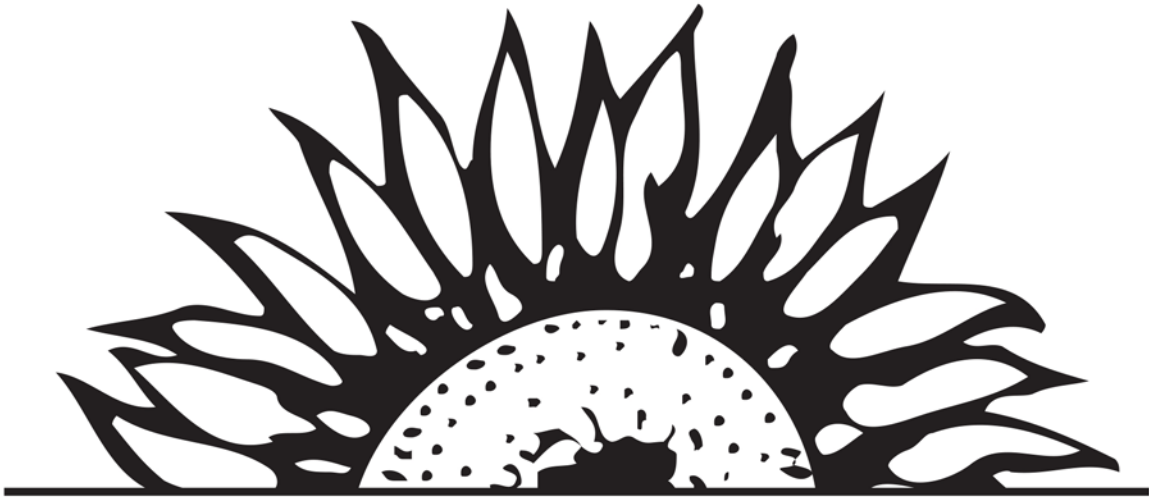




CCOF
Certification Services, LLC
www.ccof.org



GLOBALG.A.P. CERTIFICATION

Program Manual

CCOF CERTIFICATION SERVICES, LLC

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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, however, we are offering GLOBALG.A.P. Produce Handling Assurance (PHA) certification to packinghouses who pack or minimally process raw agricultural commodities.

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. The current status of approvals and accreditation by the ANSI National Accreditation Board (ANAB) 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 www.globalgap.org 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 <https://mygfsi.com/> 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 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. Harmonized Produce Safety Standard vs. Produce Handling Assurance), 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. website at www.globalgap.org.

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 www.globalgap.org.

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.

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. Additionally, with the publication of the latest version, GLOBALG.A.P. has included Annex 1 to the v5.4-GFS General Regulations Part I, which has an extensive glossary of terms and definitions. Please consult Annex I for any definitions not found here.

ANAB – ANSI National Accreditation Board: A nonprofit organization that provides accreditation oversight to certification bodies. Founded in 1918 and located in D. See <https://anab.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. CCOF does not offer certification for combinable crops such as dry beans, rice or oats.

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

CPCC - Control Points & Compliance Criteria: The individual standard criteria which the producer must comply with. Audit questions under v5 are called CPCCs.

P&C's - Principles and Criteria: Under v6, the phrase above (CPCCs) will be dropped and replaced by C&Ps, which are the audit questions and criteria in the v6 checklist.

Environmental Monitoring Program: Such a program will assess the effectiveness of the overall hygienic practices in a facility and provide necessary information to prevent possible microbial contamination of food products. Activities undertaken to evaluate the risk of microbial contamination of food products in a quantifiable way. These may include microbial swabbing, ATP tests, and visual and procedural assessments of cleaning efficacy.

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 <https://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. NOTE: Only one GGN can be used by one producer. Producers can be fined for not disclosing a previously issued GGN when transferring to a new certification.

HPSS - 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 <https://www.freshproduce.com/resources/food-safety/produce-gaps-harmonized-audit-standard/>.

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

PHA - Produce Handling Assurance: A GFSI-pending, standalone packing-house standard.

Hops (HO) Sub-scope – CCOF offers certification to the Hops (HO) sub scope, which uses the IFA checklist Version 5.3-GFS checklist with a hops specific checklist. Certifications for hops fall under the v5.3-GFS General Regulations. Under the coming Version 6, hops certification will be absorbed into the IFA V6 Smart and IFA V6 GFS checklists.

Plant Propagation Material (PPM) Sub-scope – CCOF offers certification to the Plant Propagation Material (PPM) sub-scope, which uses the IFA checklist v5.2 with the PPM scope. Certifications for PPM fall under the v5.2 General Regulations. Under the coming Version 6, PPM certification will be absorbed into the IFA V6 Smart and IFA V6 GFS checklists.

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.

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 that is gradually being phased out by 2019 and replaced with HPSS.

Quality Management Systems (QMS): Individual producer or group of individual producers with multiple production locations, who implement an internal system to manage their operations.

Scheme: Certification program.

Scope: GLOBALG.A.P. scopes include Crop

Subscope: GLOBALG.A.P. subsopes include Fruit & Vegetables. There are other subsopes like livestock, combinable crops, etc., but CCOF is not currently offering these subsopes.

GLOBALG.A.P. CERTIFICATION AND ASSESSMENT SERVICES OFFERED

CCOF offers various levels of certification and assessment under GLOBALG.A.P. “Certification” means that your farm or facility 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) v5:** GFSI benchmarked. Covers food safety, environmental sustainability, traceability and worker welfare. Available for fresh fruits and vegetables only. The Standard used is the GLOBALG.A.P. All Farm Base, Crops Base, Fruits and Vegetables Control Points and Compliance Criteria (V5.4-GFS January 2022) for the subscope of Fruit & Vegetables and Other Crops. Beginning in January 2024, CCOF will offer the non-GFSI benchmarked IFA Version 6 SMART for Plants and when Version 6 GFS achieves GFSI benchmarking (sometime in 2024), CCOF will offer both IFA V6 SMART for Plants and IFA V6 GFS.
 - **IFA v5.3-GFS Hops subscope:** CCOF offers certification to the Hops (HO) sub scope, which uses the IFA checklist Version 5.3-GFS checklist with a hops specific checklist. Certifications for hops fall under the v5.3-GFS General Regulations. Under the coming Version 6, hops certification will be absorbed into the IFA V6 Smart and IFA V6 GFS checklists.
 - **IFA v5.2 Plant Propagation Material (PPM) subscope:** CCOF offers certification to the Plant Propagation Material (PPM) sub-scope, which uses the IFA checklist v5.2 with the PPM scope. Certifications for PPM fall under the v5.2 General Regulations. Under the coming Version 6, PPM certification will be absorbed into the IFA V6 Smart and IFA V6 GFS checklists.
 - **IFA v5.2 Combinable Crops (CC) subscope (Provisional Accreditation Status):** CCOF offers certification to the Combinable Crops (CC) subscope. In the 2024 season, CCOF is provisionally approved, and in the 2025 season, this subscope will be combined into the IFA v6 Smart Scope. This subscope certifies any products that are harvested with a combine, such as dry beans, rice, or oats.
- **IFA v6 SMART:** IFA v6 is available in a Smart edition and a GFS edition. Smart is mandatory January 2024, while the GFS version will be mandatory once v6-GFS obtains GFSI benchmarking, which will likely be in late 2024. There are some key differences in the IFA v6 Smart vs. the IFA v6-GFS and there are General Regulations and different checklists for both. If your customers require a GFS certification in 2024, you may need to continue being audited under v5.4-1-GFS until v6 obtains GFSI benchmarking.
- **IFA v6 GFS:** IFA v6 is available in a Smart edition and a GFS edition. Smart is mandatory January 2024, while the GFS version will be mandatory once v6-GFS obtains GFSI benchmarking, which will likely be in late 2024. There are some key differences in the IFA v6 Smart vs. the IFA v6-GFS and there are General Regulations and different checklists for both. If your customers require a GFS certification in 2024, you may need to continue being audited under v5.4-1-GFS until v6 obtains GFSI benchmarking. The IFA v5.4-1-GFS standard will remain valid until 3 months after the new IFA v6 GFS becomes GFSI-recognized. This is estimated to be in quarter three of 2024. Previously issued certificates (to v5) will remain valid through their stated validity dates.
- **HPSS: Harmonized Produce Safety Standard (1.2-1):** GFSI benchmarked. Incorporates United Fresh’s Harmonized Standards (www.unitedfresh.org/food-safety/gap-harmonization-initiative) and replaces the PSS above. (Covered under the General Regulations Addendum to GLOBALG.A.P. General Regulations, Version 1.2 From November 20, 2020).
- **Produce Handling Assurance (PHA):** A standard for the pre-process production steps after the point of harvest for crops including cooling, packing, re-packing, handling and storage of produce for human consumptions. Designed to meet GFSI requirements (current GFSI pending) and Produce Safety Rule or the Preventative Controls for Human Food implementation criteria. Gained accreditation in 2021.

- **Option 1 & 2 Multi-site with a Quality Management Systems (QMS):** Individual producer or group of individual producers with multiple production locations, who decide to implement a QMS to reduce the number of external CCOF inspections. CCOF achieved complete and full accreditation to offer this certification August of 2020.

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 or those who can document they are in transition to 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.

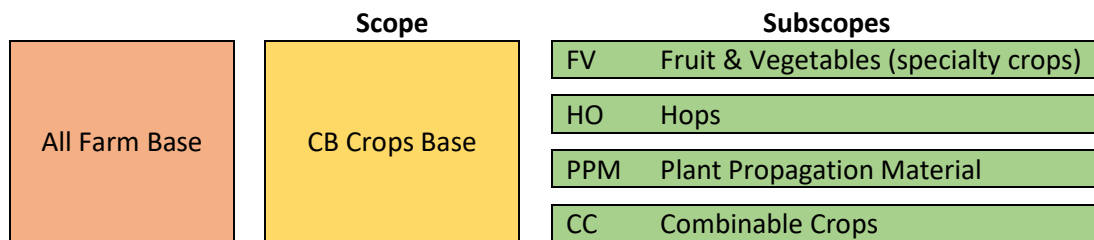
CCOF is offering GLOBALG.A.P. certification to both the organic and non-organic portions of an operation, so long as some part of the operation is certified organic.

Scopes of Certification

Farms that are producers of primary agricultural products and on-farm packing, processing or post-harvest produce facilities that are covered by the GLOBALG.A.P. standards may apply for GLOBALG.A.P. IFA or HPSS certification. A list of these primary agricultural products may be found at

<https://database.globalgap.org/globalgap/search/SearchMain.faces?init=1>

CCOF is approved to certify for the Fruit & Vegetable subscope. These subscope includes most fresh fruits and vegetables.



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.

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.

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 entity 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; 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 one certificate. On the CCOF GLOBALG.A.P. Contract 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 and Ownership¹

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 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.

Parallel Ownership (PO) is a situation where individual producers, producer members, or producer groups buy non-GLOBALG.A.P. certified products of the same products they grow or handler under their certificate. Example: A producer grows certified carrots and buys non-certified carrots from other producers to fill an order.

Parallel Ownership under v6 – What was called parallel production and parallel ownership under IFA v5 is called parallel ownership under v6 and there is a separate v6 document governing the rules for these situations called GLOBALG.A.P. General Regulations, Rules for Parallel Ownership V6. Please refer to the documents page of the www.globalgap.org website for specifics around producing or owning certified and non-certified products under v6.

Produce Handling Assurance (PHA)

A standard for the pre-process production steps after the point of harvest for crops including cooling, packing, re-packing, handling and storage of produce for human consumptions. Designed to meet GFSI requirements (current GFSI pending) and Produce Safety Rule or the Preventative Controls for Human Food implementation criteria.

Table 1. Operation Scope of activities of the PHA

Operation Scope	Activities	Examples
Packing house	Applies to the cleaning, rinsing, fluming, washing, sorting, grading, packing, waxing and drying, re-packing, staging and storing. Labeling and loading of whole unprocessed fruits and vegetables, nuts, for retail sale or further processing.	Includes all fruit and vegetable varieties and nuts. As example, trimming of asparagus stems shall be included, however, slicing that alters the state of product, such as sliced apples, shall not be included.

¹ GLOBALG.A.P. General Regulations, V5.4-GFS & (PHA) Standard General Regulations, 1.2-1

Operation Scope	Activities	Examples
Pre-processing	Applies to trimming, bundling, waxing, drenching, natural drying of fruit, vegetables, hulling or shelling of nuts. Excludes processes that alter the natural state of the product.	Applies to dehydrating grapes to produce raisins and packaging raisins, removing shell of walnuts, washing, trimming, and bundling asparagus, Brussels sprouts, etc. Excludes quick freeze or drying via dehydrator.
Cooling/Cold Storage	Applies to cooling, hydro-cooling. Excludes controlled atmosphere storage.	Unprocessed raw agricultural product stored at ambient or cooled temperature on site.
Storage/Distribution	Applies to storage, staging, loading, labeling.	Packed and labeled unprocessed produce.

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 Contract 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 initial inspection but a subsequent inspection per GLOBALG.A.P. General Regulations V5.4-GFS, January 2022 and Produce Handling Assurance (PHA) Standard General Regulations, V1.2-1 October 2021

WORKING WITH FARM ASSURERS AND CONSULTANTS

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 may be found at https://www.globalgap.org/uk_en/what-we-do/the-gg-system/gg-farm-assurers/Farm-Assurer-List/ 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.

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

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 Part 1, V5.4-GFS, January 2022.

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 the cause for sanctions. See the GLOBALG.A.P. General Regulations V5.4-GFS, January 2022 and Produce Handling Assurance (PHA) Standard General Regulations, V1.2-1 October 2021.

For V6, a new document has been developed explaining the new policy and guidelines for trademark use. For operations working to obtain a v6 Smart or v6-GFS certification, be sure to review the GLOBALG.A.P. Trademarks Use: Policy and Guidelines Version 1.0-1.

Contact the GLOBALG.A.P. Secretariat to obtain the GLOBALG.A.P. logo 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. Payment of fees does not guarantee the issuing of the certificate. The CCOF GLOBALG.A.P. Program has the following Annual Fees. For the 2024 season and beyond, CCOF is simplifying our GLOBALG.A.P. fee structure to align with industry standards. We are moving to a standard, lower annual fee of \$250 (plus your GLOBALG.A.P. Producer Registration Fees based on acreage and your license fee), plus a flat rate inspection fee (plus travel expenses).

There are 2 tiers of flat rate inspection fees based on gross farm sales per year:

- **Tier 1** is for operations grossing more than \$250,000 in farm sales per year.
- **Tier 2** will be for operations who gross less than \$250,000 in gross farm sales.
 - There will be a 2-year phase in for operations who fit into Tier 2 (<\$250,000 in gross farm sales). See below more details.

TIER 1: CCOF GLOBALG.A.P. FEES FOR OPERATIONS GROSSING > \$250,000

* Travel is billed at \$45/hr., plus expenses (meals, hotels, cars, etc.).

Fee Type	Fee Amount	Notes
Application/Annual Fee	\$250	<ul style="list-style-type: none"> • Option 2 with Quality Management Systems (QMS), i.e., group certifications: each group member will pay the Application/Annual fee each year.
GLOBALG.A.P. License & Registration Fees	Based on Acreage	<ul style="list-style-type: none"> • See below for links to Version 5 and Version 6 fees. Note, CCOF will calculate this for you, invoice and then pay GLOBALG.A.P. • Fee assessed annually
Produce Handling Assurance (PHA) flat rate audit fee	\$3,100	
Hops (HO) flat rate audit fee	\$2,475	
Plant Propagation Material (PPM) flat rate audit fee	\$2,475	
Option 2 with QMS flat rate audit fees	\$2,300 + \$1,500/member audited	<ul style="list-style-type: none"> • QMS Audit \$2,300 • Each Production Management Unit (PMU) per member audit - \$1500
Option 1 with QMS flat rate audit fees	\$2,300 + \$1,500/site	<ul style="list-style-type: none"> • QMS Audit \$2,300 • Each Production Management Unit (PMU) or site in the QMS - \$1500
IFA with Packing flat rate audit fee	\$2,300	
IFA without Packing flat rate audit fee	\$1,800	

Fee Type	Fee Amount	Notes
HPSS with Packing flat rate audit fee	\$1,800	
HPSS without Packing flat rate	\$1,650	
Extra Audit Days	\$1,500/day	<ul style="list-style-type: none"> • ½ day – \$850 • ¼ day – \$450

TIER 2: CCOF GLOBALG.A.P. FEES FOR OPERATIONS GROSSING < \$250,000

*Year 1 (2024) – CCOF will discount the rates below by 40%

**Year 2 (2025) – CCOF will charge full rates

***Travel is billed at \$45/hr., plus expenses (meals, hotels, cars, etc.)

Fee Type	2024 Discounted Audit Fees:	2025 and Beyond Fees	Notes
Application/Annual Fee	\$250	\$250	<ul style="list-style-type: none"> • Option 2 with Quality Management Systems (QMS), i.e., group certifications: each group member will pay the Application/Annual fee each year.
GLOBALG.A.P. License & Registration Fees	Based on Acreage	Based on Acreage	<ul style="list-style-type: none"> • See below for links to Version 5 and Version 6 fees. Note, CCOF will calculate this for you, invoice and then pay GLOBALG.A.P. • Fee assessed annually
Produce Handling Assurance (PHA) flat rate audit fee	\$1,560	\$2,600	
Hops (HO) flat rate audit fee	\$1,200	\$2,000	
Plant Propagation Material (PPM) flat rate audit fee	\$1,200	\$2,000	
Option 2 with QMS flat rate audit fees	\$1,080 + \$600/Member Audited	\$1,800 + \$1,000/member audited	<ul style="list-style-type: none"> • QMS Audit \$1,800 • Each Production Management Unit (PMU) per member audit - \$1000
Option 1 with QMS flat rate audit fees	1,080 + \$600/Member Audited	\$1,800 + \$1,000/member audited	<ul style="list-style-type: none"> • QMS Audit \$1,800 • Each Production Management Unit (PMU) or site in the QMS - \$1000
IFA with Packing flat rate audit fee	\$1,080	\$1,800	
IFA without Packing flat rate audit fee	\$840	\$1,400	
HPSS with Packing flat rate audit fee	\$1,080	\$1,800	
HPSS without Packing flat rate	\$690	\$1,150	
Extra Audit Days	\$690 ¼ day \$175 ½ day \$345	\$1,150/day	<ul style="list-style-type: none"> • ½ day – \$850 • ¼ day – \$450

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 to minimize travel costs and save time. Cooperation with inspection assignments is necessary 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 within 3 business days of the scheduled date, CCOF CS charges for time and expenses incurred by the inspector after initial contact regarding scheduling, plus a \$75 penalty. Additionally, the producer may be responsible for any additional cancellation fees as noted by the inspector. At the second request to schedule an inspection, the producer 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. If you would like more details, please see the following links:

GLOBALG.A.P. North America Fee Table for Version 5 certifications: v4.0-5 located at

https://globalgapfiles.blob.core.windows.net/documents/220421_GGNA_Fee-Table_2021_V4_0-5_en.pdf

- 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. North America Fee Table for Version 6 certifications located at

https://documents.globalgap.org/documents/GGNA_system_participation_fees_en.pdf

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. North America Fee Table for Version 5 certifications (v4.0-5) is located at:

https://globalgapfiles.blob.core.windows.net/documents/220421_GGNA_Fee-Table_2021_V4_0-5_en.pdf

GLOBALG.A.P. North America Fee Table for Version 6 certifications (Both v6 SMART and v6 GFS) is located at:

https://documents.globalgap.org/documents/240827_GGNA_system_participation_fees_v8_0-2_Aug24_en.pdf

NOTE: For operations in Mexico, the GLOBALG.A.P. v6 fee table is located at:

https://documents.globalgap.org/documents/240618_GG_system_participation_fees_v8_0-1_Jun24_en.pdf

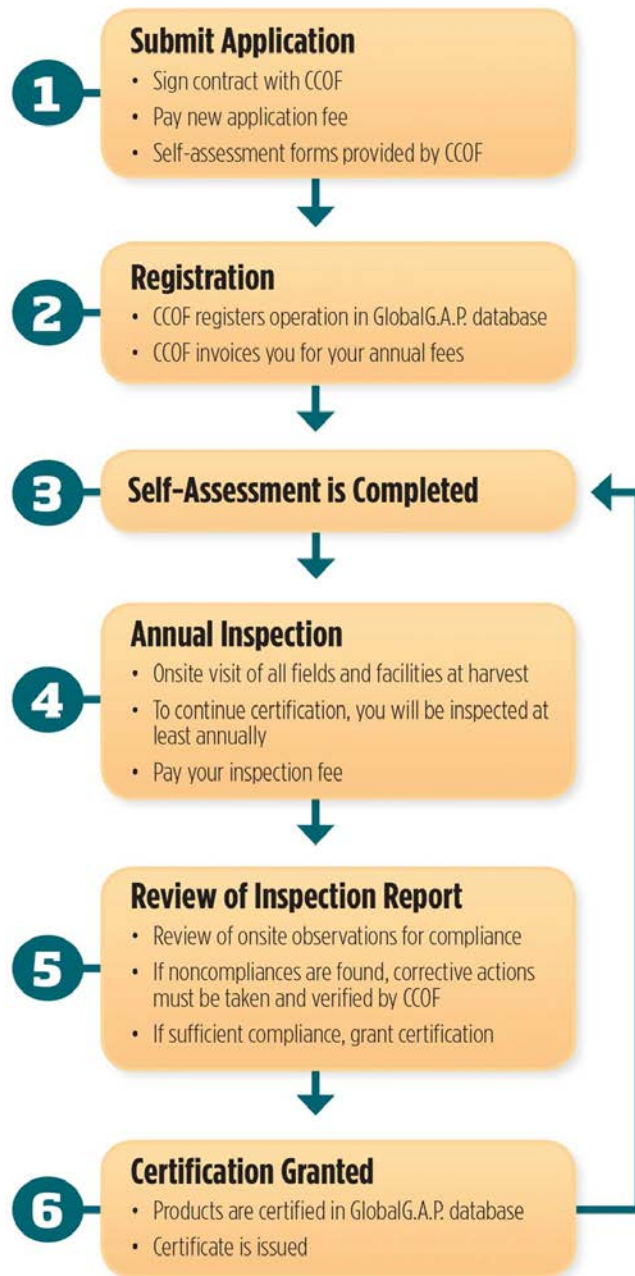
Additional fees

See the CCOF Certification Services Program Manual for a detailed break down of additional fees for specific services.

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 or facility 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 on the following pages. This manual must be used in conjunction with the CCOF Certification Services Program Manual for complete information.



APPLICATION & REGISTRATION²

Application

Any operation seeking enrollment in the CCOF GLOBALG.A.P. program can obtain a CCOF GLOBALG.A.P. Contract packet from CCOF by mail or email, or it can also be downloaded directly from the CCOF website at www.ccof.org/food-safety. The Application package for CCOF GLOBALG.A.P. certification contains at least the following items³:

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

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/food-safety. 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** or facility operations (packing, storing, etc.) Note that the onsite inspection must occur during the harvest or packing 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 Exclusion⁴

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 and this contract or written verification of this agreement between the certified producer and the buyer must be documented during the application process.** Please see the Contract forms to request the Harvest Exclusion and for more details about the requirements.

Registration⁵

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. General Regulations V5.4-GFS January 2022 and Produce Handling Assurance (PHA) Standard General Regulations, V1.2-1 October 2021.

The CCOF GLOBALG.A.P. Certification Program Contract 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 Contract forms.

² GLOBALG.A.P. General Regulations, Part III V5.4-GFS

³ GLOBALG.A.P. General Regulations, Part I, Annex 1.2 GLOBALG.A.P. registration requirements

⁴ GLOBALG.A.P. General Regulations, V5.4-GFS Part III

⁵ GLOBALG.A.P. General Regulations, V5.4-GFS, Part III Section 4.2 and Annex 1.2, & V5.3-GFS Part III

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

- Compliance with the certification requirements at all times⁶,
- 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.

For Version 6, the GLOBALG.A.P. registration data requirements have been adapted (e.g. unique email address mandatory for the certificate holder) and the new system participation fee concept is described (clarification of productive areas). See the GLOBALG.A.P. Registration Data Requirements, version 6.0_SEP22 document laying out the data requirements for v6. This document can be found at the document center at www.globalgap.org.

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.

Contract Review & Acceptance

Once CCOF has received and accepted the initial Contract packet, including completed Contract 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 Contract in writing within 28 calendar days after CCOF has received the GGN for the operation from the GLOBALG.A.P. database.

CCOF strives 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 Contract requires:

- a) Receipt of a CCOF Contract 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 Contract 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 28 days of receiving the complete Contract, CCOF confirms the receipt of the Contract in writing and provides the operation with their GGN.

⁶ ISO/IEC 17065 4.1.2.2.b & ISO/IEC 17021 5.1.2 & 9.9.2.b

- 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 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 Requirement⁷

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 complaint received.

Under v6, a rule has been established that states if a reputable government regulatory authority has established a clear link between a producer and a foodborne outbreak, suspension of the certificate shall be imposed by the certification body. If a certificate holder has informed CCOF about a complaint (as required), and is involved in actions that may endanger the reputation and credibility of FoodPLUS GmbH and/or the GLOBALG.A.P. standard, the CB shall inform the GLOBALG.A.P. Secretariat within 24 hours.

ANNUAL INSPECTION AND INSPECTION CYCLE

Each producer or facility undergoes one announced inspection at the initial 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 facility.

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 are based on the relevant checklist for the scopes and subsopes of certification that the operation has requested.

CCOF uses crop's harvest season anniversary date to organize the renewal process and we will send renewal notifications at 90, 60, and 30 days prior to the anniversary of the expected harvest date, (e.g. blueberry harvest starts beginning of April every year, so April 1st will be the anniversary date). If a producer does not commit to renewal 30 days prior to the

⁷ ISO/IEC 17065 Guide 4.1.2.2.j & ISO/IEC 17021 9.9.2.f

harvest season anniversary date, CCOF is required by the GLOBALG.A.P. Crops Rules, v5.4-GFS, section 4.2 (v) to shorten the certificate expiration date to ensure one audit and certificate is not used for more than one harvest season or growing cycle. If a producer elects to discontinue with the certification for the next cycle or does not respond to renewal notices, CCOF is required to make sufficient provisions to avoid situations where one certificate could be used to cover more than one harvest season and growing cycle of the same annually harvested crop, e.g. by shortening the certificate expiration date.

*Example: Harvest season for blueberries is the entire month of October of 2019. The first inspection takes place during the harvest and the certificate is issued November 1st of 2019, with an expiration date of November 1st 2020. Since this certificate could cover the October 2020 harvest and **if the producer does not commit to a subsequent reinspection the next year via CCOF's renewal notices, we are required to shorten the validity of the certificate to ensure the one certificate cannot be used for both the 2019 and 2020 harvest seasons or growing cycles.***

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.

Under v6, there is the introduction of the Three-year Audit Cycle Rule (with annual certification and on-site CB audit), which allows auditors to thoroughly observe the production processes while operations are going:

First certification body (CB) audit: All requirements are included in applicable checklists (quality management system (QMS) and farm).

Subsequent CB audit (year 2): operation items, as identified in the checklist.

Subsequent CB audit (year 3): Operation items as identified in the checklist.

Note: The CB shall conduct the audit using the complete checklist for the applicable scope(s) annually, but in years 2 and 3 the auditor shall focus on the operational items if there has been no change in the more permanent items (e.g. qualification of the agronomist). More details can be found for v6 in the GLOBALG.A.P. General Regulations, Rules for Plants Scope, v6.0_SEP22 document found on www.globalgap.org.

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

For Version 6, specific rules apply and are described in the General Regulations Rules for Producer Groups and Multisite Producers with Quality Management Systems (QMS). This document can be found on the GLOBALG.A.P. website: www.globalgap.org/search/?area=documents&offset=0&q=

For QMS producers of high-risk crops, those sites and products will be audited each year. High risk crops include:

- Fresh herbs, leafy greens, lettuce, romaine, spinach, arugula/rocket

- Berries
- Cantaloupe Melons
- Any other product associated with known foodborne disease outbreaks

Additionally, 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 should 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 Sites 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).

Under v6, the maximum time between the audit of the QMS and the individual sites or producer group members cannot exceed 1 month. For additional information on QMS audits under v6, please see the GLOBALG.A.P. General Regulations Rules for Producer Groups and Multisite Producers with QMS. This document can be found at www.globalgap.org.

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 INSPECTIONS⁸

Once the operation is registered and the Contract 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

⁸ GLOBALG.A.P. General Regulations, V5.4-GFS & (PHA) Standard General Regulations, 1.2-1
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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 GLOBALG.A.P. General Regulations Part III V5.4-GFS January 2022.

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.

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 documents and records in advance of the onsite visit; including the self-assessment, risk assessments, procedures required in several CPCC's, analysis program (frequency, parameters, locations), analysis reports, licenses, list of plant protection products, proof of lab accreditation, certificates or inspection reports of subcontracted activities, plant protection products/fertilizer Contract 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 Duration⁹

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

- a) an opening meeting with the farm or facility 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 V5.4-GFS, January 2022.

Timing of Inspections

Timing of inspections for pre-farm gate standards are performed per GLOBALG.A.P. General Regulations V5.4-GFS, January 2022 and the General Regulations Crops Rules, V5.4-GFS, January 2022.

Timing of inspections for the Produce Handling Assurance (PHA) standard for standalone packing-sheds are performed per the GLOBALG.A.P. Produce Handling Assurance (PHA) Standard General Regulations, V1.2-1 October 2021.

⁹ GLOBALG.A.P. General Regulations, Part III, Section 6.2

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 or packing/handling 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 or packing/handling, it may 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.

If harvest or packing/handling 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 or packing/handling times, such as pom fruit and leafy greens, then inspection timing is based on grouping the crops or products based on similarities in production and handling systems. The inspection must occur during the harvest or packing/handling 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 period of 6 months between 2 inspections for recertification.

Example: Original certification issued February 14, 2017, expiring February 15, 2018. Subsequent inspection can be at any time from October 14, 2017 to June 13, 2018, if the certificate validity is extended.

Under v6 Smart and v6-GFS (once GFSI Benchmarked), there have been some changes. For v6 Smart, under emergencies like pandemic, war, or natural disasters, the recertification audit (not an initial) can take place 100% remote. The 100% remote option can never occur under v6-GFS.

Also under v6, there is the introduction of the Three-year Audit Cycle Rule (with annual certification and on-site CB audit), which allows auditors to thoroughly observe the production processes while operations are going:

First certification body (CB) audit: All requirements are included in applicable checklists (quality management system (QMS) and farm).

Subsequent CB audit (year 2): operation items, as identified in the checklist.

Subsequent CB audit (year 3): Operation items as identified in the checklist.

Note: The CB shall conduct the audit using the complete checklist for the applicable scope(s) annually, but in years 2 and 3 the auditor shall focus on the operational items if there has been no change in the more permanent items (e.g. qualification of the agronomist). More details can be found for v6 in the GLOBALG.A.P. General Regulations, Rules for Plants Scope, v6.0_SEP22 document found on www.globalgap.org.

Inspection Checklist

The inspector uses the inspection checklist applicable to the scope and subsopes of certification being sought by the grower. The checklists are public documents and are available by following the links from

[www.globalgap.org/uk_en/documents/#fq=con_locales:\(%22en%22\)&fq=gg.document.type:\(%22checklist%22\)](http://www.globalgap.org/uk_en/documents/#fq=con_locales:(%22en%22)&fq=gg.document.type:(%22checklist%22)) 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 V5.4-GFS January 2022 and Produce Handling Assurance (PHA) Standard General Regulations, V1.2-1 October 2021.

The inspection checklist identifies 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 nonconformance 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.

Under v6 there can be a Streamlined Checklist. During registration, questions regarding the producer’s specific certification process (e.g. product handling unit (PHU) included/not included, covered crop/open field, genetically modified organisms, applicable/not applicable, seedlings additionally purchased, feed supplied (externally or internally)) are included to filter the P&Cs (control point questions) applicable to each specific producer and thus provide a customer checklist that does not have a lot of questions that are not applicable to the operation. This is for self- assessments, however, because CCOF must carry out the audit using the complete checklist and we can then determine if those items are in fact applicable and cross reference the producers registration.

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 into account geography, local legislation, crop type, compliance history and other factors deemed relevant by CCOF.

Operations who are obtaining a GFSI benchmarked certification (e.g. IFA v5.4-1-GFS) are given NO notification that they have been selected for an unannounced 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 a formal Warning. If the producer does not allow the 2nd attempt at an unannounced inspection, a suspension of all products will be issued.

Operations who are obtaining a non-GFSI benchmarked certification (e.g. IFA v6 Smart), can and will receive up to a 48 hour notification from CCOF.

Previously, the unannounced inspections were *in addition* to a producers regularly timed annual inspections, however the v5.4-GFS General Regulations has changed this to include that an unannounced inspection *may* count towards a producer’s annual re-certification audit. CCOF does not charge for unannounced inspections that are in addition to an annual inspection, however, we will charge for an unannounced inspection if it is conducted and counts toward an operation’s annual inspection.

The unannounced visit shall take place during the re-certification window, i.e. 4 months before the expiration of the certificate or during the 4-month extension of validity. The producer may nominate, during registration with CCOF, a maximum of 15 days where they are unavailable for an unannounced audit. Please let CCOF know if you have 15 days you are unavailable for an unannounced visit.

Unannounced inspections for QMS operations (Option 1 or 2 groups). CCOF is required to inspect ½ of the square root of producers or sites in a QMS certified operation each year and in addition to the announced inspections of the square root of total producers. CCOF is required to provide an unannounced audit of the QMS every 2 years. For producers with high-risk products (see below), CCOF is required to provide unannounced inspections of 20% of the producers each year.

- Fresh herbs, leafy greens, lettuce, romaine, spinach, arugula/rocket
- Berries
- Cantaloupe Melons
- Any other product associated with known foodborne disease outbreaks

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.

Under v6 the requirement for the food safety policy declaration will be removed.

Evaluation of Inspection Report

CCOF evaluates the inspection checklist and ensures the responses to nonconformances and noncompliances identified during the inspection are adequately addressed to the 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).

Certificate¹⁰

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 sites (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.

¹⁰ GLOBALG.A.P. General Regulations, V5.4-GFS & (PHA) Standard General Regulations, 1.2-1
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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 V5.4-GFS, January 2022 and Produce Handling Assurance (PHA) Standard General Regulations, V1.2-1 October 2021.

Under v6, operations will start to see certificates being generated in GLOBALG.A.P.'s Validation Service (VS) and audit reports being generated from the Audit Online Hub (AOH) online systems. Some of these reports are already be generated from AOH.

SANCTIONS¹¹

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 V5.4-GFS, January 2022 and Produce Handling Assurance (PHA) Standard General Regulations, V1.2-1 October 2021.

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).

Warnings¹²

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.

Suspension¹³

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).

¹¹ GLOBALG.A.P. General Regulations, V5.4-GFS & (PHA) Standard General Regulations, 1.2-1

¹² GLOBALG.A.P. General Regulations, V5.4-GFS & (PHA) Standard General Regulations, 1.2-1

¹³ GLOBALG.A.P. General Regulations, V5.4-GFS & (PHA) Standard General Regulations, 1.2-1

Self-Declared Product Suspensions¹⁴

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 allow 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.

Cancellation¹⁵

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 be issued if 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.

Appeals¹⁶

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 Proof¹⁷

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 RECERTIFICATION

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.

¹⁴ GLOBALG.A.P. General Regulations, V5.4-GFS & (PHA) Standard General Regulations, 1.2-1

¹⁵ GLOBALG.A.P. General Regulations, V5.4-GFS & (PHA) Standard General Regulations, 1.2-1-1

¹⁶ GLOBALG.A.P. General Regulations, V5.4-GFS & (PHA) Standard General Regulations, 1.2-1-1

¹⁷ GLOBALG.A.P. General Regulations, V5.4-GFS & (PHA) Standard General Regulations, 1.2-1-1

Once CCOF CS has received annual fee payment and the completed Continuation of Certification Contract, CCOF notifies the producer that the certification renewal is complete and we begin to assign the inspection.

Certificate extensions can be granted per the GLOBALG.A.P. General Regulations, but can only be processed once the next cycle's renewal contract has been completed and fees for next cycle have been paid. However, if a producer undergoes an extension and then fails to obtain an inspection within their extended period, CCOF is required by GLOBALG.A.P. to issue a suspension that will remain in the GLOBALG.A.P. system.



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