Quality Certification Services (QCS)

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

# QCS
# CERTIFICATION MANUAL
# for GLOBALG.A.P. v.5.4-1-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*.

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# Foreword

## 1. GLOBALG.A.P. objective and mission[1]

### 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. standard 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/

## 2. Principles of GLOBALG.A.P. Certification[2]

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/)

# 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 Services[3]

QCS responsibly operates a non-discriminatory certification service. QCS does not make undue financial or other conditions nor discriminates 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 non-discriminatory 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 rise 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)

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

[3] ISO/IEC 17065 4.2.3

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 prevents 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 pressures 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; including: Board members, committee members, personnel, contractors, subcontractors, to annually complete a conflict of interest disclosure. 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 identify(s) 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, inspectors, contractors and other personnel are not permitted to accept payment, gifts or favors of any kind, other than prescribed fees, from any business inspected.
- Inspectors/auditors are obligated to refuse work beyond their realm of competence.
- Inspectors/Auditors are assigned by the Administrative Manager 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 inspector/auditor 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 the 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 notify(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 Inspectors/Auditors to inspect anyone with whom they have a declared a conflict of interest(s);
- QCS does not allow an inspector/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 related to all GLOBALG.A.P. certification programs. 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 and the relevant GLOBALG.A.P. General Regulations and standards are made available to the public through the QCS website, www.qcsinfo.org.

#### 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.

#### 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
- GLOBALG.A.P. Produce Safety Assurance (PSA)
- GLOBALG.A.P. Harmonized Produce Safety Standard (HPSS)

#### 1.4.5 Following GLOBALG.A.P. General Regulations Part I, Section 4.2.1 d) (ii)&(iii):

- 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. System, the producer grants access of 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 is always displayed.
- In addition, every certificate holder's company name and address is available to registered industry market participants including GLOBALG.A.P. members.

### 1.5 Competency

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

# 02 Certification Categories[4]

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

Applicable worldwide to a diversity of fruit and vegetables[6]. 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 Produce Safety Assurance (PSA)

Designed for regions where producers and their customers require only a food safety solution, the new Produce Safety Assurance Standard V5. based on the GLOBALG.A.P. Integrated Farm Assurance (IFA) Standard and consists of only the food safety elements.

### 2.3 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.

### 2.4 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.

[4] GLOBALG.A..P. General Regulations, Part 1, v.5.4-1 GFS, 3
[5] GLOBALG.A.P. Regulations Part 1, v.5.4-1 GFS, 3.2 & 5.2
[5a] HPSS V1-1.2 GLOBALG.A.P. Regulations addendum

# 03 Scope of Certification

QCS applicants must certify to the GLOBALG.A.P. Standards 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 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. v.5.4-I GFS version (IFA v.5.4-1-GFS) became obligatory from 22 Jan 2022 for those users supplying customers who demand compliance with a GFSI-recognized standard. IFA v 5.4-1-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 be flexible enough to spur innovation and excellence.

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 Part 1 v5.4-1 GFS, 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 per each type of 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 Check[6]

Once QCS receives the application, QCS checks it for completeness and compatibility to comply with QCS requirements and the standards. QCS staff verifies 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 services with respect to the scope of certification requested, the location of the operation 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 declines services.

Once QCS receives the signed Service Contract Agreement, staff registers the client in the QCS and GLOBALG.A.P. Database and communicate 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

### 5.3 STEP THREE - Inspection[7]

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 validity in the GLOBALG.A.P. Database – up to 4 months after the original expiry date of 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 under Option 1 during the 12 months of validity of certificates.

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 Inspector/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.

QCS assigns an inspector/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;
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.

[7] GLOBALGA.P. Regulations, Part I, v5.4-1 GFS, Section 5

QCS attempts to assign inspectors/auditors in such a way as to minimize the cost to clients, but other factors may also affect the choice of which inspector/auditor to assign. QCS generally attempts to assign the inspector/auditor who is nearest or least expensive for the inspected client, but only to the extent that the inspector/auditor possesses the necessary expertise to conduct the particular inspection, the inspector/auditor is available to conduct the inspection in the necessary time frame, and the inspector/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 an inspector/auditor from outside the region to travel to conduct the inspection when this becomes logistically or financially advantageous to the client. QCS assigns inspectors/auditors 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 inspector/auditor issues the applicant an audit plan to establish the audit date. The audit is scheduled in 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 inspectors/auditors with guidance necessary for the inspector/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 inspector/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 inspector/auditor inspects 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 Regulations. The inspector/auditor also reviews documents, records, record-keeping systems, and interview personnel. Applicants must allow the inspector/auditor to have complete access to the production and handling operation, including non-certified production and handling areas, structures and offices.

#### 5.3.2.3 Exit Meeting

The inspector/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 inspector/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 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 inspector/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 follow GLOBALG.A.P. General Regulations. Certificates can be validated by using the online certificate validation tool accessing the GLOBALG.A.P. Database at https://database.globalgap.org/globalgap/search/SearchMain.faces?init=1.

#### 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 5.3 Inspection

**5.4.3.1 Re-Certification On-Site Provisions**

The certification cycle is no more than 12 months 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. 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 inspection/audit 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 5.4.1 Certification Review applies.

**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 and optionally an audit of the QMS is required during that year before additional 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.

**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-conformance 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 set 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 renewal deadline is still in effect as well as any require 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 operations 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 the 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.

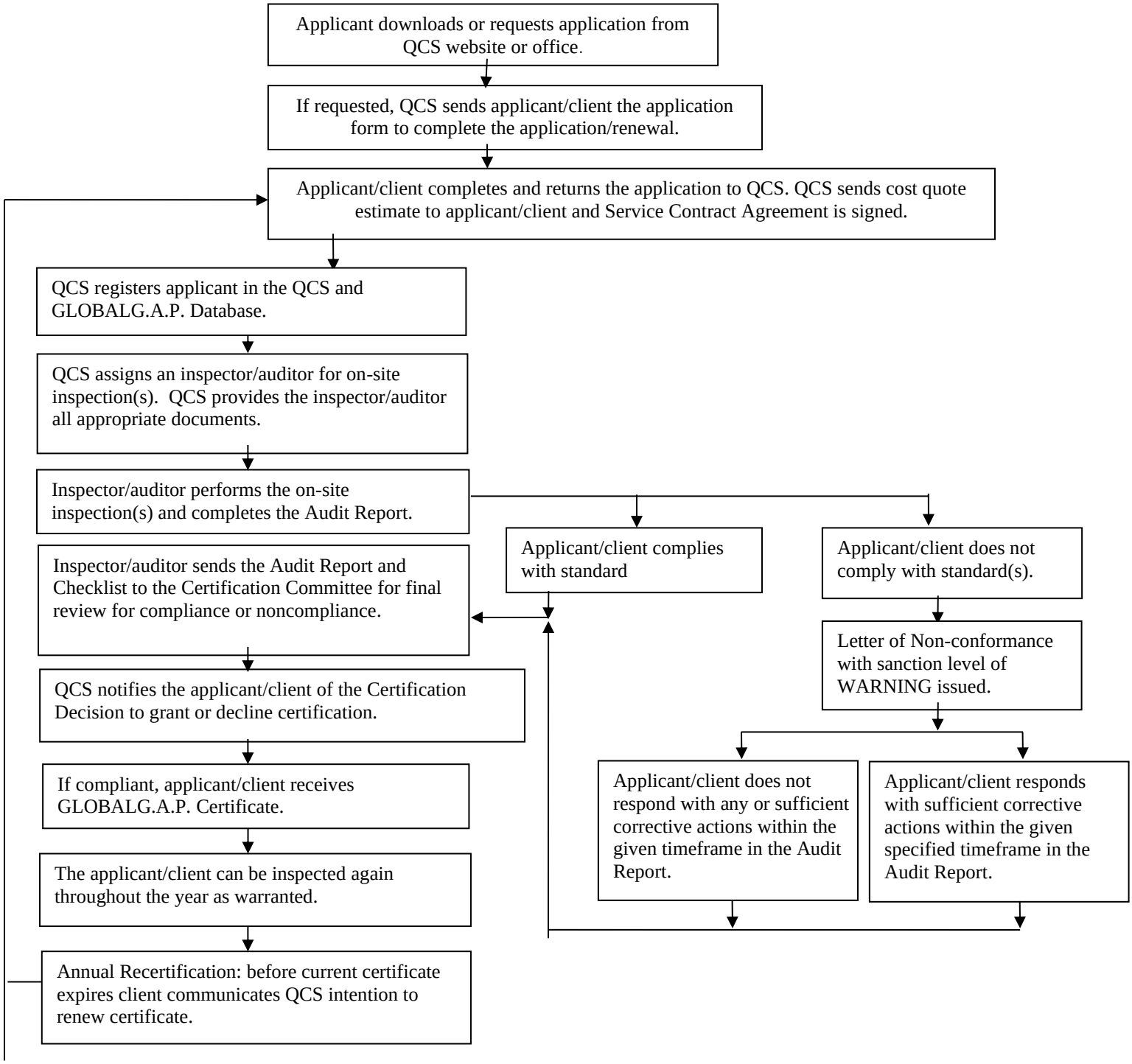
**5.4.7 Transferring certification to other Certification Bodies (CB)**

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 new certifier conducts a complete check of the client's application and follow GLOBALG.A.P. General Regulations 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.

## 5.5 QCS GLOBALG.A.P. Certification Process



# 06 Appeals

## 6.1 Appeals

Operations must either resolve noncompliances 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 is maintained along with follow-up 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

### 7.1.1 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.

### 7.1.2 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.

### 7.2 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 is taken.

### 7.3 Recall

Certified operation is expected to have a recall procedure that is in accordance with GLOBAL G.A.P standards. QCS must be notified of any significant food safety incident, such as a product recall. 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.

# 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 nonrefundable. A 50% (75% for international clients) 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 incurred travel costs (e.g.: purchasing of plane tickets) after 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 are been paid or other arrangements have been made.