that are separated in time) are now allowed for the CanadaGAP audits.

In case of a CB Transfer: for ALL CERTIFICATION OPTIONS the client's audit shall be scoped as a **new client** (i.e., all crops/Activities or crop/Activity combinations must be seen before including it in the certificate, exceptions can be granted by CanadaGAP.

3.3. INSPECTION TIMING:

3.3.1. Initial inspections:

a) Shall be done during harvest, product handling, packing season, shipping of product, storage period in use, etc. depending on the scope of the client. Note that for Production scope if the operation is still in harvest season but not actually harvesting on the audit date, audit should proceed. For only Packing scope is during packing season, ongoing, but if no packing in audit date, packing line and facilities will be set up and there may be product in storage. For Repacking/Wholesaling /Brokerage, audit is at any time of year that the facility is in operation and product is being handled/brokered. For Production/Packing scope will depend on the certification option:
b) A1, A2, E: audit done during packing (or when harvesting and packing), if necessary scheduled during storing and shipping-exception only to certain storage crops.
c) Option C and option B group members: audit must be done during harvesting and packing, when is not possible or in case of complex operations, more than one audit per year is required so both can be observed in real time. One additional audit can be unannounced.
d) *For multi-product operations: it is preferable for the initial audit to be scheduled at a time to allow for the observation of as many crop/activity combinations as possible. So, ensure that the crop/activity combinations that operation most needs certified are observed during the initial audit. For Options A1, A2 and E subsequent audit may be required at different times of the year to cover the range of commodities and activities.
e) Additional visits may be needed in the first year to get all scopes on the certificate.
f) *For Option B projects, the announced audit to the Group Management system (central function) + audits to group members (following the sample according to the category risk (Level 1, 2, 3, 4).
g) *For Multisite-projects same instructions as Option B. For Options D and F, no sampling is permitted, all sites shall be audited annually.

3.3.2. Subsequent inspections (Re-certification)

a) A minimum surveillance activity of at least once each calendar or crop year, with the date of each surveillance activity occurring not more than 12 months from the date of the previous audit activity.
b) 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 applicants who have multiple commodities and/or activities, it may not always be possible 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, no more than 6 months can be granted.

c) For Multi-product operations, shall 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. Some crops/Activities need to be seen more often based on the risk, in general terms, higher risk crops and activities includes.

d) Applicants in Option A1, A2, E and F with multiple crop and activities need to have ALL crop/activity combinations audited every 4 years, alternating schedule is not possible since the time between audits is 4 years.

e) Operations for Option B, C and D (GFSI-recognized), an audit shall be completed annually on each GFSI-recognized scope. Operations that include both "Production and packing" more than one audit may be required in a given year. Harvest and packing-related activities MUST be observed annually. If the certification includes both greenhouse and field for Option C, the audit must include observation of greenhouses and field products to maintain certification.

f) For Option D, all sites shall be visited.

g) For operations with numerous production sites (not considered multi-sites), the main facility needs to be seen each year the criteria to see other sites every year may be the proximity, the number of sites, similar conditions, distance, chemical storages, wells, or other items/activities where the risk must be assessed. This, if something unusual in the sites, applies also for operations with several long-term storage facilities (potatoes), if they are similar, they may be sampled over time.

h) Multiple locations/facilities, packing activities must be seen annually.

i) For Multisite operations: annually the audit includes a management system audit to the central function + a sample of sites according to the risk category of the products/activities (Level 1, 2, 3, 4). The sample sites are visited after the Management system audit, if necessary, a small number may be audited prior the central function. The sample is always rounded upwards to the next whole number if there are any decimals. The selection by the auditor shall be selective and partly nonselective but at least 25% of the sites chosen shall be randomly selected from the total number of sites. Selected sites shall be identified based on the organization's internal audit programme findings and the site risk profiles. For Options A1 and A2 applies during audit years on-site, not in self-assessment years.

j) For Option B, the annual announced audit to the GMS + audits to group members (following the sample according to the category risk of crops/Activities (Level 1, 2, 3, 4). GMS audit is done BEFORE the sampling of group members sites.

k) Sample size can be increased based on risk factors like audit scope, types of activities on-site, findings of the central management system audit, findings at sampled sites/members, customer requirements.

3.3.3. Random audits: for Options A1 and A2

a) Selected by CanadaGAP randomly, these are mandatory. The client shall complete the self-declarations and self-assessments and send to CU. Deadlines are communicated by CanadaGAP to applicant, but at least one month prior to the certificate expiry date. Submit complete documents also to CU at least one month prior to the certificate expiry date.

b) Applicants are advised that there will be no follow-up contact (emails or phone calls) by CanadaGAP or CU if completed forms are not submitted on time AND to regain certification status after letting the certificate lapse, the applicant is required to restart the four-year audit cycle.

c) Clients that complete and send the self-declarations and self-assessments on time, but fail to cooperate for additional information requested by CU will result in:

d) An on-site audit by the CU at the client's expense

e) Loss of certification

f) Once the documents are complete and presented, the random audit is schedule.

g) Refusal to cooperate with CU in this schedule the random audit will result in suspension or withdrawing of certification AND will not be allowed to re-enroll in CanadaGAP program for one year following withdrawal of certification.

3.3.4. Unannounced audits (UNA) are always full audits, it means a Full CANADAGAP audit checklist is used.

a) A minimum of 10% of each certification options clients will be required to have an UNA each year.

b) *Options A1 A2, E and F: UNA will take place instead of a scheduled audit (NOT additional to a scheduled audit) while activities relevant to the scope are occurring. CU will notify applicants within 2 to 5 business days. In

case the producer refuses the UNA with justified reasons a warning letter will be issue and another notification will be sent (within 2 to 5 business days), if the second notification is also refused, the certification will be suspended, or withdrawal and the client will not be allowed to reenroll in the program for one year since the withdrawal of certification.

c) If the UNA is accepted but the client is not prepared to proceed when the auditor is on site, the client will be charged for auditor time and travel, this situation put the applicant's certification in jeopardy. If possible, the auditor will return for another UNA during the current season.

d) About projects selected for UNA and selected for random audits by CanadaGAP, the client will not be told the exact date of the audit. Likewise, if they already expect to be audited in the year (because they are due for an audit in their four-year cycle), this audit could be unannounced. They will still know in advance that they are having an audit sometime this year. Option A1 and A2 clients, will see no change to their four-year audit cycle and will see no change to the way the random audits work.

e) *Options C and D: Two option options available for this UNA, Unannounced audit Option 1 (UA Option 1) and UA Option 2, to be choose in the CU application form during application.

f) UA Option 1: takes place instead of a regularly scheduled audit, and during which the auditor must observe the crops/activities that need to be seen that year. Blocking harvest or shipping for example is not possible.

g) UA Option 2: the client would undergo 2 audits in the year's crop: one announced (regular schedule) and one unannounced (no prior notice of the exact audit day or time), this unannounced audit must be for the same crop year/season as the announced audit but no need to be schedule during the harvesting, packing, etc., and can be either or after the announced audit. An audit window (30 day-period, could be less) will be defined by CU based on each reality of the applicant operation, and will inform at least 30 days before the audit window starts, the applicant may indicate one blackout date for every six days within the audit window (e.g., 30-day audit window allow 5 blackout dates, this in addition to public holidays for example. The applicant shall notify CU the blackout dates at least (8) weeks in advance.

h) The scope of the UA can be a different crop/activity than the one observed during the announced, but the UA cannot substitute for a triggered audit.

i) For both options no advance notification of exact date and time- Auditor will show up completely unannounced. Applicant will have a general idea only that the unannounced audit will happen and is responsible of keeping CU informed and updated on the timing of the crops/Activities that need to be seen in these audits so schedule can be done properly (UA Option 1). CU will contact client in advance to address audit timing, health, and safety policies (between January-April). Max. (5) five blackout dates are permitted (in addition to close days in the operation). Blackout days may be indicated by client to CU at least 8 weeks in advance through the Application form.

j) If the Unannounced audit doesn't proceed, then CU will re-schedule the audit, applicant will bear the cost of the auditor's visit. If the second attempt (without prior notice) can also not proceed due not valid reasons, applicant will loss of certification until the following year/season when an unannounced audit can occur.

k) There is no guarantee that the auditor will be available to reattempt the audit this may delay the re-scheduling and/or lapse in certification if a follow-up unannounced audit cannot occur in a timely manner, potential loss of certification is also possible if the audit cannot be done before the end of the season.

l) *Option B/Multi-sites

m) UNA are done annually, the 25% of the members/sites selected to be audited shall be UNA.

n) UA Option 1 and UA Option 2 also applies, and no advance notification is allowed.

o) UNA will follow a certification decision; maintain certification, suspension or withdraw as the results of the findings.

3.3.5. Trigger audits

a) Scheduled in case of potential food safety issues, always a full audit.

b) For Options A1 and A2 the trigger audit becomes the surveillance activity for the crop year in question. When an Option A1 or A2 program participant is subject to a triggered audit due to a change in management or ownership, the four-year audit cycle will be set to Year 1 (i.e., the triggered audit becomes the new Year 1 of the four-year audit cycle).

c) Option B projects may include the GMS audit.

d) Also trigger audits can be planned in the following cases: A change to the scope of certification; Major changes in operations or processes; Changes to the legal, commercial or organizational status or ownership and/or the management (e.g., key managerial, decision-making or technical staff); Changes to the location of the sites

included in the certification; Serious concerns raised by CU's review of self-assessments; Complaints received by the certification body or by CanadaGAP; Audit finding that the program participant is not continuously maintaining their food safety program

3.3.6. Self-declarations and Self-assessment reviews (ONLY for Options A1 and A2)

a) Annually - if not selected for random audit, must complete sworn declaration and self-assessment, annually review by CU as a desk study.
b) If no conformities are raised as part of this evaluation, applicant shall complete the Corrective action report.

3.4. AUDITOR/LEAD AUDITOR

a) The lead auditor/auditor acts in accordance with CU procedures.
b) The CU lead auditor/ auditor will also respect the CU Code of Conduct/Confidentiality/ Non conflict of Interest as also the CanadaGAP COI (Conflict of Interest).

Auditor: conducts inspections to Options A1, A2, C, D, E and F.
Lead auditor: conducts audits to Option B and Multisite operations, audits the Management systems.

3.5. INSPECTION/AUDIT

a) CU has the right to conduct announced, unannounced and trigger audits.
b) A qualified lead auditor / auditor will perform the inspection at the facilities declared in the Application form. CU will provide an audit report with the inspection findings.
c) The evaluation regarding whether the applicable requirements are met will be carried out through physical evaluation and administrative at the producer's operations, sites, storages, packing house, group members declared by the client.
d) Audit report(s) are sent to applicant via e-mail within 30 business days of the audit date, regardless of the applicant passed or failed the audit.
e) Changes area acceptable during the opening meeting like change of certification option (e.g., Option D or F) if CU approves it, but client shall consider that the change of certification option can include additional audit fees, extra audit time, and program fee payment to CanadaGAP. All changes in your operation shall be communicated to CanadaGAP through the Change of Status form. Changes like reducing scope are also valid, auditor will require your confirmation in the audit plan to proceed.

3.6. CONDITIONS TO ACHIEVE CERTIFICATION

3.6.1. Condition 1

To be certified under CanadaGAP program, applicant must comply with score according to the scope described below:

a) Option A1 or A2; score of at least 85% on the audit checklist and have no autofail items.
b) Option E or F; score of at least 95% on the audit checklist and have no autofail items.
c) Option C and D; must have no autofail items and must achieve a score of 100% on the audit checklist.
d) Multi-site operations in Options A1, A2, C, D, E and F; score of 100% + all requirements on the Management System Audit checklist for multi-site operations. (GFSI requirements will apply).
e) Option B: the group must achieve 100% with all requirements on the GMS checklist AND all sampled sites must have no autofail items and achieve a score of 100% on the audit checklist, with no auto failures.

Achieving 100% score may occur following completion of corrective actions or having and approved corrective action plan for the subsequent year/season, depending on the nature of the corrective action requests issued to the applicant.

3.6.2. Condition 2

a) If the applicant got at the end of the audit.
- auto fails,
- does not achieve a passing score on the audit or (85% Options A1 and A2; 95% options E and F; 100% Option B, C and D
- chooses to increase their audit score, as customer request for example in Option A1, A2, F.

b) They shall present corrective actions to CU using the format Corrective Actions Report from CanadaGAP this is done after the audit and before the certificate decision is made.

c) Having complete the format, the applicant may be able to present a reasonable plan to implement corrective actions in the following year/season. This can be in form of documentary evidence or photographic.

d) For Multi-site operations, 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 organization and by CU.

3.6.3. Condition 3

a) Automatic failure items shall be corrected first and then follow Executive summary of the audit report to determine higher priority corrective actions already identified by the auditor.

Timelines for corrective actions:
- A1, A2, E and F is 60 days from receipt of the audit report OR at the end of the season, whichever is sooner. A longer timeframe can be granted in exceptional circumstances (e.g., if needed for major capital investments)
- C and D auditees have 60 days from receipt of the audit report to close Corrective Action Requests. A longer timeframe can be granted in exceptional circumstances (e.g., if needed for major capital investments)
- Option B projects, in initial certification, the timeframe to close out CARs is 3 months after initial audit. If no CARs in the 3 months a new audit is required for certification. Subsequent audits, timeframe is 28 days after the audit date, if no CARs closed in the 28 days, the group would get suspension.

b) If no corrective actions by the deadline, or no having the approval from CU for the proposed corrective action plan for the following year/season WILL NOT BE certified, or will have certification withdrawn, and will need another audit or lose the opportunity to increase the score.

c) For Multisite all sites are affected in certification.

d) For Option B group members, consider if non-conformities are 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 CU.

e) The operation's effective implementation of the proposed corrective actions must be verified during the next audit or in case a further visit is required a surveillance audit will be planned to verify corrective actions, the applicant is responsible for resulting fees charged by CU.

f) Closed and approved Corrective Action request will lead to a positive certificate decision.

If during Corrective action process, a corrective action involves reducing the scope of certification or change to a less strict certification option you are allowed to do so, you will be able to continue with the corrective actions as needed, to address any other audit findings, once you receive the revise audit report. In case you decide to change to a less stricter certification option, submit the Change of status form to CanadaGAP, update your CAR form including the change of certification option, any remain corrective action request shall be closed and a revised audit report will be send to you reflecting the new final audit score.

3.7. CERTIFICATION

a) The certification decision shall be AFTER corrective action request are closed out, within a maximum of 30 business days after the audit.

b) If the applicant is not certified because fail the audit and must submit corrective actions, the certificate decision shall be made within a maximum of 30 business days AFTER the closure of the corrective action requests.

c) Audit report will be sent to client within 30 business days of the audit date, regardless of whether the program participant passed or failed the audit.

d) Any change the applicant requests for example: change to crops or activities, change in certification options applicant must inform CanadaGAP and complete the Change Status Form available in CanadaGAP website. Request for changing options is accepted at any time. If the change request is done to CU, we will guide the applicant to contact CanadaGAP to complete the Change Status form.

e) The addition of new crops and/or activities to the certification scope requires a new audit.

f) The changing in certification options restart the audit cycle (have an on-site audit) if changing the scope of their certification and/or transferring CBs.

g) Relative to the four-year audit cycle:
   - Certified companies switching from Option C to Option A1 or A2 must begin in Year 1 in the four-year audit cycle and have a full on-site audit in the effective year of the change, even if they keep the same certification scope (i.e., the same crops and activities certified) and the same CB. The company cannot start immediately in Year 2 of the four-year audit cycle.
   - A program participant switching from option A1 to A2 can continue where they are in their four-year audit cycle, but they CANNOT use a random audit previously performed under option A1 to reset their audit cycle under their new certification option, A2. For example, a company enrolled in option A1 had a random audit in 2019 and switched to option A2 after the audit. The 2019 random audit does not count as a "Year 1" reset under option A2. Rather, the program participant would simply continue where they are in their current four-year audit cycle. Similarly, a program participant enrolled in option A1 who is selected for a random audit cannot switch to option A2 until after the random audit is completed. The program participant can then switch to option A2 and will continue where they are in their current four-year audit cycle.

h) For Option B groups, 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 CU that have not been closed out.

i) For Multi-site operations, if individual sites within the multi-site operation are allowed to sell their product outside of the multi-site organization, in all cases the individual sites shall be transparent about the source and scope of certification, by providing customers with a copy of the certificate.

j) Addition of group members in Option B, under 10%: Up to 10% of new group members in one year can be added to the approved list of registered group members without an audit required, this by enrolling the new members of the group with CanadaGAP and CU. CU will request the following information to groups: Internal inspections, non-conformity reports, contracts, approval by internal auditor, updated group member list.

k) The result of the certification decision will be either:
   - Applicant meets the CanadaGAP program requirements; CU will grant the certificate.
   - Applicant fails to meet the CanadaGAP program requirements; CU will deny/suspend/withdrawn the certificate.

Certificates under suspension are temporally invalid.

CU will notify CanadaGAP about the status of the applicant.

l) Suspensions are lifted after the issue that has resulted in a suspension has been resolved. If the reason of suspension is not resolved in the established time given 3 months, (not more than 6 months), this will result in a withdrawal or reduction of the scope of certification.

m) CU may suspend or withdraw a certificate for a contractual or administrative reason.

n) CU will notify CanadaGAP about the status of the applicant.

o) Client certification status is displayed in the CU website.

4. LOGO

4.1. USE OF LOGO

CanadaGAP trademark is valid and enforceable and is the sole and exclusive property of CanAgPlus.

The use of trademark and logo will follow the Use of Logos and Certification Mark for CanadaGAP Program-CanadaGAP procedure. If using logo, contact CanadaGAP first, through: info@canadagap.ca

Any infringements and/or unauthorized use, will be communicated to CanadaGAP.

If you are going to use the CanadaGAP logos, you can request the logos from CU, indicating the reason for use. CU will keep a record of the usage of Logo of their clients.

5.   CHANGE CONTROL

Version; date	Description
Version 1.0; 03/08/2023	First version of the document.
Version 1.1; 13/02/2024	3.1; 3.2; 3.3.2, 3.6.3 updated