CCOF
Certification Services, LLC
www.ccof.org

GLOBALG.A.P. CERTIFICATION

Program Manual

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Edition: June, 2016

This manual is provided to all producers seeking CCOF CS GLOBALG.A.P. certification to present information regarding the certification process. It contains a detailed description of CCOF CS's GLOBALG.A.P. certification program and policies in addition to the rights and responsibilities of CCOF CS certification producers. Please review this manual carefully.

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SECTION ONE: INTRODUCTION TO CCOF'S GLOBALG.A.P. PROGRAM

OVERVIEW OF THE CCOF FOOD SAFETY CERTIFICATION PROGRAM

CCOF is a 501(c)5 nonprofit organization dedicated to providing certification services to organic farmers. In order to help organic farmers meet the needs of their buyers and keep pace with the changing face of food safety requirements, CCOF CS is offering a field level food safety certification program in conjunction with our organic certification programs.

References to "CCOF" in this Manual refer only to CCOF Certification Services, LLC and not to CCOF Inc or the CCOF Foundation. See the CCOF Certification Services Program Manual for a description of the legal structure of CCOF Certification Services, LLC.

CCOF is currently offering GLOBALG.A.P. certification to farmers located in the US or Mexico that are also certified organic. We are not currently offering processing level food safety certification services.

The staff of CCOF works hard to maintain a thorough and service-oriented food safety certification program. All CCOF CS producers benefit from our commitment to service and years of experience in certification activities.

CCOF developed our food safety certification program in early 2013. For a current status of approvals and accreditation by the the American National Standards Institute (ANSI) and FoodPLUS for the GLOBALG.A.P. food safety programs are made available on their respective websites.

About GLOBALG.A.P.
GLOBALG.A.P. is an international nonprofit organization based in Germany. It was founded in 1997 as EUREPGAP, an initiative by retailers in Europe, and is governed as a stakeholder owned organization, with technical working groups. See www1.globalgap.org/north-america for more information about GLOBALG.A.P.'s North American programs. GLOBALG.A.P. is not a consumer facing program- that is, products are not labeled "GLOBALG.A.P. certified" on the supermarket shelves. Instead, it is a standard intended to provide buyers, such as retailers, confidence in purchasing product.

GFSI Benchmarking
Certain GLOBALG.A.P. certification programs are "benchmarked" by the Global Food Safety Initiative (GFSI). This means that they are generally accepted by retailers, processors and other buyers of food products worldwide as being legitimate food safety certification programs. GFSI is an international, non-governmental organization founded in 2000 based in France. See www.mygfsi.org for more information about GFSI and the benchmarking process.

HOW TO USE THIS MANUAL

This manual contains information about the CCOF GLOBALG.A.P. Certification Program, and only details areas of this program that differ from the other CCOF certification programs. This Manual is not meant to stand alone, and must be used in conjunction with the CCOF Certification Services Program Manual. Areas where the CCOF GLOBALG.A.P. certification program process differs from that described in the CCOF Certification Services Program Manual, including additions, deletions or modifications, are listed below.

This Manual does not contain all of the GLOBALG.A.P. production requirements. The standards and compliance criteria for each scope and subscope of production are available on the GLOBALG.A.P. website or by requesting them from CCOF. Because the standards differ depending on the program level (Integrated Farm Assurance vs. Produce Safety Standard), on scope (crops vs. livestock) and subscope (fruits & vegetables vs. field crops), there is no one document that describes all the standards for all type of farms. Information about the various standards, scopes and subscopes can be found on the GLOBALG.A.P. North America website at www1.globalgap.org/north-america

This document is not intended as a substitute for a complete reading and understanding of the GLOBALG.A.P. General Regulations and standards that may be downloaded free of charge at www1.globalgap.org/north-america

CCOF operates in accordance to ISO/IEC 17065; therefore, CCOF cannot provide consultation services to our clients.

It is important that you carefully review the CCOF Certification Services Program Manual, this Manual, and the appropriate GLOBALG.A.P. General Regulations, standards and certification criteria.

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CCOF Certification Services Program Manual
The CCOF Certification Services Program Manual includes information about CCOF organizational structure, history, contact information and other certification programs and the certification process. Additionally, it contains CCOF's procedures and policies on: Enforcement, Complaints and Investigations, Monitoring the Marketplace, Testing of Products, Use of Contractors, Confidentiality and Public Information, Equality, Impartiality, Standards of Behavior, Governing Law, Consent to Jurisdiction, Indemnification, and Limitation of Liability.

ACRONYMS & GLOSSARY

Because GLOBALG.A.P. was founded in Europe, some of the terminology may be confusing for US producers. CCOF is providing the list below of acronyms and translations of terms not common to US agriculture or certification programs to help you understand the GLOBALG.A.P. requirements.

ANSI- American National Standards Institute: A nonprofit organization that provides accreditation oversight to certification bodies. Founded in 1918 and located in D.C. See www.ansi.org.

Benchmarked: Compared with other standards and found to be equivalent and acceptable. GLOBALG.A.P. IFA and PSS are GFSI benchmarked standards

Combinable Crops: Crops commonly farmed using a combine. Generally known as "field crops" in the US.

Covered Crops: Crops produced in a greenhouse (under "cover").

CPCC- Control Points & Compliance Criteria: The individual standard criteria which the producer must comply with.

Farm Assurers: Consultants that have specific GLOBALG.A.P. qualifications and training and are approved by GLOBALG.A.P. directly.

GAP- Good Agricultural Practices: A collection of principles applied to on-farm production and post-harvest handling, resulting in safe food, and taking into account economic, social and environmental sustainability.

GFSI- Global Food Safety Initiative: An international, non-governmental organization founded in 2000 based in France. Provides "benchmarking" of food safety standards worldwide. See www.mygfsi.com.

GGN- GLOBALG.A.P. Number: A 13 digit number assigned to each GLOBALG.A.P. registered entity. Can be used by the public to look up the operation on the GLOBALG.A.P. website, a unique identifier of all activities and acts as a search key for validating certificates.

Harmonized Produce Safety Standard: A set of compliance criteria agreed to by a group that can be used by any third party oversight body. For example, in the US, United Fresh has led the development of the Produce G.A.P. Harmonized Standard. The GLOBALG.A.P. Produce Safety Standard is aligned with this harmonized standard. See www.unitedfresh.org/newsviews/gap_harmonization.

IFA- Integrated Farm Assurance: A GFSI benchmarked GLOBALG.A.P. standard.

Major Must: A requirement (control point) of the GLOBALG.A.P. standard. 100% of applicable major musts have to be met to be compliant.

Minor Must: A requirement (control point) of GLOBALG.A.P. standard. 95% of applicable minor musts have to be met to be compliant.

Option 1 with multisite: Certification of a single producer or single organization who owns several production locations or management units. All locations and management units must be under a single legal entity.

Option 1: Certification of a single producer or single organization with a single location and management unit.

Option 2: Certification of a producer group.

localg.a.p. North America – Assessment only; not a certification and not GFSI benchmarked. Simplified standard with basic/foundation and intermediate levels. A stepping stone to full IFA or PSS certification. Provides producers with an audit report for buyers to review and aides in developing a solid food safety plan.

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Parallel Ownership: When an operation buys non- GLOBALG.A.P. certified versions of the same products that are grown as GLOBALG.A.P. certified (such as growing GLOBALG.A.P. broccoli and buying in non-GLOBALG.A.P. broccoli)

Parallel Production: For a specific crop (visually indistinguishable to the average consumer), some is produced under GLOBALG.A.P. certification and some is not GLOBALG.A.P. certified. Parallel Production will apply if an individual grower in a Option 2 QMS certification group is producing a commodity (i.e. carrots) that the group wants certified but the individual does not need certified, and if that individual grower has other commodities certified by the group, the individual grower can opt out of the certification for that particular product (i.e. carrots)."

PHU- Production Handling Unit: A facility or location where products are stored and handled, and where products are differentiated from that of other facilities.

PS- Production Site: A production unit (farm, field, orchard, greenhouse, etc.) where the crops are differentiated and segregated from that of other PSs.

PSS- Produce Safety Standard: A GFSI benchmarked GLOBALG.A.P. standard limited to only food safety.

Scheme: Certification program.

Scope: GLOBALG.A.P. scopes include Crop

Subscope: GLOBALG.A.P. subscopes of the Crops Scope include Fruit & Vegetables, Combinable Crops

GLOBALG.A.P. CERTIFICATION AND ASSESSMENT SERVICES OFFERED

CCOF offers three levels of certification and assessment under GLOBALG.A.P. "Certification" means that your farm receives a certificate from CCOF verifying that you are compliant with the GLOBALG.A.P. certification and production standards. "Assessment" means that CCOF inspects your farm to the production standards, but shall not make a decision about whether your farm is in compliance. Some buyers require full certification, while others may only require assessment, and reviews the report themselves and make the decision about whether to buy your products directly. CCOF can try to help you understand which level of certification or assessment you need, but it is critically important that you talk with your buyers and potential (retailers, distributors, wholesalers, etc.) to determine which program you need to enroll in.

For ease and clarity, this manual refers only to "Certification". If your operation is seeking only an assessment, sections relating to certification shall not apply.

CCOF offers the following programs:

Certification(s)

- **Integrated Farm Assurance (IFA):** GFSI benchmarked. Covers food safety, environmental sustainability, traceability and worker welfare. Available for fresh fruits, vegetables and "combinable crops" (field crops such as corn, soy, alfalfa, etc.). The Standard used is the GLOBALG.A.P. All Farm Base, Crops Base, Fruits and Vegetables Control Points and Compliance Criteria (V4.0 Edition 4.0-2, published March 15, 2013 and Version 5.0 Edition 5.0-1, February, 2016) for the subscopes of Fruit & Vegetables and Other Crops.
- **Produce Safety Standard (PSS):** GFSI benchmarked. Includes ONLY the food safety sections of the IFA standard, not the environmental sustainability, traceability or worker welfare sections.
- **HPSS: Harmonized Produce Safety Standard**– pending GFSI benchmark. **I**ncorporates United Fresh's Harmonized Standards and replaces the PSS above.

Assessment(s)

- **localg.a.p. North America** – Assessment only; not a certification and not GFSI benchmarked. Simplified standard with Basic/Foundation and Intermediate levels. A stepping stone to full IFA or PSS certification. Provides producers with an audit report for buyers to review and aides in developing a solid food safety plan. (previously the PFA program).

Option 1 & 2 Multi-site with a Quality Management Systems (QMS) – Indivdual producer or group of individual producers with multiple production locations, who decide to implement a QMS to reduce the number of external CCOF inspections.

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Operations in the USA whose products are exported likely need full IFA certification. Some retailers may accept the PSS, though as this was GFSI benchmarked in early 2013 it may take additional time to be accepted by the US marketplace. Certain US retailers may accept IFA, PSS, GAP and/or the Harmonized Standard.

ELIGIBILITY FOR ENROLLMENT

In order to qualify for enrollment in the CCOF GLOBALG.A.P. program, operations must meet the following criteria. Each of these is described in more detail below.

a) Location
b) Organic certification
c) Scope of certification
d) Single legal entity
e) Parallel production

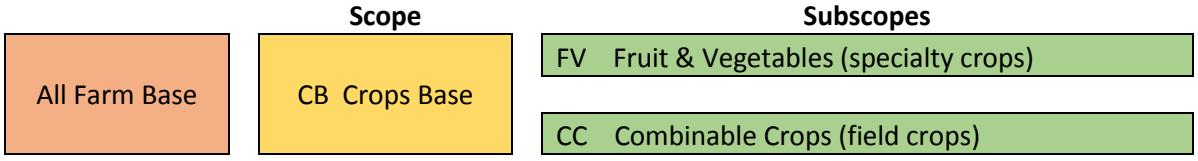
Location
CCOF is currently approved to provide GLOBALG.A.P. in the US and Mexico. If you are located elsewhere in North America (such as Canada), and you desire to enroll your farm in the CCOF GLOBALG.A.P. program, contact us.

Organic Certification Required
CCOF only provides GLOBALG.A.P. services to operations who are certified organic. The organic certification may be by CCOF or by another accredited certification agency. The organic certification may be through one of the CCOF organic certification programs (USDA National Organic Program, Canadian Organic Regime, or CCOF International Standard Program). An operation certified organic by another certifier to a standard that is USDA, EU or Canada compliant or equivalent may also enroll in the CCOF GLOBALG.A.P. certification program.

CCOF is offering GLOBALG.A.P. certification to both the organic and non-organic portions of an operation, so long as some part of the operation is certified organic.

Scope of Certification
Only farmers that are producers of primary agricultural products covered by the GLOBALG.A.P. standards may apply for GLOBALG.A.P. certification. A list of these primary agricultural products may be found at http://www.globalgap.org/uk_en/what-we-do/the-gg-system/GLOBALG.A.P.-Database/.

CCOF is approved to certify for the Fruit & Vegetable and Combinable Crops subscopes. These subscopes crops include most fresh fruits, vegetables, and grains.



CCOF cannot provide certification for crops that are used solely for medicinal or aromatic purposes and shall not provide certification for livestock, aquaculture, flowers or ornamentals, green coffee or tea. While on-farm packing houses may be covered under a farm entity's GLOBALG.A.P. certification, we cannot provide GLOBALG.A.P. certification to stand alone processing or post harvest handling facilities.

The product scope is linked to the location (parcel or facility) where the product is produced and handled. Crops grown or packed in a non-registered location cannot be certified, and crops that are not registered but are grown or packed at a registered location cannot be certified. A grower must register with CCOF the specific parcels, facility locations and crops they wish to be certified prior to the inspection. If either the crop or parcel/facility is not registered prior to the inspection, certification cannot take place and you cannot sell that crop as GLOBALG.A.P. certified.

If you wish to add parcels or crops to your certification, notify CCOF as soon as possible to avoid extra costs associated with follow-up inspections.

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Only fruits and vegetable covered by the GLOBALG.A.P. Product List, published on the GLOBALG.A.P. website, can apply for certification.

Only the legal certificate holder (i.e. the legal entitiy that is indicated on the certificate) may market crops with a GLOBALG.A.P. certificate. Members of a producer group are not legal certificate holders thuand therefore may not market products under their name with reference to the group certificate.

Single Legal Entity

Each legal entity is required to have its own GLOBALG.A.P. certification with CCOF. While multiple sites (fields) may be certified under one farm, multiple farms or businesses may not be certified under a one certificate. On the CCOF GLOBALG.A.P. Application Form, you are asked for the name and legal description of your business entity.

GLOBALG.A.P. offers programs for individual operations (called "Option 1") and Option 1 MultiSite with QMS; where the operation has multiple fields under one farming business. GLOBALG.A.P. also offers programs for grower groups (called "Option 2"); where individually owned farms operate as a group and have an internal control system or Quality Management System (called "Option 2"), generally organized around a packhouse or buyer. Option 2 certifications are very common throughout the world and are becoming more so within the United States. CCOF offers certification for both Option 1 and Option 2.

Parallel Production[1]

Parallel production from the same Production Site is not allowed in the GLOBALG.A.P. certification system. A Production Site is a production unit (farm, field, orchard, greenhouse, etc.) where the crops are differentiated and segregated from that of other Production Site's. Parallel production means that for a specific crop (visually indistinguishable to the average consumer), some is produced under GLOBALG.A.P. certification and some is not GLOBALG.A.P. certified. In order to have parallel production within the legal entity, there must be physical elements (roads, barriers, etc.) separating the Production Sites's to prevent accidental mixing, spraying, drift, etc. Visually distinguishable varieties of the same crops, such as Fuji apples versus Red Delicious apples, are not considered parallel production.

CHANGING CERTIFIERS

An operation may not have the same products or same fields certified by more than one GLOBALG.A.P. certifier. If you are already GLOBALG.A.P. certified by another certifier, and wish to switch the certification of that product to CCOF, please be sure to let CCOF know as soon as possible so that we can ensure that the transfer process is conducted correctly. If you wish to switch both your organic and food safety certification to CCOF, complete the CCOF CS Certification Transfer Form (available at www.ccof.org), including all associated documents, and the application fee may be waived.

Operations who wish to switch certifiers must ensure that they are in good standing with their current certifiers. If an operation has been sanctioned by their certifier, they cannot transfer to a new certifier until the non-conformance is closed out or until the sanction penalty period is over. The inspection timing of the first inspection is not conducted as an intial inspection but a subsequent inspection per GLOBALG.A.P. General Regulations V5.0_July2015Part 1 Section 5.3.

WORKING WITH FARM ASSURERS

GLOBALG.A.P. offers operations the ability to work with a set of qualified consultants called "Farm Assurers". In order to qualify as a Farm Assurer, a person must complete specific trainings and pass an exam conducted by GLOBALG.A.P. Farm assurers can help your farm do a self-assessment, can register your farm with GLOBALG.A.P. (see information about Registration below), and can provide you consulting about how to comply with GLOBALG.A.P. standards. An inspector may be a Farm Assurer, but not all Farm Assurers are inspectors. A list of GLOBALG.A.P. approved Farm Assurers in North America may be found at www1.globalgap.org/north-america/front_content.php?idcat=282. Fees charged by Farm Assurers for their services are separate from those charged by CCOF, and CCOF is not responsible in any way for work done by Farm Assurers.

[1] GLOBALG.A.P. General Regulations V4.0 Part 1- Annex 1.3 & GLOBALG.A.P. General Regulations V5.0 4.3.2

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POLICIES

All the Policies from the CCOF Certification Services Program Manual apply to producers enrolled in the CCOF GLOBALG.A.P. program, including: Use of Contractors, Confidentiality and Public Information, Equality, Impartiality, Standards of Behavior, Governing Law, Consent to Jurisdiction, Indemnification, and Limitation of Liability. CCOF CS maintains confidentiality during the data use and data release of information obtained during the course of certification per GLOBALG.A.P. General Regulations V4.0 Part 1 Section 4.2.d.i-vi and GLOBALG.A.P. General Regulations V5.0_July2015Part 1 Section 4.2.d.i-vi.

GLOBALG.A.P. CCOF NAMES AND SEALS

GLOBALG.A.P. is the owner of their trademarks and seal. CCOF verifies the correct use of the GLOBALG.A.P. trademark, and violation of the rules for use may be cause for sanctions. See the GLOBALG.A.P. General Regulations V4.0 Part I Annex I.1 and General Regulations V5.0_July2015 Part I Annex I.1 for the rules on using the trademark.

Contact the GLOBALG.A.P. Secretariat to obtain the GLOBALG.A.P. logo in order to ensure the exact corporate color and format. The North American representative for the GLOBALG.A.P. Secretariat can be contacted as follows:

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FEES

CCOF is committed to maintaining stable certification fees and being transparent about the costs of certification. The CCOF GLOBALG.A.P. Program has the following Annual Fees.

Annual Certification Fees for All Certificate Holders:
Annual fees for this program are on a sliding scale based on acreage. Please see below:

Acres in Production	Annual Fee
1-6	$250
7 – 200 *	$400
201 – 500	$550
501 – 2,000	$750
2,001 – 6,500	$1,000
6,501 – 12,000	$1,750
≥ 12,001	$3,500

*Greenhouses are billed annually at $400.00

This must be paid prior to Initial or Annual inspection.

Consultant Discount - Setting up a food safety program is a difficult undertaking for farmers new to food safety. CCOF offers a 50% reduction in annual fee for the first year to farmers with 200 acres or less who work with a consultant to prepare for their initial inspection. Please notify CCOF if you would like to apply for this discount and submit evidence with your application that a consultant has assisted with developing your food safety plan and conducting the required self-assessment.

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CCOF has a list of agricultural consultants and advisors on our webpage and other consultants are available throughout the industry. List available at https://www.ccof.org/certification/help/consultants-ag-advisors.

Inspection Fees
There is an annual fee for the cost of the onsite inspection. The cost is billed on a time and materials basis upon completion of the inspection and this may vary from year to year. Total inspection costs vary according to the operation's scope, size, complexity, and inspector availability.

Option 1 (single or multisite without QMS):

Inspections are billed a minimum of one half day ($500), plus $125 per hour after the half day minimum.

Option 1 or 2 (with QMS):

Inspections are billed a minimum of one half day ($750), plus $200 per hour after the half day minimum.

All Producers:

Travel time is billed at $44 per hour, with the first 4 hours free. Other billed expenses include travel expenses; airfare, mileage, food, lodging, etc.

CCOF CS clients are responsible for all incurred inspection costs from the point CCOF CS assigns the inspector. This includes preparation, planning, and any purchased tickets or travel expenses incurred. Clients wishing to eliminate inspection expenses must withdraw from certification in writing upon first contact from the inspector.

CCOF CS is committed to assigning and executing inspections in the most efficient manner possible. CCOF CS assigns inspectors to operations according to the inspector's qualifications and in order to minimize travel costs and save time. Cooperation with inspection assignments is necessary in order for inspections to be scheduled efficiently. If a client fails to comply with an inspection date set according to the inspector's schedule, additional time and travel charges may accrue. Clients who withdraw after the inspection is assigned may be billed for any expenses incurred.

If an inspection is cancelled by the operation with less than 48 hours notice, CCOF CS charges for time and expenses incurred plus a $50 penalty. Additionally, at the second request to schedule an inspection, the client has five working days to respond or else CCOF CS may bill a $50 penalty.

GLOBALG.A.P. License fee
This is based on the GLOBALG.A.P. fee schedule and is collected by CCOF and paid to GLOBALG.A.P. on your behalf. GLOBALG.A.P fee schedule are located in the GLOBALG.A.P. North America Fee Schedule located at http://www.globalgap.org. .

Option 1 Certificate License Fee = $37.50

Option 2 Certificate License Fee = $195.00 plus $1.50 for each producer group member.

GLOBALG.A.P. Producer Registration Fee
This is based on the GLOBALG.A.P. fee schedule and is collected by CCOF and paid to GLOBALG.A.P. on your behalf. GLOBALG.A.P fee schedule can be found at www1.globalgap.org/north-america.

Additional fees
See the CCOF Certification Services Program Manual for a detailed break down of additional fees for specific services. These fees include: Rush Review, late/no response fees, reproductions services hourly rates, etc.

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SECTION TWO: THE CERTIFICATION PROCESS

Certification is an annual cycle which includes an on-site inspection. The onsite inspection is conducted in order to evaluate the production activities of the farm and evaluate compliance with the GLOBALG.A.P. Control Points and Compliance Criteria (CPCC).

The certification process generally follows the same pattern outlined in the CCOF Certification Services Program Manual. Exceptions are described below. This manual must be used in conjunction with the CCOF Certification Services Program Manual for complete information.

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APPLICATION & REGISTRATION[2]

Application

Any operation seeking enrollment in the CCOF GLOBALG.A.P. program can obtain a CCOF GLOBALG.A.P. Application packet from CCOF by mail or email, or it can also be downloaded directly from the CCOF website at www.ccof.org/certification/food-safety-certification. The Application package for CCOF GLOBALG.A.P. certification contains at least the following items[3]:

- CCOF GLOBALG.A.P. Application form
- GLOBALG.A.P. Sublicense Certification Agreement
- CCOF GLOBALG.A.P. Certification Program Manual (this document)
- GLOBALG.A.P. Fee Schedule, 2013

Applicants should also review the following documents, available on the GLOBALG.A.P. website. CCOF can provide copies of these documents upon request.

- GLOBALG.A.P. Control Points and Compliance Criteria
- Checklist template for the appropriate sub-scope(s)
- Self-Assessment

Instructions and information to help complete the application are at www.ccof.org/certification/food-safety-certification. If you need additional assistance, please contact the CCOF office.

Due to the complexity of the registration, review, inspection, and compliance review process, CCOF recommends that you **begin the application process with CCOF at least 12 weeks prior to harvest**. Note that the onsite inspection must occur during the harvest of the crop(s) for which you are seeking GLOBALG.A.P. certification! Provide as much detail as possible. This helps the certification process move forward in a timely manner. Be sure to keep a copy of all of the forms inspectors submit to CCOF!

Harvest Exclusion[4]

If the grower owns the produce through harvest, then harvest must be included in the certification. If produce is sold in the field, prior to harvest, and the buyer is responsible for the harvesting of the product, the grower is not required to have the harvest reviewed as part of their GLOBALG.A.P. certification. This is known as the "Harvest Exclusion", and must be requested during the application process for each crop specifically. There must be a contract between the grower and the buyer. Please see the Application forms to request the Harvest Exclusion and for more details about the requirements.

Registration[5]

Operations must be "registered" with GLOBALG.A.P. and reregistered annually. Registration can be done by either a qualified Farm Assurer (see the section on Farm Assurers above) or by CCOF. Registration means that the operation information is entered into the GLOBALG.A.P. database with the information about each Production Site (the field or parcels to be certified), and the crops for each location. Registration must also include information about the Country of Destination intended for the crops. Registrants must register per GLOBALG.A.P. Global GAP General Regulations V4.0 Part 1 Section F.I-IV and GLOBALG.A.P. Global GAP General Regulations V5.0_July2015Part 1 Section F.I-IV.

The CCOF GLOBALG.A.P. Certification Program Application packet includes information needed to register the operation. If the operation is already registered, either by a Farm Assurer or by another certification body, this must be indicated on the application forms.

When an operation requests GLOBALG.A.P. registration, it is committing to comply with the obligations of the GLOBALG.A.P. program, including:

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[2] GLOBALG.A.P. General Regulations V4.0 & V5.0 Part III Section 4
[3] Detailed in Annex 1.2 GLOBALG.A.P. registration requirements
[4] GLOBALG.A.P. General Regulations V4.0 & V5.0 Part III Section 4.3.1
[5] GLOBALG.A.P. General Regulations V4.0 & V5.0 Part III Section 4

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- Compliance with the certification requirements at all times[6],
- Payment of the applicable fees established by GLOBALG.A.P. and by CCOF CS,
- Communication of data updates to CCOF CS, and
- The terms and conditions of the sub-license and certification agreement.

There is a registration fee due to GLOBALG.A.P. This fee is collected by CCOF, who pays GLOBALG.A.P. on your behalf.

If the operation applying for certification with CCOF has already been registered in the GLOBALG.A.P. database for any reason, including previous registration with a different certifier, the operation is required to inform CCOF of the GGN. Failure to do this results in the operation being charged twice for the registration fee.

GLOBALG.A.P. Number (GGN)
Once the producer is registered, GLOBALG.A.P. issues the operation a unique GLOBALG.A.P. Number (GGN). The GGN is a 13 digit number which is used as a unique identifier for all GLOBALG.A.P. activities. The GGN can be used by the public to look up the operation on the GLOBALG.A.P. website and acts as a search key for validating certificates.

Application Review & Acceptance
Once CCOF has received and accepted the initial Application packet, including completed Application Form, Contract and Agreement, and payment, CCOF staff registers the operation and enters the information into the GLOBALG.A.P. database. This prompts the creation or confirmation of the GGN described above. CCOF confirms the receipt of the application in writing within 28 calendar days after CCOF has received the GGN for the operation from the GLOBALG.A.P. database.

CCOFstrives to provide prompt, efficient responses to all applicants for GLOBALG.A.P. certification. CCOF may request further information in an attempt to clearly define, document and understand the information submitted.

Acceptance of the Application requires:

a) Receipt of a CCOF Application form, including Contract & Agreement; signed by an authorized representative of the producer.
b) Payment of the GLOBALG.A.P. license and registration fee.
c) Receipt of GLOBALG.A.P. Sublicense Certification Agreement; signed by an authorized representative of the producer.

When the Application has been accepted, the following occurs:

a) The operation is assigned a Producer status of “Registered” in the GLOBALG.A.P. Database
b) Products are registered in the database with the status of “not confirmed”. Products are only approved after the onsite inspection.
c) The operation is assigned a GLOBALG.A.P. Number (GGN) by the GLOBALG.A.P. database if the operation is not already registered with a GGN.
d) Within 14 days of receiving the GGN from the GLOBALG.A.P. Database, CCOF confirms the receipt of the application in writing and provide the operation with their GGN.
e) CCOF provides a cost estimate for certification or assessment services. The estimate is based on the information provided by the producer applying for certification. The actual cost of certification may vary depending on the accuracy of information provided.

Applicants may withdraw at any time, however the fees paid to CCOF are non-refundable, and an applicant who withdraws is liable for the costs of services provided up to the time of withdrawal.

Self-Assessment
Before or during the registration process, operations enrolling in the GLOBALG.A.P. program must conduct a self-assessment (sometimes called an internal audit). The self-assessment is an opportunity for the operation to review the practices and

[6] ISO/IEC 17065 4.1.2.2.b

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policies of the farm to make sure that they comply with the requirements, and implement any changes necessary to come into compliance. Doing the self-assessment well, in a thoughtful and thorough manner, can prevent problems and delays later, and save time and money in the certification process.

Self-assessments must cover all sites, products and processes being enrolled in the GLOBALG.A.P. certification program. They must review each of the control points for the appropriate program. While the operation may use a contractor, such as a consultant or Farm Assurer, to help conduct the self-assessment, the farmer is responsible for the self-assessment, its outcomes and any corrective actions resulting from the self-assessment.

To perform a self-assessment, the operation reviews the applicable GLOBALG.A.P. Control Points and Compliance Criteria, and compares the farm practices to the certification requirements. Each year, the operation must conduct a new self-assessment before the surveillance inspection. The self-assessment must include a re-signing of the Food Safety Policy Declaration Certification cannot be granted until a self-assessment is conducted and documented.

A self-assessment involves completing the checklist (including all Major and Minor Musts and Recommendations) for each scope of each program that the operation is enrolled in. Once the checklist has been completed, the results of the self-assessment, including comments and findings must be documented. The operation must ensure that the completed checklist and documented results are available on site for review at all times.

Complaint Log Requirement[7]

The operation must keep a record of all complaints received that relate to a product's compliance with the CCOF GLOBALG.A.P. manual. A record of all complaints must be made available to CCOF CS when requested. The record must show that appropriate action is taken with respect to each received complaint.

ANNUAL INSPECTION AND INSPECTION CYCLE

Each producer undergoes one announced inspection at the intial assessment thereafter one per annum.

Every year, the operation must conduct a Self-Assessment (described above). Once the Self-Assessment has been completed CCOF conducts an onsite inspection of the operation, including each crop and site.

CCOF may also conduct unannounced inspections at any time (see below). All CCOF inspections, both announced and unannounced, are conducted by a qualified inspector, and be based on the relevant checklist for the scopes and subscopes of certification that the operation has requested.

For Option 2, the minimum number of producers/Production Sites to be inspected during a cycle is equivalent to the square root of the current number of producers/Production Sites. The inspections are split into two annual site visits. The first visit is announced, auditing the QMS and inspecting a minimum of the square root of all producers. The second visit is unannounced and a minimum ½ of the square root of producers are inspected.

The steps in the CCOF GLOBALG.A.P. annual inspection cycle are:

- Operation completes self-assessment.
- CCOF assigns an inspector whose training and experience matches the producer's activities.
- The inspector contacts the producer to make an appointment for the inspection and to review any preliminary questions concerning the producer.
- The inspector travels to the producer to conduct the inspection and verify the producer's compliance or capability to comply with the standards and applicable requirements.
- The inspector conducts an exit interview at the end of the inspection.

Inspection of Option 2 Producer Groups

A qualified auditor starts at the central office of the group or the administrative center for the group to evaluate the group's QMS. From this process, using criteria based on the group structure and defined in a sampling procedure based on risk, the selection of operators; as a minimum, the square root (or next whole number rounded upwards if there are any decimals) of

[7] ISO/IEC 17065 Guide 4.1.2.2.j

the total number of the producers for each combination of sub-scopes. This mean that during the inspection of each of these selected producers/Production Sites, all the products in that sub-scope combination must be inspected.

Additioinally, sample size calculations are based on the numbers of registered producers separated into subgroup combinations taking into account production type. Producers will also be classified by production type, within the respective sub-scope and sub-scope combination. These may include, but are not limited to the following examples:

- Crops
- Covered/protected crops
- Perennial crops

If an operator of the group is selected in the sampling and that operator has multi-sites, that operator is calculated as one operation and the amount of sites inspected are selected on the square root of the sites/Production Sites of that operator.

These samplings may be increased by CCOF for reasons from the following arise (and operators have the right to appeal):

- Failure of compliance with 100% Major Must and 95% Minor Must control point on producer member level.
- Failure to comply with all QMS and if applicable, all the product handling requirements
- Customer complaints; e.g.: illegal pesticide residue detection.
- Inconsistencies between the internal audit/inspection reports and the CB inspection/audit findings.
- Producers that move from one group to another have a higher possibility of being included in the sample of producers chosen by the CB.
- Determination that a NC is structural or not.
- The number of products.

Inspection samplings may only be decreased if the operator has had no sanctions raised in the surveillance inspection, the following regular announced inspection can then be reduced to the square root of the **current** number of the producers/Production Sites minus the number of producers/Production Sitess inspected in the surveillance or equivalent 50% of the square root (providing the findings from the quality management system audit carried out at the following regular announced inspection are also favorable to this reduction).

Inspection of Produce Handling Facilities

If the certified operation has produce handling included in the GLOBALG.A.P. certification, the produce handling facilities must be inspected while in operation, whether owned or contracted facilities are used. The inspection of these facilities do not necessarily occur each year;the choice of whether to include the facility in the inspection is made by CCOF, based on risk assessment of the products being packed, any known food safety incidences related to those products, or directives from GLOBALG.A.P.

If the certified operation is part of a grower group (Option 2), CCOF inspects the central produce handling site utilized by the group.

ON-SITE INSPECTIONS[8]

Once the operation is registered and the Application has been accepted, CCOF conducts an initial on-site inspection of the operation in order to verify the producer's compliance or capability to comply with the applicable GLOBALG.A.P. Control Points and Compliance Criteria. The inspection includes all products, including production and post-harvest handling sites for each crop for which the operation is seeking GLOBALG.A.P. certification. The inspection may also include a visit to the administrative offices.

CCOF only uses approved GLOBALG.A.P. inspectors, who are verified as meeting the qualifications in Global GAP General Regulations Part III v5, Annex III.1 Inspector Qualifications and Annex III.2 Auditor Qualifications.

On-Site inspections (initial and subsequent) may be divided to include both an off-site and onsite module verification. The reasoning of both modules is to reduce time spent on-site (although the overall duration of the inspection is not reduced) and increase productivity.

[8] GLOBALG.A.P. General Regulations V4.0 & V5.0 part III Section 5.1-5.3

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The off-site module consists of a desk review of documentation conducted no earlier than two weeks prior to the inspection; which consists of the producer providing the inspector/auditor documets and records in advance of the onsite visit; including the self-assessment, risk assessments, procedures required in several CPCC's, analysis program (frequency, paramenters, locations), analysis reports, licenses, list of plant protection products, proof of lab accreditation, certificates or inspection reports of subcontracted activities, plant protection products/fertilizer application records, etc. The operator has the right to refuse sending information if considered confidential, in which case the information must be reviewed onsite during the inspection.

The onsite module consists of an onsite inspection of the remaining content of the checklist, the production process onsite and verification of information assessed offsite.

Inspection Duration[9]

Inspections must include sufficient time to allow for all of the following:

a) an opening meeting with the farm management

b) visitation of all production, storage, processing and other critical locations (such as water sources)

c) inspection of all machinery and equipment used

d) Interviewing farm personnel & key staff

e) Evaluating the records

f) Reviewing all control points and relevant documents

g) Completing the checklist with sufficient comments (see below)

h) Providing the results right after the inspection is finished.

For Option 2 inspections, time must permit the following in addition to the above:

a) Review of internal audits and inspections conducted

b) Review of Mass Balance Exercise

c) Interviews with the internal auditor(s).

Inspection of a very simple operation (one location, few crops, simple machinery, few workers, no handling, well organized, etc.) is expected to take a minimum of 3 hours. For Grower Groups (Option 2), inspections may take anywhere from 6 hours to 1 day. The operation must plan for and allow sufficient time for the inspector to complete all necessary inspection activities per GLOBALG.A.P. General Regulations Part III v5, Section 5.4 and 6.1.c.

Timing of Inspections

Timing of inspections are performed per GLOBALG.A.P. General Regulations V5.0_July2015Part 1 Section 5.3.

Due to the timing requirements of the GLOBALG.A.P. inspections, the onsite GLOBALG.A.P. inspection may or may not be able to be combined with the organic inspection. CCOF makes every effort to combine inspections so as to reduce time and travel expenses, but we cannot promise that they occur at the same time or with the same inspector.

Inspections must include observation of the harvest of crops prior to achieving GLOBALG.A.P. certification. This may require multiple inspections per year, if crops are harvested at different times. For crops that are continually harvested throughout the season (such as baby greens), one onsite inspection of each location is sufficient.

If the inspection is done before harvest, it is not be possible to inspect certain control points. As a result, either a follow-up visit is required, or proof of compliance, such as records or photos, may be sent to CCOF. No certificate is issued until all control points have been verified and all issues resolved.

[9] GLOBALG.A.P 6.2

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If harvest has already taken place before the inspection day, the grower must retain evidence of compliance to the control points related to that harvest, otherwise some control points may not be able to be checked and certification shall not be possible until the following harvest.

If not all of the crops have the same harvest times, such as pom fruit and leafy greens, then inspection timing is based on grouping the crops based on similarities in production systems. The inspection must occur during the harvest of each crop group so that CCOF can verify all control points before adding the crop to the certificate.

Example: If a farmer is already GLOBALG.A.P. certified for apples, and wants to add pears to the certificate, an inspection during pear harvest may not be required. If the production systems of apples and pears are similar and can be grouped, the pears can be added to the certificate once all control points have been verified. However, adding spinach to the scope would require an inspection during the spinach harvesting period, since the production system of spinach and pears are very different.

The follow up also known as the subsequent inspection can be done any time during an "inspection window" that extends over a period of 8 months. It can occur from 4 months before the original expiration date of the certificate, and (only if CCOF extends the certificate validity in the GLOBALG.A.P. database) up to 4 months after the original expiry date of the certificate. There can only be a minimum perioed of 6 months between 2 inspections for recertification.

Example: Original certification issued February 14, 2015, expiring February 15, 2016. Subsequent inspection can be at any time from October 14, 1015 to June 13, 2016, if the certificate validity is extended.

Inspection Checklist

The inspector uses the inspection checklist applicable to the scope and subscopes of certification being sought by the grower. The checklists are public documents and are available by following the links from www1.globalgap.org/north-america/front_content.php?idcat=284&lang=11 to the appropriate program, scope and subscope. The self-assessment required of each operation uses the same checklist as the inspector. There should be no surprises to the operation about what is required, if the checklist is followed point by point during the self-assessment.

The checklist divides criteria into "Major Musts" and "Minor Musts". An operation must comply with 100% of all applicable Major Musts and 95% of all application Minor Musts in order to achieve or maintain certification. Any "Not Applicable" control points are excluded from the calculations. These criteria are calculated per GLOBALG.A.P. General Regulations V 4.0 Part 1, Section 6.2 and GLOBALG.A.P. General Regulations V 5.0_July2015 Part 1, Section 6.2

The inspection checklist identify(s) any Noncompliances (failure to comply with a Minor Must) or Nonconformances (failure to comply with a Major Must or 95% of Minor Musts), and these are discussed during the onsite inspection. If an inspector detects a onconformance during the inspection, the inspector issues a Warning when the inspection is finalized in a provisional report. The inspector may communicate with you after the inspection to review your corrective actions and determine whether the action(s) taken and the evidence provided are sufficient to close the nonconformance. Some situations may require that the inspector return for a follow up site visit to verify corrective actions taken in order to close the nonconformance. Fees for this follow up inspection apply.

CCOF makes the final certification decisions, and may upgrade or downgrade the severity of the issue. This inspector's finding may be overridden by CCOF. See the Sanctions section below.

Unannounced Inspections

Each year, CCOF is required to conduct unannounced inspections of at least 10% of all the operations enrolled in the CCOF GLOBALG.A.P. certification program. The operations selected for these unannounced inspections take in to account geography, local legislation, crop type, compliance history and other factors deemed relevant by CCOF.

Operations are given notification that they have been selected for an unannounced inspection, normally not more than 48 hours before the inspection. 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 to be informed of an unannounced surveillance inspection.

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Operations (option 1) may opt at time of application to have their normal annual inspection to always be an unannounced inspection. If this option is chosen by the operation, the operation is excluded from the having an additional 10% random unannounced inspection.

Unannounced Reward Program

When a producer (option 1 only) agrees that the normal annual inspection will always be unannounced, they will be exluded from having an additional 10% random unannounced inspection. The use of the shortened reward checklist, as it was in v4, is discountinued.

Food Safety Policy Declaration
At each inspection, any producer enrolled in the IFA certification program must complete the GLOBALG.A.P. Food Safety Policy Declaration. This Declaration is contained within the inspection checklist and is mandatory for all IFA certifications in 2013 and beyond.

Evaluation of Inspection Report
CCOF evaluates the inspection checklist and ensures the responses to nonconformances and noncompliances identified during the inspection are adequately addressed tothe inspector and/or addressed directly to CCOF.

Timeline:

- Initial Inspection: Non-conformances must be closed within a maximum of 3 months of the date of inspection or the operation needs to be re-inspected.
    - CCOF timeline for completion of initial technical review is 28 days from the date of inspection. This provides sufficient time for the client to close non-conformances within the 3 month timeline.
- Subsequent inspections: Non-conformances must be closed no more than 28 days from the inspection. The CB committee then has 28 days to make a certification decision.

GRANTING CERTIFICATION

CCOF is qualified per GLOBALG.A.P. General Regulations Part III- CB and Accreditation Rules, Annex III.2 Auditor Qualifications. CCOF GLOBALG.A.P. reviewers analyze the Evaluation report which describes evidence for closing nonconformances and noncompliances identified during the inspection, and makes a certification decision.

CCOF then grants certification and provides a copy of a countersigned GLOBALG.A.P. Sublicense Certification Agreement and the certificate to the producer (see below).

Certificate[10]
When an operation is granted certification or the certification is continued, CCOF issues a paper certificate with the following information: the operation's name and contact information, GGN, scope of certification, certification date, and period of validity. The certificate may contain an appendix (Client Profile) with all production management units (sites, fields, locations) and products.

CCOF may re-issue a certificate when any of the above information, or the contact information of CCOF CS, has changed.

A certificate is not transferable from one legal entity to another when a production unit changes legal entity. In this case an initial inspection is required.

The certificate is valid for 12 months. The validity of the certificate may be extended by CCOF for a maximum of four months in certain circumstances described in GLOBALG.A.P. General Regulations V 4.0 Part I Section 6.7.2 and GLOBALG.A.P. General Regulations V 5.0_July2015 Part I Section 6.7.2

[10] GLOBALG.A.P. General Regulations V4.0 & V5.0 Part I Section 6.7

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SANCTIONS[11]

It is the responsibility of producers seeking certification to understand and comply with all of the applicable standards for certification. If producers do not understand the requirements for certification, they are encouraged to contact CCOF for clarification.

Sanctions, which include Warnings, Suspensions and Cancellations, are conducted per the GLOBALG.A.P. General Regulations V4.0 Part 1 Section 6.4 and V5.0_July2015 Part 1 Section 6.4.

Once an operation has been issued a sanction, they may not transfer from CCOF to another certification body, or from another certification body to CCOF, until that sanction has been closed out. Only the certification body that issued the sanction may close it out. To close it out, there must be sufficient and timely evidence of corrective action (either through a follow-up visit or other written or visual evidence).

Warnings[12]

When a nonconformance is detected, CCOF issues a Warning notice to the operation. The operation must resolve the nonconformance as follows:

- During the first year (initial inspection):
  - Within 3 months from the date of inspection.
  - If not resolved in this timeline, must have a full reinspection before certification can be granted.
- During subsequent years (annual surveillance inspections);
  - Within 28 calendar days, or less if CCOF determines that the issue is critical in terms of the safety of people, environment or consumers.
  - If not resolved in this timeline, the certification is suspended.
  - Suspensions may be issued immediately if CCOF deems the nonconformance to present a serious threat to the safety of the people, environment or consumer.

Suspension[13]

CCOF may issue a Suspension of some or all of the products of an operation if a nonconformance is not resolved by the due date in the Warning letter, or if there is a serious threat to safety. During the period of Suspension, the GLOBALG.A.P. logo cannot be used, and the operation may not use the GLOBALG.A.P. certificate to imply certification of the Suspended product(s).

If the operation is able to resolve the nonconformances before the end of the period of Suspension and document the resolution, CCOF may resolve the issue and the Suspension is lifted.

If the operation is not able to resolve the nonconformance by the end of the Suspension period, the certification is Cancelled (see below).

Self-Declared Product Suspensions[14]

If a grower has difficulty complying with the GLOBALG.A.P. standards, they may voluntarily ask CCOF for a Suspension of product(s). This may allow the grower the necessary time to resolve noncompliances without the clock ticking towards cancellation, and the grower may set their own deadline for resolving the issue. A grower may only self-declare a Suspension if they have not already been sanctioned by CCOF.

This Suspension does not delay the renewal date, nor allows the producer to avoid paying registration and other applicable fees. The producer's status shall change to "Self-declared Suspension" on product level.

Upon self-declared product Suspension, the producer must not make any claims to GLOBALG.A.P. certification of the suspended products.

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[11] GLOBALG.A.P. General Regulations V 4.0 & V5.0 Part I Section 6.4
[12] GLOBALG.A.P. General Regulations V4.0 & V5.0 Part I Section 6.4.1
[13] GLOBALG.A.P. General Regulations V4.0 & V5.0 Part I Section 6.4.2
[14] GLOBALG.A.P. General Regulations V4.0 & 5.0 Part I Section 6.4.2.1

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Cancellation[15]
CCOF issues a Cancellation when evidence is found of fraud and/or lack of trust to comply with GLOBALG.A.P. requirements. If, by the end of the Suspension period, the grower has failed to resolve the issue that led to a Suspension, CCOF issues a Cancellation. A Cancellation may also there is a contractual non-conformance.

A Cancellation of the contract results in the total prohibition (all products, all sites) of the use of the GLOBALG.A.P. logos, trademarks, certificates or licenses.

If a grower has been cancelled, they may not be GLOBALG.A.P. certified again for 12 months. Cancelled operations do not pay the GLOBALG.A.P. registration fees. After 12 months the Status changes from "Cancelled" to "Annulled." Operations remain in the GLOBALG.A.P. database with a status for 5 years.

Appeals[16]
A producer may only appeal a Warning, Suspension or Cancellation. Appeals are managed per the CCOF Certification Services Program Manual section on Appeals for programs other than USDA NOP.

Major Violations and Burden of Proof[17]
If an investigation of a producer shows a violation of the GLOBALG.A.P. standards, such as exceeding an MRL, microbial contamination, etc., CCOF must notify the GLOBALG.A.P. Secretariat with information about the findings and actions taken. If a retailer or owner of the product conducts their own investigation, they must report the findings back to the GLOBALG.A.P. Secretariat who in turn informs CCOF to take appropriate action.

The producer has the right to refute the information and show evidence that they were in compliance with GLOBALG.A.P. standards. If CCOF does not consider the evidence supplied by the producer to be sufficient, CCOF follows the normal sanctioning procedures as described above and in GLOBALG.A.P. General Regulations.

Producers must have full traceability in place – this includes capabilities to perform mass balances at the inspection and could include; Chain of Custody Certification and any other records needed. In case the evidence includes laboratory analyses, accredited laboratories (ISO/IEC 17025) and independent sampling according to the rules as set out in the relevant GLOBALG.A.P. Control Points and Compliance Criteria must be used.

ANNUAL RECERTICATION

To continue certification, producers must pay the annual certification fees and submit the Continuation of Certification Contract. If both of these steps are not completed, CCOF changes the GLOBALG.A.P. product status to "Certificate not renewed or re-registered", and CCOF allows the GLOBALG.A.P. certificate to expire without moving forward with a renewal inspection or certification.

Once CCOF CS has received annual fee payment and the completed Continuation of Certification Contract, CCOF notifys the producer that the certification renewal is complete. If the renewal is not completed by the due date, CCOF may issue a Warning, and charge a late fee.

[15] GLOBALG.A.P. General Regulations V4.0 & V5.0 Part I Section 6.4.3
[16] GLOBALG.A.P General Regulations V4.0 & V5.0 Part 1 Section 6.5
[17] GLOBALG.A.P General Regulations V4.0 & V5.0 Part 1 Section 4.4.4

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