## 1.0 Purpose.

To introduce the clients of International Compliance Group, Inc. a summary of the process, stages and main rules applicable to product certification (GlobalGAp Scheme).

## 2.0 Scope.

This Document applies to all product certification services offered by International Compliance Group, Inc.

## 3.0 Responsibility.

Operations & Marketing Manager is responsible to implement described in this Procedure.

Program Quality Manager is responsible to revise and update regularly this Procedure.

## 4.0 Definitions.

**CB:** Certification Body.
**QMS:** Quality Management System.
**P&C:** Principles and Criteria.
**PHU:** Product Handling Unit.
**ICG:** International Compliance Group, Inc.

## 5.0 Description of Activity.

### 5.1 Introduction.

5.1.1 These rules have been prepared against criteria for competence set out in below. The Scope of Accreditation issued by EMA and GLOBALG.A.P. is an acknowledgement that International Compliance Group Inc. has the necessary expertise and ability to manage audits in those particular sectors. Details of all accredited scopes held are available on request to International Compliance Group Inc.

5.1.2 International Compliance Group Inc. is a privately owned independent organisation.

### 5.2 Scope.

5.2.1 International Compliance Group Inc. undertakes the audit, evaluation and certification of products operated by companies to the respective schemes/ standards applied for. The client must agree to supply all necessary information to International Compliance Group Inc.

### 5.3 Personnel.

5.3.1 International Compliance Group Inc. undertakes to provide suitably qualified personnel for all audit and surveillance work using their own staff or suitable qualified subcontractors. All members of International Compliance Group Inc. (full-time employees or sub-contractors) are required to sign confidentiality agreements concerned with all confidential information to which they may be exposed at client premises.

5.3.2 The client has right to object to any auditor if the client perceives conflict of interest. The client can raise the objection to the designated ICG Manager, who shall review the potential impartiality threat and take necessary actions; however the change of auditor cannot be guaranteed.

 

## 5.4 Certification Process.

5.4.1 General.

5.4.1.1 The IFA scope plants covers the certification of the whole production process of the product from before the plant is in the ground to the unprocessed product. No processing or manufacturing is covered.

5.4.1.2 Only products included in the GLOBALG.A.P. Product List, published on the GLOBALG.A.P. website, may be registered for certification. The GLOBALG.A.P. product list is not limited and may be extended based on demand.

5.4.2 Service Application.

5.4.2.1 Service Application are made by an organization and sent to ICG for analysis and preparation of an “Certification Agreement - GlobalGAP”.

5.4.2.2 Organizations must use the “Application Form - GlobalGAP” defined by ICG and send the information to ICG’s staff.

5.4.2.3 The application shall cover at least the information detailed in GlobalG.A.P. Registration Data Requirements. By registering, the Applicant commits to comply with the certification requirements at all times, the communication of data updates to the ICG, and the payment of the applicable fees established by GLOBALG.A.P. and by ICG.

5.4.2.4 The receipt of the ICG’s Certification Agreement and the "Sublicense and Certification Agreement" signed by an authorized representative, constitutes acceptance of the ICG’s certification offer.

5.4.3 Registration.

5.4.3.1 Registration shall be done within 28 calendar days after receipt by ICG.

5.4.3.2 This information is used by the GLOBALG.A.P. Secretariat to supply the applicant with a unique GLOBALG.A.P. Identification Number (13 digits with a prefix determined by the applicable standard), which is used as a unique identifier for all GLOBALG.A.P. activities unless the producer already has a Global Location Number (GLN).

5.4.4 Certification Options.

5.4.4.1 Options 1 and 3 – Individual Certification.

5.4.4.1.1 Single Site Producer.

a) An individual producer (single legal entity) applies for certification to a GLOBALG.A.P. standard (Option 1) or to a benchmarked scheme/ checklist (Option 3).
b) The individual producer is the certificate holder once certified.

5.4.4.1.2 Multisite Producer without QMS.

a) An individual producer or one organization owns several production sites that do not function as separate legal entities. The individual producer is the certificate holder once certified.

5.4.4.1.3 Multisite Producer with QMS.

a) An individual producer or one organization owns several production sites that do not function as separate legal entities but where a QMS has been implemented. The individual producer is the certificate holder once certified.

 

5.4.4.1.4 Options 2 and 4 – Group Certification.

a) A producer group applies for group certification to a GLOBALG.A.P. standard (Option 2) or to a benchmarked scheme/checklist (Option 4).
b) The group, as a legal entity, is the certificate holder once certified.

5.4.4.1.5 Announced Farm Audits.

5.4.4.1.5.1 The announced farm audit shall follow the three-year cycle.

5.4.4.1.5.2 ICG may divide the announced farm audit into two stages: an off-site stage and an on-site stage. Both stages shall be performed by the same farm auditor.

5.4.4.1.5.3 The off-site stage shall be conducted no more than four weeks (28 days) before the onsite stage. It shall consist of a desk review of documentation sent by the producer to ICG before the on-site stage. ICG shall schedule a date as deadline for the producer to submit the documents to be evaluated off-site. That date shall also trigger the period of four weeks to conduct the on-site stage.

5.4.4.1.5.4 Documentation that may be audited off-site by the auditor includes, for example, the self-assessment, risk assessments, procedures required in various P&Cs, analysis programs (frequency, parameters, locations), analysis reports, licenses, list of plant protection products used, proof of laboratory accreditation, certificates or assessment reports of subcontracted activities, and plant protection product/ fertilizer/ application records. The documentation may be supported by interviews and a remote audit of the facilities.

5.4.4.1.5.5 The on-site stage shall be conducted after the off-site stage and consists of an on-site audit of the remaining content of the checklist, the production process, the registered sites/PHUs, and the verification of the information already reviewed off-site. The on-site stage shall include, at least, the inspection of good agricultural practices and food safety related requirements to determine compliance.

5.4.4.1.6 Farm Audit Duration.

5.4.4.1.6.1 The audit report shall include a recording of the farm audit duration (start and end times for each day).

5.4.4.2 Option 2 Producer Groups and Option 1 Multisite Producers with QMS.

5.4.4.2.1 Announced QMS Audits.

5.4.4.2.1.1 The announced farm audit shall follow the three-year cycle.

5.4.4.2.1.2 The QMS audit shall involve a sampling of the components (e.g., producer group members, production sites, PHUs, documents, records) to audit compliance with the relevant standard and enable certification. All documentation, sites, personnel, and operations that are declared by the producer group/ multisite producer to be relevant to the setting up and administration of the QMS as described in “GLOBALG.A.P. General Regulations – Rules for Producer Groups and Multisite Producers with QMS” shall be evaluated.

 

5.4.4.2.1.3 The aim of the QMS audit is to assess whether the implemented QMS ensures that all the components of the system comply with the certification requirements, as defined by the applicable scope(s).

5.4.4.2.2 QMS Audit Off-site and On-site Stages.

5.4.4.2.2.1 ICG may divide the announced QMS audit into two stages: the off-site stage and the on-site stage. Both stages shall be performed by the same QMS auditor.

5.4.4.2.2.2 The off-site stage shall be conducted not more than four weeks (28 days) before the onsite stage. It shall consist of a desk review of documentation sent by the QMS to ICG before the on-site stage. ICG shall schedule a date as deadline for the QMS to submit the documents to be audited off-site. That date shall trigger the period of 4 weeks to conduct the on-site stage.

5.4.4.2.2.3 Documentation that may be audited off-site by ICG includes, for example, internal QMS audit and internal farm audit reports, the internal register of approved members/sites, risk assessments, procedures, residue monitoring system documentation (frequency, parameters, sampling program), residue analysis reports, licenses, list of plant protection products used, proof of laboratory accreditation, certificates, and internal reports of subcontracted activities. The documentation may be supported by interviews and a remote CB audit of the facilities.

5.4.4.2.2.4 The on-site stage is conducted after the off-site stage and consists of an on-site audit of the remaining content of the QMS checklist, plus the verification of the information reviewed off-site and the way the QMS works on-site (e.g., internal audits, traceability, segregation and mass balance, central PHUs).

5.4.5 Audit & Certification Services.

5.4.5.1 Initial Audits.

- Producers seeking GLOBALG.A.P. certification for the first time.
- Producers who want to add a new product to an already existing GLOBALG.A.P. certificate.
- Producers changing their status from producer group member to individual producer.
- When a producer changes from one CB to another, or from a GLOBALG.A.P. standard to a benchmarked scheme/checklist (or the other way around), it is not considered an initial audit, but a subsequent one. In initial audits.

5.4.5.2 Subsequent Audits.

- The entire scope of certification shall be audited annually by ICG prior to issuing the certificate.
- This also applies if a producer changes CBs.
- Subsequent audits of 10% of certified individual producers without QMS shall be done unannounced.
- Subsequent audits can be carried out at any time during an audit window that extends over a period of eight months: from four months before the original expiry date of the certificate, and (only if ICG extends the certificate validity in the GLOBALG.A.P. IT systems) up to four months after the original expiry date of the certificate.

5.4.5.3 Surveillance Audit during Certificate Validity.

 

5.4.5.3.1 Certification/ Recertification audits and surveillance audits shall be carried out in two separate visits that shall be a minimum of 30 days apart from each other.

5.4.5.3.2 Surveillance audits shall be performed on a minimum of half of the square root of the actual number of certified members/sites.

5.4.5.3.3 In all cases, the final selection and communication to the QMS of which members/sites to audit shall normally not exceed 48 hours (two working days) per member/site.

5.4.5.4 Issuing Certificate.

5.4.5.4.1 ICG shall make the Certification Decision within a maximum of 28 calendar days after closure of any outstanding non-conformances (in total 28 + 28 days, i.e., 56 calendar days after the closing meeting of the ICG Audit). If no non-conformances are detected during the audit, it means that ICG shall make the decision no later than 28 days after the closing meeting of that audit.

5.4.5.4.2 After a positive certification decision, ICG shall issue a certificate in the GLOBALG.A.P. IT systems.

5.4.5.4.3 The certification cycle is 12 months subject to any sanctions and extensions in accordance with the applicable requirements.

5.4.5.4.4 The validity of the certificate may be extended beyond the usual 12 months for a maximum period of 4 months but only if there is a valid reason.

5.4.5.4.5 GLOBALG.A.P. Certificates will be available publicly on the official GLOBALG.A.P. Database: https://database.globalgap.org/globalgap/search/SearchMain.faces?init=1

5.4.5.5 Requirements for Maintaining GLOBALG.A.P. Certification.

5.4.5.5.1 The registration of the producer or producer group/multisite producer, the proposed products, and all information requested in the GLOBALG.A.P. registration data requirements for the relevant scope shall be confirmed with ICG annually before the current certificate expiry date.

5.4.5.5.2 ICG shall complete an audit of the entire applicable scope annually, and ICG shall also complete the certification process annually.

5.4.5.6 Non-compliance and Non-conformance.

5.4.5.6.1 Non-compliance (with P&Cs): A Minor Must or Recommendation in the relevant GLOBALG.A.P. checklist is not fulfilled according to the P&Cs.

5.4.5.6.2 Non-conformance (to the GLOBALG.A.P. certification rules): A GLOBALG.A.P. rule that is necessary for obtaining the certificate is infringed (e.g., non-compliance with one or more Major Musts or more than 5% of applicable Minor Musts).

5.4.5.6.3 Contractual non-conformances: breach of any of the agreements signed in the contract between the ICG and the producer related to GLOBALG.A.P. requirements.

 

5.4.5.7 Sanctions.

5.4.5.7.1 If a non-conformance is detected at QMS level or member/ site level, ICG shall apply a sanction (warning, suspension, or cancellation) to the producer or producer group/ multisite producer.

5.4.5.8 Warning.

5.4.5.8.1 A warning is issued for all types of non-conformances detected (i.e., non-conformance to P&Cs, GLOBALG.A.P. GR, or contractual requirements).

5.4.5.9 Suspension & Cancellation.

5.4.5.9.1 Procedure **QP21** describes specific rules and activities for Suspension and Cancellation for GlobalG.A.P. Certification services.

5.4.5.9.2 The organization whose Certification has been suspended or canceled must immediately cease the use of advertising material for the Certification, including the GlobalG.A.P. Trademark & Logo.

5.4.5.10 Complaints, Appeals and Disputes.

5.4.5.10.1 If the organization wishes to appeal ICG decisions, or present disputes, it may do so within the provisions of ICG's Procedure QP07 "Appeals and Complaints". A copy of this procedure is available on the official ICG's Internet Site: www.ic-group.com

5.4.5.10.2 The organization must formalize and present appeals, complaints, or disputes to ICG.

5.4.5.10.3 Complaints against International Compliance Group Inc. Personnel.

5.4.5.10.3.1 If a client has a complaint regarding any employee of International Compliance Group Inc., this should be sent through post mail or via email at complaints@ic-group.com. If the complaint involves the President, then the complaint is to be addressed to the Board of Directors of International Compliance Group Inc. The complaint shall be handled as per International Compliance Group Inc.'s defined complaint handling process, which is listed on the company's website.

5.4.5.10.4 Complaints against International Compliance Group Inc. certified Clients.

5.4.5.10.4.1 If any interested party has a complaint against International Compliance Group Inc. certified client, this should be sent through post mail or email to the President of ICG at the main office address. The complaint shall be handled as per International Compliance Group Inc.'s defined complaint handling process, which is listed on the company's website.

5.4.5.11 Extension to the Scope of Registration.

5.4.5.11.1 This may be applied for in the same way as the initial audit, indicating the increased scope of registration being required. Audit will be carried out in the areas not previously audited. If successful, a new certificate indicating the new full scope will be issued by International Compliance Group Inc. There will be a charge for extensions to scope and re-issue of the certificates.

 

5.4.5.12 Short Notice Audits.

5.4.5.12.1 International Compliance Group Inc. may, when necessary, conduct short notice audits to investigate complaints, or in response to changes, or as follow up to suspended clients.

5.4.5.13 Publicity.

5.4.5.13.1 Once a certificate has been issued, the client has the right to publish the fact. The relevant logos can be used on its stationery relating only to the audited scope of registration and the relevant part of the standard. All conditions of the Logo Rules issued along with the Certificate will need to be followed.

### 5.5 Liability.

5.5.1 Neither International Compliance Group Inc. nor any of its employees, auditors, managers, officers, support staff, subcontractors or agents warrants the accuracy of any audit, review, information, certification, service or advice supplied. Except as stated in this document, neither International Compliance Group Inc. nor any of its employees or agents shall be liable for any loss, expense or damage however so sustained by any company, client or person due to any act whatsoever taken by International Compliance Group Inc. or its employees or agents, save to the extent that any attempted exclusion or liability would be contrary to law.

### 5.6 Accreditation Body Witnessed Audits.

5.6.1 It is a condition of the rules of registration that all International Compliance Group Inc. certified clients should, if requested, allow, Accreditation Body auditors to visit the client premises / witness International Compliance Group Inc. staff carrying out their audits. Failure to allow this could jeopardize the client's registration.

5.6.2 International Compliance Group Inc. reserves the right to change these rules of registration herewith without prior notification.

## 6.0 References.

**QP21.** Suspension & Cancellation - GlobalGAP.
**QP07** Appeals and Complaints.

## 7.0 Formats / Exhibits.

NA.

 