Regulations for product certification according to the GlobalGAP standard

System and Product Certification Body
(TÜV Thüringen Italia Srl)
(for accredited certifications of QMS, EMS, SGSS management systems)
(for accredited product certifications GlobalG.AP and ISO22005)

Summary

1. General

This regulation of the control and certification activity of the products obtained in compliance with the IFA, GRASP and CoC standards of GLOBALG.AP, contains a series of prescriptions that the Organizations must comply with in order to obtain the certification of conformity and maintain it within the scope the surveillance and renewal activity carried out by Tüv Thüringen Italia Srl, hereinafter referred to as TTI.

The regulatory basis, to which the Organization must refer for obtaining and maintaining the certification of conformity, consists of the applicable mandatory standards and the reference Normative Documents, defined in the General Regulations of GLOBALG.AP.

1. 1 Scope of operation

TTI's scope of operation as a GLOBALG.AP approved body is the GLOBALG.AP IFA and / or GRASP and / or CoC certification of “Fruits and Vegetables” and “Extensive Crops”.

The reference documents of the Organizations in addition to the contractual ones are represented by the Regulatory ones, which include the current legislation applicable to the product and activities subject to certification, and the GLOBALG.AP Standards mentioned in par. 2, part I of the General Rules. The reference documents are translated into Italian and have regulatory value. If there are any discrepancies in the translation, the original English version prevails.

Object

The object is the certification of compliance with the GLOBALG.AP standard according to the sub-field of application "Fruit and Vegetables" and "Extensive Crops" IFA and / or GRASP and / or CoC of GLOBALG.AP. The conformity of the product and its methods of obtaining implies compliance with the legislation in force at national and community level.

Field of application

The field of application is represented by the cultivation of agricultural products by producers in the fruit and vegetable sub-sector whose productions fall within the GLOBALG.AP product list.

General requirements

TTI provides the inspection service and the issue of product certification for the required purpose to all producers who request it in compliance with the laws, regulations and specific procedures of this Control Body. The reference standards must be prescribed, certain and known, the detection of the lack of one of these elements triggers the start of the adjustment period to the standard of the standards.

The commitment to comply with the GlobalG.AP regulations and the related TTI procedures is the basis of the relationship between inspected subjects and the certification body. Failure to comply with the rules leads to the loss of the compliance requirement.

2 Definitions

Certification Body (CB):organizations that provide conformity assessment services such as audits and certifications of producers or producer groups against GLOBALG.AP (GLOBALG.AP) standards as part of the requirements defined in ISO / IEC 17065: 2012 "Requirements for organizations that certify products, processes and services ";

Global GAP Integrated Farm Assurance (IFA) Standard: General Rules, Control Points and Compliance Criteria, Applicable Checklists and National Guidelines for the interpretation and application of Control Points, as defined in chapter 2 of part 1 of the General Rules, Data access rules defined by GLOBALG.AP.

Global GAP Chain Of Custody (CoC) Standard: General Rules, Control Points and Compliance Criteria, Applicable Checklists and Data Access Rules defined by GLOBALG.AP.

GLOBALG.AP (GGN) code:A unique number assigned by GLOBALG.AP to producers upon registration. It is used as a unique identifier for all GLOBALG.AP (GLOBALG.AP) activities.

Global Identification Number (GLN): A unique number assigned by the national GS1 Organization that represents the solution for identifying physical locations and legal entities.

License and Certification Agreement: Legal document establishing the rights and obligations of GLOBALG.AP as the owner of the standard and GLOBALG.AP approved certification bodies as independent verification bodies regarding verification, certification and licensing activities within the context of the system.

Non-fulfillment: A GLOBALG.AP checkpoint in the checklist does not meet a fulfillment criterion.

Non-compliance: Infringement of a GLOBALG.AP rule required to obtain the GLOBALG.AP certificate. In other words, the manufacturer does not fulfill 100% of the Applicable Major Criteria and / or 95% of the Applicable Minor Criteria.

Registration: The process by which a single producer or group of producers initiates the certification process through a GLOBALG.AP approved CB.

Registration number:AND a number that is issued by TTI to identify the manufacturer. This number is an additional identification number to the GGN. The number consists of the acronym for TTI (TTI) followed by a space and then followed by the manufacturer or group number, as issued by TTI.

Sublicense and Certification Agreement: Legal document establishing the rights and duties of GLOBALG.AP approved certification bodies as independent bodies with regard to verification, certification and licensing activities and, furthermore, of producers or producer groups as interested parties active in the market to within the context of the GLOBALG.AP system.

Parallel production: condition in which a producer / producer member / producer group carries out the cultivation of certified and non-certified products within the same crop species.

Parallel property: condition in which, in the same certification period, a producer / producer member / producer group purchases non-certified products of the same type (same species) as those products they grow and certify according to the GlobalG.AP standard.

Product traceability: It is the possibility of tracing the origin of a specific unit and / or batch of product within the supply chain by referring to the registrations in the previous phases of the supply chain.

Product traceability: It is the possibility of following the path of a specific product unit through the supply chain as it moves from one organization to another. Products are tracked regularly for expiration, inventory management and logistical reasons. Within GLOBALG.AP Integrated Safety in Agriculture this means following a product from the producer to its direct customer.

Production Site: It is a production area (land, plot, pond, etc ...) that is owned or rented and managed by a single legal entity and where the same inputs / factors of production are used (Water source, workers, machinery , stores). A production site could consist of non-contiguous production areas, but in any case the cultivation of different products within the same production site is possible.

Food handling: Low-risk post-harvest activities, carried out on commodities still owned by the certified producer / producer group; activities carried out in the company or outside the company, such as for example packaging, storage and transport outside the company, but excluding collection and transport activities within the company from the collection point to the first point storage / packaging. Food handling does not concern food processing activities. Furthermore, all storage activities, chemical treatments, pruning, washing or other types of manipulation must be considered in the point "Handling of food products".

PHU (product handling unit): It is a product handling unit defined by the manufacturer where different commodities are stored and handled. The separation of the same is guaranteed at any time and all measures are put in place to keep the records separate and avoid mixing.

Packaging Structure: Any facility used for handling harvested produce (see Handling of Goods). Included in the GLOBALG.AP certificate with Integrated Agricultural Safety scope are only those packaging facilities in which the GLOBALG.AP registered commodities are not packaged in the packaging intended for the final consumer and / or where the commodities are not processed.

Multisite company: S.single company that owns several production sites that fall within the same legal and legal entity.

For any other term used in this Regulation, the definitions contained in the Standards UNI CEI EN ISO / IEC 17000: 2005, UNI CEI EN 45020: 2006, UNI EN ISO 9000: 2005, UNI EN ISO 19011: 2012 and mandatory legislative documents of applicable reference and GLOBALG.AP Standards.

3 Normative references

The reference documents of the Organizations in addition to the contractual ones are represented by the Regulatory ones, which include the legislation in force applicable to the product and activities subject to certification, and the GLOBALG.AP Standards cited in par. 2, part I of the General Rules. The reference documents are translated into Italian and have regulatory value. If there are any discrepancies in the translation, the original English version prevails.

The documents underlying the rules of this regulation for certification comply with: ISO / IEC 17065: 2012 “Requirements for bodies that certify products, processes and services”; UNI CEI 70006 "General rules for a standard system of product certification by an independent body"; Statute of TTI; ACCREDIA regulations and prescriptions.

This regulation for certification according to the GlobalG.AP standard is based on the requirements contained in the official documents GlobalG.AP IFA sub-field of application Fruit and Vegetables and Combinable Crops, Version 5.2 February 2019, Standard GLOBALG.AP Chain of Custody CoC V5.0_Dec14 , ADD ON GRASP GLOBALG.AP Version 1.3.1.i of 1 July 2020.

In addition to these regulatory documents, the GLOBALG.AP Technical and Regulatory Committee may approve and publish Guidelines regarding the general interpretation and application of Control Points within the CPCC Fruit and Vegetables and guidelines relating to geographical diversity. and cultural specifics.

4 Organizational and operational structure TTI

TTI makes use of a national office, employees and external inspectors to carry out its activities. The management bodies operate in the national headquarters, and all certification activities are carried out.

The General Management of TTI is entrusted to the Directors, the internal staff is organized in the various offices of the national headquarters that report to the Divisional Departments; the external inspectors carry out their activity within the framework of a professional performance relationship and operate under the coordination of the Technical Management of the Certification Division.

TTI uses qualified personnel for control and certification activities, for which it has defined minimum levels of competence, and also provides training, training and updating to always guarantee high levels of professionalism.

The management bodies of TTI are made up of the Impartiality Safeguard Committeè which has the task of guaranteeing the objectivitỳ and impartialitỳ of controls and certifications, the Appeals Management Committee which has the task of evaluating disputes initiated by suppliers against decisions taken by TTI, and by the Technical Certification Committee, which decides on the suspension and revocation of certificates.

5 Types of certification

GlobalG.AP certification can be achieved by:

- Individual producers applying for GLOBALG.AP Certification (Option 1 individual certification);
- Farmer Group applying for GLOBALG.AP Certification (Option 2 group certification).

5.1 Individual certification (OPTION 1)

The certification individual according to option 1 it can be issued in the following cases:

A. option 1 company with a single production site;

B. option 1 multisite company without implementing a Quality System;

C. option 1 multisite company with implementation of a Quality System.

This type of GlobalG.AP certification requires:

Internal self-control of the manufacturer: based on the GLOBALG.AP Checklist of fields and sub-fields of application. It will be reviewed by the TTI assessor during the corporate audit process.

The farm has the obligation and responsibility to carry out the aforementioned self-control at least once a year in relation to the risk analysis and make available evidence of such self-control at the time of the audit.

External verification of TTI (GLOBALG.AP approved certification body):

TTI will carry out at least one external audit scheduled annually on the registered farm and on all registered sites used for handling the produce. TTI will carry out additional unannounced audits equal to a minimum of 10% per year, among all its Producers certified and registered according to Option 1 on the basis of considerations relating to the criticality of the company. The latter will be notified to the producer with a maximum notice of 48 hours (2 working days); the producer, presenting reasons that must be considered valid by TTI, may request, only once, to postpone this verification which will be subsequently planned again by surprise by TTI. In the event that the manufacturer manifests a second time the impossibility of carrying out this activity, without valid justifications, then all products will be suspended. The choice of the sample (10%) to be subjected to unannounced verification will not be made randomly, but based on a business risk assessment that takes into account at least the following factors: number of crops falling within the manufacturer's certificate of conformity and their different seasonality; crop type and presence of post-harvest activities; outcome of previous audits, geographical area etc ... crop type and presence of post-harvest activities; outcome of previous audits, geographical area etc ... crop type and presence of post-harvest activities; outcome of previous audits, geographical area etc ...

TTI offers the opportunity to participate in the Unannounced Recognition Program; in this case, the inspection, which will be carried out using the complete Checklist, will not be announced. Participation in this program will allow the manufacturer to be excluded from the sample of unannounced additional checks (10%), unless TTI, due to particular circumstances (receipt of complaints from the manufacturer), still decides to include the manufacturer in that sample. Participation in this program will be recorded in the GlogalGap database.

These external audits may be carried out by a GLOBALG.AP Auditor or Auditor.

In the case of a multi-site option 1 company with an implemented quality system, TTI will carry out its checks in the same manner as described for option 2.

5.2 Group certification (OPTION 2)

This type of GlobalG.AP certification requires:

Internal Management and Quality System: The producer group must have implemented a Quality System compliant with the GlobalG.AP General Rules part II.

Internal audits of producers belonging to the Producer Group: Lhe internal verification must be carried out with the help of the GLOBALG.AP checklists (Major and Minor Requirements and Recommendations) with reference to the applicable fields of application and sub-fields of application. At least one internal audit per year must be carried out for each producer / production site / handling site registered with a producer group; this verification must be carried out by a qualified internal assessor of the producer groups or by an external Certification Body in charge other than the external auditor of the group.

External audit via TTI: The CB carries out the following checks:

- Quality System Audit;
- Sample inspection on farms /members of the Producers' Group.

The Auditor appointed by TTI will carry out an assessment of the conformity of the Quality system. The Audit will be performed in the first certification phase and repeated annually.

The inspection will be carried out annually on a random sample that corresponds at least to the square root of the total number of farms /of production sites and handling sites registered within the Producer Group.

TTI will carry out additional unannounced audits equal to a minimum of 10% per year, among all its Producer Groups certified and registered according to Option 2 for the aspects of the QMS and on the basis of considerations relating to the criticality of the company. The latter will be notified to the Producers Group with a maximum notice of 48 hours (2 working days); the GP, presenting reasons that must be considered valid by TTI, may request, only once, to postpone this verification which will be subsequently planned again by surprise by TTI. In the event that the group of producers manifests a second time that it is impossible to carry out this activity, without valid justifications, then a complete suspension will be carried out. The choice of the sample (10%) to be subjected to an unannounced audit will not be made randomly, but on the basis of a business risk assessment that takes into account at least the following factors: size of the Producer Group, number of producers participating in the GP and their different seasonality; crop type and presence of post-harvest activities; outcome of previous audits, geographical area etc ...

Furthermore TTI, dDuring the period of validity (12 months) of the certificate, it will carry out a second verification announced with a number of members of the producer group which is equivalent to 50% of the previously verified sample. Only if in the unannounced external audits no non-conformities are found, the number of the sample of members of the producer group to be verified at the time of renewal of the certificate will be equal to the square rootof the total number of farms /of production sites and handling sites minus the number of farms/of production sites and handling sites checked during the previous unannounced check audit.

6. Purpose of the certification

The entire production process conducted by the requesting Organization, in relation to the products declared and registered for the GlobalG.AP certification, must be audited in order to verify their compliance with the requirements of the GlobalG.AP standard.

The certificate of conformity will in fact be issued to the Producer / Group of Producers for the registered products (including the handling activity, if applicable); for this reason the products obtained insites of production / handling not registered / certified will not be able to be certified by GlobalG.AP.

Only the organization requesting the certification, understood as the owner of the GlobalG.AP certificate of conformity, which will report the company name, will be able to market those products by referring to the certification in question. In the case of option 2, in fact, the individual members belonging to the PG will not be able to market any product under their own name by referring to the certification of the Producers Group.

7. Levels of Compliance

Fulfillment of the GLOBALG.AP Fruit and Vegetables scheme requires compliance with the specifications provided for by the three types of control points of the GLOBALG.AP documents: Control points and compliance criteria Basic module for all agricultural activities, Basic module for all crops, Fruit and Vegetables Basic Module, which must be respected by the applicant in order to obtain GLOBALG.AP recognition.

The issue of the certification is subject to the fulfillment of 100% of the control points of the QMS,100% of all applicable Major Control Points and 95% of all applicable Minor Control Points. There is no minimum compliance rate for recommendations.

TTI at the time of the inspection visit will check all CPCC checkpoints, including recommendations, as described in the GlobalG.AP scheme.The fulfillment percentage will be calculated on the total of the Major and Minor control points applicable in all the combined modules (AF, CB, FV). Control Points that report a "Not N / A" in the Compliance Criterion field must be verified and cannot be declared "not applicable", unless clearly indicated in this regard in the respective text of the Compliance Criterion.

In the GRASP evaluation module, the individual control points are evaluated with 4 levels of compliance as required by the general rules and whose results will be loaded and verifiable in the specific database.

8. Application for certification

Access to the GLOBALG.AP product certification services takes place with the compilation and submission by the Organization of the following documents:

- Application for certification and required attachments;
- Economic offer signed for acceptance;
- Contract for the provision of the inspection and / or certification service;
- GLOBALG.AP Sublicense and Certification Agreement.

All documents must be signed by the Legal Representative or by the Owner of the Organization and sent to TTI. Contracts must be sent in original.

Any requests for clarification and / or additional information can be included in the certification application.

The Organization must inform TTI about any certifications and / or registrations with other Certification Bodies, at the time of the certification application, also communicating its GGN code (GLOBALG.AP Number, see General Rules, part I, Annex I. 1 paragraph 3) assigned by the previous TOO, following registration in the GLOBALG.AP database.

9. Preliminary check

The preliminary verification can be requested by the requesting Organization, if it deems it useful, in writing, directly in the appropriate spaces of the certification application, or through subsequent communication.

The preliminary verification, if requested, must be carried out before the actual conformity assessment activity starts, it cannot be repeated, it is not considered part of the certification process and its possible execution cannot reduce the duration of the verification initial certification.

The preliminary check has the purpose of assessing the adequacy of the organization, of the management system of the product or process in relation to the reference standard document and, if necessary, of identifying precisely the purpose and extent of the certification.

The preliminary check is carried out following the payment of the consideration as per the undersigned economic offer.

10 Certification path

The GlobalG.AP registration requires the company to provide TTI with at least the information required by Annex I.2 of the General Rules. Furthermore, these must be updated regularly by the company and in any case communicated to the CB whenever there are changes. The procedure must be completed before the first control / audit by the CB.

Once the registration has been successfully completed, TTI will provide:

- a GLOBALG.AP (GGN) Code
- a GlobalG.AP Registration number.

TTI undertakes, within 28 calendar days from the complete receipt of the registration request, to communicate the relative GGN to the Organization and to to release the GLOBALG.AP Certificate of Conformity within 28 calendar days following the certification audit or after the elimination of all suspended non-conformities.

The Audit of the Organization can only be performed after registration or re-registration in the GLOBALG.AP database and subsequent acceptance of the application.

TTI transmits to the applicant Organization the Evaluation Plan which includes the planning of the audit activity in terms of members of the Audit Audit Group, timing and possibly dates of execution.

In relation to the methods and criteria for conducting the initial GLOBALG.AP IFA audits, TTI complies with what is defined in par. 5.1.2 of part I of the General Rules and in particular for options 2 and options 1 multisite with implementation of a quality system (QMS).

In relation to the methods and criteria for conducting GLOBALG.AP CHAIN OF CUSTODY audits, TTI complies with what is defined in par. 5.1.2 and 5.2 of the related General Rules.

In relation to the certification of several products in the initial phase, TTI takes into account the criteria set in the Cultivation Regulations version 5.2 of 01/02/2019.

The audits announced, in accordance with the provisions of par. 5.2 of the General Regulations part III, according to option 1 can be divided into two modules: an off-site module and an on-site module.

The off-site form verification must be conducted no more than four weeks prior to the on-site form verification. This is an analysis of the documentation sent by the manufacturer to TTI prior to on-site verification. TTI will schedule a date as a deadline for the producer to submit documents to be evaluated off site. This date triggers the 28-day period to conduct the on-site assessment.

The documentation that can be evaluated off-site by TTI includes the following: Self-control, Food Safety Policy Statement, risk assessment, procedures required in different PCCAs, analysis program (frequency, parameters, sites), analysis reports, licenses, list of plant protection products used, proof of laboratory accreditation, certificates or verification reports of the subcontracted activities and records relating to the application of plant protection products / fertilizers.

In the event that defaults are found during the entire assessment process (off-site and on-site forms simultaneously), the time remaining until the deadline for the closure of such defaults begins with the on-site closing meeting.

This system does not reduce the overall verification time (see requirements regarding verification duration in the scope specific rules), but allows for more efficient use of time on site. The duration of the on-site module must never be less than two hours.

The Organization may choose to participate in the "Unannounced Recognition Program" based on the conditions defined in point 5.1.2.3 of the General Rules Part I, in particular:

1. by adhering to the above program, the organization will be excluded from the 10% sample of companies chosen annually by TTI. However, the conditions under which the audits will be conducted are those defined for the unannounced audits in point 5.1.2.2 of the General Rules part I.
2. The audits must be conducted using the IFA checklist in full, according to the purpose and sub-purpose of certification.
3. Participants in the program cannot adhere to the "off site" verification methodology
4. participation in the program is made evident by recording this information in the GLOBALG.AP database.
5. in justified circumstances (eg follow-up audits) TTI retains the right to schedule unannounced audits during the validity period of the certificate.
6. if the Organization needs to receive a verification for an “add-on” and the rules of this additional module exclude the possibility of unannounced verifications, the Organization cannot join the “Unannounced recognition program”.

As regards the verification of the quality system for both Options 2 and Options 1 multisite with quality system, reference is made to what is established in par. 5.4.1 of the General Rules part 3.

In relation to the conducting times of GLOBALG.AP IFA audits, TTI is required to observe the minimum requirements contained in the GLOBALG.AP General Regulations (Part III, par.5 which, depending on the sites being audited, provide that:

1. The normal duration of the GLOBALG.AP verification of the production site for GLOBALG.AP IFA crops is between 3 and 8 hours (producer under Option 1);
2. The minimum duration of 3 hours concerns the simplest cases (ie a single site, one or a few crops, simple machinery, few workers, absence of food handling, subsequent verification, good organization of documentation, etc.);
3. Option 2 producer group members could be subjected to shorter audits based on the complexity of the business situation;

The factors that can increase the minimum duration of 3 hours (the list is not exhaustive and is applicable for Option 1 and Option 2 members) are: initial verification, addition of new crops during subsequent verifications, addition of new sites during subsequent audits, including storage, including food handling, different types of products (product groups), different types of collections (collection methods), multiple locations and sites, additional sub-fields, use of subcontractors (not controlled by third parties).

The duration of the audits of the quality system regarding the assessment of the requirements included in the General Regulations Part II, as required by point 5.4.1 of the General Regulations part III, will last at least 6 - 8 hours, depending on the size of the producer / company group with multiple site.

As regards the lead times for GLOBALG.AP CHAIN OF CUSTODY audits, they will be defined based on the structure of the Organization and the processes implemented. The date of execution of the audit can also be defined by the Head of the Audit Group, in agreement with the Organization and formalized in the Audit Plan sent to the same Organization.

The Audit Team can consist of only one member, who has the function of Manager, and can also include Observers, Supervisory Inspectors and Inspectors in training. The Organization may object to members of the Audit Group, communicating the reasons in writing to TTI, within two working days from the transmission of the Evaluation Plan.

TTI evaluates the objection, and if it deems the reasons justified, it sends the Evaluation Plan with the name of the new member of the Audit Group to the Organization. If the reasons are unjustified, TTI communicates this decision to the Organization, confirming the Group previously appointed.

In the case of multi-site audits, the number of sites subject to audits is defined in relation to the sampling methods contained in the GLOBALG.AP Standards. The planning of the audit activity takes into account the criteria established in the GLOBALG.AP Standards, in relation to periods of execution.

The Organization must provide the Inspection Verification Group with assistance during the stages of the inspection audit, access in safe conditions to the sites and production processes subject to certification, availability of the documents of the product management system and of the records provided for by the management system. of the product and the GLOBALG.AP Standards. In particular, the information reported in the registration documents, for the purposes of compliance with the Standard, are considered valid starting from the three months prior to collection or from the date of registration in the GLOBALG.AP database if the period of time is longer.

The same guarantees must be ensured to the Inspectors of the Accreditation Bodies of TTI (eg ACCREDIA) who work alongside the Audit Group. Any non-compliance in relation to access to the sites, processes and documents will result in the non-granting of the certification.

The inspection includes the initial meeting with the organization's management, carrying out the compliance check of company documents, registrations and production processes, any product sampling and the final meeting.

The initial meeting of the Audit Group with the Management of the Organization has the purpose of illustrating the procedures and criteria used for conducting the audit, confirming the program, also at the logistical level, agreeing on the places of execution of the audit, identifying the representative of the Organization in charge of acting as an interface with the Audit Group, clarify any doubts.

The verification of the production structures, processes and products of the Organization involves the assessment of compliance with the requirements of the reference GLOBALG.AP Standard. The verification is conducted according to the sampling method and is based on interviews with staff, direct observation of the activities carried out, tests, places, documents and records.

Any consultants of the Organization may attend the Audit, exclusively as observers; they are granted the right to intervene when called into question by one of the members of the Audit Group.

For the purpose of collecting any evidence necessary to support compliance and / or non-compliance, the operator must also guarantee the possibility of such collection by copying, photocopying or photography, in compliance with the regulations in force regarding the protection of personal data. .

At the end, the Audit Group draws up the Audit Report itself and presents it at the final meeting to the representatives of the Organization, in order to illustrate its contents and in particular any non-conformities that have emerged. The Organization may ask for clarification in relation to the results and if it deems it appropriate, it may record any reservations in the report itself.

The audit report, complete with any attachments, after being signed in the appropriate spaces by the members of the Verification Group and by the Organization Representative for acceptance, is left in copy to the Organization itself.

The Inspection Report is to be considered confirmed if TTI, following its re-examination, does not communicate changes and / or corrections to the results, within ten working days of its release. The Organization must send the TTI within 28 calendar days from the date of issue of the Verification Report proposals for corrective actions relating to the non-conformities that have emerged.

TTI assesses the adequacy of the documented evidence sent by the Organization, and if it deems it insufficient to demonstrate compliance with the standard, it plans and carries out an additional Audit (follow-up), the costs of which are charged to the Organization itself.

During the audits in the company, the TTI inspector can be accompanied by external or internal observers with the role of verifiers of the CB's operations, such as personnel of Accredia (accreditation body), of the Public Control Authorities, of the Quality Department of TTI and of the CSI of TTI (Safeguard Committee for impartiality) or by observing personnel for the completion of the training procedure foreseen for TTI personnel. In this case, the Operator, who is notified in advance, is required to accept the presence of such personnel, giving them full availability and access to the company structures.

10.1 Definition of the calendar of the inspections

TTI prepares the audits during the collection and handling period, where applicable, in order to be able to evaluate in the most correct way the largest number of control points and all the stages of the production process that fall within the scope of the certification.

In the event that for technical / operational reasons, adequately justified, the inspections must be carried out in a period other than collection or handling, they will be conducted in different periods. In any case, certificates will not be issued until the entire production process, for registered products, is verified. And in any case, the products collected or handled before registration cannot be certified.

10.2 Certification of multiple crops

In the presence of companies that record vegetable productions grown in different production cycles (autumn-winter and spring-summer) or with different production systems, TTI will program the initial checks by grouping those crops that have similar production systems and periods, verifying the entire production process, including collection and handling, if applicable. In case of a positive outcome of the verification, only the crops checked in this phase will be included in the certificate of conformity. The other crops not inspected during the ordinary verification, but always falling within the annual production cycle, can be added to the certificate only following further audits, which allow TTI to carry out a complete verification of the production process.

10.3 First Inspection Visit

During the first year, in relation to the GlobalG.AP certification, TTI will check the company records for the 3 months prior to the inspection date, or, if longer, the date of the manufacturer's first GLOBALG.AP registration. The collection and handling of the produce must be carried out after the registration of the Producer to GLOBALG.AP. The entire production process of each registered product must be fully verified in order for the certificate to be issued.

10.4 Subsequent Checks

The subsequent annual checks in general will be carried out in a period in which at least one product of the registered sub-scope is present in the field or in the warehouse or in any case when there are agronomic activities directly connected to the product subject to certification. In the event that the handling is not included in the scope of the certification, then the subsequent verification must be carried out during the collection phase with a frequency of at least every 2 years.

In the presence of the food handling activity, the processing structures involved must be annually verified during their operation; this control frequency can be extended to 2 years only if justified by a specific risk assessment conducted by TTI.

Subsequent verifications can be conducted during an 8-month inspection window, starting from 4 months before the certificate expiration up to 4 months after the certificate expiration (only in the case of extension of the validity of the certificate).

10.5 Homogeneous groups of crops

In the respective year, at least one crop falling within each product grouping must be inspected during the harvest phase. TTI will group crops considering the similarities in the production and harvesting process and their risks.

The crops may fall into at least the following Groupings:

- Crops with exclusively mechanical harvesting (only in this case it will not be necessary to check during harvesting);
- Low-risk manual harvesting crops i.e .:
    - Always cooked before consumption
    - Not edible after cleaning
    - Dried walnuts
    - With inedible peel or with shell
    - With natural reduction of pathogens in post harvest
    - Crops for which no previous food safety incidents are known;
- High-risk crops with manual harvesting or all those not falling under the previous item;
- Crops affected by the use of water or ice during the harvesting phase;
- Field packaged crops.

10. 6 Parallel production (PP)

A producer / producer group wishing to obtain GlobalG.AP certification has the possibility of having certified and non-certified products within the same crop species.

Parallel production will not be allowed within the same production site unless there are visible unmistakable and recognizable characteristics by the average consumer between the certified and non-certified product (Example: Cherry Tomatoes and Roma Tomatoes).

10.7 Parallel Property (PO)

A producer / group of producers who are certified GlobalG.AP for some products they grow has the opportunity to purchase the same non-certified products and be the owner, at the same time, of the same certified and non-certified references.

Parallel Ownership is possible within the same manipulation site.

In these cases, however, all products must be traceable to their respective production sites / PHUs and certified and non-certified products must be completely separated at all times. Producers must be able to demonstrate that their registration and traceability system guarantees full traceability and isolation.

10.8 Handling of food

The handling of commodities includes any type of post-harvest handling of products such as storage, chemical treatment, sorting, washing, packaging or any other handling in which the products may come into direct contact with other materials or substances.

In the event that the producer or producer group declares to carry out the handling of the food, the following scenarios may occur:

1. The legal entity (A) produces and manipulates the commodities within its own facilities. TTI will issue (A) a certificate showing the handling of the commodities in question;

2. The legal entity (A) subcontracts the handling of the food to a third party (B) that is not certified. TTI, following the positive verification which will also include the manipulation phase, will issue (A) a certificate including the manipulation with attached the address of (B) who carries out the manipulation on behalf of third parties;
3. The legal entity (A) subcontracts the handling of the goods to a third party (B) certified (also for the handling phase) by the same body as (A). TTI will issue to (A) a certificate including the manipulation with attached the address of (B) who carries out the manipulation on behalf of third parties;
4. The legal entity (A) subcontracts the handling of the goods to a third party (B) certified (also for the handling) by another CB for the same goods. In this situation, TTI will ask (B) a copy of the valid certificate and, in the absence of sanctions imposed by the other CB, will issue (A) a certificate also indicating the manipulation and specifying the address of (B) as an attachment ;
5. The legal entity (A) subcontracts the handling of the goods to a third party (B) certified (also for handling) by another CB, but for different products. In this situation TTI will check the manipulation site of (B) and in case of compliance it will issue to (A) a certificate also showing the manipulation and specifying the address of (B) in attachment;

The manipulation of the produce can be excluded in the event that the Producer / Group of Producers requesting certification, once the harvest has been completed, sells its products directly without manipulating them.This exclusion must be communicated to TTI during the certification request phase.

As long as the products are still owned by the Producer / Group of Producers, regardless of whether they are stored or handled within its own facilities or within subcontractor facilities, the handling phase is always applicable and must be included in the inspection and in the certificate.

10.9 General indications for interviews with workers following the entry into force of GRASP Version 1.3.1.i dated 01/07/2020:

During the opening meeting, inspectors will have to request a list of all workers present in the company that day, including the type of contract and migratory status.

The sample must always be selected by the evaluator and never by management (or its representative).

Although the selection of the evaluator is random, the sample must include workers of all types of contracts and the migratory status of the workers who are present at the time of verification.

Interviews must be conducted without the presence of management, supervisors or any other person who may interfere with the interview.

Management must provide adequate facilities for the interviews.

Interviews must be conducted by inspectors in the language in which the work instructions are provided and commonly understood by the employee (s).

It is the responsibility of the management to provide facilities, resources and means to the evaluator to overcome linguistic limitations. Any third party involved must be objective (i.e. mediators, translators or interpreters, must be independent of the management).

During the assessment, inspectors can take note of the names, initials or internal numbers of the interviewed staff / register of workers which are kept confidential.

Workers must be protected from any retaliation for participating in interviews:

Management must sign a declaration acknowledging this and enabling the certification body to continue. This is a statement or confirmation signed by management (or its representative) - in any form that fits the internal processes of the company (e.g. an attachment, a single communication provided to the evaluator).

If during the subsequent assessment the CB finds evidence of retaliation due to the interviews conducted, the assessor initiates a procedure, as described in the GRASP General Rules v1.3-1-i, Chapter 7.4

11. Exclusion of collection

In the event that the productions are sold in the field to third parties, before harvesting and the same is charged to the buyer, the Harvest chapter can be excluded from the producer's certificate.

The exclusion of the collection must be evaluated and approved in advance, during the registration process, by TTI.

To this end, the applicant for certification during the registration phase must provide the necessary documentation to allow the CB to make this assessment.

If there is already a contract between the manufacturer and the buyer then this must be provided to Tüv Thüringen Italy. The contract must contain the following information:

1. Indication that the buyer becomes the owner of the product prior to collection;
2. Assumption of responsibility by the purchaser in relation to compliance with the waiting times;
3. Indication that the subsequent handling to be borne by the buyer;
4. Acquisition of all the product subject to certification

In the event that the applicant Producer / Group of Producers at the time of registration does not yet know the buyer, then a declaration will be required indicating the waiting times that must be observed and a contract between the Organization and the buyer will not as soon as this is known.

In the event that collection is excluded from the certification, any subsequent manipulation will also be excluded.

12. Subcontractors

The producer / Group of Producers may / may, if they deem it appropriate, entrust certain tasks that are subject to the GlobalG.AP Control Points and Compliance Criteria to subcontractors. These must undergo the same internal checks for the control points that concern the performance of their activities.

13. Certificate of conformity

The issuance of the Certificate of Conformity with the GLOBALG.AP Standard is entrusted to the Scheme Manager, following the review of the assessment report and the verification of the documentation relating to the corrective measures or the control of the results of the assessments undertaken to eliminate the findings. The decision to issue the certificate is made within 28 calendar days from the end of the evaluation process.

The GLOBALG.AP certificate issued by TTI will have an annual duration (one year minus one day) and will affect the field of application described, as required by the general rules.

TTI may decide, as appropriate, to reduce the validity of the certificate of conformity.

Likewise, the validity of the certificate can be extended for a maximum period of 4 months, if:

- the Organization and the relative productions have been re-accepted at the same CB for the next cycle and within the original validity period of the certificate;
- the Organization has paid the due registration and certification fees for the next cycle.

In any case, the request for extension of the validity of the certificate must be sent to TTI in due time and in any case always before the expiry of the certificate itself; the undersigned CB reserves the right to examine

each request to assess whether it can be accepted or not in consideration of the above and of the other requirements envisaged by the GlobalG.AP General Rules.

TTI will also have to carry out the certification renewal verification during the extension period.

14 Transfer of producer / producer groups

The Producer / Producer Group may / may, if they so wish, decide to move between accredited certification bodies for the same field of application.

The incoming Certification Body must verify the existence of the customer number of the requesting Organization that must be transferred, in order to keep the same GGN. In fact, the double registration of the Producer / Group of Producers is not allowed.

The process of transferring the producer between accredited CBs can take place either when the producer certificate has expired or during the validity period of the certificate.

In any case, in order for the transfer of the producer / Group of Producers to be consented, all the requirements envisaged by the General Rules must be respected, starting with the absence of NC still open for the same requesting / requesting the transfer between the CB. The transfer procedures will follow the specifications provided by the standard.

15 Use of the Trademark and Logo

As part of the audit activity, TTI checks the correct use of the commercial trademark and logos, in relation to what is defined in the GLOBALG.AP General Regulations (Annex I.1 - RULES FOR USE OF GLOBALG.AP TRADE MARK AND LOGO). Certified products cannot be labeled, branded or described or advertised in a way that implies the fulfillment of specific food safety criteria, as referred to in Annex I.1, Part I of the General Rules.

16 Sanctions

TTI applies the sanctioning system defined in the GLOBALG.AP General Regulations.

Warning

TTI transmits to the Organization in the cases provided for by the GLOBALG.AP General Regulations, a written notice of Warning, indicating the reasons for the sanction, the terms envisaged for the correction of the non-conformity found.

The terms of time provided are established by TTI in relation to the seriousness of the non-compliance, and in any case cannot exceed 28 calendar days from the day of issue from the warning.

The Organization must resolve non-conformities by describing the methods by filling in the forms prepared by TTI and by submitting the evidence in the formats and according to the methods indicated in the IFA GLOBALG.AP General Rules. If the evidence submitted is not deemed sufficient to demonstrate adequacy and implementation, TTI plans and carries out an additional Audit (follow-up).

In the event that the Organization does not demonstrate within the prescribed deadline that it has implemented adequate corrective actions, the suspension is applied.

16.1 Suspension

TTI communicates by registered letter with return receipt or equivalent to the Organization the suspension of the certification following the failure to activate suitable corrective actions following the Warning. The Organization can voluntarily request the partial or total suspension of the certificate if it is not subjected to other

sanctions. This suspension does not delay the renewal date and does not exempt the Organization from paying the foreseen fees to TTI.

Following the Suspension, the deadline for resolving the non-conformities that generated the suspension of the certificate, whether partial or total, is set by TTI, and in any case it cannot exceed the times provided for by the General Rules (12 months). If the suspension is voluntary, the term and the corrective actions are established by the Organization itself, after agreement with TTI.

During the suspension period, the certified Organization may not make any reference to the GLOBALG.AP certification, use the GLOBALG.AP logo / trademark, the certificate or any other type of document related to GLOBALG.AP.

The Suspension may concern the entire scope of the certificate or only some parts of it, as required by the GLOBALG.AP General Regulations.

The suspension is also imposed if there is a link between the certified product and an alert regarding food safety issued by the competent bodies.

The Suspension is revoked if the Organization produces evidence of corrective actions in the period granted. TTI assesses the adequacy of the documented evidence sent by the Organization, and if it deems it insufficient to demonstrate the adequacy and implementation, plans and carries out a supplementary Audit (follow-up).

TTI notifies the Organization of the revocation of the suspension of the certification by registered letter with return receipt or equivalent.

If the cause of the Suspension is not removed within the established term, the Organization is sanctioned with the Cancellation of the Certificate.

Where a clear link has been established between a manufacturer and a public health hazard report from a government regulatory authority, suspension of certification must be enforced and a review of the manufacturer's certification will be performed.

16.2 Cancellation

The Certificate, the TTI Agreement with the Organization for the provision of the certification service according to the GLOBALG.AP scheme, and the Sublicense and Certification Agreement and GLOBALG.AP are canceled when:

- The Organization does not demonstrate that it has implemented adequate corrective actions after a partial or complete suspension has been applied within a maximum of twelve months provided for by the standard or in any case within the terms granted by TTI at the time of the suspension communication;
- A non-conformity in a field of application calls into question the integrity of the entire production;
- Major contractual non-conformities were found.

The cancellation of the certificate and the revocation of the contracts implies the total prohibition for the Organization to use the GLOBALG.AP logo / trademark, the certificate, or any document related to the GLOBALG.AP certification.

Communications regarding the cancellation of the certificate and contracts are sent by registered letter with return receipt or equivalent.

The revocation of the certificate can also be carried out if requested by ACCREDIA or by whoever is entitled to it.

16.3 Waiver of Certification

The Organization can renounce certification at any time by sending TTI a communication signed by the Legal Representative or Owner.

If the Organization renounces in the period between the acceptance of the application and the issuance of the certificate, it is required to pay TTI, in addition to the fee for the presentation of the application as per the tariff, the costs incurred by the latter for the assessment activities, registration of any updates in the GLOBALG.AP database that have been carried out up to the time of receipt of the notification of the renunciation to TTI.

If the certification file is filed before the certificate is issued, the Organization requesting the certification must pay TTI the costs incurred by the latter for the assessment activities carried out up to the time of filing.

The organization that renounces is required to pay TTI the share for the time in which it has been included in the TTI certification system.

17 Appeals

The Organization may appeal against decisions taken by TTI, within thirty days of receiving the communication to which it refers. The appeal must be sent, by registered letter with return receipt or equivalent, to the Chief Executive Officer of TTI; it must contain the reasons and essential points for which it is believed that TTI's decision can be contested, and all documents supporting and proof of the thesis presented must be attached.

Once the appeal has been received, the Chief Executive Officer of TTI sends it to the Chairman of the Appeals Management Committee who, within thirty days, convenes the Committee. The Committee decides in an unappealable manner in the first session or, if necessary, a supplement of verification and control on the companies or products object of the appeal for justified and well-founded reasons, may extend this term by a further thirty days; in this case, the Organization is notified of the date foreseen for the final decision.

At the end of the examination of the appeal, the Appeals Management Committee sends a written communication to all interested parties, containing the outcome of the examination.

The costs of the appeal follow the loss.

The Organization has the right, if not satisfied, to submit a complaint to the GLOBALG.AP Secretariat, through the procedures defined in the GLOBALG.AP General Regulations.

18. Contractual obligations

By signing the Contract for the supply of control and certification services, the organization assumes the following obligations:

1. In the event of information relating to the GlobalG.AP certified product having a potential impact on the product itself or in the case of complaints that are transmitted to the GlobalG.AP Secretariat (for example, RMA overcoming, microbial contamination, etc.) it will be the responsibility of the Organization provide all the evidence necessary to highlight compliance with the GlobalG.AP standard and which may be requested by TTI and the GlobalG.AP Secretariat.

   The GlobalG.AP certified organization, although responsible for compliance with the standard of certified products, as long as it is the owner of the same, must in any case inform its customers so that they comply with the points relating to the traceability and correct labeling of the same even in the subsequent phases. of the production chain.

2. always meet the certification requirements, including the implementation of appropriate changes when these are communicated by TTI;

3. ensure, if the certification applies to ongoing production, that the certified product continues to meet the product requirements;
4. take all necessary steps to:
   - conducting assessment and surveillance, including providing, for review purposes, documentation and records, and access to relevant equipment, site (s), area (s), personnel, and subcontractors of the customer;
   - the investigation of complaints;
   - the participation of observers, if applicable;
5. make certification declarations consistent with the scope of the certification itself;
6. not to use your product certification in a manner that would bring TTI into disrepute and not to make any claims regarding your product certification that TTI may consider misleading or unauthorized;
7. under suspension, revocation or expiration of the certification, stop using all advertising material that contains any reference to it and take actions as required by the certification scheme (for example, termination of the use of certification documents) and adopt any other measure required;
8. provide copies of the certification documents to others, which are reproduced in their entirety or as specified in the certification scheme;
9. in referring to its product certification in the media such as documents, brochures, or advertising material, comply with the requirements of TTI or as specified in the certification scheme;
10. comply with any requirement that may be prescribed in the certification scheme relating to the use of conformity marks, and comply with the information relating to the product;
    - Maintain a record of all complaints submitted that they are aware of concerning compliance with certification requirements and make these records available to TTI when requested, and take appropriate action with respect to such complaints and any defects found in products that affect compliance with the requirements certification;
    - document the actions taken;
11. inform TTI, without delay, of changes that may affect its ability to meet the certification requirements (Examples of such changes are reported in the individual certification agreements, also with reference to the specific needs of the certification schemes).
12. return any certification documents at TTI's request;
13. accept the unscheduled and additional (follow-up) audits at their own expense;
14. allow the Inspectors, and observers appointed by TTI to the Inspectors of the Accreditation Bodies of TTI, and to the Inspectors of GLOBALG.AP in the context of integrity audits (CIPRO);
15. communicate any report from the Public Authority in relation to non-compliance with the mandatory legislation;
16. communicate any involvement in judicial processes resulting from product liability laws or violations of applicable laws in relation to the certification obtained;
17. send the updates made in relation to the products, sites and production processes subject to certification;
18. comply with contractual obligations;
19. provide the GLOBALG.AP Secretariat with the evidence required to demonstrate compliance with the standard, specifying that the Secretariat has the right to send the necessary elements to TTI so that it can

take a decision on the matter by applying the sanctioning system provided for by the standard if the evidence collected is found to be inadequate ;

20. implement an effective traceability system that includes mass balance verification;
21. In the event that the evidence consists of laboratory analyzes, these must be conducted by accredited laboratories according to the UNI CEI EN ISO / IEC 17025 standard and independent sampling ensured (according to the regulations established in the respective PCCA);
22. the Organization holding the certificate is responsible for compliance with the GLOBALG.AP Standard.

Following failure to comply with the aforementioned conditions, TTI, in relation to the frequency and seriousness of the situations, reserves the right to adopt the sanctions provided for in these Regulations (Warning, Suspension and Cancellation).

19. Security

Pursuant to Article 26 and, where applicable, of Title IV of Legislative Decree 81/2008 and subsequent amendments, the Customer will provide TÜV Thüringen Italia with information on:

- the specific risks existing in the workplaces where TÜV Thüringen Italia staff will work
- the methods of conduct that TÜV Thüringen Italia technicians will have to respect in order to work safely on the site.

These indications will be reported in specific sheets or alternatively in extracts from the site's DVR or, where applicable, in the Safety and Coordination Plan (PSC) provided for by article 100 of Legislative Decree 81/2008 and subsequent amendments. Client will provide Evacuation and Emergency Plan.

It is the Customer's responsibility to make available all the tools, equipment (including Specific Protective Devices in case of special processing) and qualified personnel that may be necessary for the execution of the activities covered by this offer. Finally, the availability of a person is requested to accompany and assist the TÜV Thüringen Italia technician on the site in carrying out the commissioned activities and inform him of any additional risk factors compared to what has already been transmitted.

20. Confidentiality

Confidentiality is a fundamental element for the correct performance of control and certification activities, therefore all those who participate in any measure directly or indirectly in the activities of TTI are required not to disclose the information they become aware of. external collaborators and members of management bodies and committees sign a declaration of confidentiality to protect the information learned during the activity carried out for TTI.

Information relating to Organizations, including details on products and processes, audit reports and associated documents, is treated by TTI confidentially, except as required by law. This information may be released to third parties only with the written consent of the Organization, or if required by the General Rules of GLOBALG.AP.

21. Note to the revision

This document of the quality system of the TTI Control Body replaces any previous one with the same coding.

This regulation is understood to be accepted and signed upon signature of the GlobalG.AP certification and sub-license agreement.