

COVID-19 (Coronavirus) Stakeholder Communication

September 9, 2020

Date: September 9, 2020

To: Industry Stakeholders, CropLife Canada/Fertilizer Canada members

Subject: Update AWSA Auditing Guidelines and COVID-19 (Coronavirus)

As COVID-19 pandemic continues and fall is just weeks away, AWSA management continues to monitor the situation on a province by province basis.

Our initial communication regarding AWSA auditing activities during the COVID-19 restriction period was issued on [March 17, 2020](#). Updates were issued on [June 2, 2020](#) and on [July 13, 2020](#) announcing the continued suspension of in-person audits and providing guidelines for completing audits virtually for all sites due for re-audit before December 31, 2020.

On September 3, 2020 the AWSA Board of Directors met virtually to review AWSA's auditing activities and to provide further direction on auditing policy and procedures for the remainder of 2020. Provincial re-opening plans, CropLife Canada and Fertilizer Canada member company organizational policies, allied stakeholder policies and the directives of other auditing bodies (including government agencies) were taken into considerations.

The following auditing guideline continues to be applicable to all AWSA managed programs for the remainder of 2020:

- **All AWSA managed audits and re-audits (due by December 31, 2020) must be completed remotely by AWSA auditors via electronic means (telephone, E-mail, video conferencing).**

We appreciate that some sites who complete various AWSA managed audits are strongly in favour on in-person audits, however feedback from the AWSA Board of Directors was overwhelmingly in support of continuing to suspend in person audits nationally.

We thank industry for patience and understanding during these challenging times. As the situation evolves, we will endeavour to provide timely updates and revise AWSA auditing guidelines, as applicable. The AWSA Board of Directors are scheduled to review auditing policy and procedures in early December 2020.

If you have any questions or concerns please email our program manager, Anthony Laycock at manager@awsa.ca

Regards,
Russel Hurst
Executive Director

COVID-19 (Coronavirus) Stakeholder Communication Update July 13, 2020

Date: July 7, 2020

To: AWSA Audited Facilities, Industry Stakeholders, CropLife Canada/Fertilizer Canada members

Subject: Update AWSA Auditing Guidelines and COVID-19 (Coronavirus)

As COVID-19 pandemic continues, AWSA management continues to monitor the situation on a province by province basis. We are pleased to see the number of cases reducing and are optimistic that this trend will continue if Canadians continue to follow guidelines being issued by all levels of government to mitigate transmission of COVID-19.

Our initial communication regarding AWSA auditing activities during the COVID-19 restriction period was issued on [March 17, 2020](#). An update was issued on [June 2, 2020](#) announcing the continued suspension of in-person audits and providing guidelines for completing audits virtually for all sites due for re-audit before December 31, 2020.

Over the past week, as provinces progress with their re-opening plans, we have consulted with the AWSA Board members, CropLife Canada and Fertilizer Canada to assess our auditing directives for the remainder of 2020. Based on their feedback and the continued provincial states of emergencies we will continue to suspend all in-person audits. This directive will be reviewed again on September 1, 2020.

We appreciate that some sites who complete various AWSA audits are strongly in favour of in-person audits, however the feedback we received from our Board members, member organizations, key stakeholders and the directives of other auditing bodies (including governmental agencies) support our decision to continue to suspend in-person audits nationally.

The auditing directives outlined in the memo of June 2, 2020 (attached) still apply. All sites have options to maintain certification with virtual audits. If you have not done so already, please start to contact your Auditor to initiate the virtual audit process. It is highly probable that in-person audits will be suspended for all of 2020. Given sites have a virtual audit option, re-audit date extensions are not envisioned. If unique circumstances present that make a virtual audit not possible, please speak with an AWSA Auditor.

We thank the industry for patience and understanding during these challenging times. As the situation evolves, we will endeavour to provide timely updates and revise the AWSA auditing guidelines as applicable. If you have any questions or concerns please email our Program Manager, Anthony Laycock at manager@awsa.ca

Regards,

A handwritten signature in black ink, appearing to read "Russel".

Russel Hurst
Executive Director

COVID-19 (Coronavirus) Stakeholder Communication Update June 2, 2020

Date: June 1, 2020

To: AWSA Audited Facilities, Industry Stakeholders, CropLife Canada/Fertilizer Canada member

Subject: Revised AWSA Auditing guidelines and COVID-19 (Coronavirus)

Our initial communication regarding AWSA auditing activities during the COVID-19 restriction period was issued on [March 17, 2020](#). At that time it was anticipated that some restrictions would start to be lifted in May.

The situation remains fluid as provinces start to discuss gradual lessening of COVID-19 restrictions. Details continue to be vague as experiences of other countries are assessed and scientific evidence evolves. Until we have clear direction from the Federal and Provincial government we continue to suspend all in person auditing activities with AWSA auditors working virtually.

The previous guidelines issued on March 17, 2020 did not address re-audit activities for sites due in 2020. There are more than 1,100 re-audits for AWSA managed programs due to be completed by December 31, 2020. Given restrictions could continue into June (and perhaps beyond) we are now issuing guidelines for all AWSA auditing activities for the remainder of 2020.

Re-audits due in 2020:

AWSA auditors are encouraged to start contacting sites they work with to conduct re-audits virtually.

There are a significant number of protocols that are documentation based and can be reviewed remotely. Photo and video evidence can also be used to verify protocols where visual verification is required.

If the site successfully completes a virtual audit a physical audit will not be required. Upon successful completion the next audit due date will be December 31, 2022.

Change in Ownership

Sites that undergo a change of ownership are required to complete an audit within 90 days of ownership transfer. Renewable extensions will be granted due to COVID-19 travel restrictions, but a completed application form and insurance verification is required.

If the site successfully completes a virtual change of ownership audit a physical audit will not be required. Upon successful completion the next audit due date will be December 31, 2022.

New sites & Renovations:

AWSA auditors are encouraged to start contacting sites they are working with to conduct audits virtually.

In the same manner as sites that are due for re-audit in 2020 new sites and renovations may complete an audit virtually where audit protocols are verified by the AWSA auditor via remote means.

Sites will be granted a conditional certification and are required to complete a physical audit within 90 days of the COVID-19 travel restrictions being lifted.

Pre-audit Incentives

AWSA managed programs with pre-audit incentives (Accredited Seed Treatment Operation Standards) with deadlines that expired during the COVID-19 travel restriction period have been extended indefinitely. The working goal will be to establish a pre-audit incentive deadline of 90 days after the COVID-19 travel restrictions have been lifted.

Commercial seed treatment operators that are considering a pre-audit are encouraged to contact an AWSA auditor and commence working towards completing a virtual pre-audit.

We thank the industry for patience and understanding during these challenging times. As the situation evolves, we will endeavour to provide timely updates and revise the AWSA auditing guidelines as applicable. If you have any questions or concerns please email our Program Manager, Anthony Laycock at manager@awsa.ca

Regards,



Russel Hurst
Executive Director

COVID-19 (Coronavirus) Stakeholder Communication Update March 24, 2020

Through the COVID-19 crisis AWSA is committed to providing updates to AWSA auditors and AWSA certified sites in an effort to provide accurate and up to date information.

1. AWSA has advised AWSA Auditors to cease physical auditing activities until the government directed travel and social distance restrictions associated with COVID-19 have ceased.
2. AWSA managed auditing activities may still proceed via remote means (i.e. phone, video, e-mail, etc.). For reference please review COVID Stakeholder Guidance dated March 19, 2020. For unique situations where there is the potential for negative business impact, sites and Auditors are encouraged to contact the AWSA office for further direction at manager@awsa.ca
3. The industry (CropLife Canada and Fertilizer Canada) is seeking government clarity on the agriculture supply chain being designated as an “essential service”. This status allows the agriculture supply chain (i.e. manufacturing plants, distribution centres, crop input sites, etc.) to remain open in the event provincial governments mandate all non-essential services close. As of March 23, 2020, several provinces have designated the agriculture supply chain as an essential service (Ontario and Quebec). We anticipate other provinces will make these designations shortly and do we not foresee this being an issue for the industry.
4. Within the AWSA managed codes there are a number of requirements for 3rd party training, registration or regulatory licencing to satisfy various protocol requirements. Given that 3rd party in person training and licencing courses have temporarily ceased operations these protocols may be difficult for sites to satisfy. Sites are encouraged to explore electronic means (i.e. AWSA’s online TDG and WHMIS courses; and some provinces offer online vendor licencing). In situations where these avenues cannot be satisfied, various provincial governments have indicated that existing licences will be extended indefinitely. As a working goal AWSA is encouraging sites to regain compliance with any 3rd party training, registration or regulatory licencing within 90 days of the COVID-19 restrictions having ceased or to follow yet to be announced provincial government instructions, as applicable.
5. For sites that have not already established corporate COVID-19 policies, AWSA suggest the following measures be implemented immediately:
 - Work closely with suppliers to ensure there is adequate product(s) and inventory to satisfy your crop input needs during the spring season.

- Restrict access at locations to employees deemed essential.
- Communicate with customers via electronic means (i.e. phone, email, video, text, etc.).
- Follow Public Health Agency guidelines about social distancing and cleaning/disinfecting procedures ([please visit](#)).
- For crop input product deliveries ensure staff maintain a 2 m distance with customers and reduce hard copy documentation to a minimum.

We thank you all for your understanding and patience during these challenging times. As the situation evolves, we endeavor to provide revised guidelines. If you have any questions please email our Project Manager, Anthony Laycock at: manager@awsa.ca

Regards,

A handwritten signature in cursive script, appearing to read "Russel".

Russel Hurst
Executive Director

STAKEHOLDER NOTICE

AWSA Auditing Approach during COVID-19 (Coronavirus) Restrictions

March 19, 2020

In an interconnected global economy, the new COVID-19 (also known as Coronavirus) is affecting Canadian businesses and their operations. It has resulted in restrictions on travel and public gatherings, as well as supply chain disruptions and market uncertainty.

The continued certification and re-certification of agri-retailers by the Agrichemical Warehousing Standards Association (AWSA) on behalf of Fertilizer Canada and CropLife Canada is essential to limit business interruption in the Canadian agricultural sector. AWSA management, in consultation with Fertilizer Canada and CropLife Canada, continues to review and revise guidelines for auditing to ensure alignment with the most recent Federal and Provincial Government recommendations, guidelines and directives.

On March 17, 2020 AWSA released a statement advising that all physical (in person) aspects of auditing for the various codes and programs under AWSA management are to cease until further notice. Various avenues for continued auditing, in the absence of in person contact have been prepared and distributed to AWSA Auditors.

The objectives of the auditing programs managed by AWSA are to foster continuous improvement of managing the risks associated with agri-chemical and fertilizer storage and distribution. Certification processes will remain stringent and rigorous during the COVID-19 restriction period.

The various codes and programs under management include protocols that address:

- Siting in relation to neighbour occupancies, environmental sensitive areas and zoning designations.
- Physical structures and equipment;
- Operational procedures;
- Employee training and knowledge;
- Emergency response; and
- Insurance.

Many of these protocols are documentation based and can be review remotely by AWSA Auditors. In addition to documentation review, Auditors will be using telephone

interviews, photographs and live video walking tours of sites (i.e. Facetime) to conduct audits.

Sites due for a re-audit in 2020 have until the end of 2020 (i.e. December 31, 2020) to complete their respective audit(s), consequently these will be scheduled for a physical audit once the COVID-19 restrictions have been lifted.

For sites due for a re-audit in 2020 that have had a physical visit in the past two months and are working on action items to finalise their certification; if the AWSA Auditor is satisfied by using the above mentioned remote tools that the site has met the necessary protocol requirements, certification will be issued with the applicable re-audit due date.

For new sites or sites being renovated (new storage buildings and/or new equipment) that have had a physical visit (pre-audit) in the past two months and are working on action items to finalise their certification; if the AWSA Auditor is satisfied by using the above mentioned tools that the site has met the necessary protocol requirements, certification will be issued with the applicable re-audit due date.

For new sites or sites being renovated (new storage buildings and/or new equipment) that have not had a physical visit (pre-audit) in the past two months and are working on action items to finalise their certification; if the AWSA Auditor is satisfied by using the above mentioned tools that the site has met the necessary protocol requirements, conditional certification will be issued. The site will be required to complete a physical audit within 90 days of COVID-19 restrictions being lifted.

Some of the various codes and program include protocols that require **3rd party training, registration or regulatory licensing** to satisfy protocols. Given many of these 3rd parties have temporarily ceased operations, these protocols will be conditionally passed in the interim. Sites will be required to provide proof of successful completion to the AWSA Auditor the initial audit was completed by within 90 days of COVID-19 restrictions being lifted. Note: regulatory requirements referenced in the various codes and programs managed by AWSA and any timelines established by the applicable regulatory authorities supersede. AWSA will endeavour to liaise with the noted regulatory authorities to ensure clean communication and minimize business interruptions.

We thank you all for your understanding and patience during these challenging times. As the situation evolves, we endeavor to provide revised guidelines. If you have any questions please email our Project Manager, Anthony Laycock at: manager@awsa.ca

Regards,



Russel Hurst
Executive Director

NOTICE

AWSA Auditing Activities and COVID-19 (Coronavirus) Version: March 17, 2020

In an interconnected global economy, the new COVID-19 (also known as Coronavirus) is affecting Canadian businesses and their operations. It has resulted in restrictions on travel and public gatherings, as well as supply chain disruptions and market uncertainty.

Personal and public health are paramount. Government, at all levels, have implemented guidelines, restrictions and recommendations. These supersede. Information can be found on the Government of Canada website at: <https://bit.ly/2x3WnDf>. This information is currently being updated daily.

During this period, the following guidelines may help address any questions you may have:

Audits due in 2020:

- For all programs audited by AWSA the re-audit due dates are the 31st of December. For audits booked during the next several months (i.e. until June 2020) AWSA Auditors have been advised to suspend all in-person site visits.

New Sites/Renovations:

- Sites that are currently being newly commissioned or being renovated require a physical audit before product can be stored. Auditors have been provided guidance on how to address these situations. Please contact your AWSA Auditor to discuss options.

Change of Ownership:

- Sites that are undergoing a change of ownership are required to complete an audit within 90 days of ownership transfer. Reasonable extensions will be granted, but a completed application form and insurance verification will be still required. Please contact your AWSA Auditor to facilitate extensions.

Pre-Audit Rebates – Accredited Seed Treatment Operation Standards:

- Pre-audit incentives for the Accredited Seed Treatment Operation Standards have a deadline of March 31, 2020 to receive a \$400 rebate on the cost of a pre-audit.

AWSA will be extending the pre-audit incentive period indefinitely. In the interim please contact an AWSA Auditor so we can track operators seeking certification.

AWSA Office:

- For the next several weeks we will have no staff in the office, with most working from home. It is expected that there will be minimal delays in responding to emails and phone calls. There may be some delays in sending compliance certificates. Electronic certificates will continue to be issued.

We thank you all for your understanding and patience during these challenging times. As the situation evolves, we will endeavor to provide revised guidelines. If you have any questions please email our Project Manager, Anthony Laycock at manager@awsa.ca

Regards,

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Russel Hurst
Executive Director