

Quality Certification Services (QCS)

QCS is Certification Body of Florida Certified Organic Growers and Consumers, Inc. (FOG)

QCS CERTIFICATION MANUAL for GLOBALG.A.P. v8-GFS

This document contains the certification standards, policies and procedures for the operation of the GLOBALG.A.P. Scheme offered by Quality Certification Services (QCS). QCS operates in accordance with the International Organization for Standards ISO/IEC 17065 General Requirements for Bodies Operating Product Certification Systems.



Quality Certification Services (QCS)

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Foreword

1. GLOBALG.A.P. Objective and Mission¹

Objective

GLOBALG.A.P. sets voluntary standards for the certification of agricultural products worldwide with the objective to assure safe and sustainable agricultural production.

Mission

To connect farmers and brand owners globally in the production and marketing of safe food to achieve:

- a) A universal standard
- b) Safe and sustainable food for everyone everywhere today and in the future
- c) Safe production methods
- d) Responsible use of resources
- e) Welfare of workers and animals
- f) Protection of scarce resources
- g) Easier certification and wider markets for producers
- h) Reliable sourcing and processing for retailers
- i) Valuable reassurance for consumers

GLOBALG.A.P. Certification

GLOBALG.A.P. certification is a system of institutionalized trust that allows buyers to identify those who meet the standards. This requires an informed effort on the part of the producer and/or handler, and careful vigilance with consistent, transparent decision making on the part of the certification agent.

The system relies on independent third-party certification. The certificates are issued by auditing organizations (certification bodies (CBs), who are responsible for inspecting producers, performing assessments and updating the global online database). These CBs conduct both announced and unannounced onsite farm and facilities inspections and audits throughout the year. The CBs issue GLOBALG.A.P. certificates to producers who have successfully implemented the GLOBALG.A.P. standards and general regulations.

The CBs are accredited by accreditation bodies (ABs) that are members of the International Accreditation Forum (IAF) and have signed a Memorandum of Understanding with GLOBALG.A.P. For a full list of ABs check www.globalgap.org/uk en/what-we-do/the-gg-system/certification/list-of-accreditation-bodies/

¹ http://www.globalgap.org/uk_en/who-we-are/



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2. Principles of GLOBALG.A.P. Certification²

Quality Certification Services (QCS) provides an impartial third party certification for several GLOBALG.A.P. scopes and sub-scopes. QCS is the certification body of Florida Certified Organic Growers and Consumers, Inc. (FOG). FOG is a not-for-profit grassroots membership organization committed to safe, ethical, and environmentally sound production of food and the preservation of natural resources, through good and sustainable farming practices. QCS is a not-for-profit certification body committed to providing transparent and quality certification services to its clients and constituents of the food industry. This Certification Manual contains the policies and procedures for those seeking GLOBALG.A.P. certification.

QCS meets the requirements for operating the GLOBALG.A.P. certification body as a GLOBALG.A.P. approved CB. QCS is also accredited by the ANSI National Accreditation Board (ANAB) for ISO/IEC 17065.

The purpose of the Certification Manual is to provide a basis of communication between clients and QCS, a guideline of the certification process for GLOBALG.A.P. certification, overview of the standards and notification of fees for QCS services.

² GLOBALG.A.P. website and documents (www.globalgap.org/uk_en/)



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01 General Provisions

1.0 QCS Provisions

QCS offers impartial third-party certification in a non-discriminatory, impartial, confidential, transparent and competent manner.

1.1 Non-Discriminatory Certification Services³

QCS responsibly operates a non-discriminatory certification service. QCS does not make undue financial or other conditions nor discriminate against applicants based on the size or type(s) of operation(s).

QCS grants certification solely on compliance related to the scope of certification being considered. QCS does not certify or issue conditions to its clients based on the number of certifications already issued, nor on the basis of any of the clients' membership affiliations and/or associations to organic and food related industries. QCS does not place any undue financial or other consideration on clients to obtain certification services.

QCS services are also designed not to discriminate against any member because of race, creed, religion, marital status, sex, ancestry, age or national origin, and are administered in a nondiscriminatory manner, which does not impede or inhibit applicant(s) access to the certification services of QCS.

1.2 Safeguarding Impartiality

QCS has identified that by the nature of this business there are several risks to the impartiality of certification. There may be conflicts that may arise from its relationships, activities and persons responsibly connected to the certification process. To prevent risks from arising that cause conflict with objectivity, QCS has preventive systems in place to safeguard impartiality.

1.2.1 Risk from Type(s) of Service(s) & Scope(s) offered by QCS

QCS provides only those services as outlined in section 03 (Scope of Certification). QCS cannot design, produce, operate, install, supply, distribute products, process and provide services of the type(s) it certifies. QCS does not provide products or services that could compromise the confidentiality, objectivity or impartiality of its certification processes. QCS undertakes to remain free from commercial, financial, or other pressures that may influence the results of the certification process. QCS does not provide consultancy services to its applicants or certified clients nor does QCS imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used. QCS may direct applicants to resources on good agricultural practices for production and handling, and may answer questions regarding how standards are interpreted or applied.

1.2.2 Risk from Type(s) of Services & Scope(s) offered by FOG (potential related entity)

³ ISO/IEC 17065 4.2.3



FOG provides education and marketing resources that are available to the public and not customized for a specific operator. FOG may also direct QCS applicants to resources on good agricultural practices for production and handling and may answer questions regarding how standards are interpreted or applied.

FOG supports and maintains QCS's provisions by providing products or services that would not compromise the confidentiality, objectivity or impartiality of QCS certification. FOG services prevent risks to impartiality by:

- Not designing, producing, operating, installing, supplying, processes, distributing products, and/or providing services of the type(s) QCS certifies.
- Not having a direct influence or authority to put pressure on the QCS certification process.
- Not providing consultancy services to QCS applicants or certified clients, pertaining to matters dealing with barriers to overcoming certification.
- Not marketing or offering as linked with the activities of an organization that provides consultancy.
- Not state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used.

If and when FOG were to offer or produce the certified product (including products to be certified) or offers or provides consultancy, the QCS management, those evaluating (inspection and review) personnel in the review and making certification decisions are not to be involved in the activities of FOG, vice versa, the personnel of FOG are not involved in the management of QCS, the evaluation or the certification decision. The consultancy from the personnel must be well recorded, available upon request by QCS and personnel involved must have agreed to the confidentiality and impartiality requirements.

As FOG is a not-for-profit organization, at times product and cash donations are pursued for educational programs, workshops and project-based initiatives. The QCS program staff does not solicit any donations from certified entities or applicants for certification. The QCS program cannot accept donations from certified entities or applicants for certification. Any knowledge of donations from an operation that is certified by QCS must not bias the management of an operations file and final decision of certification. The FOG personnel are the only personnel that are to know what donations are received and from whom the donations are received. In circumstances where QCS personnel are privy to discussions about donations, personnel must remove themselves from the discussions and/or declare those operations as potential conflicts on the Conflict-of-Interest Agreement.



1.2.3 Risks from Certification

QCS takes full responsibility for the granting, maintaining, extending, suspending or withdrawing of certification, particularly regarding decisions on certification, considering appeals, and handling complaints and disputes. QCS may contract evaluation services to inspectors and may subcontract testing services to approved laboratories.

At all levels of QCS, provisions are taken to ensure that independence is maintained, and conflict of interest is avoided.

- QCS's main method for preventing a conflict of interest from occurring is requiring all persons
 responsibly connected to the certification services of QCS to annually complete a Conflict of
 Interest Agreement, including board members, committee members, personnel, contractors,
 and subcontractors. The Conflict of Interest Agreement describes the commitment to
 objectivity and by which persons disclose any perceived conflicts that could directly affect the
 objectivity of an operation'(s) certification (i.e. commercial, financial, family or relationship, or
 other pressures that could be perceived to compromise impartiality; including any
 consultancy provided within the last 24 months to an operation, and any bias that could
 indirectly create conflict to arise (i.e. over-familiarity, pressures, advocacy, intimidation,
 competition). QCS reviews all declarations and identifies any risk(s) to the impartiality of its
 evaluation, review and certification decision. The Administrative Manager reviews the
 disclosures and reports them to the CEO and/or GLOBALG.A.P. Scheme Manager so as not to
 assign conflicting files. Inspectors/Auditors must not inspect anyone with whom they have a
 declared conflict of interest.
- Employees, auditors, contractors and other personnel are not permitted to accept payment, gifts or favors of any kind, other than prescribed fees, from any business inspected.
- Auditors are obligated to refuse work beyond their realm of competence.
- Auditors are assigned by the Admin or GLOBALG.A.P. Scheme Manager usually based on scope of the audit, qualification of the inspector/auditor, proximity to operation and/or availability, cost and assessing any potential COI. Inspection arrangements between operation and auditor farms our QMS are outlined in Section 5.3 of the QCS Certification Manual for GLOBALG.A.P.
- As QCS GLOBALG.A.P. Auditors of Certification committees are bound by the policies of QCS GLOBALG.A.P. Confidentiality and Conflict of Interest. In the event a conflict of interest is identified with a GLOBAL.G.A.P. file, the committee member immediately notifies(s) the Chief Executive Officer and excuse(s) him/herself from the file review. The Chief Executive Officer appoints a temporary alternative qualified auditor.
- QCS does not allow Auditors farms our QMS to inspect anyone with whom they have a declared conflict of interest(s).
- QCS does not allow an auditor to inspect a producer (Option 1) for more than 4 consecutive years (regardless of whether the inspection/audit is announced or unannounced). Under Option 2, the same rule applies for the lead auditor.



 QCS ensures that persons who make certification decisions (final, appeals and complaints) are different from those who carried out the evaluation of the operation (i.e. inspection, closing noncompliance(s).

If it is determined within 24 months of certifying the operation that any person participating in the certification process has or had a conflict of interest involving the applicant, QCS may determine it necessary to perform a new on-site inspection. All costs associated with a reconsideration of application, including on-site inspection costs is borne by QCS. QCS may refer a certified operation or applicant to a different accredited certifying agent for recertification and reimburse the operation for the cost for the recertification when it is determined that any responsibly connected person involved in the certification decision had a conflict of interest involving the applicant at the time of certification.

1.3 Confidentiality

All persons responsibly connected to QCS; Board members, committee members, personnel, contractors and subcontractors maintain strict provisions for confidentiality with respect to QCS clients and do not disclose to third parties (with exception of compliance with the law, accreditation bodies, GLOBALG.A.P., government agencies or subpoena when applicable) any business related information concerning any client obtained while implementing any regulations of the certification body expect for information routinely provided to the public by QCS and GLOBALG.A.P.

1.4 Public Information

The QCS certification body is transparent to all persons internally and externally. Publications and other documents are published or made available upon request to the public electronically or by other means. At a minimum, QCS publications include the following:

1.4.1 QCS Certification Manual

The QCS Certification Manual is designed to outline QCS policies and processes related to the GLOBALG.A.P. certification program. This manual includes a description of the relevant standards and information on the certification procedures for those programs operated by QCS to facilitate GLOBALG.A.P. certified product sales worldwide.

The QCS Certification Manual is made available to the public through the QCS website, <u>www.qcsinfo.org</u>. Relevant GLOBALG.A.P. General Regulations and standards are made available to the public through the GLOBAL G.A.P website , <u>https://www.globalgap.org/</u>. Please reach out to QCS to request a copy of the standards.

1.4.2 QCS Client Directory

Upon request QCS offers any interested party a list of QCS GLOBALG.A.P. certified clients listed by their GLOBALG.A.P. number (GGN) that uniquely identifies each individual producer in the GLOBALG.A.P. Database.



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1.4.3 Online Certificate Validation Tool

The GGN can be used as a search key for validating certificates here: https://database.globalgap.org/globalgap/search/SearchMain.faces?init=1

1.4.4 GLOBALG.A.P. Standards

The QCS website provides web links to the current versions of the following GLOBALG.A.P. Standards.

- GLOBALG.A.P. Crops Fruit & Vegetables Standard (IFA-GFS)
- GLOBALG.A.P. Harmonized Produce Safety Standard (HPSS)
- GLOBALG.A.P. Chain of Custody (CoC)

1.4.5 GLOBALG.A.P. Add-Ons

- GLOBALG.A.P. Risk Assessment on Social Practice (GRASP)
- GLOBALG.A.P. Food Safety Modernization Act Produce Safety Rule (FSMA/PSR)
- GLOBALG.A.P. TR4 Biosecurity (TR4)
- GLOBALG.A.P. AH DLL Grow
- **1.4.6** Following GLOBALG.A.P. General Regulations Rules Certification Bodies V6 section 6.2.2. d) Data access rules
- All data in the GLOBALG.A.P. database is available to GLOBALG.A.P. and QCS and can be used for internal processes and sanctioning procedures.
- Minimum and obligatory data release level for all sub-scopes, as well as additional information on confidentiality and data use, is defined by the GLOBALG.A.P. Data Access Rules. By participating in GLOBALG.A.P. IT System, the producer grants access to the producer/company data as listed to the respective data access groups. This setting represents the minimum data access setting. The certificate holder's (producer/producer group) organization name, country and city are always displayed.
- In addition, every certificate holder's company name and address are available to registered industry market participants including GLOBALG.A.P. members.

1.5 Competency

QCS operates the GLOBALG.A.P. certification program with competent individuals with the required experience, education and/or training. QCS GLOBALG.A.P. auditors and decisions makers meet strict requirements before being allowed to inspect any operation in accordance with GLOBALG.A.P. standards and monitors them on an ongoing basis. QCS also welcomes any constructive feedback from the operators on auditors' performance.



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02 Certification Categories⁴

QCS specializes in certification of production processes for the following GLOBALG.A.P. scopes and sub-scopes. Certification to GLOBALG.A.P. standards supports the continuous improvement of farming systems with a holistic approach to farm assurance including food safety, environment and biodiversity, workers' welfare, traceability, and animal welfare.

2.1 Crops – Fruit & Vegetables Standard (IFA-GFS)

Applicable worldwide to a diversity of fruit and vegetables⁶. It covers all stages of production, from pre-harvest activities such as soil management and plant protection product application to post-harvest produce handling, packing and storing.

2.2 Harmonized Produce Safety Standard (HPSS)

Designed for fruit and vegetable producers in the US or selling into the US market^{5a}. It covers all stages of production, from pre-harvest activities such as soil management and plant protection product application to post-harvest produce handling, packing and storing. This standard only focuses on food safety and traceability elements.

2.3 Producer Group (Option 2)⁵

A Producer Group or Option 2 is a group of producers, a legal entity, applying for or awarded certification. Option 2 requires internal control of 100% of members registered to the GLOBALG.A.P. requirements and a management representative with ultimate responsibility.

A producer group may have parallel production and/or parallel ownership within its members and their products. In these cases, segregation of products is key and specific rules for registering with GLOBALG.A.P. identifying product and producers and other requirements must be followed to avoid sanctions.

A group member may only sell GLOBALG.A.P. certified product through the legal entity representing the group that is the certificate holder.

QCS must determine how many producers must be inspected after the Quality Management System (QMS) audit by following the current GLOBALG.A.P. General Regulations.

2.4 Chain of Custody (CoC)

Accepted worldwide and it is applicable to all products that have GlobalG.A.P. IFA certification. It safeguards the certification status at different stages of the supply chain for consumers and corporate clients, such as retailers, processors and restaurants. It uses traceability through the use of the GGN code as a basis.

⁴ GLOBALG.A.P. General Regulations

⁵ GLOBALG.A.P. Regulations

^{5a} HPSS V1-1.2 GLOBALG.A.P. Regulations addendum



2.5 GLOBALG.A.P. Add-Ons

2.5.1 GLOBALG.A.P. Risk Assessment on Social Practice (GRASP)

It is a complement to the globally accepted IFA standard and is used to assess the well-being of workers on farms and management centers with hired or subcontracted labor, as well as family farms (without hired labor). It can be applied to individual producers or groups of producers and is based on the Guidelines of the National Interpretation Guides NIG GRASP and the country risk classification. It covers the social and labor aspects covered by the criteria of the International Labor Organization (ILO) conventions.

2.5.2 GLOBALG.A.P. Food Safety Modernization Act Produce Safety Rule (FSMA/PSR)

It is a complement to the globally applicable IFA standard for individual producers or groups of producers exporting to the US market and is officially recognized by the FDA. It covers the specific requirements of the US Food and Drug Administration (FDA) PSR at the farm level for the production, handling and storage of fruits and vegetables. It addresses worker training, biological soil amendments, agricultural water, record keeping and other farm activities.

2.5.3 GLOBALG.A.P. TR4 Biosecurity (TR4)

This add-on is applicable on banana and plantain farms worldwide. It covers individual producers or producer groups trying to prevent the introduction of tropical Race 4 fungus (TR4), as well as farms where the pathogen is already present. It can be combined with IFA and assesses the risk mitigation plan to minimize the spread of TR4 between farms and countries.

2.5.4 GLOBALG.A.P AH DLL GROW

This add-on is a private standard applicable to fruit and vegetable producers around the world who intend to market with Albert Heinj and Delhaize in the Netherlands and Belgium directly or through suppliers. It complements the IFA standard and assesses the risks of general hygiene in handling and the product, the presence of residues of phytosanitary products and contamination by foreign bodies or substances.



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03 Scope of Certification

QCS applicants must certify to the GLOBALG.A.P. Standards and Add-Ons and follow GLOBALG.A.P. General Regulations.

3.1 GLOBALG.A.P. General Regulations

As a baseline for certification, QCS operates in accordance with GLOBALG.A.P. General Regulations under a signed License and Certification Agreement between GLOBALG.A.P. and QCS. As such, QCS must ensure that any type of client, as per section 02, that wants to sell a GLOBALG.A.P. certified product conforms to all GLOBALG.A.P. requirements.

GLOBALG.A.P. GFS version (IFA v.6.0-GFS) became obligatory from 01 September 2024 for users supplying customers who demand compliance with a GFSI-recognized standard. IFA v.6.0-GFS will remain benchmarked against GFSI until a new version is recognized. The intention of the GLOBALG.A.P. System is to be robust enough to build trust and integrity into the supply chain while at the same time being flexible enough to spur innovation and excellence.

QCS will apply these standards and add-ons in compliance with the GlobalG.A.P. regulations.

A few of the important features that GLOBALG.A.P. offers are that GLOBALG.A.P.

- (1) implements a pioneering *integrity system* with independent assessments to monitor the performance of CBs,
- (2) has a secure online *certification database* that customers and the public can use to check producers and validate certificates,
- (3) provides classroom and online *trainings* globally in different languages, and
- (4) has a harmonization program to benchmark schemes and standards around the world.



04 Labeling

4.1 QCS Certification Logo

Unauthorized or misleading use of the QCS logo, and/or the GLOBALG.A.P. logo is prohibited and is treated as an infringement of copyright, and subject to the GLOBALG.A.P. sanctioning procedures and penalty provisions of the Governing accreditation body to the full extent of any applicable civil or criminal laws governing fraud. Incorrect references to the certification system or misleading use of Sublicenses and Certification Agreements, certificates or marks found in advertisements, catalogues, or any other published documents is dealt with by suitable actions.

4.2 GLOBALG.A.P. Trademark and Logo

GLOBALG.A.P. is a business-to-business (B2B) label and its logo must never appear on the product, consumer packaging of the product nor at the point of final sale where in direct connection to single products intended for human consumption. Only the GLOBALG.A.P. Number (GGN) and/or generated QR code logo of the GGN of a legal entity with a valid certificate can be printed on the product and/or in final packaging at the point of sale visible to consumers.

GLOBALG.A.P. certified producers may use the GLOBALG.A.P. logo in business-to-business communication, and for traceability, segregation or identification purposes on site at the production location.

The GLOBALG.A.P. logo must never be used on promotional items, apparel items or accessories of any kind, bags of any kind, or personal care items, or in connection with retail store services.

For information on the Rules for Use of GLOBALG.A.P. Trademark and Logo, refer to GLOBALG.A.P. General Regulations, Annex I.1.



05 Certification Steps

QCS certification steps are the overall process by which QCS ensures client's conformance with applicable standards.

5.1 STEP ONE - Application

Application forms and general information of the certification procedures and fees are available through QCS website or supplied to any applicant upon request.

The client is responsible for familiarizing him/herself with this information and the GLOBALG.A.P. system. The application for each category of certification must be completed and returned to QCS. If requested, additional application information is provided to the applicant.

5.2 STEP TWO - Application Check⁶

Once QCS receives the application, QCS checks it for completeness and compatibility to comply with QCS requirements and the standards. QCS staff verify that an applicant is not listed in the GLOBALG.A.P. list of producers that cannot take part in the GLOBALG.A.P. system. Also, in case a client already has a GLOBALG.A.P. Number (GGN) staff checks in the GLOBALG.A.P. Database to verify the status of the client before any further actions are taken. Failure to communicate the GGN previously assigned by GLOBALG.A.P. to QCS results in a surcharge of the registration fee of 100 EURO to an Individual Producer (Option 1) and of 500 EURO to a Producer Group (Option2) according to GLOBALG.A.P. General Regulation.

If no further information is required a quote estimate of the cost of certification is developed and sent to the client for acceptance. Upon acceptance of the quote estimate by the client a Service Contract Agreement with QCS and the GLOBALG.A.P. Sublicense and Certification Agreement is sent to the client for signage. A copy of the most recent GLOBALG.A.P. Data Access Rules is also provided to the client. Furthermore, QCS ensures its capability to perform the certification and any special requirements such as language used by the applicant. If the applicant is not within scope of QCS's certification services, QCS is obligated to decline services.

Once QCS receives the signed Service Contract Agreement, staff registers the client in the QCS and GLOBALG.A.P. Database and communicates the unique GGN generated within 28 calendar days for first registrations.

The applicant may withdraw his or her application at any time. An applicant must inform QCS in writing of his or her decision to withdraw an application. An applicant who withdraws his or her application is liable for the costs of services provided up to the time of application withdrawal.

⁶ ISO/IEC Guide 17065 §7.3.1



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5.3 STEP THREE - Inspection⁷

An initial on-site inspection is conducted (including harvesting activities for each product, as well as product handling if it is included) for each operation requesting certification and include the unit, facility and site(s) that produces and/or handles products included in an operation for which certification is requested. To maintain GLOBALG.A.P. Certification the registration of the client and the proposed products for the relevant scopes must be reconfirmed with QCS annually before the expiry date of the certificate. Subsequent on-site inspection must be conducted annually at any time within an "inspection window" that extends over a period of 8 months as indicated in GLOBALG.A.P. General Regulations (i.e.: from 4 months before the original expiry date of the certificate, and – only if the CB extends the certificate. Inspections for each certified operation that produces and/or handles products are required for the purpose of determining whether to approve the request for certification or whether the certification of the operation should continue.

QCS also conducts unannounced inspections of a minimum of 10% of all certified producers that QCS has certified per scope during the 12 months of validity of certificates.

These 10% unannounced QCS audits are longer counter as additional audits, but rather included in the original number of certification audits.

Notification period: Individual producer: No notification prior to QCS audit is allowed and Producer Group or multisite producer with QMS 20% of producer group members/ production site/PHUs with no notification and rest (80%) with 48h notification.

The QCS Scheme Manager selects operations to participate in unannounced inspections based on geography, scope, legislation, crop type, and compliance history, etc.

There will be no notification to the producer in advance of the intended unannounced audit. In the exceptional case where it is impossible for the producer to accept the proposed date (due to medical or other justifiable reasons), the producer receives one more chance of an unannounced inspection. The producer receives a written warning if the first proposed date has not been accepted. If the visit cannot take place because of non-justifiable reasons, QCS issues a suspension of all products.

All on-site inspections must be conducted when an authorized representative of the operation who is knowledgeable about the operation is present and at a time when the sites and/or facilities demonstrate the operation's compliance with or capability to comply with the relevant standards.

5.3.1 Assignment and Scheduling of Farm Auditor or QMS Auditor

Once the client and each production process for products are registered and payment received, the inspection may be scheduled. For a first-time inspection applicant must have records for at least 3 months before the inspection date.

⁷ GLOBALGA.P. General Regulations Rules for Certification Bodies, section 7



QCS assigns a Farm Auditor or QMS Auditor, based on the following criteria or combination thereof for the specific type of operation to be evaluated:

- a) Specification of appropriate education, training, and experience (i.e. training policy) complying with GLOBALG.A.P. general regulations, standards, and add-ons.
- b) Knowledge of the language; and
- c) No prior affiliation or business relationship with applicant or certified operation being evaluated within an amount time as established by GLOBALG.A.P.

QCS attempts to assign Farm Auditor or QMS Auditor in such a way as to minimize the cost to clients, but other factors may also affect the choice of which Farm Auditor or QMS Auditor to assign. QCS generally attempts to assign the Farm Auditor or QMS Auditor who is nearest or least expensive for the inspected client, but only to the extent that the Farm Auditor or QMS Auditor possesses the necessary expertise to conduct the particular inspection, the Farm Auditor or QMS Auditor or QMS Auditor or QMS Auditor is free from conflicts of interest in inspecting the operation. QCS reserves the right to group inspections in such a way as to allow a Farm Auditor or QMS Auditor from outside the region to travel to conduct the inspection when this becomes logistically or financially advantageous to the client. QCS assigns Farm Auditor or QMS Auditor solely at its own discretion.

5.3.2 Inspection Plan Requirements

The inspector/auditor contacts the applicant and both must agree on the audit logistics and the audit appointment. The Farm Auditor or QMS Auditor issues the applicant an audit plan to establish the audit date. The audit is scheduled at a reasonable time to cover all control points and when a knowledgeable representative of the operation is available.

5.3.2.1 Prior to Inspection

Before performing an actual on-site inspection, QCS provides Farm Auditor or QMS Auditor with guidance necessary for the Farm Auditor or QMS Auditor to complete a successful audit, including at minimum:

- 1) The checklists and guidance documents if any
- 2) Audit results of previous announced or surveillance audits, and any
- 3) Requirements for audit report writing

5.3.2.2 During the Inspection

The Farm Auditor or QMS Auditor conducts an Opening Meeting with an authorized agent of the operation in order to confirm the scope of the audit, the standard and version, products to include in the assessment, inclusion or not of harvesting/product handling/PP/PO, etc., explain methods of assessment, and grading of non-compliances. The Farm Auditor or QMS Auditorinspects all production units, facilities, premises and sites that produce or handle products and that are included in the request for certification according to GLOBALG.A.P. General



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Regulations. The Farm Auditor or QMS Auditoralso reviews documents, records, record-keeping systems, and interview personnel. Applicants must allow the Farm Auditor or QMS Auditorto have complete access to the production and handling operation, including non-certified production and handling areas, structures and offices.

Cycle audit of three-year:

Three-years audit cycle rules (with annual certification and on-site CB audit) allows auditors to thoroughly observe the production processes while operations are ongoing.

First QCS audit: All requirements are included in the applicable checklists (quality management system (QMS and farm).

Subsequent QCS audit (year 2): operational items, as identified in the checklist.

Subsequent QCS audit (year 3): operational items, as identified in the checklist.

5.3.2.3 Exit Meeting

The Farm Auditor or QMS Auditor conducts an exit meeting with an authorized agent of the operation in order to confirm the accuracy and completeness of the inspection observations and the information gathered during the inspection.

At this time the Farm Auditor or QMS Auditor notifies the applicant of the findings, observations, or of anything out of compliance with the standard and is presented in writing in the Audit Report. The applicant is expected to read all items described in the Audit Report and sign this document as acknowledgement that such items have been explained to him/her. The Audit Report and Checklist is uploaded as soon as possible to QCS via the Intact platform is sent as soon as possible to QCS as-is after the inspection. QCS issues a Letter of Non-conformance with a sanction level of WARNING if applicant does not comply with the standard. When compliance is achieved (i.e. after closing the necessary reported non-compliances if any, within the given specified timeframe in the Audit Report and/or warning letter) the Farm Auditor or QMS Auditor, as soon as possible, forwards the Audit Report to QCS for CB Committee review. Within a maximum of 28 calendar days QCS makes the final certification decision.

If necessary, the cost of any additional on-site inspection to attest the implementation of corrective action(s) taken by client to close the raised non-compliances are the responsibility of the client. QCS can at any time of the certification decision process make request(s) for more information to determine compliance with the relevant standards.

5.4 STEP FOUR – Certification Decision

The QCS Certification Committee is the sole authority to grant, decline, renew, suspend or cancel certification.

5.4.1 Certification Review

The QCS Certification Committee conducts a Certification Review of the Audit Report and supporting documentation (e.g. checklist) to determine the client's compliance with standards per category and scope of certification and make the certification decision. The client is notified



of and given the opportunity to comment on any information used to make the decision that comes from a source other than the inspection and application materials.

When a decision is reached, an appropriate communication or letter (i.e. granting, suspending, cancelling), & a certificate(s), if applicable, is sent to the client. The GLOBALG.A.P. Database is updated accordingly.

5.4.2 Granting of Certification

If the applicant's operation is in compliance with the requirements of the applicable Standard(s), and QCS determines that the applicant has been and is able to operate in accordance with all GLOBALG.A.P.'s and QCS's contractual agreements, then certification is granted.

If QCS has reason to believe that an applicant for certification has willfully made a false statement or otherwise purposefully misrepresented the applicant's operation or its compliance with the certification requirements pursuant to this part, QCS can deny certification.

5.4.2.1 Certificate

When certification is granted, QCS issues a paper certificate to the legal entity that follows GLOBALG.A.P. General Regulations. Certificates can be validated by using the online certificate validation tool accessing the GLOBALG.A.P. Database at <u>https://database.globalgap.org/globalgap/search/SearchMain.faces?init=1</u>.

The IFA v.6.0-GFS No more templates, all certificates will be issued in validation Services. The reports are generated by the ECert system and transported to the Audit Online Hub AOH GlobalG.A.P. IT System.

5.4.3 Re-Certification (Continuation of Certification)

In order for a client to maintain certification with QCS, the certificate holder must:

- a) Maintain compliance to the relevant GLOBALG.A.P. Standard(s),
- b) Inform of any changes in the operation (e.g. company and location information, production site(s)/product handling unit information, contact names, product information, production increases, etc.),
- c) Annually pay the certification and inspection fees, and
- d) Successfully complete an annual on-site inspection per Section 7.1 in a three-year cycle in both option 1 and option 2.

Recertification audit: All requirements included in the applicable checklists (for QMS and farm audit), same as initial CB audit.

5.4.3.1 Re-Certification On-Site Provisions

The certification cycle is no more than 12 months. In both Option 1 and Option 2, QCS audit content shall be organized in a three-year cycle and the producer can be subject to any sanctions and extensions in accordance with the scope. The client should re-certify to avoid a lapse of certification by having an on-site inspection, preferably before the expiry date of the certificate.



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The registration of the client and the proposed products for the relevant scopes must be reconfirmed with QCS annually before the expiry date of the certificate. In the event that it is impossible for QCS or client to conduct the annual on-site inspection following receipt of the certified operation's information update and registration payment, QCS can extend the validity of the certificate beyond the 12 months (for a maximum period of 4 months) only if there is valid reason, which must be recorded. The extension may only be issued for the following reasons:

- 1. QCS schedules the on-site the Farm Auditor or QMS Auditor after the certificate has expired in order to observe a certain part of the production process, because it has not been seen in the previous inspection/audit, because it is considered to be a high-risk process in terms of product safety, or to be able to see a newly added product, process or a new or particular member of a producer group.
- 2. QCS needs to be able to extend some certificates because of resource restraints.
- 3. QCS was not able to conduct the on-site inspection/audit and/or the producer was not able to receive the audit due to circumstances beyond its control (e.g. natural disaster, political instability in the region, epidemic or unavailability of the producer due to medical reasons).

5.4.3.2 Re-Certification Decision

Section 8. Certification process the Rules for Certification Bodies- General Regulations. IFA v6

5.4.4 Modification of Certification

Clients are required to inform QCS, in writing, of any modifications, which extend or reduce their scope of certification already granted. These modifications can include, but are not limited to, changes in organizational structure or management and/or significant changes in the production process. In case of Producer Groups (Option 2) or Individual Producers with multi-sites operating under one quality management system (QMS) (Option 1 with QMS), increases by more than 10% of new producers sites in one year or 10% increases in the area or number of livestock of previously approved registered products in one year, further external sample inspections of the newly added farms or producers can be added to the approved list. If changes to the system are minimal and below the 10% threshold in one year, then new producers sites can be added to the approved list by registering the producers sites without necessarily resorting to further verification by the certification body. Apply provisions of the General Regulations, Rule for Producer Group and Multisite producers with QMS section 4.9

5.4.5 Sanctions

When a non-conformance is found, QCS must apply a sanction in the form of a Warning, Suspension of a product or Cancellation. Producers must address all non-conformances prior to changing certifiers. QCS can only lift sanctions when operations provide sufficient and timely evidence of their corrective actions. This may be done with written evidence, photographs (or other visual evidence) or a follow-up visit.

5.4.5.1. Warning



Warnings are issued for all types of non-conformances detected. Warnings for non-conformances are issued at the completion of an inspection. QCS can override these warnings during the final decision.

5.4.5.2. Product Suspension

One, several or all products may be suspended. Operations are prohibited from using the GLOBALG.A.P. logo/trademark, license/certificate or any other documentation during the suspension period. Operations must resolve the non-conformance before the deadline in order for QCS to lift the suspension. If the nonconformance is not sufficiently addressed or not addressed prior to the set deadline, a product cancelation is issued.

A producer or a producer group may voluntarily request a product suspension for one, several or all products if the operation has difficulty complying with the standards and needs time to close out any non-conformances. During this time the renewal deadline is still in effect as well as any required fee payment deadlines. The deadline for closing a non-conformance must be set by the operation and agreed to by QCS.

5.4.5.3 Cancellation

A cancelation of the contract is issued where:

- 1) QCS finds evidence of fraud and or lack of trust in the operation's ability to comply with the GLOBALG.A.P. requirements.
- 2) A producer or producer group cannot demonstrate evidence of the implementation of an effective corrective action after a declared suspension, or
- 3) Contractual violation or non-conformance.

A cancellation of the contract results in total prohibition (all products, all sites) of the use of the GLOBALG.A.P. logo/trademark, license/certificate, or any device or document that may be linked to GLOBALG.A.P.

Producers who have received a cancellation must not be accepted for GLOBALG.A.P. certification within 12 months after the date of cancellation.

5.4.6 Discontinuance of Certification

At any time clients may withdraw from QCS through written notification and are liable for the costs of services provided up to the point of withdrawal.

Clients that fail to respond to renewal requests and/or do not renew their product certificate have their product status automatically set from "Certified" to "Not confirmed" in the GLOBALG.A.P. Database.

5.4.7 Transferring certification to other Certification Bodies (CB)

Clients wishing to change from their existing certifier to QCS or vice versa during the valid period of their certificate must complete a new application for QCS or their new certifier. QCS or the



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new certifier conducts a complete check of the client's application and follow GLOBALG.A.P. General Regulations- Rules for Certification Bodies section 9 procedures for transfer between CBs.

Certified operations must notify their QCS of their intent to certify elsewhere and communicate the GGN assigned by GLOBALG.A.P. to the new CB. Certificate holders who are sanctioned cannot change CBs until QCS closes corresponding non-conformances.

QCS treats producers transferring from other CBs as a "subsequent inspection" and not as an "initial (first) inspection" following GLOBALG.A.P. General Regulations- Rules for Certification Bodies section 9.



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5.5 QCS GLOBALG.A.P. Certification Process





06 Appeals

6.1 Appeals

Operations must either resolve noncompliance or appeal to QCS. Appeals must be made in writing to QCS and be accompanied by supporting documentation. The written appeal must provide sufficient detail and describe prior involvement in the operation at issue. A written appeal must be submitted within 14 calendar days of receipt of any notification regarding the certification decision.

QCS acknowledges appeals received via email or letter.

The burden of establishing the validity of evidence rests with the filing participant. A record of all appeals is maintained at QCS. Records of subsequent actions are maintained along with followup to ensure the action was effective. QCS reviews appeals in a confidential, impartial and timely manner, and decided by persons not involved with the original decision.

At the conclusion of the appeals process, QCS issues the appellant a letter outlining the appeal findings and the reasons for the decision.

If the appeal is unsuccessful, the appeal can be addressed to the GLOBALG.A.P. Secretariat using the GLOBALG.A.P. Complaints Extranet, available on the GLOBALG.A.P. website (www.globalgap.org).



07 Complaints

7.1 Complaints Regarding Certified Operations

QCS can investigate complaints of noncompliance with this manual concerning production and handling operations certified by QCS.

If a certified party or applicant refuses to cooperate in an investigation, QCS can deem this sufficient cause for denial or suspension of application or certification.

7.2 Complaints Regarding QCS

If the complaint is against QCS services, QCS investigates the matter and if found valid, takes appropriate corrective and preventive action and resolution of any deficiencies found in products or services. These actions are taken, documented and the complainant notified of the outcome.

QCS maintains a record of all complaints.

7.3 Investigation

QCS must investigate any complaint regarding clients' activities in relation to the applicable standards and complaints regarding QCS's certification operations. A complaint may come from either clients (e.g., producers, contract producers, processors, handlers, etc.) or from other parties such as interested stakeholders or the general public. Complaints must be submitted to QCS in writing and be accompanied by supporting evidence, including prior involvement in the operation at issue. QCS acknowledges complaints received via email or letter.

The Program Director/CEO or their designate conducts an investigation of the complaint. Personnel directly involved in the complaint do not investigate complaints. The investigation is conducted in a confidential and timely manner. If QCS identifies nonconformities during the course of an investigation, appropriate actions are taken.

7.4 Recall

In the event of a significant food safety incident, including a product recall or regulatory food safety non-conformity (e.g. a regulatory enforcement notice), the client should inform QCS within 3 working days. The client shall then provide sufficient information to enable the certification body to assess any effects of the incident on the ongoing validity of the current certificate. As a minimum, this shall include corrective action, root cause analysis and a preventive action plan. Depending on the risk that triggered the recall, QCS may need to conduct another inspection/audit and have to inform GLOBAL G.A.P Secretariat and applicable authorities. QCS will evaluate the corrective actions and root cause analysis and preventive actions and will respond back with the adequacy of the measure within 28 days.



08 Standard Revisions

8.1 Revision of GLOBALG.A.P. General Regulations

Suggestions for changes to the GLOBALG.A.P. General Regulations must be directed to the GLOBALG.A.P. Secretariat. Please contact them directly.

8.2 Revision of GLOBALG.A.P. Standards

Suggestions for changes to the GLOBALG.A.P. Standards must be directed to the specific scope GLOBALG.A.P. Standard Manager. Please contact them directly.



09 Fees

Fee Schedules appropriate for the certification scope can be downloaded from QCS website or provided to requesting applicants/clients.

9.1 GLOBALG.A.P. Registration Fees

QCS follows the current GLOBALG.A.P. North America, Inc. Fee Table for activities performed in North America. Producers in other countries pay similar fees in Euros as per the current GLOBALG.A.P. Fee Table.

9.2 QCS Fee Structure

QCS evaluates fees periodically and are subject to change. QCS fee structure is formed by the following two components:

9.2.1 Certification Fee

Certification Fee is the base annual fee due each year for certification. The amount to be paid depends on the selected certification Option chosen in the application form and the complexity of the operation. This fee is in addition to the inspection fees charged.

9.2.2 Inspection Fees

Inspection fees vary based upon the size and complexity of the operation inspected, the travel distance and the individual inspector/auditor assigned. All travel expenses are paid by the party to be inspected as well.

9.3 Collection Policy

Certification fee and GLOBALG.A.P. registration fees are due at the time of contract signing (1st year) and before certificate expiration date in subsequent years for timely renewal. These fees are non-refundable. 100% or a payment plan inspection deposit is due at the time of contract signing (1st year) and before certificate expiration date in subsequent years. A higher inspection fee deposit may be required in some cases. The balance not covered by the inspection deposit is invoiced at the conclusion of the inspection/audit and is due within 30 calendar days of the invoice being posted. Upon withdrawal of application and written request, the inspection deposit minus incurred administrative costs is refundable before inspection takes place. Any travel costs incurred (e.g.: purchasing plane tickets) after the Audit Plan is signed and invoiced to client if audit does not take place because of client cancellation. All invoiced inspection fees are to be paid and are nonrefundable after inspection/audit has taken place. Checks must be made payable to QCS and sent to the QCS office. QCS does not issue certificates until all fees have been paid or other arrangements have been made.